



MEETING MINUTES

Environmental Management Public Information Review Effort (EMPIRE) Committee

November 6, 2007

Members Present: Walter Wegst, Chair; Bob Gatliff, Hal Sullivan

Members not Present: Paul Adras, Vernell McNeal, Stacy Standley

Department of Energy: Kelly Snyder, DDFO

Support Staff: Rosemary Rehfeldt, Navarro Research and Engineering, Inc.

The fact sheet: *Transporting Low-Level and Mixed Low-Level Waste to the Nevada Test Site* was reviewed. Walt Wegst and Stacy Standley talked over the telephone prior to the Committee meeting and agreed to proposed changes which were provided to other Committee members in a separate handout that was distributed at this meeting. Suggested changes are as follows:

- The first paragraph with bullet points should be changed to read:

Safety is the first priority of the Nevada Test Site (NTS) when transporting waste to the NTS. The NTS is committed to considering the concerns of neighboring areas, which are impacted by the transport of low-level and mixed low-level waste shipments to the site. These concerns include:

- ♦ *Avoiding heavily populated/congested areas in the State of Nevada*
- ♦ *Avoiding Hoover Dam (I-40, US-93) and Davis Dam (AZ-68, NV-163)*
- ♦ *Using the Nevada Site Office identified preferred routes (see map on reverse side)*
- ♦ *Completing the driver routing questionnaire*
- ♦ *Avoiding the Las Vegas Beltway (I-215)*

- The second paragraph should read as follows:

The NTS recognizes that although generators cannot direct the specific routes taken by carriers, they can suggest preferred routes. The Nevada Site Office may consider suspension of a generator's shipments if waste is transported through the above-mentioned sensitive areas.

- There are no changes to the third paragraph.
- With regard to the fourth paragraph, the Committee agreed that a legend would be created for the map with symbols that designate the different routes, for those who will not be viewing a colored copy of the fact sheet. The symbols will be a triangle, a square, and a circle. The verbiage in this paragraph should read as follows:

During summer months (May-October) carriers are directed to use the northern route. See map on the reverse side for Interstate-80 highlighted in blue, symbol is a circle. The required alternative during winter months (November-April) is to divide shipments between CA-127 (symbol is a triangle), and NV-160 (symbol is a square). See map on the reverse side for these routes; both are depicted in pink colors.

- The second sentence of the fifth paragraph should read as follows:

The required shipping permits are obtained through the Department of Transportation for these states (not the Highway Patrol).

It was also noted that the background was too busy and the fact sheet was difficult to read. All of the above changes were approved by the Committee to include in a recommendation letter to DOE, drafted by Rosemary Rehfeldt, for approval by the Full Board at the January 2008 meeting.

The fact sheet: *Mixed Low-Level Waste at the Nevada Test Site* was reviewed. The Committee agreed that this fact sheet can be combined with *Mixed Low-Level Waste Acceptance Guidelines at the Nevada Test Site* fact sheet. Therefore, verbiage was taken from the second fact sheet and inserted into the first. The *Mixed Low-Level Waste at the Nevada Test Site* fact sheet should read as follows:

- On page 1, Mixed Low-Level Waste Composition should read as follows:

Mixed low-level waste is a “mix” of low-level radioactive materials and hazardous constituents. These constituents are toxic, corrosive, reactive, ignitable, or are specifically identified by the U.S. Environmental Protection Agency (EPA) as “hazardous.”

The low-level portion of mixed waste contains small amounts of radioactive material and can generally be handled without personal protective equipment. Mixed low-level waste is managed separately from low-level waste because of its non-radioactive, hazardous component. Examples of waste forms that **will not be accepted** are free liquids, biodegradable sorbents, and etiologic and chelating agents.

The EPA regulates generation, transportation, treatment, storage, and disposal of hazardous waste (often referred to as “cradle-to-grave” management) as set forth in the *Resource Conservation and Recovery Act (RCRA)*. In Nevada, the EPA has delegated authority to the State of Nevada to ensure compliance with RCRA.

- On page 1, Disposal at the Nevada Test Site, the first sentence should read:

The DOE National Nuclear Security Administration Nevada Site Office operates a Mixed Waste Disposal Unit under the Nevada Test Site Part B RCRA permit reissued by the State of Nevada Division of Environmental Protection (NDEP) in December 2005.

- Page 2 has been restructured to read as follows:

It is important to note that all mixed low-level waste disposed as the Nevada Test Site must comply with strict waste acceptance criteria which includes conformance to RCRA Land Disposal Restrictions. Compliance is ensured through extensive document review and verification of a minimum of five percent of all mixed low-level waste disposal. Any waste that does not meet the acceptance criteria after undergoing verification will not be accepted.

How does a generator get approval to dispose waste at the NTS?

Each mixed low-level waste generator must complete a series of steps prior to the first waste shipment. A key element is the development of a waste certification program to comply with waste acceptance criteria. Once the program is approved, waste stream profiles can be submitted for review and approval on a waste stream-specific basis. The approval process includes a comprehensive review of program documents, generator and treatment facility evaluations (i.e., audits, surveillances, and program reviews) and waste verification.

What are the packaging requirements?

Typical U.S. Department of Transportation packaging to be accepted for disposal includes boxes measuring 4' x 4' x 7' or 4' x 2' x 7', 55-gallon drums, and cargo containers. Alternate packaging will be considered, but Nevada Test Site Disposal Operations personnel must be consulted prior to shipment to ensure the appropriate resources are available.

Storage of mixed low-level waste

In addition to disposal capabilities, a mixed low-level waste storage facility (for on-site generated waste only) is operated at the Nevada Test Site. Legacy and newly identified mixed low-level waste is managed at this facility prior to off-site treatment and/or disposal. The waste handled at this facility must be managed in accordance with strict treatment/disposal schedules established by the NDEP.

Summary

Mixed low-level waste is managed at the Nevada Test Site in support of environmental cleanup and other activities. In addition, the Nevada Site office will continue to work diligently towards accelerating closure of the Nevada Test Site Mixed Waste Disposal Unit while meeting its objective to provide a crucial disposal capability for other DOE sites throughout the United States engaged in accelerated cleanup. The priority of the Nevada Site Office is to conduct these and other activities while protecting the public, the workers, and the environment.

It was also suggested that pertinent photos be included in the new fact sheet. Additionally, the black box with reverse type on Page 2 of the *Acceptance Guidelines* fact sheet should be included in the new, combined fact sheet. The information in the box begins with: The Nevada Test Site plans to accept mixed low-level waste with the following EPA Hazardous Waste Numbers, etc.

The Mixed Low-Level Acceptance information from the previous recommendation letter will remain intact, with the new information added to combine both fact sheets, as stated above. All of the above changes were approved by the Committee to include in a recommendation letter to DOE, drafted by Rosemary Rehfeldt, for approval by the Full Board at the January 2008 meeting.

The Committee asked that the fact sheet numbers be added to the spreadsheet, after the title. Fact sheets to be reviewed at the next Committee meeting will be *Soils Project* and *Groundwater at the Nevada Test Site*. Rosemary Rehfeldt will send out copies, via e-mail, to the Committee. The Committee also requested a list of all Public Involvement videos.

The next meeting is scheduled prior to the next Full Board meeting. Because the meeting will potentially take place in a rural community, the time and location will be announced once a location has been determined.

Meeting adjourned at 3:30 p.m.