



SRS Citizens Advisory Board

Consolidated Incineration Facility Focus Group

Meeting Summary

March 14, 2001
North Augusta Community Center
North Augusta, SC

The Consolidated Incineration Facility (CIF) Focus Group met on Wednesday, March 14, 2001, 5:00 p.m., at the North Augusta Community Center, North Augusta, SC. Attendance was as follows:

FG Members

Wade Waters, CAB

Jean Sulc, CAB

Perry Holcomb, CAB

Murray Riley, CAB

William Lawrence, CAB

Helen Belencan, DOE-HQ

Mike French

Lee Poe

Bill Lawless

Ray Hannah

Sonny Goldston

Peter Hudson

Helen Villasor

Stakeholders

Rick McLeod, CAB Tech.
Advisor

John Meyers

Regulators

None

DOE/Contractors

George Mishra, DOE

Wade Waters opened the meeting promptly at 5:00 p.m. by inviting introductions and thanking everyone for coming. There were no public comments. Mr. Waters then introduced Helen Belencan, DOE-HQ, who is also a member of the CIF Focus Group.

Complex-Wide Incineration Needs: Results of Complex-Wide Analysis

Helen Belencan began her presentation by noting that while it was the same briefing delivered to Carolyn Huntoon, Acting Assistant Secretary of Environmental Management, it was important to share the information with the CIF Focus Group. In the briefing, Ms. Belencan provided the chronology of why the analysis was performed since it appeared that individual sites across the complex had been making their own decisions regarding incineration technology. As examples, Ms. Belencan cited the three DOE complex incinerators: the Waste Experimental Reduction Facility (WERF) incinerator at Idaho, which has been shut down; the Consolidated Incineration Facility (CIF) at SRS, which is in a suspension mode; and the Toxic Substance Control Act Incinerator (TSCAI) at Oak Ridge that is still operational. Ms. Belencan

said that the Advanced Mixed Waste Treatment Project (AMWTP) incinerator component has been deferred pending the Blue Ribbon Panel's recommendations.

Ms. Belencan pointed out that in May 2000, DOE-IDAHO requested Environmental Management (EM-HQ) to shutdown operations of the Idaho National Engineering and Environmental Laboratory (INEEL) WERF incinerator at the end of Fiscal Year 2001, thus avoiding the cost of upgrades to meet the Maximum Achievable Control Technology (MACT) Rule. At that time, WERF was the only DOE incinerator accepting mixed low-level waste (MLLW) from other DOE sites for treatment. Then an assessment of the impact to the rest of the DOE complex from closing WERF was requested. Based on the preliminary assessment, the Office of Integration and Disposition concurred with the 2001 closure of WERF, and identified an uncertainty on the impact of the planned 2003 closure of TSCAI at Oak Ridge. Ms. Belencan said that the analysis provided the results of a detailed bottoms-up review of the demand for incineration of low-level radioactive waste containing polychlorinated biphenyls (PCBs) and other hazard constituents, and also assessed the viability of the commercial sector to meet the demand.

However, Ms. Belencan said that what was new since her arrival at SRS to make the presentation, was a letter from the State of Tennessee to Dr. Huntoon concerning DOE's Burn Plan for the TSCAI. The letter, signed by Governor Don Sundquist, considers INEEL's stream, a small Naval Reactors waste stream from SRS, and a significant quantity from the Rocky Flats Plant in Colorado and justifies acceptance of the liquid waste shipments because of overriding national security concerns. However, the letter specifies that evaluation of offsite solid waste streams from these sites and from the Nevada Test Site (NTS) as well as Los Alamos National Laboratory (LANL) for incineration will be undertaken on a case-by-case basis. (NOTE: copies of the letter from the State of Tennessee can be obtained by calling Helen Villasor at (803) 725-9732 or by e-mail at helen.villasor@srs.gov.)

In response to a question regarding the demand for incineration, Ms. Belencan said that with a lifecycle estimate of approximately 63,000 cubic meters of waste in inventory and projected waste to be generated at each facility within the complex, DOE has looked to the commercial sector, not as alternative, but as to what is transpiring in the commercial world.

Ms. Belencan continued her presentation by explaining that the analysis performed by her group answered two major questions:

1. Are there viable commercial-sector alternatives for waste streams currently targeted for DOE incinerators?
2. Should DOE continue with the current planning baseline of closing the incinerator at Oak Ridge in 2003?

