



Waste Area Group 7 Proposed Plan

The Idaho National Laboratory (INL) Site Environmental Management (EM) Citizens Advisory Board (CAB) recommends acceptance of the preferred alternative in the *Proposed Plan for Radioactive Waste Management Complex Operable Unit 7-13/14*. The INL Site EM CAB recommendation is based primarily on the following considerations:

This recommendation does not apply to the lawsuit related to the Settlement Agreement; it only addresses CERCLA compliance issues.

The INL Site EM CAB agrees that there appears to be a sufficient level of knowledge as to the location and characterization of the waste. The INL Site EM CAB agrees with the State of Idaho, the Environmental Protection Agency (EPA), and the Department of Energy (DOE) that it has been characterized as well as reasonably possible. Additionally, continued long-term monitoring is vital. The INL Site EM CAB agrees that appropriate action will be taken if unforeseen detrimental activity is detected.

The INL Site EM CAB understands that there is a logical break point that balances costs and the risks to the workers, the public, and the aquifer. The INL Site EM CAB believes the preferred alternative achieves this balance.

The identified sum of 4.8 acres, as recommended in the preferred alternative, appears to meet the desired requirements. The INL Site EM CAB also recommends that the public presentation of the preferred alternative include specific information concerning the location of the sum of 4.8 acres. It would be helpful to know if the removal of additional waste acreage would provide incremental protection to the public and the environment.

In reviewing all potential surface barriers, the INL Site EM CAB believes that the evapotranspiration cap proposed by the preferred alternative provides the desired solution. The proposed evapotranspiration cap is of sufficient size to meet the CERCLA requirement to be protective.