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INTERMODEL TRANSPORT OF FERNALD WASTE

10/31/96

**TASK FORCE DOE-FN
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MEMORANDUM**



MEMORANDUM

TO: Jack Craig
FROM: Tom Wagner
SUBJECT: Intermodal Transport of Fernald Waste
DATE: October 31, 1996

Thank you for the detailed information regarding intermodal transportation of waste to the Nevada Test Site. After reviewing your letter and discussing many issues with DOE and Fluor-Daniel Fernald staff, the Transportation Committee of the Fernald Citizens Task Force has come to a number of conclusions which we would like to share with you.

It appears neither practical nor safe to seek rail transport of Fernald waste on non-dedicated trains. The Task Force shares DOE's concern that rail cars containing Fernald waste in the general railway system would present an unfamiliar risk to rail workers, especially at intermodal transfer stations. In addition, we would not feel comfortable with the lack of control of such cars regarding routes, switching, and stand-by time. As such, we ask that DOE not spend any more resources exploring these options.

On the other hand, we still fully believe in the promise of intermodal transport for waste traveling to NTS to the degree this transport can be coordinated with the unit trains already being planned for the waste pits. Your letter points out three issues with this option: 1) that Envirocare is not permitted to accept 11(e)(2) material for disposal; 2) that the route would require shipment hundreds of miles out of the way, and 3) that this will require shipment and/or transfer in densely populated areas. While intermodal transport through Envirocare may prove to be impractical for other reasons, we find none of the three listed to be persuasive. In fact, we believe this option will greatly decrease total waste miles and thereby exposure to populated areas overall. Even more important, the fewer road miles traveled, the greater overall benefit to public safety. First, we did not mean to suggest that this material be disposed at Envirocare. We recognize that even the transfer facility will likely be constructed off the property. We believe the transfer should occur near Envirocare, not in Salt Lake City, and using a temporary facility to serve DOE only, unless Envirocare had interest in building a facility to provide them

with some economic advantage. With the overall accelerated schedule and the frequency and duration of the planned unit train trips, we feel that much of the material scheduled to be disposed at NTS could be routed through Utah without increasing the number of trains already scheduled to go there. An additional railcar or two per trip will likely keep up with waste generated and prevent the need for any other form of interim on site storage. Though a slightly different route, the total trip length would not be greatly increased and the total waste-haul miles would be cut dramatically. The significant decrease in total truck miles would reduce the number of trucks on local roads and through other population centers. Envirocare is not significantly farther from NTS than other intermodal transfer points, and the route from Envirocare to NTS could be done mostly away from population centers. We believe the idea is promising and the logistics are feasible.

At this time, we are requesting that DOE develop the scenario in sufficient detail so that we might make a recommendation on this matter some time in the first half of 1997. If you have any questions regarding this request, please feel free to contact me at (513) 556-2041 or Doug Sarno at 648-6478.