

**PGDP Citizens Advisory Board
Waste Operations Task Force
February 12, 2003 * CAB Office**

CAB Members Present: Mark Donham
Merryman Kemp (via teleconference)
John Russell (via teleconference)
John Tillson

DOE Representatives: David Dollins
Glen Newtown

Ky. Division of Waste Mgt.: Gaye Brewer

Support Staff Present: Rudy Bonilla, Bechtel Jacobs Company, LLC
Greg Cook, Bechtel Jacobs Company, LLC
Kendra Payne
Tom Wheeler, Bechtel Jacobs Company, LLC

Public: Ruby English

The meeting was called to order at 5:40 p.m.

North-South Diversion Ditch (NSDD)

Dollins reported the hardpiping was completed on January 9, 2003. He said the U.S. Department of Energy (DOE) submitted the D2 Land Use Control Implementation Plan (LUCIP), the D1 Remedial Design and Remedial Action (RD/RA) workplan, and the D1 Sampling Plan to the Commonwealth of Kentucky and the U.S. Environmental Protection Agency (EPA). DOE received comments on January 31, 2003. DOE is incorporating those comments and anticipates approval of the documents on March 1, 2003.

Russell asked when excavation of the ditch will begin. Dollins said the excavation will start in July or August and run through late December. Russell asked when DOE will begin disposing of waste from the NSDD project into the C-746-U Landfill. Dollins said DOE needs to access the landfill or postpone the project until the landfill is accessible.

Bonilla gave a presentation to the task force regarding the contaminant concentrations within sections 3,4, and 5 of the NSDD. The presentation showed comparisons to risk-based concentrations and surface soil background concentrations.

Tillson asked what document the background information was obtained from. Bonilla said the presentation was based on information found in *Methods for Conducting Risk Assessments for Risk Evaluations at the Paducah Gaseous Diffusion Plant, Volume 1. Human Health* (DOE/OR/07-1506&D2). Tillson stated the charts included in the presentation show the ditch is cleaner than the background. Bonilla said there is an information packet on the NSDD that clarifies that information. Russell requested the task force be provided copies of the information packet.

Russell said the charts use a different risk-based level for arsenic and uranium (i.e., Arsenic uses child recreational no action level; and Uranium-238 uses industrial worker no action level). He questioned why the Uranium-238 is less for an industrial worker than child recreation. Wheeler reported the risk-based level is based on several factors, including exposure time, which is longer for an industrial worker.

Russell asked when samples NSD024-NSD030 were taken. Wheeler said those particular samples are the most recent and were taken in April 2002. Russell stated some samples were taken for a few different reasons, and asked why the most recent samples were limited to Section 3. Bonilla said the characterization effort was driven by the Environmental, Safety & Health (ESH) department to verify safe working conditions. During that effort, 22-23 samples were taken at locations inside the fence and 7-8 samples in Section 3. Russell asked why the most recent samples are the ones that showed detection of contamination. Bonilla said the samples were targeted at areas that were suspected hot spots.

Russell said graphs in the presentation clearly show an area in Section 5 where there is a problem with arsenic. He said the hot spot is downstream of the old original landfill. Russell expressed his concern that there may be a source of contamination outside the fence.

Donham said it was his understanding the excavation plan for sections inside the fence is to dig up 4 ft. of surface soil. He asked if the depth would change for sections outside the fence. Dollins said that as you move further from the plant you will find less contamination and will not have to dig as deep.

Russell stated, based on the information that has been provided to the task force, that DOE has a basis for conducting a characterization on the NSDD. He said the samples that have been taken, on which DOE has based its decision for excavation, are too inconsistent. Tillson agreed and said that more viable samples are needed. Russell said the next step for DOE would be to do a proper study that will show reason for excavation or remedial action.

January Agenda

Russell asked if there were any comments or concerns about the January minutes for the task force. There were no comments.

Russell said he had promised to write a statement regarding the task force's concern about the C-746-U Landfill and its cost. He stated he will send that to the task force via E-mail the next day for the February Board meeting.

C-746-U Landfill

Russell reported he has heard that a Notice of Violation (NOV) has been issued regarding incorrect disposal of waste in the C-746-U Landfill. He said the board was notified of the NOV at the November Board meeting and has heard that a remedial action may result. Tillson said the NOV was mentioned at the Board meeting but he thinks actions were already being discussed. Tillson reported the NOV states that uncharacterized materials were moved, mislabeled, and put into the landfill. He said DOE cannot tie its sampling records to the actual containers, therefore, the container will have to be retrieved. Tillson said the containers in question are located in a cell that is not currently in use. He questioned whether or not the Commonwealth of Kentucky had been told about the burial of the suspect drums.

Donham said a Commonwealth of Kentucky official told him the landfill has been reopened, under a minor modification, for particular substances, but also heard the landfill was closed due to an investigation regarding the NOV. Donham asked if the landfill is currently in use. Dollins said the landfill is open but is limited under a minor modification. Newtown reported that 140 tons of soil and debris from Solid Waste Management Area (SWMU) 194 and 2 tons of general landfill trash have been disposed of in Phase 3 of the landfill recently. Donham asked if DOE is using the landfill in conjunction with Authorized Limits. Newtown said there are 7,000 tons of rubble that will have to go through the Authorized Limits review before disposal.

Newtown reported the NOV states that DOE remove the material in question or develop a sampling plan to determine the suspect waste. He said DOE has submitted a sampling plan that will be implemented as soon as the Commonwealth of Kentucky grants approval. Newtown said the sampling results will indicate whether or not a remedial action is necessary.

Tillson asked what kind of waste is suspected to be in the mislabeled containers. Newtown said the waste is suspected to be F-listed waste. Brewer said DOE has been told to look for all listed waste. Russell stated that F-listed waste is restricted from land disposal, which would result in a violation without conducting samples. He asked how much waste is involved. Newtown reported there are 2,369 containers in question. Tillson said he would look at waste disposal packages to see what kind of material may be present. He asked to be provided with a copy of the list of waste put into the C-746-U Landfill.

Donham inquired about the status of the Solid Waste Permit Modification. Brewer said DOE is still waiting for the permit to be issued. Newtown said the permit will not be issued until the NOV is addressed to the satisfaction of the Commonwealth of Kentucky.

Russell asked how DOE planned to sample the areas in the landfill where the violation has occurred. Newtown said the sampling plan is bulk based, and will sample the area or the drum itself if it is still intact. Russell asked to what phases the NOV applies. Newtown said Phases 1 and 2 are the areas under investigation.

The meeting adjourned at 6:55 p.m.

Action Items:

- DOE: Provide NSDD Information Sheet package to task force members and Ruby English
- Russell: Provide statement regarding task force's concern about C-746-U Landfill and its cost via e-mail to task force members for February Board meeting.
- DOE: Provide Tillson and English with list of waste put into C-746-U Landfill.
- Staff: Provide Kemp with a copy of the presentation.