

DOE F 1325.8
(8-88)
EFO 107-90

United States Government

Department of Energy
Ohio Field Office

memorandum

Fernald Environmental Management Project

DATE: JAN 15 2002/3

REPLY TO
ATTN OF: FEMP:White

DOE-0171-03

SUBJECT: NOTIFICATION OF MIXED LOW-LEVEL WASTE TARGETED FOR DISPOSAL AT A COMMERCIAL FACILITY IN ACCORDANCE WITH THE DOE O 435.1 SMALL QUANTITY EXEMPTION

TO: Ned Hallein, EM-31/CLOV

The attached memoranda provides the exemption from DOE Order 435.1 for the disposal of small quantities of mixed waste from all DOE sites. Small quantities are defined as no more than 1,000 cubic yards of mixed waste per year per site. The exemption requires that Environmental Management be notified of the waste type, total volume, and destination of the waste prior to the beginning of each shipment campaign.

Fernald Environmental Management Project (FEMP) is providing notification for the Mixed Low-Level Waste (MLLW) targeted for disposal at a commercial facility in accordance with the attached information. Although the waste streams may undergo treatment at Materials and Energy Corporation (M&EC) in TN, Waste Control Specialists (WCS) in TX, or Envirocare of Utah (Envirocare), Envirocare is the only available site to receive the treated MLLW for immediate disposal. Disposal of the waste at Envirocare will result in immediate disposition upon treatment, thus avoiding shipment back to FEMP and subsequent storage costs. Immediate disposal at Envirocare also supports the accelerated disposition of low-level waste in accordance with the strategy to achieve 2006 closure at FEMP. A total of 806 cubic yards of waste is currently targeted for disposal at Envirocare.

<u>Waste Type</u>	<u>Pre-Treatment Volume (cubic yards)</u>
Inorganic Soil/Sludge Debris	440
Lead	148
Mercury	10
Organic Soil/Sludge/Debris	109
Fire Training Area Soils	71
U-134 Concrete	13
Barium Carbonate	15

JAN 15 2002

DOE-0171-03

Mr. Ned Hallein, EM-31

-2-

If you have any questions or require additional information, please contact Debbie White at (513) 648-3218.


for **Parsons**
Stephen H. McCracken
Director

Attachments: As Stated

cc w/attachments:

D. Kula, EM-22/CLOV

J. Sattler, OH/FEMP

T. Stapleton, Fluor Fernald, Inc./MS52-3

T. Walsh, Fluor Fernald, Inc./MS52-3

DOE FORM 1125-1
MAY 1987
GPO 87-491

110068

Department of Energy

United States Government

memorandum

*to John Dutton
Dew Post*

DATE: OCT 22 1993

OCT 20 PM 1:44

REPLY TO
ATTN OF:

EH-421 (W. A. Williams, 903-8149)

SUBJECT:

Issuance of Exemptions to Department of Energy Order 5820.2A to Permit Commercial Disposal of Certain Radioactive or Mixed Waste

TO:

W. Adams, OR
L. C. Sjastrom, SR
R. Hansen, FH

An exemption from Department of Energy (DOE) Order 5820.2A has been approved to permit the disposal of small quantities of mixed waste from all DOE sites. A second exemption permits a group of "off-site" remedial action programs to use commercial disposal facilities for the disposal of radioactive waste. A copy of the entire exemption package is attached for your use, including some portions that are applicable to DOE activities at other sites.

There are several clarifications in regard to these actions. First, the "small volumes" of mixed waste should be no more than 1,000 cubic yards of mixed waste per year per site. Second, this initiative will likely promote environmental compliance and reduce the cost of operations; please furnish any success stories to me. Finally, this package is not intended to discourage efforts to obtain additional exemptions for appropriate waste types.

I will be happy to discuss the exemption package with you further. Alexander Williams (301-903-8149) of my staff is the appropriate contact for interactions with your staff.

