

FEDERAL FACILITIES COMPLIANCE ACT  
DRAFT SITE TREATMENT PLAN  
COMPLIANCE PLAN VOLUME

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## PLAN VOLUME

## 1 Purpose and Scope of the Compliance Plan Volume

For each facility at which the Department of Energy (DOE) generates or stores mixed waste, section 3021(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6721, as amended by section 105(a) of the Federal Facility Compliance Act ((P.L. 102-386) (the Act)), requires DOE to prepare a plan for developing treatment capacities and technologies to treat mixed wastes to the standards promulgated by the U.S. Environmental Protection Agency (EPA) pursuant to section 3004(m) of RCRA. Upon submission of a plan to the appropriate regulatory agency, the Act requires the recipient agency to solicit and consider public comments, and approve, approve with modification, or disapprove the plan within six months. The agency is to consult with EPA and any State in which a facility affected by the plan is located. Upon approval of a plan, the agency shall issue an Order requiring compliance with the approved plan.

DOE has prepared this Draft Site Treatment Plan (Draft Plan) for mixed waste at Ames Laboratory in accordance with the schedule published in the April 6, 1993, Federal Register notice for submitting the site treatment plans for facilities at which the Department generates or stores mixed waste (58 FR 17875). The purpose of this Draft Plan is to identify the currently preferred options for treating the mixed waste at Ames Laboratory or for developing treatment technologies where technologies do not exist or need modification. The Draft Plan reflects the site-specific preferred options, developed with the State's input and based on existing available information. The options reflect the "bottoms-up" approach and have not been completely evaluated for impacts on other DOE sites and impacts to the overall DOE program. Therefore, changes in the preferred option and associated schedules are possible between the Draft Plan, the Final Proposed Plan, and final approval and issuance of the Order as evaluation of DOE-wide impacts and State-to-State discussions progress.

To the extent possible, the Draft Plan identifies specific treatment facilities for treating the mixed waste and proposes schedules as set forth in the FFCAct. When not possible, schedules for alternative activities such as waste characterization and technology assessment are provided as appropriate. All schedule information presented is preliminary and is subject to change. For new facilities, the schedule is heavily dependent upon decisions made during the design phase and is contingent on funding availability. Assumptions and professional judgments related to the type of treatment technology, location of the treatment facility, contracting mechanism, project approval process, cost, etc. were used to develop the estimated schedule. Any variation from these assumptions will impact the estimated schedule. In addition, cost data used in developing options and schedules are planning estimates only and do not reflect a commitment of budgetary resources.

Emerging or new technologies not yet considered may be identified in the future that provide opportunities to manage waste more safely, effectively, and at lower cost than

the current technologies identified in the Draft Plan. Working closely with regulators and other interested parties during the implementation of the Draft Plan, DOE will continue to evaluate and develop technologies that offer potential advantages in the areas of public acceptance, risk abatement, and performance and life cycle cost. Should more promising technologies be identified, DOE may request a modification of its treatment plan in accordance with provisions of the final Site Treatment Plan and/or the Order.

The Draft Site Treatment Plan is comprised of two volumes: this Compliance Plan Volume and the Background Volume. The Compliance Plan Volume proposes overall schedules with target dates for achieving compliance with the land disposal restrictions (LDR) and procedures for converting these target dates into milestones to be enforced under the Order. The more detailed discussion of the options contained in the Background Volume is provided for informational purposes only.

When finalized, the Site Treatment Plan will satisfy DOE's obligation under the Act to develop and submit a treatment plan for Ames Laboratory. In addition, inasmuch as the Plan is intended to provide DOE's plans for achieving compliance with the LDR requirements of 3004(j) of RCRA at Ames Laboratory, it is understood that no further civil enforcement action, administrative or judicial, will be initiated for violations of RCRA section 3004(j) arising from storage of mixed waste covered by the approved Plan for so long as DOE is in compliance with the requirements of the approved Plan and the Order issued which requires compliance with the Plan. This will include all mixed waste in storage at Ames Laboratory and identified in the approved Plan, as well as future mixed waste generated and incorporated into the Plan in accordance with the provisions of the Plan.

## 2 Implementation of the Plan

Section 2 describes certain provisions DOE proposes to include in the Final Site Treatment Plan for Ames Laboratory to facilitate implementation of the Plan. This Draft Plan provides a general description of what these provisions would be intended to achieve and the approach DOE proposes; it is expected that the specific language to be used in the Final Plan and Order, as well as specific milestones, will be developed in conjunction with the State of Iowa. As discussions on the Final Plan and Order progress, the Plan for some sites may eventually be expanded to address other administrative provisions or, alternatively, some or all of these provisions may be incorporated into the Order.

