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Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

December 24, 1997

Mr. William M. Pardue
222 Connors Circle
Oak Ridge, Tennessee 37830

Dear Mr. Pardue:

RECOMMENDATIONS ON TOXIC SUBSTANCES CONTROL ACT INCINERATOR FROM THE OAK RIDGE RESERVATION ENVIRONMENTAL MANAGEMENT SITE SPECIFIC ADVISORY BOARD

Following are responses to the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) recommendations on the Toxic Substances Control Act (TSCA) Incinerator:

Recommendation 1 - For the Department of Energy (DOE) to review the process used by waste storage personnel to initiate shipment of TSCA Incinerator wastes.

We concur with this recommendation and consider activities associated with this recommendation to be complete. DOE field and program representatives played key roles on the original investigation team which evaluated the disposal of mixed waste at the Y-12 landfill, and participated in the Document Summary Information development of corrective actions associated with the waste code non-compliance at the TSCA Incinerator. Lessons learned sessions were held with the DOE waste management field representatives concerning the deficiencies and corrective actions associated with both events. Corrective action evidence files were developed and are on file for future reference.

Recommendation 2 - Waste storage personnel should never fill out forms to initiate the shipment of TSCA Incinerator waste - only the generator of the waste should complete the forms.

We concur with this recommendation. Policies and procedures have been revised to more clearly delineate the roles and responsibilities of all operations personnel as related to all waste processing activities. Waste Storage personnel cannot initiate shipment or processing of any wastes. Authority for directing any waste processing activities resides with the Waste Coordination Department (WCD). The WCD acts on behalf of DOE as the generator of all wastes at East Tennessee Technology Park (ETTP) processed to any treatment, storage or disposal facility (TSDF). TSCA residuals are managed within the WCD. In this role, the WCD confirms all generator information and completes all legal documentation including, TSDF waste profile records, hazardous waste manifests, land disposal restrictions certifications and radioactive shipment reports. All field personnel have been trained related to these procedure changes.

Recommendation 3 - Clearly differentiate, through documentation, between the management and processing of TSCA Incinerator waste in storage and newly generated waste.

We concur with this recommendation. Procedures have been revised to require formal review and documentation of all original generator waste item description forms prior to legacy waste processing as treatability group batches or as individual waste streams. This review is required prior to shipment to any TSD. In addition, review of all original generator waste item description forms, manifests, existing characterization records, and current data base information is reviewed for discrepancies prior to shipment. Any discrepancies encountered are clarified with the original generator or generating organization. These requirements were implemented in response to the F007 waste code non-compliance at the TSCA Incinerator.

Recommendation 4 - To produce by the end of Fiscal Year (FY) 1997-98, a TSCA Incinerator Fact Sheet.

We concur with this recommendation and will develop the TSCA Incinerator Fact Sheet for future reference.

Recommendation 5 - To develop at Oak Ridge Reservation (ORR) an integrated computer system which can track TSCA Incinerator waste as it moves from site to site on the facility and leaving ORR.

We concur with this recommendation. An integrated ORR waste information tracking system (WITS) has been under development during FY 1997. This system is currently in the testing and certification phase and is planned for implementation in FY 1998. This system will provide cradle to grave tracking of all wastes generated on the Reservation.

Recommendation 6 - To consider such a system DOE Complex nationwide.

The decision to consider implementation of a nationwide tracking system is not within the scope of the Oak Ridge Operations Office and should be addressed to DOE Headquarters. Based on the costs to date for developing and deploying WITS, we believe the costs for deploying a nationwide system would be extremely high and difficult to implement based on the rapidly declining Environmental Management budgets.

Recommendation 7 - DOE continue to support national forums such as the National Dialogue and specifically request Site Specific Advisory Board (SSABs) to work jointly to make coordinated recommendations on state equity issues.

DOE will continue to support national forums on U.S. waste management policy. We also support the continuing efforts of the Oak Ridge Environmental Management SSAB to work with other sites' SSABs on common issues, including state equity.

Mr. William M. Pardue

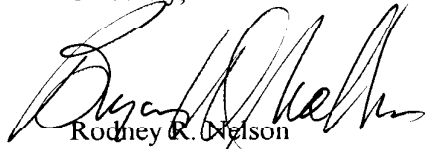
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Recommendation 8 - DOE review operations and procedures at all waste transportation and storage operations at the ORR and consider applying recommendations 1,2,3,5, and 6 to all waste streams that are handled in these facilities.

The operating contractor has issued a "lessons learned" alert related to the TSCA Incinerator waste incident and reviewed programmatic changes implemented at ETTP for potential incorporation into applicable waste management operations on the ORR.

If you have questions or need additional information, please call Joy Sager at 576-0850.

Sincerely,


Rodney R. Nelson
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Environmental Management

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