DEBRIEF OF CENTRAL PLATEAU INNER AREA PRINCIPLES

Questions:

- What is the definition for industrial vs residential land use?

- Are the local DOE office(s) and HQ in agreement about what needs to be done?

- Concerning the new ideas for characterization (bullet 3), how does HAB present ideas, how much detail is required, and how does the HAB know if these ideas have been considered earlier?

- What is the difference between MTCA –B and –C level cleanup as applied to the Inner Area?

- What is the impact on actual cleanup if the risk assessment is done O.U. by O.U.?

- How was 10 square miles of the Inner Area originally defined?

- How do the TC&WM-EIS RODs fit into these CERCLA decisions?

- What prevents contaminant migration from the Inner Area to the Outer Area? (and ultimately to the Columbia?)

- How do you calculate protectiveness?

Comments:

1. Run residential, and tribal scenarios for impacts on policy decisions (and work plans). What is DOE’s argument against doing this??

2. The HAB should write advice about support for triggers that require waste characterization or risk assessment (necessary work that is easily postponed).

3. Predetermination of compliance cleanup depth is foolish without a better understanding of the problem. Why not wait to determine points of compliance until characterization is available to inform decision?

4. The change of compliance depth from 15 to 10 feet in concerning.

5. Reconsider rooting depths to reconsider resetting point of compliance depth.

6. Change the directions to “go to 15 feet, but also cleanup hot spots.”

7. Leave no hot spots.
8. Run an additional risk assessment model using sensitivity analysis (e.g., the storm of the century).

9. Need to model the impacts of increased vadose zone flow and contaminant movement due to climate change (increased annual precipitation, catastrophic event, etc.)

10. Vadose zone-groundwater must be cleaned up to beneficial use.

11. The HAB should write advice on decision not to remove mass of contaminants in the plutonium cribs (Z-9).

12. The HAB needs a Committee of the whole to further discuss these issues (not just committee).

13. Are the Institutional Controls forever?

14. What about the Treaty Rights?

15. What is the level of industrial cleanup (actions) meant for other industrial uses to come?

16. Cleanup of the Central Plateau must address the Ponds.

17. How can DOE put an industrial land-use boundary around lands that are not industrial (like undisturbed sagebrush-steppe habitat)? How does Ecology evaluate these land use areas of good habitat as Industrial?

18. How does DOE plan to comply with the requirement that human health protected by industrial controls can not be factored into baseline risk assessment?