

**Waste Operations Task Force Meeting
March 13, 2002, CAB office**

Members present: Mark Donham, ex-officio
Merryman Kemp, Chair
Rosa Scott

DOE staff present: Gary Bodenstein
Craig Czuchna
David Dollins

Public present: Sam Sheerer

Support staff present: Stacey Young, BJC
Bruce Gardner, DiG

Mike Guffey and Tony Hatton of the Kentucky Division of Waste Management participated by telephone.

Kemp called the meeting to order at 3:15 p.m.

Bodenstein said the Waste Disposition EA has been issued for public comment. The comment period ends April 25. A public meeting will be held from 6-8 p.m. at the EIC.

Young reported that the answer to John Tillson's question about per ton disposal costs at the C-746-U Landfill would be available at the April task force meeting.

Dollins reported that the seismic field study was progressing well and that the investigative report will be issued June 3. A decision about whether trenching is needed at Site 3A and Barnes Creek will be made in the next two weeks. He said there was some concern about damaging farmland around the Barnes Creek site by trenching. Donham asked if the final recommendation of the seismic report would be made by DOE or in consultation with regulators. Dollins, Hatton and Guffey said the recommendation on whether Site 3A would meet state seismic requirements would be made after all parties discussed the data.

Dollins also talked about the state's desire to include Long-Term Stewardship considerations in the CERCLA Disposal Facility evaluation and other DOE projects. He said the state also wants footprint reduction to be part of the CERCLA cell discussion such as digging up closed landfills and moving their contents to the potential new facility. Guffey said that if the state is to approve the CERCLA cell project, it wants to be certain that Long Term Stewardship is part of any remedial action and that the long-term effectiveness of any remedy is ensured. Donham asked if that kind of trading was

covered in the FFA. Bodenstein said it was not. Hatton commented that this was not really trading.

Dollins and Bodenstein gave an update of the F-Listing determination regarding the North-South Diversion Ditch. The state has issued a letter saying it will consider the waste to be contained-in, which means characterization must be performed as the project proceeds. The determination of whether the soil is hazardous or not will determine where it is disposed. If a contained-out ruling is made, material can be disposed of as non-hazardous as long as it meets leaching and disposal criteria. Guffey said the state will not consider the material hazardous below certain levels.

Bodenstein provided a brief overview of RCRA regulations from 40CFR261. He drew the following chart.

- 1) **Solid Waste**
 - 2) **Hazardous Waste**
 - a. **Characteristic**
 - b. **Listed**
 - i. **F-listing**
 - ii. **K-listing**
 - iii. **P-listing**
 - iv. **Q-listing**
- Contained-in/contained-out**
Toxicity Characteristic Leaching Properties
Land Disposal Requirements

He explained that most of the waste discovered to date at the plant is potentially F001, F002 and U228 in addition to characteristic waste. However, the investigation is continuing.

Donham asked what would happen if in the course of excavating the NSDD that a concentrated “nugget” of contamination were found. Dollins explained that DOE intends to characterize the ditch as it proceeds. He said the worst contamination lies 3 to 4 feet below the surface. The plan is to remove the first approximately 3 feet, stage it near the ditch. Next, the soil will be sampled. Then a determination will be made about the disposition of that material. Also, the determination will be made as to how deep the excavation needs to continue. Contaminated material will have to be disposed of in facilities with Waste Acceptance Criteria allowing that type and/or level of contamination.

Young reported that the underground storage tank (UST17) the task force has sought information about was found in the southwest corner of the cylinder yards. It has been placed in one of the plant’s scrapyards and will be disposed of as part of that action.

Young also reported that a new team from DOE headquarters is involved in preparing the Programmatic Environmental Impact Statement on scrap metal. She said the D2

document should be available in July. The Task Force may want to suggest to the board that the board send a letter to DOE reminding it of the previous team's promise to hold a public meeting in Paducah.

Young brought four of the five blueprints that John Tillson had requested. She noted that the fifth blueprint would not be issued at this time because of security concerns. At this point, Bodenstein expressed concern that the documents were not properly declassified and took control of them and exited the meeting. He confirmed that it was proper to release them to the Task Force and they were left with Young to give to Tillson.

Czuchna reported on the status of the C-410 D&D project. He said the DOE Top-to-Bottom review has prevented the release of planned documents. During the review, DOE has asked its field offices to make no new regulatory commitments. The Remedial Action Work Plan is complete and will be released once the hold is removed, he said. Work is scheduled to begin in June, but whether that happens depends on when the hold is removed. In the interim DOE continues to ready the facility for D&D. This includes removing power, turning off water, evaluating equipment and other items. He said about 10,000 of the 80,000 gallons of water that leaked in the building's basement has been analyzed, found to be clean, and is about to be discharged. DOE will continue to process this water in 10,000-gallon batches.

Czuchna plans to invite three approved contractors to meet with him to discuss the fluorine cells in the facility. He said DOE would invite proposals and accept the best one. Also, he stated that having a private company take the cells could save the government \$2.5 million in transportation and disposal costs.

The discussion about finding a new meeting time will be held over until the April meeting.

The meeting adjourned at 5 p.m.