



SRS Citizens Advisory Board

Environmental Remediation and Waste Management Subcommittee

Meeting Summary

January 24, 2000
Hilton Oceanfront Resort
Hilton Head Island, SC

CAB Members

Mel Galin
Wade Waters
Karen Patterson*
Maria Reichmanis*
Jimmy Mackey
Murray Riley*
Lola Richardson*
Rebecca Gaston-Witter
Bill Vogeles
Georgia Leverett

Stakeholders

L. Waishwell
Rick McLeod
George Minot

Regulators

Ann Clark, SCDHEC
None, EPA

DOE/Contractors

Julie Petersen, DOE
John Reynolds, DOE
George Mishra, DOE
Thomas Johnson, Jr., DOE
Bill Noll, DOE
Kim Wierzbicki, BSRI
Bob VanPelt, bSRI
Sonny Goldston, WSRC
Kelly Way, WSRC
Ken Rueter, WSRC
Helen Villasor, WSRC

* Denotes ER&WM Subcommittee Member

Maria Reichmanis opened the meeting with introductions of all attendees. Ms. Reichmanis then announced the meeting agenda would consist of draft motion reviews.

Draft Motion 1, Environmental Protection Agency (EPA) Rule Change: Wade Waters read the draft motion, noting that the Proposed Rule Change is in the public comment period that ends in mid-February 2000. Part 2 of the new proposed Rule applies to DOE in that it offers an exemption from Resource Conservation and Recovery Act (RCRA) for the off-site transportation and disposal of the mixed Low-level wastes generated by DOE. The rule applies when those wastes transported and disposed away from DOE sites meet the waste acceptance criteria at the low-level radioactive waste disposal facilities licensed by the Nuclear Regulatory Commission or an Agreement States (South Carolina is an Agreement State). Although the specified wastes would be exempted from RCRA, they would continue to be regulated by NRC or Agreement States during transportation and disposal under regulations comparable to RCRA regulations.

Issues: None.

Actions: Helen Villasor and Rick McLeod to make subcommittee approved changes to the motion for presentation to the CAB on 1/25/00.

Draft Motion 2, WIPP RCRA Permit/Transuranic (TRU) Waste: In reading Draft Motion 2, Wade Waters said the Waste Isolation Pilot Plant (WIPP) is a repository built deep within underground salt deposits near Carlsbad, NM. DOE is already operating WIPP to dispose of non-mixed TRU wastes.

However, most of DOE's TRU wastes are mixed wastes due to its non-radioactive hazardous content. New Mexico's Environmental Department (NMED) has regulatory authority over the disposal of mixed TRU wastes at WIPP. This authority required WIPP to obtain a RCRA Part B operating permit before accepting mixed TRU wastes. A RCRA permit is not required for non-mixed TRU wastes. On November 3, 1999, the Department of Justice filed suit in federal district court in New Mexico on behalf of DOE. DOE believes the RCRA permit places onerous and unlawful requirements on its operations that could lead to workers being unnecessarily exposed to hazards, delays in the disposal of TRU wastes at WIPP, and significantly more costs without increasing the protection of the environment. In this draft motion, the CAB supports DOE in its lawsuit and in its attempt to reduce administrative burdens without jeopardizing health, safety, environmental protections, and to minimize costs to the taxpayers.

Issues: None.

Actions: Helen Villasor and Rick McLeod to make minor wording subcommittee-approved changes to the motion for presentation to the CAB on January 25, 2000 for review and recommendation approval.

Draft Motion 3, Selection of HLW Salt Processing Alternative: Based on work performed by the public stakeholder Focus Group, formed at the request of the CAB's former Environmental Remediation and Waste Management Subcommittee, Karen Patterson, motion manager and also a member of the Focus group read the draft motion. Ms. Patterson noted that this motion was significant in that it had been developed specifically to assist DOE in determining a timely and cost effective solution to disposal of cesium-bearing salt solutions.

Issues: The draft motion needed clarification on some of the technical language to ensure consistency.

Actions: Kelly Way and Ken Rueter to make technical language and subcommittee approved changes to the motion for presentation to the Board on January 25, 2000. Invite Ken Rueter back to provide a progress report on the HLW Salt Processing alternative to the new Waste Management Committee in March.

Draft Motion 4, SRS DOE-HQ Approved Low Level Waste (LLW) Disposal Authorization Statement and Future SRS CERCLA Soils Trench Disposal: Substituting for Kathryn May, motion manager of Draft Motion 4, who was delayed by inclement weather, Maria Reichmanis read the draft motion. The first part of the draft motion included a commendation for SRS on DOE-HQ approval of the Disposal Authorization Statement (DAS). The DAS was obtained in response to DOE Order 435.1, "Radioactive Waste Management" requirement to obtain a DAS in order to continue LLW disposal. The second part of the draft motion was to readdress the use of the SRS trenches to dispose of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) soil wastes.

Issues: Because of a lack of understanding of the issue by some of the subcommittee members, a recommendation was made to keep the first part of the draft motion and turn it into a letter of commendation on the DAS only.

Actions: A motion was made to table the second half of the draft motion dealing with the use of the SRS trenches to dispose of CERCLA soil wastes. Five subcommittee members voted to table the second half of the draft motion and one was opposed. Helen Villasor and Rick McLeod to make the subcommittee-approved changes to the motion for presentation to the CAB on January 25, 2000 for review and approval.

Draft Motion 5, Stakeholder Review of Integrator Operable Unit (IOU) Plans, Studies, and Reports: Jimmy Mackey read Draft Motion 5 dealing with the Federal Facility Agreement (FFA) that sets the standards and schedules for the comprehensive remediation of SRS. Distinct geographic areas or media-specific units requiring cleanup are called Operable Units (OUs). Since 1997, the SRS CAB voiced concerns that the IOU process not place additional burdens on SRS with additional significant operational

and administrative costs that do not improve the protection of the environment, public, or SRS workers. In addition, over the past six years, the CAB has expressed its opinion that they would like to participate in decisions among the three agencies as they are made. More notably, neither the CAB, nor the public wants to be a rubber stamp for approving decisions that have already been made.

Issues: None.

Actions: Helen Villasor and Rick McLeod to make minor wording subcommittee-approved changes to the motion for presentation to the CAB on January 25, 2000 for review and recommendation approval.

Draft Motion 6, Proposed Interim Action Plan for A-Area Burning/Rubble Pit (ABRP): Maria Reichmanis read the draft motion that provided a unit history for each of the pits under consideration in the Interim Action Proposed Plan. Focusing on the contaminants of concern, which are benzo(a)pyrene-contaminated soil that may cause significant risk to current and future workers (Pit 731-2A only) and trichloroethylene (TCE) in the water table aquifer. Tetrachloroethylene (PCE) and methylene chloride are volatile organic compounds (VOCs) also present in the water table at the ABRP waste unit. The SRS CAB supports the proposed actions as a reasonable choice among the alternatives. However, it is the CAB's preference to spend remediation dollars toward actual cleanup and not additional study research.

Issues: The CAB recognizes the need to determine if commingling of the contaminants in the deeper aquifer has occurred.

Actions: Helen Villasor and Rick McLeod to make minor wording subcommittee-approved changes to the motion for presentation to the CAB on 1/25/00 for review and recommendation approval.

Maria Reichmanis adjourned the meeting at 9:35 p.m.

Meeting handouts may be obtained by calling 1-800-249-8155.