

APPENDIX A

RCRA REQUIREMENTS FOR IMPACTS ON SRP TRU WASTE MANAGEMENT

Introduction

This appendix describes the requirements of the Resource Conservation and Recovery Act (RCRA) for transuranic (TRU) waste management at SRP. Hazardous waste management facilities within South Carolina are subject to regulation by the U. S. Environmental Protection Agency (EPA) and the state regulatory agency, the South Carolina Department of Health, and Environmental Control (SCDHEC).

Current SRP Regulatory Compliance Status

RCRA directs federally owned facilities to comply with Federal, state, and local waste management requirements. DOE has issued an interpretive ruling clarifying that DOE radioactive hazardous wastes (mixed wastes) are subject to RCRA requirements for the hazardous waste components and to DOE Atomic Energy Act requirements for radioactive components.

Between 1965 and 1974, SRP placed TRU wastes in concrete containers (culverts) and buried the waste retrievably. Since 1974, SRP has stored TRU waste on concrete pads. These wastes can include hazardous waste components, most frequently lead and used oil (SCDHEC only). TRU mixed waste buried in units constructed prior to 1970 will not be transported to WIPP. Waste in these units will be addressed under the provision of RCRA 3004(u) or CERCLA/SARA. DOE-SR has revised its RCRA Part A application to include the TRU waste burial area (mixed Waste Management Facility, or "MWMF") and storage area (TRU waste pads). DOE-SR is working with EPA and SCDHEC to determine the most appropriate regulatory standards to apply to the SRP TRU waste management activities. DOE-SR has submitted a RCRA closure plan for the MWMF and is complying with a SCDHEC request to submit a Part B application for this facility.

Future Compliance Activities

DOE TRU wastes will ultimately be emplaced in a geologic repository at the Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico. SRP proposed to construct a TRU Waste Facility (TWF) to process SRP TRU wastes preparatory to shipment to the WIPP facility. RCRA regulations impose management standards and require permits for hazardous waste treatment. The regulations define "treatment" to include:

" any method... designed to change the physical, chemical, or biological character or composition of hazardous waste so as to... render such waste... safer to transport, store, or dispose of... or reduced in volume..."

SRP will apply for a RCRA permit for TWF mixed waste management treatment and any incidental storage preparatory to TRU waste shipment to the WIPP facility.

RCRA regulations also impose requirements for hazardous waste transportation. SRP will comply with these requirements by using manifests to track shipments and by using a transporter having an EPA-required identification number.

Summary

SRP is complying with the substantive RCRA requirements for present operations and is planning actions necessary to ensure future activities will be in compliance. Compliance with RCRA requirements will not adversely affect the environmental impacts of the management of stored and retrievable TRU waste at SRP.