



SRS Citizens Advisory Board

Waste Management Committee

Meeting Summary

March 6, 2001
North Augusta Community Center
North Augusta, SC

The Waste Management Committee met on Tuesday, March 6, 2001, 6:00 p.m., at the North Augusta Community Center, North Augusta, SC. Attendance was as follows:

CAB Members

Wade Waters*
Perry Holcomb*
Bill Willoughby*
Lola Richardson*
Murray Riley
William Lawrence*
Karen Patterson*

Stakeholders

Rick McLeod (CAB Tech.
Advisor)
Frank Carl
Sam Booher
Todd Davis, DNFSB
Jim Pope
Brandon Haddock
Bill Lawless

Regulators

None

DOE/Contractors

Gerri Flemming, DOE
Ray Hannah, DOE
Larry Ling, DOE
Mike Simmons, DOE
Gail Whitney, DOE
Peter Hudson, BNFL
Elmer Wilhite, SRTC
Tim Coffield, WSRC
Greg Peterson, WSRC
Sonny Goldston, WSRC
Don Gordon, WSRC
Rod Stewart, WSRC
Kelly Dean, WSRC
Helen Villasor, WSRC

***Waste Management Committee member
Becky Gaston-Dawson was unable to attend.**

Wade Waters opened the meeting promptly at 6:00 p.m. by inviting introductions and thanking everyone for coming.

Public Comment

In lieu of a public comment period at the beginning of the meeting, Mr. Waters introduced Mike Simmons, DOE-SR Waste Operations Division, who provided the attendees with an update on the *Offsite Transportation of Certain Low-level and Mixed Radioactive Waste from the Savannah River Site (SRS) for Treatment and Disposal at Commercial and Government Facilities Environmental Assessment (EA)*. Mr. Simmons also provided copies of the final document, which also includes the Responsiveness Summary. While the Finding of No Environmental Impacts (FONSI) document

was not included in the copy of the EA, Mr. Simmons emphasized that indeed no environmental impacts had been found.

Mr. Simmons explained that several months ago, the SRS Citizens Advisory Board (CAB) was briefed on the EA, and a copy of its response (through CAB Recommendation 131) was included in the EA. However, Mr. Simmons said that the signed EA is only one piece of the puzzle which will enable SRS to ship waste offsite. The Record of Decision is now at DOE-HQ and progress is being made so that shipments may be possible as early as spring 2001. When asked what type of waste is targeted to be shipped offsite first, Mr. Simmons that one of the candidates is low-level waste (LLW).

Burning of Paper Pellets as Alternate Fuel Co-fired with Coal in A-Area Boilers

Don Gordon, Section Manager for the Environmental Protection Division (EPD) provided a presentation on the burning of paper pellets as an alternate fuel. Explaining that his section of EPD is responsible for managing issues related to the Clean Water and Clean Air Acts, Mr. Gordon said his purpose was to inform the committee of SRS's proposal to burn recycled office paper as a fuel. This activity would also serve as a supplement to the primary fuel (bituminous coal) in stoker-fired boilers.

Mr. Gordon began his presentation by discussing the composition of the pellets, which includes used office paper, cardboard and plastic bags. Mr. Gordon emphasized that items such as food waste, hard plastics, tires, spray cans, detergent, etc. would not be included in the pellets. Mr. Gordon then showed a diagram of the paper pellet process.

Explaining that the boiler fuel would consist of 30 percent paper pellets and 70 percent coal, one of the benefits of the pellet process would include reducing disposal of recyclable material to a landfill. In addition, Mr. Gordon said burning the pellets would also reduce air emissions of particulate matter and chemicals to the environment, reduce ash volume, and allow on-site disposal of SRS documents, improving the site's security posture.

Mr. Gordon said this proposal would ultimately save nearly \$1 million per year, by eliminating the sorting of paper materials from offices, reducing the need for primary fuel (coal), and reducing tipping fees for landfill disposal.

However, Mr. Gordon pointed out that this process must obtain regulatory approval in order to change the A-Area boiler's operating permit. In discussing the chronology, Mr. Gordon said that on June 16, 2000, SRS initially proposed the use of paper pellet blending with coal for combustion in A-Area boilers to the South Carolina Department of Health and Environmental Control (SCDHEC).

On June 23, 2000, saying that based on the definition of municipal solid waste as "...material discarded by non-manufacturing activities at prisons and government facilities, ..." SCDHEC denied the proposal. A presentation was then provided to SCDHEC on November 9, 2000, showing regional examples of similar cases that were permitted under industrial boiler regulations. On January 17, 2001, SCDHEC replied that the examples submitted were manufacturing facilities unlike industrial non-production/government facility as SRS, so municipal solid waste rules would still apply.