The Oak Ridge TSCA incinerator is currently the only incinerator (DOE or commercial) capable of treating low-level radioactive waste containing PCBs and other hazardous constituents, and it is the only operating DOE incinerator. Ms. Belencan said that the scope of work now is to quantify and qualify the demand for incineration while identifying and evaluating commercial sector alternatives such as incineration and thermal and non-thermal treatment.

Results of Ms. Belencan's Study Team analysis determined that in answer to question one, approximately 90% of MLLW streams can eventually be treated by the commercial sector (approximately 55,000 of the 63,000 cubic meters analyzed). However, the balance (approximately 8,000 cubic meters) needs further evaluation. For example, the PUREX solvents (approximately 20 percent) at SRS has a site team working on the issue. In addition, the TRU/Mixed Waste Focus Area is sponsoring a Waste Elimination Team to look at technology alternatives for high organic sludge and clean-up residues from other sites.

In discussing question two, Ms. Belencan said that the demand for treatment of solid MLLW containing PCBs and other hazardous constituents continues through 2007; the treatment capacity of PCB solids is limited; commercial sector alternatives for PCB treatment need to be demonstrated (PCB treatment by

Allied Technology Group (ATG) in Richland, WA is at least six months out); the current schedule for treating liquid PCB waste from Fernald is tight and disruption could be problematic because of equity issues; and an uncertainty remains concerning waste from closure sites.

Ms. Belencan was then asked about SRS's waste. In response, Ms. Belencan said that the SRS waste streams that have been targeted for incineration are defined in the site's Site Treatment Plan (STP). However, it was noted that SRS's liquid PCB waste targeted for incineration will continue to go to TSCAI until it shuts down. The discussion prompted the group to ask for a future presentation on SRS waste streams that have regulatory commitments according to the STP. Wade Waters asked that the topic be added to the next agenda.

Lee Poe noted there was confusion regarding the definition of organic constituents since the Hazardous Waste Code (FW05) was narrower than the Resource Conservation and Recovery Act (RCRA) definition. Sonny Goldston said that as an example, it is possible to have constituents below RCRA limits that can be stabilized and treated as low-level waste. However, when the constituents are above a certain concentration they must go above RCRA limits. Mr. Goldston cited the MLLW streams that were included in the recent *Offsite Transportation of Certain Low-Level and Mixed Radioactive Waste from the Savannah River Site for Treatment and Disposal at Commercial and Government Facilities Environmental Assessment (EA)*. Ms. Belencan said that approximately six percent of the 63,000 cubic meters of waste discussed earlier would be sent to ATG (a DC Arc Incinerator). Some of the balance could find treatment paths to other incinerators, with the exception of SRS's PUREX waste. Believing that future missions are an important issue, Bill Lawless asked if DOE-HQ had also looked at the possibility of other waste streams coming in, and as a specific example, Dr. Lawless asked if the STP would include any treatment plans for mixed oxide (MOX) fuel.

Perry Holcomb asked if there was any information available concerning the cost ratio between operations at TSCAI and ATG. Ms. Belencan said that cost information on ATG is not yet available since ATG has not come on line for operations. In terms of operations cost for TSCAI, Ms. Belencan said that it costs approximately \$11M per year to run the facility. Ms. Belencan noted that a comparable one-to-one analysis is not yet available; however, there are plans to include it in the next update of the study.

Several questions were then raised as to cost. For example, how can recommendations be made in the study when there is no forecast for cost; how will the \$80M for CIF closure costs be factored in; and where will the budget come from to pay for all the closure costs? Ray Hannah responded that it is difficult to be specific at this time since closure has to first be defined by the regulators. Bill Lawless said that it was important then to ask the regulatory agencies from the states of Tennessee and Idaho to explain their positions and also define the timeframe that each of the state agencies granted. More specifically, it was noted that the states be asked what limitations for closure they allowed beyond the 180 days specified in RCRA. Based on the discussion costs and the fact that SRS is not budgeted for the outyears, it was noted that a presentation of the cash flow analysis be provided to the group to determine if at the DOE-HQ level, there is a possibility of movement of funds between sites, or if funds can be changed from operations to decontamination and decommissioning. Wade Waters asked that this topic be included in a future agenda as well as optimization of CIF. Ray Hannah said that the report on optimizing CIF had not yet been reviewed by DOE-SR or DOE-HQ and asked that this topic be considered for a June agenda.

