



# Community Advisory Board for Nevada Test Site Programs

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January 16, 2008

Ms. Kelly Snyder, DDFO  
U.S. Department of Energy, Nevada Site Office  
P.O. Box 98510  
Las Vegas, NV 89193-8518

SUBJECT: Community Advisory Board for Nevada Test Site Programs (CAB) -  
Recommendations for Revisions to fact sheets: Transporting Low-Level and Mixed Low-Level Waste to the Nevada Test Site, Mixed Low-Level Waste at the Nevada Test Site, and Mixed Low-Level Waste Acceptance Guidelines at the Nevada Test Site.

Following are recommendations for revision to the fact sheet mentioned in the Subject of this letter. The CAB suggests the same general revisions and additions for all of the fact sheets:

1. Define unfamiliar terms and acronyms before they are used in a sentence.
2. Bold the definitions so that they are easily referenced.
3. When doing several definitions together, bullet the definitions, rather than listing them in the sentence.
4. Include a key and/or glossary on each fact sheet for unfamiliar terms and acronyms.
5. Reference on each fact sheet that other fact sheets are available.
6. In general, increase font point size for easier reading.
7. Try to keep fact sheets at an eighth grade reading level.
8. Update all references to off-site locations to comply with current transition status.
9. Distribute fact sheets to libraries, city halls, Nuclear Testing Archive, Legislator offices, environmental groups, UNLV, and senior centers.

Specific suggestions for the above-mentioned fact sheets are:

### Transporting Low-Level and Mixed Low-Level Waste to the Nevada Test Site

- The first paragraph with bullet points should be changed to read:  
Safety is the first priority of the Nevada Test Site (NTS) when transporting waste to the NTS. The NTS is committed to considering the concerns of neighboring areas, which are impacted by the transport of low-level and mixed low-level waste shipments to the site. These concerns include:
  - Avoiding heavily populated/congested areas in the State of Nevada
  - Avoiding Hoover Dam (I-40, US-93) and Davis Dam (AZ-68, NV-163)
  - Using the Nevada Site Office identified preferred routes (see map on reverse side)
  - Completing the driver routing questionnaire
  - Avoiding the Las Vegas Beltway (I-215)

- The second paragraph should read as follows:  
The NTS recognizes that although generators cannot direct the specific routes taken by carriers, they can suggest preferred routes. The Nevada Site Office may consider suspension of a generator's shipments if waste is transported through the above-mentioned sensitive areas.
- There are no changes to the third paragraph.
- With regard to the fourth paragraph, the Committee agreed that a legend would be created for the map with symbols that designate the different routes, for those who will not be viewing a colored copy of the fact sheet. The symbols will be a triangle, a square, and a circle. The verbiage in this paragraph should read as follows:  
During summer months (May-October) carriers are directed to use the northern routes. See map on the reverse side for Interstate-80 highlighted in blue, symbol is a circle. The required alternative during winter months (November-April) is to divide shipments between CA-127 (symbol is a triangle), and NV-160 (symbol is a square). See map on the reverse side for these routes; both are depicted in pink colors.
- The second sentence of the fifth paragraph should read as follows:  
The required shipping permits are obtained through the Department of Transportation for these states (not the Highway Patrol).

It was also noted that the background was too busy and the fact sheet was difficult to read.

### **Mixed Low-Level Waste at the Nevada Test Site - and - Mixed Low-Level Waste Acceptance Guidelines at the Nevada Test Site**

The Committee agreed, and it was approved by Kelly Snyder, that the two above-named fact sheets can be combined. Therefore, verbiage was taken from the second fact sheet and inserted into the first. First, we will outline changes to the first fact sheet: *Mixed Low-Level Waste at the Nevada Test Site*:

- Under Mixed Low-Level Waste Composition:
  - Take the first sentence of the second paragraph and move up to become the second sentence of the first paragraph, which reads: "*hazardous wastes are materials that are toxic, corrosive, reactive, ignitable, or are specifically identified by the U.S. Environmental Protection Agency (EPA) as "hazardous."* "
  - Change the last sentence in the first paragraph to read, "*Because of its hazardous non-radioactive component, mixed-low-level waste is managed separately from low-level waste.*"
- Under Disposal at the Nevada Test Site:
  - On the second page, first paragraph, take "*and*" out of the last sentence and add "*and x-ray,*" to read: "*Compliance is ensured through extensive document review and x-ray verification of a minimum of five percent of all mixed low-level waste disposed.*"
- Under Summary:
  - Write the first sentence in present tense and add the word "*remediation,*" to read, "*Mixed low-level waste is managed at the Nevada Test Site in support of environmental management remediation and other activities.*"

