



Environmental Management Site-Specific Advisory Board - Idaho National
Engineering Laboratory

IDAHO NATIONAL ENGINEERING LABORATORY DRAFT SITE TREATMENT PLAN

INTRODUCTION

The Environmental Management Site Specific Advisory Board -- Idaho National Engineering Laboratory (EM SSAB-INEL) met December 6-7, 1994 in Idaho Falls and developed their recommendation on the INEL Draft Site Treatment Plan (DSTP) after having studied the plan with the assistance of Department of Energy Idaho Operations Office (DOE-ID) and Lockheed Idaho Technologies Company (LITCO) personnel. The meeting was facilitated and the recommendation was obtained via consensus and it was unanimous.

OVERVIEW

With the assistance of DOE-ID and LITCO staff, the board confirmed the following assumptions regarding the DSTP. These assumptions were utilized in the development of the recommendation.

1. That the plan is mandated by FFCA to ensure compliance with RCRA.
2. That all hazardous and mixed wastes are uniformly regulated by RCRA regardless of risk and volume. DSTP addresses only mixed waste (mixed waste is waste that is both hazardous and radioactive).
3. That the DSTP was prepared based upon RCRA compliance and not on cost/benefit or risk analysis. That selection of treatment technologies and implementation time will be dependent upon the DOE's negotiations with the State of Idaho.
4. That the DSTP has identified treatment technologies for each waste stream and additional improved technologies may be developed.
5. That the schedule for mixed waste treatment is driven by the FFCA, negotiations with all parties, and the DOE budget.
6. That this plan requires some integration with other DOE Sites, states and tribal governments, and that such national coordination will be difficult.
7. That the State has the overall lead and will decide how much public involvement it wants during negotiations. (Further clarification will be forthcoming from the State of Idaho via Steve Hill, INEL Oversight ex officio).
8. That waste, treated or otherwise, will require storage for an unknown amount of time and that disposal decisions have not been made.

RECOMMENDATION

COST

In the present national budget climate it is apparent that funding for treatment of mixed waste at the INEL is presently, and will continue to be, limited to some extent. Consequently, it is urged that the DOE prioritize the INEL Site Treatment activities on the following basis:

- Initial expenditures should be applied to treatment of those wastes that pose the highest risk to site workers, off-site citizens, the aquifer, and air quality.
- More of the present and near term expenditures should be applied to actual treatment as opposed to a continuation of waste and waste stream characterization of very low risk and very small volume wastes.
- Waste treatment should be conducted in the most cost effective manner possible to meet regulatory standards; consideration should be given to privatization of as much of the effort as possible; and relatively inconsequential wastes and waste streams should receive attention only after the significant and high risk wastes have been treated.

RISK

The Board is aware that the Site Treatment Plan must meet the legal requirements of RCRA. Within RCRA constraints, the Board believes that the actual site treatment should be risk-driven and closely related to the potential impact of the specific waste. A clear delineation of risk ensures the implementation of necessary treatment.

Therefore, it is recommended that DOE consider the following tenets in regard to the INEL Site Treatment Plan.

- Each waste or waste stream should be evaluated on the basis of its quantity, physical state, hazardous and radiation components, and ultimately, the risk to site workers, the general public, the aquifer, and air quality to determine the schedule for mixed waste treatment requirements. This evaluation should form the basis for DOE's recommendations to the State of Idaho for scheduling expenditures.
- Risk-based evaluations should be continually applied at various steps in the treatment process to assure that limited funds are applied first to the treatment of waste having the highest risk.
- Existing treatment technologies should be utilized wherever reasonable to put the waste into a stable and retrievable form. The form for the waste should not be driven by the anticipated acceptance criteria or timing of a national repository.

PUBLIC INVOLVEMENT

From a broader perspective than the DSTP, but engendered by its review of this document, the INEL SSAB has some comments on the public involvement process utilized by the DOE. It is crucial that the site workers, local residents, tribes, and other stakeholders know what is being done, including the State's involvement. Your attention is therefore directed to the following concerns.

- All practical avenues, including an Executive Summary and the use of public involvement professionals and technical experts, should be used to inform the public of the key aspects of the Site Treatment Plan and other related plans.
- As cleanup and treatment proceed and remediation of waste problems is actually accomplished, advise the public on an ongoing basis.
- Provide a brief but clear road map of document integration to make it clear how various plans are interconnected and how they interrelate with national plans.
- Avenues should be provided to allow the public to be involved in subsequent actions, including the Consent Order negotiations.