



OAK RIDGE RESERVATION

Environmental Management

July 9, 1997

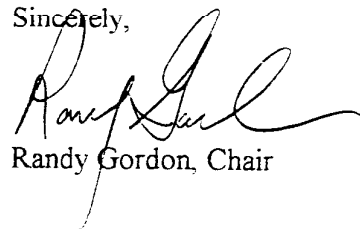
Ms. Margaret Wilson
FFA Projects Manager
Oak Ridge Remediation Management
DOE Oak Ridge Operations
3 Main Street
Oak Ridge, TN 37830

Dear Ms. Wilson:

The Oak Ridge Reservation Environmental Management Site Specific Advisory Board has reviewed the "Proposed Plan for Surface Impoundments Operable Unit, Waste Area Grouping 1, Oak Ridge National Laboratory, Oak Ridge, Tennessee" dated June 30, 1997. The attached recommendations were unanimously approved by the Board at the July 9, 1997 regular meeting.

We appreciate the opportunity to submit our recommendations and look forward to receiving the Department of Energy's written response.

Sincerely,



Randy Gordon, Chair

MB/RG/sb

Enclosure

cc: Mr. John Hankinson, USEPA Region IV
Mr. Earl Leming, TDEC



**Comments on the Department of Energy's Proposed Plan for
Surface Impoundments Operable Unit (SIOU)
Waste Area Grouping 1,
Oak Ridge National Laboratory
Oak Ridge, Tennessee, Dated June 30, 1997**

The Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) is in general agreement with the preferred alternative (Alternative 6) of removal, treatment and disposal of surface impoundment sediments as presented in the Department of Energy's Proposed Plan of June 30, 1997.

Alternative 1 (no action) is unacceptable because of the continued release of contaminants to groundwater, leakage through Impoundment B berm, migration of contaminants to surface water, and resultant unacceptable risk to ecological receptors. The possibility for flooding of the impoundments also remains under the no action scenario. In addition, the potential risk to human health if the water cover over the impoundment sediments is lost would be at an unacceptable level.

Although both Alternative 3 (on-site consolidation cell) and Alternative 6 would prevent continued releases of contaminants to groundwater, Alternative 6 is preferable because the source material would be removed and this portion of the Bethel Valley area of the Oak Ridge National Laboratory would not be restricted from future surface use. This area is desirable for future surface use as it is adjacent to other well-developed and highly-used areas of the Laboratory. Alternative 6 is also preferable to Alternative 3 because long-term stewardship of the SIOU would not be required. It is also desirable to create as few waste disposal areas as possible, and by transporting the impoundment sediments to either an on-site waste management facility (which would accept CERCLA wastes from many areas on the Oak Ridge Reservation) or to the Nevada Test Site, the creation of a waste disposal area solely for the impoundment sediments would be avoided. If it is determined that an on-site waste management facility can be safely operated at the Oak Ridge Reservation and that waste acceptance criteria include the surface impoundment sediments, it would be preferable to dispose of the impoundment sediments on-site rather than at an off-site location because of reduced risks of transportation accidents and reduced costs.

Specific Recommendations on the Proposed Plan are listed below:

1. In descriptions of the preferred alternative (Figure 4 and page 10), there is discussion that sediment from Ponds A and B would be removed and allowed to settle in a settling tank. After settling, the supernatant would be decanted from the tank and returned to the impoundment. Sometime later, the impoundments would be back-filled with clean soil. There is no discussion about what would happen to

the supernatant. Would it be treated? Would it be allowed to percolate into soils and groundwater? The Record of Decision needs to specify that any significantly contaminated supernatant be treated before release.

2. On page 10 of the Proposed Plan, it is stated that "Waste would be solidified into containers meeting DOT requirements and staged on the SIOU site for curing and transport. After curing, waste would be immediately shipped to the disposal facility." These statements presume that either the Nevada Test Site, an on-site waste management facility, or some other facility will be available when remediation of the impoundments begins. The ORREMSSAB hopes that this is the case. It would be undesirable to store the treated sediments in DOT containers indefinitely.
3. In Table 1, the short-term effectiveness of the preferred alternative is described as having the potential for very high, adverse short-term effects. The Record of Decision needs to describe how this potential will be avoided or mitigated.