Disposing Waste, Reducing Risk

Blanket Exemptions: Expediting Waste Disposition

Issue

EM sites have a wide range of disposal options, including use of DOE on and off-site facilities and commercial facilities. Use of commercial disposal facilities however, requires field office approval of an exemption. Preparing commercial exemptions on a waste-stream basis is time consuming and limits flexibility to quickly respond to changing situations.

Traditional approaches

Typically, waste generators have prepared an exemption for each individual waste stream for which commercial disposal is a viable option.

Disposal of bulk soils at Envirocare of Utah

Results

- Reduces administrative burden, diverting resources to other higher-risk reduction activities
- Expedites waste disposal
- Provides assurance of safety and cost effectiveness

Disposal at Nevada Test Site

New Approach

A "blanket" exemption, covering various waste streams generated over the life of the project, can be used to provide approval to use commercial disposal facilities.

On Site Disposal Facility, Fernald, Ohio

Immediate Risk Reduction Action Plan:
Expediting Access to Commercial Disposal Facilities

Various disposal options are available for low-level and mixed low-level waste, including DOE on-site and off-site facilities and commercial facilities. To assure the use of commercial facilities is protective of health, safety, and the environment, and is cost effective, the DOE waste management order requires field office managers to approve an exemption to use a non-DOE facility. The Disposing Waste, Reducing Risk project team identified the practice of preparing "blanket" exemptions as a best practice for implementation complex-wide. A blanket exemption provides a mechanism for authorizing commercial disposal for a range of waste streams over the project's life. This practice reduces administrative requirements, focuses attention and resources on reducing risk by getting waste to disposal facilities faster, while still meeting the intent of assuring safety and cost effectiveness.

Basis for Implementation

Previously, blanket exemptions were established for only those projects not located at major DOE installations, such as the RMI facility in Ashtabula, Ohio, and the General Atomics facility in San Diego, California, or for disposal of mixed low-level waste up to 1,000 cubic yards per year. By contrast, most large waste generators have followed the practice of preparing an exemption for each individual waste stream. One site visited by the project team noted that submitting exemptions on a waste stream level limited their ability to respond quickly to changing situations which might have allowed disposition of an alternate or an additional waste stream. As an alternative to this time consuming and restrictive practice, the Idaho National Engineering and Environmental Laboratory developed an approach that encompasses the volume of waste planned for disposal over a four-year period.

Discussion of Identified Activity

In developing a blanket exemption, the waste generator should consider:

- total volume of waste likely to benefit from commercial disposal over the project life,
- present availability of DOE disposal facility alternatives,
- cost benefit of commercial disposal, including potential differences in waste characterization, packaging, and transportation, and the life cycle disposal facility costs.

The exemption should also address, by means of a graded approach, the elements noted in the waste management order. For example, while the order requires the waste be sufficiently characterized and certified to meet the disposal facility's waste acceptance criteria, it does not require that the characterization information be available at the time of the exemption request. It remains the field office manager's responsibility to ensure disposal decisions are made based on technical acceptability, schedule, and cost benefit.

For More Information/References:

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