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PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: New Proposed Plan for the Contents of the V-Tanks (TSF-09 and TSF-18) at the Test Area North, Operable Unit 1-10 (Draft)

DATE: February 26, 2003 REVIEWER: Idaho Department of Environmental Quality

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
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GENERAL COMMENTS

- None -

SPECIFIC COMMENTS

1	Introduction, 2 nd para., 5 th sentence	1	A suggestion to streamline the wording of the fifth sentence is the following: "However, following the cleanup decision, the facility selected to treat the tank contents ceased operations and it nor other facilities are available to treat the tank contents."	Accepted. The language will be revised to clarify the meaning.
2	Introduction, 3 rd para., 1 st sentence	1	We would also suggest, in the third paragraph, that the end of the first sentence, "which is no longer available," be deleted.	Accepted. These words will be deleted.
3	Margin definition: ROD Amendment	3	From the explanation in the Introduction section, it appears that we are modifying the ROD, rather than building on it. "When a fundamental change is made to the basic features of the remedy selected in a ROD with respect to scope, performance, or cost, the lead agency is required to develop and document the change consistent with the ROD process (NCP §§300.435(c)(2)(ii)(A) through (H))." "The information included in a ROD Amendment is a function of the type of change made and the rationale for that change" (A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents - OSWER 9200.123P - July 1999). Language reflecting this line of reasoning should be used in explaining the ROD amendment.	Accepted. The language will be rewritten.
4	Site History and Site Characteristics, sidebar definitions	4-5	In maintaining consistency with the definitions for tanks contents, sidebar definitions should be added for "metals" and/or "inorganic compounds." Both are mentioned on these pages and not defined, and although the public probably has at least a somewhat intuitive understanding of "metals," the term "inorganic compounds" is not common knowledge to the public, and certainly would not always be associated with metals (see Table 2).	Accepted. Sidebar definitions will be added for metals and inorganic compounds.

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5	Site History, 2 nd para., 2 nd sentence	4	Additional information regarding the location in the statement "...subsequent disposal elsewhere at the INEEL" may be of interest to the public. If it is certain that disposal occurred at an INEEL facility, then records should be available indicating where the waste was disposed. If disposal was off-site records should also be available. If it is unknown where the waste was disposed, this also should be stated. Please provide a brief explanation.	Accepted. The sentence will be rewritten to clarify where disposal took place.
6	Site History, 4 th para., 3 rd sentence	4	In the fourth paragraph under "Site History", a suggested change for the third sentence would be the following: "After thermal treatment (Vitrification, see Page 10) [comment (a)] to reduce toxicity, mobility, and volume, the treated residues [comment (b)] would be returned to the INEEL...."	(a) No change. Although the reviewer is correct that the thermal treatment under the original selected remedy was, in fact, vitrification, the word "vitrification" was not used in the Original ROD. Describing the Original Selected Remedy as vitrification could be confusing, especially since vitrification was the preferred alternative originally presented in the 1998 proposed plan (a different remedy was selected in the ROD). (b) Accepted. The sentence will be rewritten. The reviewer's suggestion to point the reader to the full description provided later in the document was incorporated. A parenthetical reference to the graphic on page 9 will be added at the end of the first sentence.
7	Site History, 5 th para., 2 nd & 3 rd sentences	4	In the fifth paragraph, [comment (a)] it is suggested that the second sentence be deleted, and [comment (b)] the third changed to read "While other facilities (delete at other DOE sites) may become available..."	Partially accepted. (a) No change. Although the information in the second sentence was briefly presented in the Introduction, its inclusion here is essential to public understanding of why a completely new remedy must be selected. (b) Accepted. The third sentence will be rewritten.

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8	Site History, 5 th para., 5 th sentence	5	Please expand on the "new information that was not available when the remedy was originally selected." This will also provide a basis for part of the increase in cost.	Accepted. An explanation of the "new information" will be added to the text.
9	Margin definition: volatile and semi-volatile organic compounds (VOCs and SVOCs), last sentence	5	It may be helpful to explain that exposure to a high concentration in a short period (acute) could lead to immediate effects (damage body tissue, death, etc.) while exposure to a lower concentration for a long period (chronic) could lead to long-term effects (cancer, disease, etc.).	Accepted. The sidebar text will be rewritten.
10	Summary of Risks From V-Tanks Contents, 2 nd para., last 2 sentences	6	Please expand on the V-Tanks contaminant discussion pertaining to radionuclides. The reference to the radionuclides contents of the V-tanks is buried at the end of the discussion of the metals content, and does not adequately convey that the complexity of the V-tanks remedial action is in large part driven by the radionuclides present in the V-Tanks.	Accepted. The existing sentences were replaced with a more specific discussion of the radionuclides listed in Table 2 and the text.
11	Description and Evaluation of Alternatives, 1 st para., 2 nd sentence	10	Throughout the document, disposal has been discussed as possibly being at the ICDF or other approved facility. It is recommended for the sake of consistency that this sentence also include that possibility.	Accepted. The words "or other approved facility" will be added.
12	Alt. 1(a)-In Situ Vitrification, 1 st para., last sentence	10	Please add "if necessary" to the sentence. Contaminants captured in the off-gas system would be treated if necessary and disposed of at the ICDF or an approved off-site facility.	Accepted. The sentence was revised.
13	Alt. 1(a)-In Situ Vitrification, "Evaluation," and Alt. 2(a)-Ex Situ Vitrification, "Evaluation"	10 & 11	References to the destruction of volatile organic compounds in these discussions should be changed to more accurately reflect what happens to these compounds during ISV or ESV. Their fate is more accurately described as being a combination of destruction (pyrolysis) and/or off-gassing, as described in the last sentence of the first paragraph of the "Alternative 1 - Vitrification" section on page 10.	Accepted. The evaluation for Alt. 1(a) will be revised for clarification.
14	Figure 3	11	For "some soil added," insert "contaminated" between some and soil.	Accepted. This change also will be made to the other figures where soil is added.

