

300 Area Remedial Investigation/Feasibility Study and Proposed Plan Deconstruct Advice Points (paragraph number [])

[4-1] **The Board believes** the Tri-Party Agreement (TPA) agencies should opt for an alternative that employs a combination of focused RTD for contamination hot spots, and uranium sequestration in other, less contaminated areas.

[4-2] **The Board suggests** that if the sequestration does work, the sequestration technology would possibly capture uranium released by RTD activities, lowering the amount of uranium that could get to the river.

[5] (Because the sequestration technology relied on in this *Proposed Plan is questionable in effectiveness*.) **the Board advises** that the current 300 Area RI/FS decision be made as an Interim Remedial Measure/Expedited Response Action until the time that this or some other technology can be sufficiently tested and proven to be effective before proceeding to the final ROD. [Weak phrasing]

[8-1] **The Board advises** the TPA agencies that the CERCLA process for the 300 Area RI/FS (including finalizing the risk assessment portion and selection of a preferred alternative) *was not correctly implemented and was incomplete*. [Verb tense, not advice]

[8-2] **The Board advises** the TPA agencies to finalize the RI/FS document (including all supporting documents) prior to development of a Proposed Plan.

[8-3] **The Board recommends** that future RI/FS documents should be based on a solid (*and complete*) risk assessment. [Meaning of “and complete.”]

[9-1] **The Board advises** the TPA agencies to present concise and transparent information in its RI/FS and supporting documents to make them easier to read and *decipher*. [Meaning of decipher]

[9-2] **The Board advises** DOE to include the data and details which support the decision basis within the body of the RI/FS documents, *rather than in unavailable and draft contractor documents*. [Opinion, judgment without support]

[9-3] **The Board advises** that the decision for the 300 Area RI/FS and Proposed Plan be reexamined by the TPA agencies. [Generic/sweeping]

[10] **The Board advises** the TPA, per the CERCLA guidance, to complete testing and proving of potential technologies, like uranium sequestration, in a revised Feasibility Study, before the technology is included in a Proposed Plan for the final ROD.

[11-1] **The Board advises** the TPA agencies to select an alternative that promotes a combination of focused RTD for contaminated hot spots, and to employ uranium sequestration only in other, less contaminated areas (Alternative 4).

[11-2] **The Board advises** the TPA agencies to consider the HAB’s longstanding commitment to RTD values *when alternative selection* is being made. [Wording]

[11-3] **The Board advises** that *Alternative 3 is not the best alternative*. [Is not the best, period.]

[12] **The Board advises** the TPA agencies that RTD cleanup plans should be developed assuming reasonably foreseeable exposures for people other than industrial workers inside buildings or on paved areas, with cleanup levels based on the more *stringent of MTCA Method B or maximum concentration limits; and based on contaminants of concern to which flora and fauna are exposed due to communication with ground water and riparian habitat*. [Cluttered, vague]

[13] (*Because of the questionable effectiveness of the primary remediation technology,*) **the Board advises** the TPA agencies to amend the current RI/FS and Proposed Plan to an Interim Remedial Measure status, and *continue to develop tested and reliable technology*, including technologies other than sequestration, for uranium remediation in the final ROD and Proposed Plan for the 300 Area. [Awkward claim, “develop tested?”—if tested they have been developed]

[14] **The Board advises** the TPA agencies *to address questions of consistency of the mitigation technology of injection of a phosphate solution with state policies and environmental benefits* of reducing phosphorus and phosphate introduction into the environment. [Clarity, purpose, necessity strained]