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SILO 3 INFORMATION NEEDS

10/17/96

**TASK FORCE DOE-FN
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MEMORANDUM**



MEMORANDUM

TO: Jack Craig, DOE

FROM: Gene Willeke, Fernald Citizens Task Force

SUBJECT: Silo 3 Information Needs

DATE: October 17, 1996

Following the September 28 Task Force meeting and October 15 public meeting, the Waste Management Committee of the Fernald Citizens Task Force met to discuss a path forward for Task Force involvement on deciding the treatment for Silo 3 materials. It was determined that no recommendation is likely to be possible before the March 1996 decision timeframe. In addition, it was noted that a decision will only be reached at that time if all relevant information has been assembled. To help facilitate this process, the committee has identified the key information that will be needed by March 1, 1997 to coincide with the reporting of vitrification pilot plant results. The degree to which this information can be developed prior to March 1, will greatly enhance the effectiveness of the Task Force and other stakeholders in providing meaningful input to the decision.

1. Identify the administrative and legal requirements associated with changing the Silo 3 treatment from vitrification to stabilization, and again for Silo's 1 and 2. Will this require an ESD or a ROD Amendment? This information needs to come from EPA, and we would like to see as much clarity of this issue before the March 1 deadline as possible.
2. Provide as much information as possible on the potential effectiveness of cementation on the Silo 3 material. It is our understanding that similar materials on site have been solidified and this information needs to be made available. In addition, we believe there is sufficient time between now and March 1 to conduct testing on actual Silo 3 materials and would like to see such an effort begin as soon as possible. There is an additional concern that we do not have an accurate understanding of the compounds contained in Silo 3 (analysis has been limited to an elemental analysis), and this casts some doubt on the legitimacy of the surrogates currently being used. A compound analysis should be performed to ensure that all future testing results in accurate information.
3. There is significant concern regarding the increased volume of wastes associated with cementation. We would like a detailed analysis on the volume of waste associated with vitrification versus cementation.

4. Cementation does not result in as stable a waste form as vitrification and this has ramifications on both transportation and disposal. We would like a detailed analysis for all constituents and compounds in Silo 3 comparing the effectiveness of vitrification and cementation, the risks of transportation, and compliance with waste acceptance criteria. There is also the possibility that Silo 3 wastes could be treated off site. In order for this to be a viable option, an analysis of transportation of the untreated waste will be needed.
5. There are political and legal as well as technical issues surrounding disposal of a different waste form than originally proposed. Prior to March 1, it is important to have written verification that the receiving facility is permitted to receive this waste, that the waste meets all legal requirements for transportation and disposal, and that local stakeholders at the receiving facility understand the changes being made.
6. The changes being made are significant enough to warrant outside review. We are in agreement with the appointment of an independent panel. It is important that this panel have a complete understanding of the concerns and issues of stakeholders as identified above and in the questions posed in the public comment period. It is also imperative that the independent panel complete its work prior to the March 1 deadline.

The Waste Management Committee will continue to meet regularly as this information becomes available. We look forward to working with DOE on this important issue.