### 2.1 Approach to Setting Milestones

This Section of the Final Plan would establish a process for committing to milestones for specific activities based on the target dates in the schedules provided in Section 3 through 5 of the Compliance Plan Volume. Milestones would be defined as fixed, enforceable near-term dates on which a specified

activity must be completed. Target dates would mark the anticipated completion of longer-term tasks and would not be enforceable until converted to milestones.

Activities to be proposed as milestones and target dates would generally be the activities identified in the Act for wastes with existing technology, for waste for which technology does not exist or needs adaptation, or for providing information when radionuclide separation is involved. However, other closely related activities, such as completion of design or characterization activities, may be proposed as milestones and target dates as well.

Target dates would be converted into milestones as the Plan is implemented according to procedures established in Section 2. DOE proposes establishing milestones for long-term projects such as those that will be covered by the Plan on a gradual basis because such projects are subject to significant uncertainties. This would allow DOE and the EPA to establish commitments as technical and funding information becomes known and would provide the EPA, with input from the public as appropriate, to play a significant role in establishing work priorities at the site. Possible approaches to establishing milestones include:

- Establishing milestones on an annual basis for near-term activities. Milestones would be proposed for approval for activities that will take place in the ensuing one year period, with target dates covering longer-term activities.
- Establishing milestones in a phased approach that correspond to the activities identified in the Act. A milestone would be established for the current phase of each project (e.g., initiating construction of a treatment facility), and the target date for the next phase (e.g., commencing facility testing) would be converted to a milestone when the previous phase was achieved and when there is a good technical understanding of the work involved in carrying out the next phase.

For mixed waste to be shipped off-site, the final milestone and target date associated with the wastes would be the date of shipment. Other milestones and target dates for on-site activities related to preparing wastes for shipment could be proposed. When the intended treatment site is a DOE site, the Section would recognize that the development and availability of such off-site capacity is pursuant to the Site Treatment Plan and Order or other enforceable agreement at that site.

The Section would reference procedures for setting new milestones and for modifying milestones and target dates when necessary. Generally, where practical new milestones and changes to target dates would be achieved through Section 2.2, "Annual Site Treatment Plan Update." Modifications to current milestones would be governed by procedures in Section 2.5 "Modifications/Extensions or Revisions to the Plan."

## 2.2 Annual Site Treatment Plan Update

This Section of the Final Plan would provide for submission of an Annual Site Treatment Plan Update intended to communicate information on progress in implementing the Plan and to provide a mechanism for establishing new milestones, amending wastes covered by the Plan, and updating the Plan, as well as proposing revisions to the Plan when necessary. These latter actions may be accomplished through other mechanisms as described in other Sections of this Plan, but the Annual Update provides a coordinated mechanism to effect such changes on a routine basis. DOE proposes that all sites with a Site Treatment Plans provide Annual Updates in the same timeframe to facilitate necessary site and State interactions and to facilitate tracking progress across the DOE complex in developing treatment capacity and treating mixed waste.

The Annual Update would amend the Background Volume as necessary, identifying changes to mixed wastes covered by the Plan, including volumes; new waste streams and waste streams no longer covered by the Plan; and progress on activities undertaken to carry out the Plan.

The Annual Update would also update the Compliance Plan Volume. It would contain proposals for new milestones, identify any changes to target dates, and propose revisions to the Plan in accordance with Section 2.5, "Modifications/Extensions or Revisions to the Plan."

The Annual Update would be submitted to the EPA for review and comment or approval, as appropriate, and made publicly available as defined in this Section and in accordance with the procedures in 2.8, "Submittal, Review and Approval of Deliverables." After the appropriate procedures are followed, the Compliance Plan Volume would be considered amended.

It is intended that the Annual Update be done in a way that minimizes unnecessary paperwork to the extent practical through page changes, etc. If there are no changes that require updates to the Compliance Plan and Background Volumes in a given year, a letter notifying the EPA to that effect could be provided as an Annual Update.

## 2.3 Inclusion of New Waste Streams

This Section of the Final Plan would establish procedures for incorporating newly identified and newly generated or stored waste streams into the Site Treatment Plan and for developing a plan and schedules for providing treatment capacity.

It would establish procedures for notifying the EPA of a new waste stream as soon as possible. The notification would describe the waste code, volume, current and expected generation rate, and technology needs to the extent possible and would include the waste as a covered waste.

The next Annual Update would incorporate the new waste streams and propose a plan for treatment and associated schedules where possible, or schedules for developing a treatment plan as required by the Act if necessary.

