

May 19, 2014

Susan Cange Acting Manager Oak Ridge Office of Environmental Management U.S. Department of Energy P.O. Box 2001, EM-90 Oak Ridge, TN 37831

Dear Ms. Cange:

Recommendation 223: Recommendations on Additional Waste Disposal Capacity on the Oak Ridge Reservation

At our May 14, 2014, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed recommendations on additional waste disposal capacity on the Oak Ridge Reservation.

These recommendations are based on the Remedial Investigation/Feasibility Study for CERCLA Oak Ridge Reservation Waste Disposal (DOE/OR/01-2535&D2).

The recommendations encourage DOE to continue planning for an additional on-site disposal facility for low-level waste and that a second facility be placed in an area already used for similar waste disposal. The recommendations also request a trust fund be established for a second facility, similar to the one in place for the Environmental Management Waste Management Facility.

We appreciate your consideration of our recommendations and look forward to receiving your response by August 14, 2014.

Sincerely,

Dave Hemelright

Dave Hemelright, Chair DH/rsg

Enclosure

cc/enc: Dave Adler, DOE-ORO Dave Borak, DOE-HQ Fred Butterfield, DOE-HQ Kristof Czartoryski, TDEC Connie Jones, EPA Region 4 Terry Frank, Anderson County Mayor

Melyssa Noe, DOE-ORO John Owsley, TDEC Mark Watson, Oak Ridge City Manager Ron Woody, Roane County Executive File Code 140



Oak Ridge Site Specific Advisory Board Recommendation 223: Recommendations on Additional Waste Disposal Capacity on the Oak Ridge Reservation

Background and Discussion

In formal presentations made to the Oak Ridge Site Specific Advisory Board (ORSSAB) in January and February of 2014, the Department of Energy (DOE) identified the need for additional contaminated waste disposal capacity on the Oak Ridge Reservation (ORR). Disposal capacity in the existing Environmental Management Waste Management Facility (EMWMF) will be exhausted by the year 2023, primarily due to:

- 1. availability of American Recovery and Reinvestment Act funds that allowed the acceleration of Cold War clean-up projects, and
- expansion of the Oak Ridge Environmental Management Program to include the removal of outdated facilities at the Oak Ridge National Laboratory and the Y-12 National Security Complex. In addition to 2.2 million cubic yards of waste to be disposed in EMWMF by year 2023, capacity for approximately 2.5 million cubic yards more will be needed through year 2046.

Development of a new disposal area, named the Environmental Management Disposal Facility (EMDF), has been proposed to the Tennessee Department of Environment and Conservation (TDEC) and the Environmental Protection Agency (EPA). The initial remedial investigation/feasibility study (RI/FS) report has been compiled to "develop, screen, and evaluate alternatives for waste disposal against CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) criteria ..." including off-site disposal options. This report was submitted to TDEC and EPA for review and comment in September 2012 and revised in June 2013 to incorporate the many comments received. Comments on the revised version currently are pending resolution.

The ORSSAB understands that no decision has been made regarding whether, when, or where to develop another on-site disposal facility, and that ORSSAB and public input will be solicited and incorporated as appropriate prior to any decision being made.

Recommendations

Based on information provided by the DOE that identified the need for additional contaminated waste disposal capacity on the ORR and the preliminary facility design criteria, the ORSSAB makes the following recommendations to the DOE:

- Continue with planning for additional on-site disposal capacity for low-level radioactive and chemically hazardous contaminated waste, and continue ongoing efforts to minimize the need for additional on-site capacity;
- Ensure that the proposed new disposal facility will have sufficient capacity to accept all appropriate future generated waste from DOE activities through cleanup of the ORR;
- Ensure the proposed disposal facility is engineered to operate safely and block migration of contaminants into adjacent groundwater, soil, and air;
- Locate the proposed facility in proximity to existing waste burial grounds, if technically feasible, such that contaminated areas are consolidated on the ORR;
- Ensure that a trust fund for long-term stewardship is established for any new disposal facility similar to that for EMWMF.