



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

July 9, 2009

Mr. Steve McCracken
Assistant Manager for Environmental Management
DOE-Oak Ridge Operations
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. McCracken:

Recommendation 180: Recommendations on Expansion of the CERCLA Waste Facility and Sorting and Segregating of Wastes Destined for the Facility

At our July 8, 2009, meeting the Oak Ridge Site Specific Advisory Board (ORSSAB) approved the enclosed recommendation regarding the expansion of the Comprehensive Environmental Response, Compensation and Liability Act Waste Facility in Bear Creek Valley.

In summary ORSSAB recommends that DOE proceed expeditiously to expand the current facility and plan for the development of a new facility to meet waste disposal needs forecast as a result of work to be done through the anticipated Integrated Facility Disposition Project.

The board also recommends an aggressive approach to sort and segregate wastes to ensure that only wastes with higher levels of contamination are disposed in the Bear Creek Valley Facility rather than the Y-12 Sanitary Landfill on Chestnut Ridge.

We appreciate your consideration of this recommendation and look forward to receiving your response by October 14, 2009.

Sincerely,

A handwritten signature in black ink that reads "Steven M. Dixon".

Steven M. Dixon, Chair

Enclosure

cc/enc:

Dave Adler, DOE-ORO
Cate Brennan, DOE-HQ
Fred Butterfield, DOE-HQ
Mike Farmer, Roane County Mayor
Pat Halsey, DOE-ORO

Connie Jones, EPA Region 4
Rex Lynch, Anderson County Mayor
James O'Connor, Oak Ridge City Manager
Melissa Nielson, DOE-HQ
John Owsley, TDEC



Oak Ridge Site Specific Advisory Board Recommendation 180: Recommendations on Expansion of the CERCLA Waste Facility and Sorting and Segregating of Wastes Destined for the Facility

Background

Much of the waste generated as part of the cleanup of the Oak Ridge Reservation (ORR) is disposed in a CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) Waste Disposal Facility west of the Y-12 National Security Complex in Bear Creek Valley. Construction of the facility to receive CERCLA waste was required as a result of a Record of Decision signed on November 2, 1999 by the U.S. Department of Energy (DOE), the Environmental Protection Agency, and the Tennessee Department of Environment and Conservation. Commonly known as the Environmental Management Waste Management Facility, the landfill has been in operation since May 2002 receiving CERCLA waste from the ORR, as well as three other non-ORR sites.

The facility is authorized to receive low-level radioactive waste as well as waste regulated under the Resource Conservation and Recovery Act and the Toxic Substances Control Act. Wastes can include soil, sludge, sediments, solidified waste forms, stabilized waste, vegetation, building debris, personal protection equipment, and scrap equipment.

A build-out of 800,000 cubic yards of capacity was completed in April 2005, bringing the operating capacity to 1.2 million cubic yards. An additional build-out is underway to bring the capacity of the facility to 1.7 million cubic yards.

However, the most recent estimate for existing waste forecast from current baseline cleanup work is 1.9 million cubic yards. In addition, estimates of waste to be generated from the Integrated Facility Disposition Project (IFDP) are about 2.2 million cubic yards. IFDP is the plan to eliminate more than 200 excess facilities at Y-12 and Oak Ridge National Laboratory. As a consequence, even with aggressive sorting and segregating of waste and volume reduction activities, the CERCLA Waste Facility will need additional expansion and another site may need to be found for another facility. Expansion at the current location would allow only up to 2.5 to 2.7 million cubic yards of waste. That is not enough for all of the anticipated IFDP waste.

Discussion

Additional CERCLA waste disposal capacity is likely to be needed sooner than originally planned because the schedule for cleanup has accelerated and the scope has expanded, in particular the demolition of the K-33 Building at East Tennessee Technology Park. The schedule for expansion of the present waste facility is prone to slippage. Approval of a new facility can be delayed because of the needed geological investigations for siting a new facility.

Waste sorting and segregation can forestall the need for additional disposal capacity. Sorting and segregation should be implemented where practicable and at a minimum until the schedule for additional capacity becomes very firm.

Recommendations

The Oak Ridge Site Specific Advisory Board recommends that DOE proceed with a sense of urgency to evaluate the future need for disposal capacity and, if warranted, begin planning for the expansion of the existing CERCLA Waste Disposal Facility while concurrently evaluating the need for a new facility should additional capacity be required.

In addition, the board recommends that DOE implement an aggressive approach to waste sorting and segregation on all projects to assure that only those wastes which require the higher level of containment are placed in the CERCLA Waste Disposal Facility. Waste Handling Plans should carefully examine the wastes targeted for the CERCLA cell to ensure that is the best option for disposal.