



### Recommendation No. 133

November 14, 2000

#### Consolidated Incineration Facility (CIF) RCRA Part B Permit Modification

##### **Background**

(This recommendation constitutes the SRS CAB's comments on the RCRA Part B Permit Modification.)

On September 27, 2000, SCDHEC initiated a forty-five (45) day comment period on the SRS RCRA Part B Permit modifications to reflect the conditions of the CIF's suspension of operations (Ref. 1). At the request of the Savannah River Site (SRS) Citizens Advisory Board (CAB) and the Waste Management Committee, this public comment period was extended through November 17, 2000 (Ref. 2 & 3). SCDHEC included in the permit modification a schedule of activities, which SRS must follow. In this schedule, SRS must decide to re-start (operate) CIF or pursue an alternative treatment (for the PUREX) by April 1, 2002. If SRS decides to pursue an alternative treatment, then CIF must begin final closure on this same date (April 1, 2002).

In a presentation to the CIF Focus Group on October 30, 2000, DOE presented its life cycle costs for two assumed cases (Ref. 4). One case was the re-start of CIF the other case was the operation of an alternative treatment technology. In both cases the cost to close CIF was estimated to be approximately \$80 million and the funds would not be required until the FY 13 through FY 15 period. If an alternative treatment technology is implemented, it appears from the proposed life cycle schedule that CIF will be idle for an extended period of time before closure takes place. Per the proposed SCDHEC schedule, SRS would need the necessary funds for closure during FY 03 and closure must begin when a decision is made not to operate CIF.

##### **Comment**

If the proposed schedule in the permit modification is approved, SRS will be forced to re-start CIF because funds will not be available to both close CIF in FY 03 and continue with the development of an alternative treatment technology. This action would certainly meet one intent of the SRS CAB Recommendation #126 (Ref. 5), which was to operate CIF. However, as stated in this recommendation, the SRS CAB was not opposed to an alternative treatment technology as long as it was available (i.e., would work), was more cost-effective, could be implemented, and met all regulatory requirements. The SRS CAB wanted CIF to operate until an alternative treatment technology met these conditions. DOE continued with its plan to suspend CIF operations but this action is in a funding quandary unless SCDHEC changes the proposed schedule in the permit modification.

The SRS CAB does not want to sacrifice a viable, safe and reliable technology (i.e., CIF) unless it can be proven that another technology is superior by measures of cost, technology, and waste products. Such an alternative technology needs to be operational before CIF is dismantled. While DOE may have several promising technologies identified by April 1, 2002, it is highly unlikely that any will be operational by that date. Through information presented at recent CIF Focus Group meetings, there is merit in completing the alternative treatment investigations. Some of the technologies being investigated could be used as a pre-treatment to CIF and actually make CIF safer, more efficient and less expensive to operate; thus, saving taxpayer money. In addition, the SRS CAB is also interested in receiving and reviewing information on improving the current CIF operating efficiencies (Ref. 6).

To accomplish the objective of the SRS CAB, which is to have at least one treatment technology available to meet the legacy waste (PUREX) regulatory disposal date (FY 09), SCDHEC may want to reconsider the proposed schedule. The SRS CAB also questions whether the RCRA regulations allow the period of closure to be extended as long as DOE reported in its life cycle cost comparison.

##### **Recommendation**

The SRS Citizens Advisory Board recommends that:

1. The SCDHEC CIF permit modification recognize the need for adequate time for the full development, implementation and operation of an alternative treatment technology before CIF closes.
2. The SCDHEC provide the SRS CAB with its assessment of the likelihood of extending the closure period and if so, the maximum allowable time the closure period could be extended.

### **References**

1. Public Notice of Draft Permit Modification, September 25, 2000, Letter Rippy to Odum.
2. Public Comment Extension Request, October 2, 2000, Letter Patterson/Waters to Litton.
3. Public Comment Extension Request Approval, October 12, 2000, Letter Litton to Patterson/Waters.
4. CIF Life Cycle Costs for Two Assumed Cases, presentation to the CIF Focus Group by Ray Hannah, October 30, 2000
5. Citizens Advisory Board Recommendation No. 126 (adopted July 25, 2000), "Path Forward for Consolidated Incineration Facility".
6. Citizens Advisory Board Recommendation No. 129 (adopted September 26, 2000), "Request for Data/Information on Alternative Technologies to Incineration".

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### **Agency Responses**

*Department of Health and Environmental Control*