#### 2.4 Duration of the Plan and Deletion of Wastes

This Section of the Final Plan would establish that the approved Plan will terminate when the site's mixed waste, regardless of the time it was generated, is in compliance with the storage prohibition in RCRA 3004(j). This will occur: 1) when there is no longer any mixed waste stored or generated at the site that does not meet land disposal restriction requirements, or 2) when the mixed waste currently being stored or generated at the site, or that will be stored or generated, is being stored solely for the purposes of accumulating sufficient quantities as are necessary to facilitate proper treatment, recovery, or disposal.

Similarly, it would also establish that a specific waste would be deleted from the Plan when the waste is no longer being stored or generated at the site, or when the waste meets land disposal restriction standards or is being accumulated solely for the purposes of facilitating proper treatment, recovery, or disposal. This could occur, for example, when the last scheduled milestone under the Site Treatment Plan for treating the waste is completed; when the waste is shipped off-site, or when the characterization of the waste demonstrates it meets RCRA land disposal standards.

The Section would allow DOE and the EPA to agree to terminate the Plan or to keep the Plan in effect, e.g., in anticipation of waste to be generated in the future, for reasons other than those provided above.

The Section would provide for notification of the EPA and other procedures as appropriate for terminating the Plan and for deleting waste streams.

#### 2.5 Modifications/Extensions or Revisions to the Plan

This Section of the Final Plan would establish procedures to enable DOE to seek adjustments to milestones when events cause or may cause delays, and would define the circumstances which justify a delay. It would require DOE to notify the EPA, provide an explanation for the delay, and set procedures for reviewing and approving/disapproving alternative milestones.

It would also define and establish procedures for those revisions to the Plan that would require the EPA to follow procedures in Section 3021(b)(2) and (3) of RCRA, as amended by the Act, including providing the proposed revision to the public and consulting with other affected States and EPA. The Annual Update described in Section 2.2 would generally be used to propose and approve a revision, unless the revision would become effective before it could be addressed in the regularly scheduled Annual Update.



DOE proposes that all Site Treatment Plans consistently define what constitutes a "revision" to the Plan that is subject to Sections 3021(b)(2) and (3) of the Act, since such a revision may often require the involvement of other affected States. Revisions would include addition of treatment capacity, technology development or use of radionuclide separation not previously included in the Compliance Plan Volume of the Site Treatment Plan or extensions to milestones for a period greater than one year. Inclusion of new waste streams would not constitute a revision but may result in a revision if inclusion of the new waste results in a change to the Site Treatment Plan that meets one of the above criteria. Other types of modifications to the Site Treatment Plan such as milestone changes of less than one year, although not a "revision," would require approval as described in Section 2.8.

## 2.6 Funding Considerations

This Section would describe DOE's obligations to seek the funding necessary to accomplish the activities in the Final Site Treatment Plan. It would also confirm DOE's authority over its budget and funding level submissions and its responsibilities under the Anti-Deficiency Act, 31 U.S.C. Section 1341, as amended.

## 2.7 Disputes

This Section would provide procedures to address disputes concerning scheduling under Section 2.1, Modifications/Extensions or Revisions to the Plan under Section 2.5, Review and Submittal of Deliverables in Section 2.8, and other circumstances agreed to by [DOE and the EPA. The Section would establish timeframes to resolve a dispute and a process that would elevate the dispute when agreement cannot be reached.

## 2.8 Submittal, Review and Approval of Deliverables

This Section would establish a process and timeframes for review, comment, response to comments, and approval as appropriate by the DOE and the EPA of such deliverables as the Annual Update, notices signifying completion of milestones and identification of new wastes, and other deliverables.

# 3 Low Level Mixed Waste Treatment Plan and Schedules

## 3.1 Mixed Waste Streams for which Technology Exists

### 3.1.1 Analytical Reference Standards

Waste Matrix: MLLW, CH Lab Packs with Metals  
MWIR Number: AL-W001

**Off-site Option:** Hanford Site Mixed Waste Treatment Facility

Schedule for Activities to Ship Waste Off-site:

<u>Identify Activities:</u>	<u>Schedule Dates:</u>
Complete waste profile	6/95
Complete SDAR approval process	9/95
Complete shipment of AL-W001 to Hanford	To be determined

Basis for schedule: Based on time required for waste characterization and approval process.

3.1.2 Waste Matrix: MLLW CH, Non-activated lead  
MWIR Number: AL-W002

**Commercial Facility Option:**

Facility Name: Scientific Ecology Group  
Location: Oak Ridge, TN  
Technology: Decontamination

Schedule for Activities to Ship Waste Off-site:

<u>Identify Activities:</u>	<u>Schedule Dates:</u>
Complete treatment by decontamination	9/30/94

Basis for schedule: Decontamination is nearly complete.

