



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

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Dec. 9, 2004

Mr. Steve McCracken  
Assistant Manager for Environmental Management  
DOE-Oak Ridge Operations  
P.O. Box 2001, EM-90  
Oak Ridge, TN 37831

Dear Mr. McCracken:

## **Recommendation on the Proposed East Tennessee Technology Park to Environmental Management Waste Management Facility Haul Road**

At our Dec. 8, 2004, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed recommendation.

We appreciate your consideration of this recommendation and look forward to receiving your written response.

Sincerely,

Kerry Trammell, Chair

### Enclosures

cc/enc: Dave Adler, DOE-ORO  
Paul Clay, Bechtel Jacobs Company LLC  
Pat Halsey, DOE-ORO  
Connie Jones, EPA Region 4  
John Owsley, TDEC  
Sandra Waisley, DOE-HQ



## Oak Ridge Site Specific Advisory Board Recommendation on the East Tennessee Technology Park to Environmental Management Waste Management Facility Haul Road

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### BACKGROUND

The *Record of Decision for the Disposal of Oak Ridge Reservation Comprehensive Environmental Response, Compensation, and Liability Act of 1980 Waste* (November 1999, DOE/OR-1791&D3) documents a decision by the U.S. Department of Energy (DOE), the Tennessee Department of Environment and Conservation, and the U.S. Environmental Protection Agency to construct a dedicated disposal facility in the Bear Creek Valley of the Oak Ridge Reservation (ORR) to receive ORR Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) waste. Although “access roads” to the facility were specifically included as part of the remedy selected in the record of decision, it was understood that waste would be transported over existing public and restricted-access roadways running between the disposal facility and the project locations from which the waste would be transported.

DOE’s recent experience in transporting waste shipments from East Tennessee Technology Park (ETTP) to the CERCLA disposal facility has led it to conclude that the original remedy should be modified to provide for construction of a major haul road extension in restricted areas of the ORR, which will eliminate all need to use public roadways for transport of ETTP waste to the facility. This haul road extension will involve construction of 4.8 miles of newly constructed roadway at an estimated cost of \$11 million and is considered a significant change to the original remedy selected in 1999. DOE is issuing an explanation of significant differences (ESD) under CERCLA for this change and making it available to the public in the Administrative Record File as *Explanation of Significant Differences for the Record of Decision for the Disposal of Oak Ridge Reservation Comprehensive Environmental Response, Compensation, and Liability Act of 1980 Waste, Oak Ridge, Tennessee* (October 2004, DOE/OR/01-2194&D1).

According to DOE, several alternative routes were reviewed. The parameters considered included travel distance, route security, effects on sensitive and cultural resources, opportunities to use previously disturbed right-of-ways, most reasonable locations for bridges over existing highways, ease of construction, and cost, among others. DOE’s preferred route consists of a total length of 5.6 miles of 30-foot wide gravel roadway and two bridges. Of the total, 0.8 miles use existing roads and 4.8 miles are newly constructed. To minimize tree cutting, approximately 4 miles of the new roadway construction will be along an existing cleared power line right-of-way. DOE has attempted to identify sensitive resources along the preferred route and to initially assess potential impacts in consultation with affected parties. Detailed plans will be prepared during the remedial design phase to address compliance with construction related Applicable or Relevant and Appropriate Requirements (ARARs) to protect the environment. The Haul Road is expected to be in service by September 2005 and in use through the end of ETTP cleanup in 2008. After use, a decommissioning radiological survey and dismantlement of the bridges is proposed. The 30-foot wide and 18-inch thick gravel roadbed will remain in place.

## **DISCUSSION**

A presentation on the Haul Road was made at the September 8, 2004, monthly meeting of the Oak Ridge Site Specific Advisory Board (ORSSAB). Numerous questions and issues regarding design, route selection, economics, potential environmental and cultural resource impacts, transportation safety, and adequacy of waste characterization were raised by Board members as well as by public attendees and are documented in the meeting minutes. Additional discussion continued at the ORSSAB Environmental Management Committee meetings on September 22, October 20, and November 17. Several ORSSAB members and other stakeholders attended field trips to inspect the areas involved in the proposed route. DOE and Bechtel Jacobs also held a dedicated public meeting on November 15 to rehabilitate earlier attempts to address issues that have been raised.

## **RECOMMENDATION**

The Oak Ridge Site Specific Advisory Board supports prompt and cost-effective disposal of waste from the accelerated cleanup of East Tennessee Technology Park. The transportation of this waste to the CERCLA Waste Facility in Bear Creek Valley should be in a manner consistent with the highest level of public safety. However, we do not agree with the construction of a Haul Road exactly as the Department of Energy has proposed. The following points form the basis of our disagreement:

- The information regarding quantifiable economic justification for the project and proposed monitoring of the shipments changed after the initial presentation. It is now known that U.S. DOT equivalent rules do apply including round-trip radiation monitoring. This significantly reduces the savings that would have helped offset the \$12M cost of the project. The economic justification was originally a major part of the project rationale.
- Potential impacts to sensitive environmental and cultural resources, including air and water, are intuitively sufficient to warrant a more thorough analysis of the route. Mitigation should not be performed during execution of the project. In spite of the fact that numerous parties are listed as contacts for input, it is not apparent that all concerns have been satisfactorily investigated.
- It is not clear that all route options other than the preferred route have been adequately studied. There may be a combination of existing DOE road (Bear Creek) and engineered haul road that would work. Whatever route is used must have a more friendly restoration to the original state than has been proposed.

We recommend that this project be evaluated more thoroughly than has been presented and to a level more consistent with a National Environmental Policy Act assessment.