James J. Fiore
James J. Fiore
Director
Office of Eastern Area Programs
Office of Environmental Restoration

Attachments

cc:
L. Price, OR
R. Sleaman, OR
S. McCracken, WSSRAP
L. Goldell, SR
J. Craig, FH

cc: KOZLOWSKI
REISING
QUAIDER
RILEY

10-14-1993 11:45AM FROM

TO

15137339533 P.02

United States Government

SRIDS

Department of Energy
RAST**memorandum**CONTRACT
ATTACH 3+9

DATE OCT 12 1993
 REPLY TO EM-421 (W. A. Williams, 903-8149)
 WITH OF:

SUBJECT: Exemption from Department of Energy Order 5820.2A for Mixed Waste from Environmental Restoration and Waste Management Activities

TO: Managers, DOE Operations Offices
 Acting Manager, Fernald Field Office
 Acting Manager, Rocky Flats Office

This memorandum authorizes the Department of Energy (DOE) Operations Offices, Field Offices, and Sites, to use commercial facilities for the disposal of small quantities of mixed waste on a case-by-case basis. This memorandum is an approved exemption to the relevant requirements of DOE Order 5820.2A and is based upon my review and consultation with the Office of Environment, Safety and Health (ESH).

The following conditions apply to this exemption:

- The exemption is limited to small volumes of mixed waste as determined to be needed or appropriate on a case-by-case basis.
- Appropriate environmental documentation under the National Environmental Policy Act shall be prepared.
- If applicable, appropriate documentation under the Resource Conservation and Recovery Act, the Toxic Substances Control Act, or the Comprehensive Environmental Response, Compensation, and Liability Act shall also be prepared.
- Appropriate procurement or contracting documents shall be prepared for waste disposal services. The Oak Ridge Operations Office is procuring a large volume contract for land disposal of mixed waste; this contract may be used by other DOE Operations Offices if it meets the waste disposal requirements of other facilities.
- Prior to execution of a contract, the permits, licenses, approvals, and regulatory record of any proposed disposal facility shall be reviewed to establish the types of waste that may be accepted and to assess the operational performance of the facility. Any treatment necessary to meet applicable Land Disposal Restrictions shall be identified. If applicable, this review shall establish that the appropriate low-level waste compact or State has no objection to the acceptance of DOE waste at the disposal facility.
- This blanket exemption is not intended to authorize or encourage the land disposal of untreated hazardous or toxic wastes. All wastes which are Land Disposal Restricted shall meet Best Demonstrated Available Technology (i.e., LDR treatment) standards or concentration standards prior to being land disposed.

1995 11:46AM FROM

TO

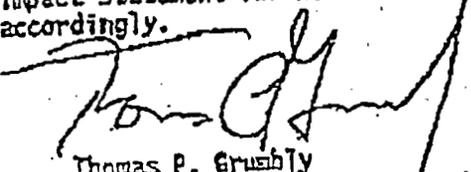
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Prior to the beginning of each shipment campaign, EH-93 shall be notified of the waste type, total volume, and destination of the waste. This information will be factored into equity discussions under the Federal Facility Compliance Act.

Prior to shipment of waste, the regulatory status of the facility shall be confirmed.

Periodic reviews/audits of the commercial facility or facilities will be conducted by your staff. If there is a continuing use of any particular commercial facility, these reviews/audits should be conducted annually. Alternatively, reference to a similar effort by another DOE entity may be provided.

In addition to this authorization, I would also like to advise you of my position in regard to planning and negotiations for the treatment, storage, and disposal of mixed waste from DOE sites. In my view, after consultation with EH-1, planning for the treatment, storage, and disposal of DOE mixed waste should not be constrained by the existing DOE Order 5820.2A restriction limiting disposal at DOE sites. Discussions with the State, the Environmental Protection Agency, and the public should be open and straightforward in this regard. Decisions on the disposal of DOE mixed waste on site, off site at another DOE facility, or at a commercial treatment/disposal facility will be addressed in the programmatic environmental impact statement for DOE wastes now ongoing and DOE policy will be revised accordingly.


Thomas P. Grubbly
Assistant Secretary for Environmental
Restoration and Waste Management

cc:
R. P. Whitfield, EH-40
J. Lytle, EH-30
R. Berube, EH-20