Sludge/slag from decontamination will require further treatment to stabilize mixed waste for disposal.

3.1.3 Uranium Sulfate

Waste Matrix: MLLW CH, Aqueous Slurries  
Mixed Waste Inventory Report Number: AL-W003

**Off-site Option:** Oak Ridge Central Neutralization Facility

Schedule for Activities to Ship Waste Off-site:

<u>Identify Activities:</u>	<u>Schedule Dates:</u>
Complete waste profile	6/95
Complete waste approval process	9/95
Complete shipment of AL-W003 to ORNL	To be determined

Basis for schedule: Based on time required for waste characterization and approval process.

3.1.4 Acidic Aqueous Liquids

Waste Matrix: MLLW, CH Acidic Aqueous Liquids  
Mixed Waste Inventory Report Number: AL-W007

**Off-site Option:** Oak Ridge Central Neutralization Facility

Schedule for Activities to Ship Waste Off-site:

<u>Identify Activities:</u>	<u>Schedule Dates:</u>
Complete waste profile	6/95
Complete waste approval process	9/95
Complete shipment of AL-W007 to ORNL	To be determined

Basis for schedule: Based on time required for waste characterization and approval process.

3.2 Mixed Waste Streams for which Technology Exists but needs Adaptation or for which no technology exists

Ames Laboratory does not have any waste streams requiring adapted or new treatment technology.

3.3 Mixed waste streams requiring further characterization or for which Technology Assessment has not been done

Ames Laboratory does not have any waste streams requiring further characterization or for which technology assessment has not been done.

4 TRU Mixed Waste Streams

4.1 TRU Wastes Expected to go to WIPP

4.1.1 MTRU Transuranics/Uranium in Glove Box

MWIR Number: AL-W005

Estimated Schedule for Shipping Waste to WIPP

Compare waste to WIPP-WAC: To be determined  
(WIPP-WAC not finalized)

Prepare Waste for Shipment: To be determined

#### 4.2 TRU Wastes not destined for WIPP

Ames Laboratory TRU waste is generated in association with defense related programs. All Ames Laboratory TRU and MTRU waste is destined for WIPP.

#### 5 High Level Mixed Waste Streams

Ames Laboratory does not foresee any production of High-Level Waste.

**U.S. DEPARTMENT OF ENERGY  
CHICAGO OPERATIONS OFFICE**

**PUBLIC PARTICIPATION PLAN  
FOR  
IMPLEMENTATION  
OF THE  
FEDERAL FACILITY COMPLIANCE ACT**

**Section 1.0 Introduction**

The Federal Facility Compliance Act of 1992 (FFCA) contains specific provisions directing the U.S. Department of Energy (DOE) to address the treatment of mixed (radioactive and hazardous) waste currently being stored or generated at DOE sites. FFCA amends the Resource Conservation and Recovery Act (RCRA), the law that defines requirements for the management of hazardous waste. RCRA contains specific restrictions on land disposal of hazardous waste, including treatment standards that must be met prior to storage and disposal. In general, the DOE Chicago Operations Office (CH) sites, like all DOE sites that are storing mixed waste, are not in compliance with these land disposal restrictions because they lack the capacity to treat mixed waste.

DOE-CH has seven sites that are impacted by FFCA issues. Instead of preparing a public participation plan for each site, this plan describes activities that will be performed at all the CH sites.

*These seven sites are:*

- 1) RMI Titanium Company Extrusion Plant (RMI) in Ashtabula, Ohio;*
- 2) Argonne National Laboratory in Argonne, Illinois;*
- 3) Site A in Palos Hills, Illinois;*
- 4) Brookhaven National Laboratory on Long Island, New York;*
- 5) Princeton Plasma Physics Laboratory in Princeton, New Jersey*
- 6) Ames Laboratory in Ames, Iowa;*
- 7) Battelle Columbus Decommissioning Project in Columbus, Ohio.*

Currently, DOE-CH is preparing an EM Public Participation Program Plan along with site specific implementation plans for public participation. FFCA is one of several public involvement opportunities included in the Program Plan for CH stakeholders. This FFCA Public Participation Plan outlines DOE-CH roles and responsibilities, stakeholder issues associated with FFCA, and planned activities for supporting major milestones.

## Section 2.0 Roles and Responsibilities

Four major DOE-CH Points-of-Contact are involved in communicating with stakeholders on FFCA issues. These include the EM Public Participation Coordinator, the Technical Project Manager, Site Points-of-Contact, and the Office of Communications (OCM). While each of these Points-of-Contact have a lead in a particular area, the EM Public Participation Coordinator is responsible for integrating with all of these Points for implementation of stakeholder participation activities. Appendix A lists the DOE-CH Points-of-Contact based on areas of responsibility. Appendix B lists the Sites' Points-of-Contact.

