

# Commercial Low-level Radioactive Disposal Facility

## Interim Remedial Action

Washington State Department of Ecology

Larry Goldstein

April 28, 2010

# US Ecology - Interim Remedial Action

## Summary

- Construct an interim cover on trenches
- Reduce threat to human health and environment
  - Prevent further infiltration that could mobilize hazardous substances
- Preferred alternative in March 2004 EIS

# US Ecology - Interim Remedial Action

## Site History

- Accepted LLRW in 1965
- LLRW Policy Act 1980
- LLRW Policy Amendments Act 1985
- First facility investigation 1998
- Second investigation 2008 – Agreed Order

# US Ecology - Interim Remedial Action

## Regulatory Authority

- Ecology
  - “Interim Action” WAC 173-340-430(1)
  - Technically necessary and consistent
- Health
  - Licensing and closure WAC 246-250
  - On and Off-site human exposure standard

# US Ecology - Interim Remedial Action

## Alternatives Considered

- Delay construction – not selected
  - ❑ 25 mrem/year standard exceeded
  - ❑ Inconsistent with EIS
  - ❑ Potential loss of soils and increased costs
- Construct entire cover now – not selected
  - ❑ Cleanup Action Plan may require additional work

# US Ecology - Interim Remedial Action

## Alternatives Considered

- Construct interim/lower layer – selected
  - Future human health via groundwater protected
  - Consistent with FEIS
  - Take advantage of available soils
  - Reduced construction costs
  
- Other possible actions, e.g., waste retrieval still viable

# US Ecology - Interim Remedial Action

## Cover Design

- Meet regulatory requirements of agencies
- Interim layer
  - Soils from the Environmental Restoration Disposal Facility (ERDF) and geosynthetic membrane
  - Vapor Extraction System
- Upper layer fine-tuned after the investigation

# US Ecology - Interim Remedial Action

## Interim Action Plan

- ✓ 30-day public comment ends May 12
- ✓ <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>
  
- ✓ Questions?
  - ☐ Larry Goldstein - [larry.goldstein@ecy.wa.gov](mailto:larry.goldstein@ecy.wa.gov)  
360.407.6573