In SCDHEC's Air Pollution Control Regulations, flexibility exists in Standard No. 3. For example, case-by-case limitations allow for the consideration of the material being burned and source testing, i.e., stack emission testing and analysis of fuel. Therefore, SRS submitted a request to SCDHEC on February 22, 2001, to obtain temporary approval to burn the paper pellets in the A-

Area boilers and to use stack test data in case-by-case limitation determination. In closing, Mr. Gordon said that a formal presentation of the data to SCDHEC is planned for mid-March.

Responding to a question, Mr. Gordon said the financial correlation for recycling is \$1 recovered for every \$4-\$5 spent. When asked how much money was spent up front to purchase the pelletizer machine, Mr. Gordon explained that the machine had been used and was purchased at a fraction of the price of a new one. In response to a question if there was a known market for the ash, Mr. Gordon said that some are being investigated now.

Wade Waters then invited Mr. Gordon to make this same presentation to the full CAB at its next meeting on April 24, 2001.

Release of Surplus and Scrap Materials

Opening his presentation, Sonny Goldston told the attendees that contrary to recent rumors, former Secretary of Energy Richardson had not signed DOE Order 5400.5, "Radiation Protection of the Public and the Environment". Mr. Goldston said that at the January 23, 2001 CAB meeting, several CAB members indicated that they had heard the Order had been signed. Mr. Goldston said a letter dated January 19, 2001 had been received that discussed the basis for the decision not to sign the Order.

Nevertheless, the letter does leave in place the January 12, 2000 Moratorium on the Release of Volumetrically Contaminated Metals, and the July 13, 2000 Suspension on Unrestricted Release for Recycling of Metal from Radiological Areas. In addition, the letter directs DOE to initiate the National Environmental Policy Act (NEPA) process in the development of an Environmental Impact Statement (EIS). The EIS will allow public discussion of a broad range of concerns associated with unrestricted release of materials from DOE sites. The EIS will also help stakeholders better understand DOE release practices. Mr. Goldston said that the Notice of Intent (NOI) to begin the EIS should be published within 60 days from the January 19, 2001 date.

When asked if the suspension was still in effect at SRS, Gail Whitney, DOE Environmental Quality Management Division said the moratorium and suspension restrict the release of metals for recycling into commerce. Karen Patterson suggested sending a letter to DOE-HQ asking for a response to CAB Recommendation 132, "Release of Radioactive Scrap." In this recommendation, the CAB asked DOE-SR to develop and certify a program for the control and release of personal property including metal for recycling that meets the revised DOE Order for the radiation protection of the public and environment (DOE Order 5400.5). The recommendation also asked DOE-SR to involve the SRS CAB in the development of its public participation program for the release of radioactive property and scrap metal; DOE-HQ to use its time and resources to work aggressively with the Nuclear Regulatory Commission (NRC) to establish national release standards for volumetrically contaminated metals; and for DOE-HQ not to pursue a dedicated steel mill.

In closing, Mr. Goldston said that as its path forward, DOE-HQ will be conducting planning meetings to discuss the EIS and how to involve the field offices.

Solid Waste Division 2000 Annual Report

Sonny Goldston presented a "walk-through" of the Solid Waste Division 2000 Annual Report. Mr. Goldston highlighted the division's relationship with its DOE customer and said that while the year had many challenges, once again those challenges were met with remarkable success. Mr. Goldston also focused on the division's safety culture that is highlighted in the report, and emphasized that the site's new Behavioral-Based Safety process, which had its origins in SWD, had been adopted by the site. The Behavioral-Based Safety process encourages safe behaviors

through routine facilitated safety discussions in the work environment. Mr. Goldston also pointed out several areas of the book that would require future briefings to the CAB, including HANDS-55, a semi-remotely operated, modular, waste sorting and repackaging system that opens 55-gallon drums, sorts and segregates the contents, and repackages the acceptable waste separate from non-compliant waste. HANDS-55 is being developed for the preparation of TRU waste for shipment to Waste Isolation Pilot Plant (WIPP) in New Mexico.

Consolidated Incineration Facility Focus Group Update

Bill Lawless, Technical Lead of the Consolidated Incineration Facility (CIF) Focus Group first asked the group to note his e-mail address, which is lawlessw@mail.paine.edu. Dr. Lawless then provided an update on the recent activities of the Focus Group. In its pursuit to follow DOE's actions on the selecting an alternative treatment technology for the PUREX waste stream, Dr. Lawless presented the highlights from two recent CIF Focus Group meetings.