### *2.1 DOE-CH EM Public Participation Coordinator*

The EM Public Participation Coordinator is the lead Point-of-Contact for CH on FFCA public involvement issues. FFCA program integration and coordination of information going to stakeholders, regulators, media, elected officials and other audiences is the responsibility of the EM Public Participation Coordinator, in consultation with the Office of Communications. This means that the Public Participation Coordinator is responsible for keeping the EM Technical Program Manager and EM Management informed of all public involvement activities pertaining to FFCA. The EM Coordinator will keep Headquarters and the other site contacts informed about requirements and opportunities for public involvement. OCM has the lead for

Congressional, Intergovernmental activities, and Media activities. OCM will keep the EM Public Participation Coordinator informed of all related activities prior to implementation.

## *2.2 EM Technical Project Manager*

The EM Technical Project Manager has the lead responsibility for the FFCA program at DOE-CH. The EM Public Participation Coordinator supports the Technical Project Manager by assisting with collection and incorporation of public feedback into the FFCA decisions.

## *2.3 Office of Communications (OCM)*

In support of the EM FFCA Project, OCM will have the lead on all media relations such as press releases, media interviews, editorial boards, advertisements, and other activities dealing with media communications. OPCD will also have the lead in Congressional and Intergovernmental Relations such as making telephone contact, briefings, and correspondence to elected officials, and other related activities. OPCD will ensure their activities are closely coordinated with the EM Public Participation Coordinator and EM Technical Project Manager to ensure integration of issues and activities.

## *2.4 Site Points of Contact*

Site Points-of-Contact will implement mailings to the FFCA stakeholders and conduct other public involvement activities developed in coordination with the EM Public Participation Coordinator. Site Points-of-Contact are also responsible for soliciting, collecting, and responding to public input regarding the Site Treatment Plans. Reports of these activities will be communicated to the EM Public Participation Coordinator.

## Section 3.0 Issue Identification

Overall, most of the controversy surrounding FFCA at DOE-CH sites has focussed on the disposal issue. Treatment has been a minor concern of the regulators and stakeholders at the sites. This section briefly describes the issues identified from public participation activities performed in the past on FFCA issues.

### *3.1 Argonne National Laboratory (ANL) Stakeholder Issues*

DOE-CH/EM and ANL had FFCA meetings with Illinois regulators on July 13, 1993, and May 27, 1994. DOE plans for public participation activities were discussed with these regulators; all DOE public participation activities will be coordinated with the regulators. Major concerns by regulators, elected officials and media coverage have focussed on the potential for a disposal facility on site.

### *3.2 Site A Stakeholder Issues*

Site A officials participated in a roundtable discussion sponsored by a local environmental group after Site A was announced as "a potential dumpsite" for mixed waste. In this meeting, DOE-CH/EM officials spoke with State and local officials, business and community group leaders, and media representatives. The Site A Technical Review Committee was given a copy of the Conceptual Site Treatment Plan (CSTP) to review. Discussions were held relative to this document.

It is expected that stakeholders' concerns about Site A as a "potential dumpsite" will cease since Site A has been removed from the disposal site candidate list.

### *3.3 Ames Laboratory Stakeholder Issues*

Ames Laboratory has provided the public with a copy of the CSTP in the information repository located at the Ames Public Library. In addition, a representative of the Laboratory was present at the first public information session to address questions or concerns about the FFCA. The meeting was held on April 5, 1994.



At the present time, EPA Region VII has had no comment on the CSTP. The stakeholders are focussed on the Chemical Disposal Site removal action which will begin in early August. FFCA is not predicted to be a significant issue at the site since most of the mixed waste will be removed as a result of the removal action.

To date there has been little interest in FFCA activities at Ames Laboratory by EPA regulators. It is the intent of the Laboratory and DOE-CH to meet with regulators approximately 30 days after the release of the Draft Site Treatment Plan (DSTP).

### *3.4 Battelle Columbus Laboratories (BCLDP) Stakeholder Issues*

BCLDP prepared a site-specific factsheet describing the FFCA requirements, the BCLDP CSTP, quantities and types of mixed waste, and proposed disposal (off-site). An Activity Plan for Stakeholder Involvement in Mixed Waste Site Treatment Plans was prepared and implemented. Copies of the factsheet and Conceptual Plan were mailed to the area libraries. BCLDP participated with other Ohio sites in meetings with the Ohio EPA to develop public involvement plans. Those meetings occurred between April 1993 and September 1993. During site tours of Battelle's facilities, information about the STP process was given to area residents. The BCLDP/STP factsheet has been revised to reflect the distribution of the DSTP. This will be included with the DSTP and mailed to area libraries, local and state regulators and contacts at other Ohio sites. The Activity Plan for Stakeholder Involvement in Mixed Waste Site Treatment Plans is being updated to be completed by August 30, 1994, as agreed among the public affairs staff at the Ohio sites meetings. The BCLDP anticipates continuing monthly meetings with representatives of other Ohio sites to maintain a common approach regarding the FFCA. BCLDP will also offer support to the other Ohio sites at their public meetings to explain BCLDP activities and plans.