The verbiage taken from the second Fact Sheet, *Mixed Low-Level Waste Acceptance Guidelines at the Nevada Test Site*," should be inserted into the first Fact Sheet as follows:

- On page 1, Mixed Low-Level Waste Composition should read as follows:

Mixed low-level waste is a "mix" of low-level, radioactive materials and hazardous constituents. These constituents are toxic, corrosive, reactive, ignitable, or are specifically identified by the U.S. Environmental Protection Agency (EPA) as "hazardous."

The low-level portion of mixed waste contains small amounts of radioactive material and can generally be handled without personal protective equipment. Mixed low-level waste is managed separately from low-level waste because of its non-radioactive, hazardous component. Examples of waste forms that **will not be accepted** are free liquids, biodegradable sorbents, and etiologic and chelating agents.

The EPA regulates generation, transportation, treatment, storage, and disposal of hazardous waste (often referred to as “cradle-to-grave” management) as set forth in the *Resource Conservation and Recovery Act (RCRA)*. In Nevada, the EPA has delegated authority to the State of Nevada to ensure compliance with RCRA.

- On page 1, Disposal at the Nevada Test Site, the first sentence should read:

The DOE National Nuclear Security Administration Nevada Site Office operates a Mixed Waste Disposal Unit under the Nevada Test Site Part B RCRA permit reissued by the State of Nevada Division of Environmental Protection (NDEP) in December 2005.

- Page 2 has been restructured to read as follows:

It is important to note that all mixed low-level waste disposed at the Nevada Test Site must comply with strict waste acceptance criteria which includes conformance to RCRA Land Disposal Restrictions. Compliance is ensured through extensive document review and verification of a minimum of five percent of all mixed low-level waste disposal. Any waste that does not meet the acceptance criteria after undergoing verification will not be accepted.

#### **How does a generator get approval to dispose waste at the NTS?**

Each mixed low-level waste generator must complete a series of steps prior to the first waste shipment. A key element is the development of a waste certification program to comply with waste acceptance criteria. Once the program is approved, waste stream profiles can be submitted for review and approval on a waste stream-specific basis. The approval process includes a comprehensive review of program documents, generator and treatment facility evaluations, (i.e., audits, surveillances, and program reviews) and waste verification.

#### **What are the packaging requirements?**

Typical U.S. Department of Transportation packaging to be accepted for disposal includes boxes measuring 4' x 4' x 7' or 4' x 2' x 7', 55-gallon drums, and cargo containers. Alternate packaging will be considered, but Nevada Test Site Disposal Operations personnel must be consulted prior to shipment to ensure the appropriate resources are available.

#### **Storage of mixed low-level waste**

In addition to disposal capabilities, a mixed low-level waste storage facility (for on-site generated waste only) is operated at the Nevada Test Site. Legacy and newly identified mixed low-level waste is managed at this facility prior to off-site treatment and/or disposal. The waste handled at this facility must be managed in accordance with strict treatment/disposal schedules established by the NDEP.

#### **Summary**

Mixed low-level waste is managed at the Nevada Test Site in support of environmental cleanup and other activities. In addition, the Nevada Site Office will continue to work diligently towards accelerating closure of the Nevada Test Site Mixed Waste Disposal Unit while meeting its objective to provide crucial disposal capability for other DOE sites throughout the United States engaged in accelerated cleanup. The priority of the Nevada Site Office is to conduct these and other activities while protecting the public, the workers, and the environment.

It is also suggested that pertinent photographs be included in the new fact sheet. Additionally, the black box with reverse type on page 2 of the *Acceptance Guidelines* fact sheet should be included in the new, combined fact sheet. The information in the box begins with: The Nevada Test Site plans to accept mixed low-level waste with the following EPA Hazardous Waste Numbers, etc.

We appreciate the opportunity to review and comment on changes, revisions, and updates of the fact sheets, and will continue working to help improve Environmental Management's efforts to communicate with the public.

Sincerely,

A handwritten signature in cursive script that reads "David Hermann".

David Hermann, Chair  
Community Advisory Board  
for Nevada Test Site Programs