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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

September 5, 2001

Reply To  
Attn Of: ECL-113

Kathleen Hain, Director  
Environmental Restoration Program  
Department of Energy  
Idaho Operations Office  
850 Energy Drive  
Idaho Falls, Idaho 83401-1563

Re: Response to Letters:

Path Forward for In Situ Vitrification Evaluation in the Operable Unit 7-13/14 Remedial Investigation/Feasibility Study-(EM-ER-01-141), August 27, 2001

Path Forward for the Operable Unit 7-13/14 In Situ Grouting Treatability Study-(EM-ER-01-142), August 27, 2001

Dear Ms. Hain:

This letter is in response to your letters, dated August 27, 2001, describing your intended path forward for the Operable Unit 7-13/14 Remedial Investigation/Feasibility Study and Treatability Studies. While noting your stated intention to expand the scope of the In Situ Grout (ISG) treatability study while eliminating the In Situ Vitrification (ISV) treatability study, the EPA does not concur with these changes to the established Workplan and schedule.

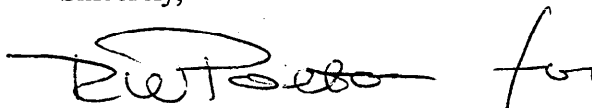
It is not clear that expanded ISG studies are necessary to meet the data quality objectives for the evaluation of ISG. Further, the expanded ISG testing does not substitute for the elimination of the field scale testing of ISV on waste in the Subsurface Disposal Area (SDA). An essential element of the ISV field scale test is the demonstration of DOE's ability to perform remedial operations on actual SDA waste. Such demonstration is necessary in order to provide a basis for evaluating the CERCLA criterion of implementability during remedy selection. The path forward described in your letters leaves no practical demonstration of implementability using actual SDA waste for any of the alternatives studied. Your argument that existing commercial experience and test data is sufficient to evaluate ISV is not consistent with ongoing studies of ISG, for which there is also extensive information available. Existing commercial and test data does not address the site-

specific issues, including implementability, which are necessary to the selection of a remedy consistent with CERCLA.

As you note, the work scope discussed in your letters is not consistent with the 1998 Addendum to the Operable Unit 7-13/14 RI/FS Work Plan. The EPA does not concur with these changes. A comprehensive analysis of the objectives of Operable Unit 7-13/14 treatability studies, and how these objectives can best be met, would be necessary in order to support such significant changes to the Work Plan.

If you have any questions, please contact me at 206-553-7261.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Pierre", followed by the word "for" written in a cursive style.

Wayne Pierre, INEEL Project Manager

cc: D. Nygard, IDEQ, 1410 N. Hilton, Boise, ID 83706  
D. Koch, IDEQ, 1410 N. Hilton, Boise, ID 83706  
Richard Poeton, ECL-113  
K. O'Neill, DOE-ID