### *3.5 Brookhaven National Laboratory (BNL) Issues*

With the release of the April/May selection of sites, there was media coverage on concerns about BNL being required to have a new

disposal site for mixed wastes. The BNL site, a superfund site, is the subject of an Interagency Agreement between the U.S. Environmental Protection Agency, DOE and the New York Department of Environmental Conservation. During a civic association meeting in the local community, the BNL Director answered questions from concerned citizens. In addition, briefings were conducted for local officials. The primary focus of the regulators, both EPA and the State, has been the disputes resolution actions and cleanup of the site.

### *3.6 Princeton Plasma Physics Laboratory (PPPL) Stakeholder Issues*

To date, PPPL has had little interaction with their stakeholders on EM issues. A new information repository is being established for FFCA and other EM activities. Thus far, there has been little concern about FFCA in the media, with local regulators, local officials or the public.

### *3.7 RMI Stakeholder Issues*

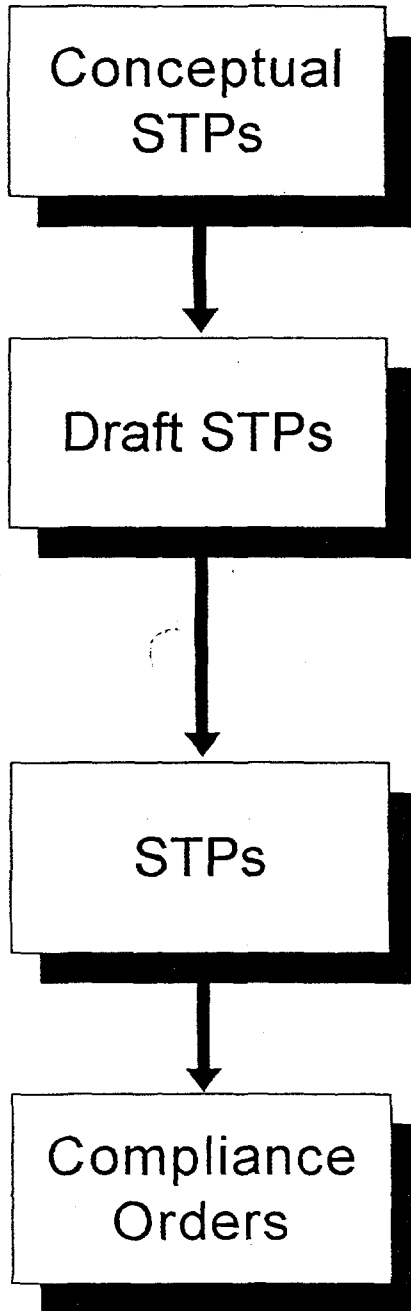
RMI has developed a one-page information summary on the FFCA to introduce the Site Treatment Plan development process at the RMI. This information summary has been placed in their information repository at the Kent State University Ashtabula Campus Library. The CSTP of October 1993 has also been placed in the information repository. Representatives from RMI are working with the Ohio EPA to develop a fact sheet for inclusion in a brochure on the Ohio Sites. There has been little concern over FFCA with the stakeholders. The major concern in the local community has been focussed on economic development and employment.

## Section 4.0 Public Participation Planned Activities

This section describes the milestones and decision points in the FFCA process and the associated public participation opportunities.

Chart1

## *Site Treatment Plans (STPs)*



#### *4.1 Planned Decision Points or Milestones*

In order to move DOE towards compliance with the land disposal restrictions, the FFCA requires DOE to develop Site Treatment Plans (STPs), which must be prepared for each site managing mixed waste. These plans will identify how DOE-CH will provide the necessary mixed waste treatment capacity. DOE has defined a three-phase approach for developing STPs for each of the DOE sites that handle mixed waste. The first phase, developing CSTPs, provides a preliminary set of candidate treatment options for treating each mixed waste stream. A description of currently available treatment facilities and their capacities is also included. In October 1993, DOE-CH delivered these documents to state regulators or regional Environmental Protection Agencies and State Governor's offices for review.