In closing her presentation, Ms. Belencan said that the study made a recommendation to defer the decision for closing the TSCAI until March 2002 (in time for the 2004 budget submittal) while continuing to monitor progress in the development of the commercial sector treatment capacity. John Meyers asked if DOE-HQ was still open to reviewing technologies other than those listed in Ms. Belencan's presentation package. Mr. Meyers noted that he represented the NOCHAR stabilization technology that was recently demonstrated at SRS, and also mentioned the success of using NOCHAR at the Mound site. Ms. Belencan said that NOCHAR had been discussed in a previous workshop and would be included in the study update as the study group goes through the process of reviewing technologies again. Wade Waters asked that the study group also take a look at the molten aluminum technology process.

Group Discussion

During an informal discussion, Ms. Belencan was asked how her study integrated with the Blue Ribbon Panel study. In response, Ms. Belencan said that they were different in terms of mission. The Blue Ribbon Panel was appointed by former Secretary of Energy Richardson to study alternative technologies to incineration at Idaho and that the mission of the Blue Ribbon Panel was put into the settlement agreement that DOE has with the "Keeping Yellowstone Nuclear Free" lawsuit. In Ms. Belencan's EM Study Group, the team is studying the availability of viable commercial-sector alternatives for waste streams currently targeted for DOE incinerators as well as identifying the best treatment option for the waste streams. Ms. Belencan noted that the final Blue Ribbon Panel report could be found on the Internet at: <http://www.seab.energy.gov/>.

Bill Lawless said that the CIF Focus Group was trying to make a point through CAB Recommendation 129, "Request for Data/Information on Alternative Technologies to Incineration", that DOE is not interested in pursuing incineration as a technology. In citing the major concern of the CIF Focus Group, Dr. Lawless said that DOE is looking at alternatives to incineration but no one is looking at incineration itself. A comment was made that the Focus Group would like to see it in writing that DOE-HQ is not saying incineration is not to be used. Another comment was made that it does not make sense for DOE to promote DC Arc (another term for incineration) technology while shutting down its complex incinerators. Ms. Belencan said that it is her opinion that DOE is not walking away from incineration since it plans to keep TSCA1 operating until 2003. Murray Riley said it was his belief that DOE made the decision to shut CIF down without having a full study performed and now DOE has to make its decision work. Jean Sulc mentioned that SRS could also be subject to a lawsuit so it was important to clarify that what happened at other sites does not apply directly to SRS. Helen Belencan said that for clarification, she would go back and take a closer look at the language in the settlement agreement in the Idaho lawsuit.

As a final discussion topic, Ms. Belencan was asked to explain the letter sent by the Environmental Management Advisory Board (EMAB) inviting local stakeholders to participate in an Alternative Technologies to Incineration Committee (ATIC). The ATIC will examine emerging candidate technologies for treatment and disposal of mixed TRU and low-level wastes previously scheduled for incineration at INEEL. A secondary mission of ATIC will be to facilitate stakeholder comment and communications on the issue of emerging alternative technologies to incineration for the treatment of mixed TRU and low-level wastes. Ms. Belencan explained that with the Secretary accepting the recommendations of the Blue Ribbon Panel, it was directed that a type of citizen advisory board be formed to participate in the process. The citizens group will be a part of the EMAB, and the invitation letter is in direct response from the Blue Ribbon Panel that ATIC be established. Ms. Belencan explained further that forming the group is a step that is moving out ahead of the action plan and anyone in attendance could be considered as a participant. However, Perry Holcomb said he disagreed with the letter since it did not specifically identify SRS stakeholders as primary candidates, nor did it indicate any assurance that SRS would be granted a member. In defense of the letter, Ms. Belencan said that it was prepared under Federal Advisory Committee Act (FACA) guidance, but encouraged Mr. Holcomb and all the attendees to submit applications since there was direct interest in the issue which has been well established and documented by the CIF Focus Group. Bill Lawless concurred with Mr. Holcomb's comment and suggested letters be sent to the EMAB in support of ensuring that at least one member of the SRS stakeholders be selected for participation on the ATIC.

In closing the meeting, Mr. Waters expressed his deepest appreciation to Ms. Belencan for coming to SRS and making the presentation to the Focus Group. Mr. Waters also thanked Ms. Belencan for her candidacy and openness in sitting down in an informal discussion to answer the many questions the Focus Group has regarding its charter to follow CIF activities.

Public Comment

Everyone in attendance used the public comment period to express his or her appreciation to Ms. Belencan for her participation as a Focus Group member and for conveying their concerns regarding CIF to DOE-HQ.

Wade Waters adjourned the meeting at 7:30 p.m.

Meeting handouts may be obtained by calling 1-800-249-8155.