

# Waste Disposition Task Force

## DMSA Project Update

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Characterization/Remediation of the  
Department of Energy Material Storage Areas  
at the  
Paducah Gaseous Diffusion Plant

Citizens Advisory Board Waste Disposition Task Force  
April 13, 2005

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# General Description

DOE Material Storage Areas (DMSAs):

- Various material storage areas located throughout the PGDP

- **Types of materials include:**

- **Enrichment process equipment**
- **non-process equipment**
- **surplus material**
- **scrap material**
- **LLW and PCB/radioactive waste containers**
- **UF<sub>4</sub> containers**

- Includes inside and outside areas
- Boundaries marked with blue and white roping, signs and postings as required

# Overview

- **DMSA Project Scope Statement:**

**To characterize approximately 800,000 cubic feet and disposition approximately 630,000 cubic feet of material stored in 160 DMSAs.**

- **Major Agreed Order Milestones:**

<b>Milestones</b>	<b>Status</b>
Characterize Priority “A” DMSAs by September 30, 2004	Completed
Characterize DMSA C-400-05 by September 30, 2004	Completed
Characterize Priority “B” DMSAs by September 30, 2006	Ongoing
Characterize Priority “C” DMSAs by September 30, 2009	Ongoing

# Current Status

- 45 DMSA Characterization Reports have been submitted to DOE.
- 17 RCRA Closure Plans have been submitted to DOE and KDWM.
- **~630,000 ft<sup>3</sup> of the estimated 865,000 ft<sup>3</sup> of material have been characterized for NCS, re-use, or waste (radioactive/hazardous/PCB/asbestos/solid waste/combination).**
- ~268,000 ft<sup>3</sup> of waste have been packaged for disposition.
- ~228,000 ft<sup>3</sup> of waste have been dispositioned.
- **14 Outside DMSAs are now empty with originally stored material dispositioned.**
- 3 additional Outside DMSAs are awaiting material removal and disposition.
- **Of the 14 empty Outside DMSAs, 3 have had the boundaries removed and returned to other DOE Projects.**

# Path Forward

- Complete Agreed Order Milestones for Characterization by 2006 and 2009
- **Complete RCRA Closures with KDWM approval**
- **Complete Disposition of ~630,000 cubic feet of waste by end of 2010**
- Removal of ropes and boundaries
- Return areas to the DOE or USEC

# RCRA Closure Process for DMSAs

- **Applicability:** DMSAs in which “**Newly Discovered**” hazardous waste is determined to be present in a DMSA

- **Regulatory Drivers:**

1. Agreed Order between DOE and Kentucky Natural Resources and Environmental Protection Cabinet, Section D.
2. 401 KAR 34:070. Closure and postclosure.

- **Agreed Order Options for DMSA RCRA Closures:**

1. Final (Clean Closure)
2. Partial Closure
3. Deferral of Closure to FFA (inside units only)

# RCRA Closure Process for DMSAs (cont.)

## • Requirements

### 1. Closure Performance Standards:

- a. Minimize need for future maintenance
- b. Controls, minimizes, or eliminates....postclosure escape of hazardous waste....
- c. Complies with closure requirements of administrative regulations.

### 2. Closure Plan Submittal to and approval by KDWM:

- a. Description of closure
- b. Estimate of hazardous waste inventory over life of facility
- c. Description of methods of closure
- d. Other activities to accomplish closure
- e. Schedule for closure
- f. Notification of closure to and approval by KDWM

# RCRA Closure Process for DMSAs (cont.)

## 3. Closure Implementation

## 4. Closure Report and Certification

## 5. Schedule for DMSA RCRA Closures under the Agreed Order:

- a. **Closure Plan Submittal** - within 120 days of completion of characterization of a DMSA
- b. **Approval or NOD by Cabinet** - within 45 days of receipt of closure plan
- c. **Completion of Closure** - within 180 days of approval of closure plan
- d. **Submit Final Closure Report to Cabinet** - within 60 days of closure
- e. **Approval or NOD by Cabinet** - within 30 days of receipt
- f. **If NOD received, DOE to respond** - within 30 days of receipt
- g. **Approval or 2nd NOD** - within 30 days of receipt
- h. **Invoke consultation process or submit new plan** - within 30 days of receipt

Q & A