In the second phase, DOE will work with states, EPA and others in evaluating the candidate treatment options and will prepare DSTPs by August 1994. The DSTPs will identify the preferred treatment option(s). In the third phase, DOE will prepare a Final Site Treatment Plan (FSTP) by February 1995. DOE-CH will submit these plans to the appropriate State (or to the EPA, as appropriate) for approval and as a basis for Compliance Order. These decision points are listed in Chart 1. Major milestones with a schedule are listed in Chart 2. Chart 3 summarizes important information about the Site Treatment Plans.

#### *4.2 Identification of Stakeholders*

Stakeholders which include members of the public, regulators, elected officials, organizations and groups are available in the site specific mailing lists or the DOE-CH mailing list. These stakeholders have been identified for all EM activities and are communicated with on a regular basis. Feedback will be provided to stakeholders as described under the public participation opportunities section.

## Chart 2

### Key Dates in the Development of Site Treatment Plans

- 10/93      Conceptual Site Treatment Plan  
Identifies preliminary options for treating each site's wastes.  
Discussions occur among states, EPA, DOE, and other stakeholders.
- 8/94      Draft Site Treatment Plan  
Identifies, based on regulator/stakeholder discussions, preferred option for treating each site's mixed wastes. Identifies specific mixed waste treatment facilities and locations and proposed treatment schedules.  
Discussions occur among states, EPA, DOE, and other stakeholders.
- 2/95      Final Site Treatment Plan  
Identifies final DOE options for treatment technologies, facilities, locations and schedules for each site's wastes. Goes to regulators for review and approval.
- 10/95      Compliance Date  
Date by which all sites must be in compliance with an approved Site Treatment Plan.

CHART 3

*The Federal Facility Compliance Act (FFCA) Site Treatment Plans at a Glance*

ISSUE	Site Treatment Plans
Applicable Statute	RCRA/FFCA Act
Focus	To develop site-specific plans for providing mixed waste treatment capacity and achieve compliance with land disposal restrictions
Wastes addressed	Focus solely on mixed wastes (radioactive waste mixed with hazardous components)
Scope of activities	Treatment of mixed waste (primarily focused on developing sufficient treatment capacity)
Timeframe	Conceptual - 10/93 Draft - 8/94 Final - 2/95 Consent Orders (State approval)
Responsible office	Office of Environmental Management
Outcome	Compliance Orders issued by State or EPA, as appropriate. Noncompliance with Orders could potentially result in fines for DOE.
Public involvement	National - National Governors' Association facilitating discussions with States and EPA; public review and comment on plans; inclusion in PEIS interactions. Site-specific - interaction with local communities at involved sites through established forums; varies according to local interest.

### 4.3 Public Participation Opportunities

Opportunities for public involvement have been identified for FFCA activities. Each opportunity described below includes an objective and time frame for implementation. The objectives of each of the public participation activities is to provide timely, accurate information and public involvement opportunities for the FFCA decisionmaking process.

#### - AVAILABILITY OF DRAFT SITE TREATMENT PLANS (DSTPs)

DSTPs will be made available for public review and comment on August 31, 1994. DSTPs will be available in the information repositories listed in Appendix C. OCM, in cooperation with the EM Public Participation Coordinator will issue a press release, announcing the availability of the document for public review and comment. Copies will be mailed to affected elected officials and regulators. Copies of the DSTPs, or a summary, will be provided upon request to the public. The objective of this activity is to announce the availability of the document and ensure that all affected parties have access to FFCA information.

#### - FFCA INFORMATION PACKET

An information packet will be mailed to stakeholders the first week in September, describing: FFCA and the decisionmaking process; site specific information; and how the public can become involved. This packet will include national factsheets from Headquarters, local site specific factsheets, a mailback card and an evaluation feedback form. Also, briefings will be offered to the public and conducted upon request from the stakeholders. The information packet and briefings will allow DOE-CH to meet the objective of being responsive to the information and communication needs of their seven local communities.

#### **- ACKNOWLEDGEMENT CARDS**

All comments received will be sent to the EM Public Participation Coordinator along with site responses from the site Points-of-Contact. The EM Public Participation Coordinator will transmit the responses and comments to EM-331. Where possible, comments will be factored into the draft plans. All commentors will receive an acknowledgement card stating that their comment was received and is being considered. The objective of sending the card is to provide a timely acknowledgement of the comment.

#### **- RESPONSES TO COMMENTS**

All commentors will be sent an individualized response letter explaining how their comment has been addressed. A matrix of comments and responses will be developed and placed in the information repository.

#### **- AVAILABILITY OF FINAL SITE TREATMENT PLANS**

When final plans are made available in February 1995, a mailing will be conducted announcing their availability along with a press release. Copies of the plans will be placed in the information repositories and made available upon request.