At the January 10, 2001 meeting, Dr. Lawless said the group heard that Helen Belencan, DOE-HQ, EM-20, Office of Integration and Disposition, had been appointed to develop an action plan responding to the Blue Ribbon Panel's (BRP) recommendations on viable treatment paths for DOE incinerable waste. Dr. Lawless also mentioned that incineration had been precluded in David Huizenga's response to CAB Recommendation 129, "Request for Data/Information on Alternative Technologies to Incineration". Other topics heard at the January 10 meeting included CIF funding strategies, identification of alternative treatment technologies, CIF Safety Analysis Report Evaluation, and the status of SCDHEC's permitting efforts.

At the February 21, 2001, meeting, Dr. Lawless said the group heard a regulatory discussion of the CIF standby mode, SCDHEC's response to comments on the Draft Resource Conservation and Recovery Act (RCRA) Permit. The group also heard a presentation on NOCHAR technology to stabilize PUREX, and an evaluation on PUREX alternative treatment options including scoring for the stabilization process.

Dr. Lawless said that the following key issues remain:

- DOE-HQ's decision not to include the Focus Group's involvement in the development of the action plan related to the BRP recommendations
- Not enough time left to get CIF into the budget process
- Time running out and no closure plan activity is under development
- Durability and integrity of the stabilization process wasteform disposal in terms of stewardship
- Optimization of CIF as a major alternative

Furthering the discussion on the key issues, Dr. Lawless emphasized that with a projected cost of \$80M to close CIF, optimization is an option worth considering. Saying that it may be possible to optimize CIF and operate the facility without dilution, the cost could conceivably be reduced to \$20M. Ray Hannah noted that the \$80M figure is a crude estimate and the cost can go either up or down; however, \$80M would be at the high end. Dr. Lawless asked that a discussion on CIF optimization be discussed before the CAB's April meeting in the event the Focus Group plans to develop a draft motion supporting this option.

Ray Hannah emphasized that SRS still needs to discuss a closure definition with SCDHEC to be sure the site knows exactly what regulatory actions would be required to close the facility. Dr. Lawless reminded the group that SCDHEC is asking for six months before a closure plan is submitted, and to keep in mind that closing CIF is contingent upon finding an alternative treatment technology for the PUREX waste stream.

Perry Holcomb said that the Performance Assessment (PA) for NOCHAR storage disposal had an assumption that NOCHAR would not retain PUREX material in it. Peter Hudson clarified that radioactivity can move in soil; however, including an additional barrier such as cement would stabilize the reactivity, i.e.; the material would be physically trapped and chemically bound. Perry Holcomb then asked that Mr. Elmer Wilhite of the Savannah River Technology Center provide a presentation to the Focus Group about the PA for PUREX. Sonny Goldston said that it was important to first provide the Focus Group with an understanding of how the PA works. Wade Waters asked that this topic be placed on the agenda for an upcoming meeting. Thanking Dr. Lawless for the hard work the Focus Group has been doing, Mr. Waters also asked Dr. Lawless to provide the CAB with this same CIF Focus Group update at the Board's April 24, 2001 meeting.

The attendees then discussed the topics they would like Helen Belenacan to address at the next CIF Focus Group meeting on March 14, 2001, including Ms. Belenacan's briefing to the Assistant Secretary of Environmental Management; DOE-HQ response to CAB Recommendation 139; a response from David Huizenga on the CAB's letter; the Environmental Management Advisory Board's invitation letter to participate on the Alternative Technologies to Incineration Committee (ATIC); and the effects of the new administration.

High Level Waste Recommendation Review

Wade Waters and Kelly Dean provided a review of CAB recommendations pertaining to the High Level Waste (HLW) Program. Based on the definitions of Pending, Open-Response, Closed-Complete, and Closed-Incomplete, five HLW recommendations (78, 81, 82, 88 and 112) were moved to Closed-Complete since actions for each of these recommendations have been completed. It was decided to keep Recommendations 43 and 51 open since additional responses are required.

Public Comment

Sam Booher announced that Don Moniak of the Blue Ridge Environmental Defense League would be speaking at 7:30 p.m., at a meeting of the Sierra Club on March 20, 2001, at the Unitarian Church, 3501 Walton Way Extension, Augusta, GA. For more information, Mr. Booher can be reached at 706-863-2324.

Wade Waters adjourned the meeting at 8:30 p.m.