



# AK RIDGE RESERVATION

Environmental Management

March 4, 1998

Mr. Rod Nelson  
Assistant Manager for Environmental Management  
DOE/ORO  
P.O. Box 2001  
Oak Ridge, TN 37831

Dear Mr. Nelson:

At our March 4, 1998 meeting, the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) reviewed and approved the enclosed "Recommendation to Site a Waste Disposal Facility on the Oak Ridge Reservation."

This recommendation is based upon and consistent with the conclusions reached by the End Use Working Group, an independent group initiated by the ORREMSSAB.

We look forward to receiving your written response to our recommendation. Thank you for your continued support of the ORREMSSAB.

Sincerely,

William M. Pardue, Chair  
ORREMSSAB

WMP/sb

Enclosure

cc: Ms. Margaret Wilson, DOE/ORO  
Mr. John Hankinson, USEPA Region IV  
Mr. Earl Leming, TDEC  
Ms. Susan Gawarecki, LOC  
M. Heiskell, DOE/ORO  
Karol Hazard, DOE/HQ  
ORREMSSAB Members  
EUWG Members

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## Recommendation to Site a Waste Disposal Facility on the Oak Ridge Reservation

Remediation of contaminated areas and buildings on the Oak Ridge Reservation (ORR) will generate large volumes of waste materials (up to 1.5 million cubic yards) with varying levels and kinds of contamination. The Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) believes that the Department of Energy (DOE) must take a balanced approach<sup>1</sup> to the disposal of the contaminated waste materials. A balanced approach requires (1) construction of an onsite waste disposal facility for materials meeting site-specific waste acceptance criteria and (2) disposal offsite for those materials not meeting the waste acceptance criteria.

DOE should consider the following criteria when planning an ORR waste disposal facility:

1. The facility should be located on or adjacent to an area that is contaminated and previously used for long-term waste disposal. After consideration of the Community Guidelines, the End Use Working Group conclusions, and the siting recommendation based on summaries of ecological, hydrogeological, and transportation issues prepared by the ORREMSSAB<sup>2</sup>, the Board believes that the East Bear Creek Valley site is the most appropriate location for a waste disposal facility.
2. Facility design must safely isolate contaminated materials from the environment.
3. For materials with very low levels of contamination, options for safely managing these materials without elaborate disposal requirements should be given meaningful consideration.
4. Waste disposal capacity should accommodate both current and future volumes of ORR remediation waste.

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<sup>1</sup> A balanced approach recognizes that ORR's environmental problems can not be solved by shipping all of its waste elsewhere. DOE must take into account the concerns of stakeholders at potential receiving facilities and along transportation routes. DOE must also take into account the total costs and risks associated with managing wastes on site vs. off site.

<sup>2</sup> Recommendation to eliminate the White Wing Scrap Yard from consideration as a location for an Environmental Management Waste Management Facility. Approved by the ORREMSSAB on February 5, 1997. Subsequently, DOE deferred any disposal options until the End Use Working Group developed Community Guidelines to aid in cleanup decisions (March 3, 1997 letter to Stakeholders from Rodney R. Nelson, Assistant Manager for Environmental Management, DOE/ORO.)

6. Perpetual stewardship of the disposal facility and surrounding property must be assured.
7. Focused stakeholder input should be solicited prior to making decisions regarding facility design, waste acceptance criteria, and acceptance of waste from outside ORR.

Implementation of this recommendation by the DOE must be consistent with the Community Guidelines and needs for long-term stewardship. This recommendation is based upon and consistent with the conclusions reached by the End Use Working Group for Siting a Waste Disposal Facility on the Oak Ridge Reservation (End Use Working Group recommendation dated September 19, 1997). If the DOE cannot meet this recommendation, exceptions must be discussed in a public forum as part of the decision-making process.