## **Section 5.0 Evaluation**

As part of the factsheets mailed to the public, a feedback form will be included to evaluate whether public participation is effectively contributing to the development of the Site Treatment Plans. This feedback form will be used to review this public participation plan in response to building an interactive and responsive relationship with the CH FFCA stakeholders. Based on the feedback, adjustments will be made to the public participation effort supporting FFCA activities.



**APPENDIX A**  
**DOE-CH POINTS OF CONTACT BASED ON AREAS OF RESPONSIBILITY**

EM Public Participation Coordinator  
Office of Public Accountability  
Ms. Mary Jo Acke  
708-252-8796

Mr. Mike Klimas  
EM Technical Project Manager  
Support, Technology Development, and Waste Operations  
708-252-2134

Congressional and Intergovernmental Relations  
Office of Communications  
Ms. Carol Morrison  
708-252-2014

Media Relations  
Office of Communications  
Mr. Brian Quirke

**APPENDIX B**  
**SITE POINTS OF CONTACT**

1. Ms. Donna Green  
U.S. DOE  
Argonne Area Office  
9800 South Cass Avenue  
Argonne, IL 60439

PH: (708) 252-2264  
Fax: (708) 252-2361

2. Ms. Caroline Polanish  
U.S. DOE  
Brookhaven Area Office  
PO Box 5000 Building 464  
Upton, NY 11973

PH: (516) 282-5224  
Fax: (516) 282-3444

3. Mr. Ward Best  
RMI DOE Project Office  
PO Box 579  
1800 East 21st Street  
Ashtabula, OH 44044

PH: (216) 993-2020  
Fax: (216) 993-1961

4. Mr. Tom Baillieul  
U.S. DOE  
Battelle Columbus Decommissioning Project (BCLDP)  
505 King Ave. Room #A-04-095  
Columbus, Ohio 43201

PH: (614) 424-7226  
Fax: (614) 424-3951

5. Mr. Allen Wrigley  
U.S. DOE  
Princeton Area Office  
P.O. Box 102  
Princeton, N.J. 08542  
  
PH: (609) 243-3710  
Fax: (609) 243-2032
  
6. Mr. Jim Fletcher  
U.S. DOE  
Ames Laboratory Management Office  
9800 South Cass Avenue  
Argonne, IL 60439  
  
PH: (708) 252-2424  
Fax: (708) 252-7947
  
7. Mr. Jay Hunze  
U.S. DOE  
Site A Project Office  
9800 South Cass Avenue  
Argonne, IL 60439  
  
PH: (708) 252-2428  
Fax: (708) 252-2654



# *Chicago Operations Office*

## Information Repositories

### **AMES**

Reference Section  
Ames Public Library  
515 Douglas Ave.  
Ames, IA 50011  
(515) 233-2229

### **Site A/Plot M & Argonne**

Lemont Public Library  
New Books Section  
810 Porter Street  
Lemont, IL 60439  
(708) 257-6541

Documents Department  
University Library  
3rd Floor Center  
The University of Illinois  
801 S. Morgan Street  
Chicago, IL 60680  
(312) 413-2594

### **RMI**

Kent State University  
Ashtabula Campus Library  
3431 W. 13th Street  
Ashtabula, OH 44004  
(216) 964-4239

### **Princeton Plasma Physics Laboratory**

Middlesex County Library  
Plainsboro Branch  
PO Box 278  
Plainsboro, NJ 08536  
(609) 275-2897

### **Brookhaven National Laboratories**

Longwood Public Library  
Reference Department  
800 Middle County Rd.  
Middle Island, NY 11953  
(516) 924-6400

Records Center  
26 Federal Plaza  
29th Floor, Rm. 2900  
New York, NY 10278  
(212) 264-8770

Mastics-Moriches-Shirley  
Community Library  
425 William Floyd Parkway  
Shirley, NY 11967  
(516) 399-1511

Brookhaven National Laboratory  
Research Library  
Building 477A  
Upton, NY 11973  
(516) 282-3489

Brookhaven Town Library  
Public Information Office  
3333 Route 112  
Medford, NY 11763  
(516) 451-6260



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## Information Repositories

### ***Battelle Columbus Laboratories***

Main Branch  
Columbus Metropolitan Library  
96 S. Grant Ave.  
Columbus, OH 43215  
(614) 645-2000

Northside Branch  
1423 N. High St.,  
Columbus, OH  
(614) 645-2110

State Library of Ohio  
65 S. Front St.,  
Columbus, OH  
(614) 644-7061

West Jefferson Public Library  
301 Main St.,  
West Jefferson, OH  
(614) 879-8448