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15	Ex Situ Vitrification, "Evaluation," 1 st (incomplete) sentence [on p. 12]	12	Adding contaminated soil to the melt would initially "increase the volume," but there would still be a net reduction of volume of all contaminated materials after vitrification. This should be noted in the discussion.	Accepted. The primary waste volume is reduced through treatment. However, the Agency-approved Decision Model also considered the significant amount of secondary waste that would be generated through contamination of ex situ treatment equipment (see TER Tables 28 and 31 and page 104). The language was clarified.
16	Figure 4	12	For "some soil added," insert "contaminated" between some and soil.	Accepted. The wording was revised.
17	Alt. 2-Thermal Desorption, 2 nd para., last sentence	12	In the last sentence on page 12, it is not clear how adding contaminated soil to the desorption unit facilitates desorption, as stated. Please add an explanation.	Accepted. The language was revised to clarify why soil would be added to the process.
18	Alt. 2(a)-Thermal Desorption with Both On-Site and Off-Site Disposal, "Evaluation"	13	(a) Thermal Desorption (TD) drives off the volatile and semi-volatile compounds into the off-gas system for capture and eventual disposal, and possibly destruction dependent on the set-up. In itself, TD alone is not noted for destroying these contaminants as stated here. (b) Also, the addition of soil to the TD unit is again mentioned, and again it is not clear how the addition facilitates desorption.	(a) Accepted. The language was clarified. (b) Accepted. The language was clarified. Also see the resolution to IDEQ Comment 17.
19	Thermal Desorption with On-Site and Off-Site Disposal, "Evaluation"	14 & 15	In the "Evaluation" sections [of Alts. 2(b) and 2(c)], please again consider changing the reference to the destruction of "all volatile and semi-volatile organic compounds."	Accepted. The language for both Alts. 2(b) and 2(c) was clarified to parallel Alt. 2(a).
20	Alt. 3-Chemical Oxidation/Reduction with Stabilization	16	The current plan involves heating of the tank contents some time after the addition of the oxidant; this fact should be explained in this and the following sections.	Accepted. A new sentence was added to the description of Alternative 3. The Alternative 3 description contains common elements of both variants of the alternative.



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21	Alt. 3(a)-In Situ CO/R-S, last para., second to the last sentence	17	Heat transfer is mentioned in this sentence without any previous discussion. Please provide a brief description as to why this is an uncertainty/concern. Avoidance of high temperatures is brought up in the evaluation section of ex situ chemical oxidation/reduction with stabilization. It would be helpful to explain how and why this occurs and the problems/advantages with ex situ vs. in situ.	Accepted. The text will be rewritten to clarify the issues.
22	Alt. 3(b)-Ex Situ CO/R-S	17	The in situ process discussed the combining of the V-9 Tank contents with another V-Tank. The disposition of the V-9 Tank contents should be discussed in this section as well.	Accepted. Although the specific details regarding whether contents of the tanks are merged before treatment will be worked out post-ROD, the sentence was clarified.
23	Alt 3(b)-Ex Situ CO/R-S, 1 st para., before last sentence	17	Between the fourth and fifth sentence, please consider inserting "The empty tanks would be removed, crushed and/or grouted and disposed on-site at the ICDF."	No change. The specific details of how the tanks will be dealt with will be worked out post-ROD. Disposition of the tanks is described in general in <i>Common Elements</i> .
24	Preferred Alternative-3(b), Ex Situ CO/R-S, 2 nd para., 3 rd sentence	18	Please change "or" to "and/or" in the following sentence: "It would have high long-term effectiveness because organic contaminants would be destroyed and all other contaminated material would be stabilized and/or removed."	Accepted. None of the material would be stabilized and left in place. Therefore, the sentence was clarified.
25	Table 3	19	"Operating and maintenance costs" are not discussed elsewhere in the document. Please provide a brief footnote that explains what these costs entail.	Partially accepted. The information requested is on page 8. A parenthetical was added to Footnote b to reference the reader to page 8.
26	Preferred Alternative-3(b), Ex Situ CO/R-S, 4 th para., last sentence	19	Please provide information to clarify why ex-situ chemical oxidation is a significantly more mature treatment technology.	Accepted. The sentence was rewritten.
27	Public Involvement, 3 rd para.	21	In the third paragraph, a suggested revision would be the following: "One public meeting will be held during the public comment period. The meeting will be in Idaho Falls on April 30, 2003 at the (indicate building and address)."	Accepted. The next draft will be updated with the date and location agreed to by the Agencies in early February.