

DRAFT, DRAFT, DRAFT

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The following are submittals via e-mail and from the last RAP meeting to be considered as the committee begins further discussions on recommendations for the development of the 200 Area CW-5; 200 Area PW-1; 200Area PW-3; and PW-6 ROD Work Plan.

- 1) The Community Acceptability criteria discussion in the ROD failed to note the very strong objections to the PP from the HAB as well as the overwhelming public opposition voiced at community meetings. The minor changes made in the ROD do not mitigate the overwhelming public opposition. The Community Acceptability criteria portion of a ROD is not drafted prior to the comment period. However, in this instance, it does not appear to have been meaningfully addressed at all, even after the comment period. Since the CERCLA process utilizes a balancing approach amongst criteria, failure to have drafted and considered an accurate Community Acceptability discussion undermines the entire ROD. (Gerry Pollet)
- 2) The ROD Acknowledged that RCRA/hazardous waste law criteria have to be met for the settling tanks, but failed to acknowledge that enforceable permit conditions are required, rather than a statement that the criteria will somehow be met later in the CERCLA process. (Gerry Pollet)
- 3) Pu is forever, the climate will change and a wetter climate could result in the material becoming mobile and moving toward Groundwater. (Pam Larson)
- 4) The cost of re-mediating this dangerous material should not be a factor (limited budgets). (Pam Larson)
- 5) There were two explanations of how the observational approach will be applied. Will they dig deeper and remove more material if the concentrations are high? (Pam Larson, Shelley Cimon)
- 6) We do not accept the premise that Pu is not mobile (Pam, Dale, Shelley, Dick, etc.)
- 7) Managers at Hanford change frequently. Someone's word about how they will interpret something can't be relied on for remediation that will be done years in the future. It must be in writing and locked in. (Pam, Shelley)
- 8) DOE does not take into account the actual nature of the geology and soil under the trenches. (Pam)
- 9) When the acidic soil column beneath Z-9 Trench receives infiltrated rainwater, how might that affect the transmission of Pu through the silty soil layers in that column where the Pu seems to collect, downward toward the GW level, over a long time period? (Dick Smith)
- 10) We have little or no data from the contaminated acidic soil column directly beneath Z-9 in the depths between 27ft bgs and 102 ft bgs, (consider a sample boring vertically down through the center of the trench floor) Using that data DOE should perform some data-supported calculations to estimate the rate of downward migration of the plutonium into the groundwater, assuming various water infiltration rates, thus estimating the timelines for plutonium reaching the groundwater. (Dick Smith)
- 11) PNNL-18640 – Transuranic Contamination in Sediment and Groundwater at Hanford states that Pu under the Z-9 crib was not sorbed on soil because of acidic conditions. The acidic pu moved downward until it hit a layer of basic materials at 120 feet where the pH increased to basic conditions which facilitated sorption into soil at that point. Further, the document states that water which passes through the acidic soil under the Z-9 crib becomes acidic and removes the pu sorbed on the soil. Sounds like if water gets under Z-9 crib, it will move the Pu down toward the GW. In other words, the Pu is mobile! (Vince Panesko)

- 12) Question of why the ROD did not reflect the technical work performed by PNNL. (Vince)
- 13) Ship it off-site. Send this material to WIPP. Should go to a deep geologic repository.(Shelley, Pam)
- 14) The letter should stress the operating phrase “meaningful public involvement” involvement alone is not sufficient. At the end of the process the public must not only perceive that they have had an impact, upon the decision making process, but they have to be convinced that even if their specific desires have not been met, the values inherent in those desires have been met. This means that the decision-makers must be painfully transparent in explaining why, or why not a particular suggestion, remedy or solution was not accepted. The current comment/response gesture fails to meet what should be considered a minimum expectation. Given the nature of PW 1,3,6 and CW-5 ROD, far more time and effort and care should have been invested in that document including ample support for the reasoning process. (Steve Hudson)
- 15) The specific ask from EPA to HAB for PW 1,3,6 was related to public meetings that I remember but it would be in mtg summaries. I know they engaged us on this decision. (Liz)
- 16) There is the potential for neutron, and neutron-gamma ray activation exposure in their (DOE) risk assessment of the Z-9 crib. I have heard that neutrons are ten to one hundred times worse than gamma. (Stan Sobczyk)
- 17) Misinterpretation and use of the term “Observational approach”. (Shelley)
- 18) Cost and efficacy of I.C.'s over time. LTS.
- 19) Assessment of Pu levels after excavating to specified depth? (Shelley)
- 20) Mobility.
- 21) Do not rely on barriers/caps
- 22) Excavate and remove all Pu
- 23) Assumption government will be in place (government is not LTS)
- 24) Insufficient data – settling tanks, Z-ditches and High Salt waste group
- 25) old, suspect data coupled with no data on depths of contamination or cost evaluation for removing at different depths
- 26) Fact sheet s to the public too high level. Technical info must be included and available
- 27) Use RCRA on settling tanks and Z-ditches
- 28) Integrity of the tanks – should be removed
- 29) TCWM-EIS is not completed – should dovetail cumulative impacts