

Oregon Hanford Cleanup Board Meeting,
Portland, Oregon
January 27 and 28, 2004

Present:

Board Members:

Barbara Jarvis, Chair
Norm Dyer, Vice-Chair
Norma Jean Germond
Michael Grainey
Maxine Hines
Paige Knight
Wayne Lei
Dr. Robert A. McFarlane
Eric Nisley
Marc Rogelstad
David Van't Hof
Doug Woodcock
Sen. Ted Ferrioli
Sen. Dave Nelson
Rep. Steve March

U.S. Department of Energy:

John Eschenberg
Mark French
Greg Jones

Tribal representatives:

Ted Repasky for Armand Minthorn,
Confederated Tribes of the Umatilla
Indian Reservation (CTUIR)
Rico Cruz, CTUIR

Washington Department of Ecology:

Laura Cusack
Jeff Lyon
Suzanne Dahl (by phone)

Oregon Department of Energy:

Dirk Dunning
Deanna Henry
Lynda Horst
Susan Hughes
Doug Huston
Ken Niles

Members of the Public:

Doug Riggs, Hanford Information
Network
Matt Wingard, Hanford Information
Network
Maura McLoughlin, Hanford Watch

Tuesday's meeting began at 1 p.m. and was adjourned about 5:00 p.m., followed by a voluntary Board dinner at a local restaurant.

Wednesday's meeting began at 8:30 a.m. and was adjourned shortly after 4:15 p.m.

Administrative Business

Barbara Jarvis opened the meeting at 1 p.m.

Introductions were made of new and existing members and visitors were welcomed. New members Maxine Hines and Wayne Lei shared information about their background and interest in Hanford issues.

- Approval of September/October 2003 Meeting Minutes – Mr. Rogelstad moved that the minutes of the last board meeting be approved. Mr. Dyer seconded. Motion passed unanimously.

Board members discussed the options available to replace Shelley Cimon as the board representative on the Hanford Advisory Board (HAB). Ms. Cimon was the regular member and Mr. Dyer was the alternate. It was decided that board members would consider serving as a representative on the HAB, and the selection would be carried over to the next meeting for a decision. Staff will send board members a copy of the next HAB meeting agenda to assist with their decision.

- Mr. Rogelstad moved that Mr. Dyer become the interim regular board member to the HAB. Ms. Knight seconded. The motion passed unanimously.

Board members and staff discussed locations for the May 2004 meeting. Staff agreed to look into the availability of various locations and apprise board members of the findings by e-mail. It was agreed that the meeting will be held on May 18 and May 19, 2004 somewhere along the Columbia River corridor or Hanford waste transport route. Hermiston, La Grande, Bend, and the Tamastlikt Interpretive Center were suggested.

Ms. Horst reviewed procedures for filling out board member travel reimbursement forms, and passed out some forms to each member. After discussion, it was agreed that Ms. Horst would prepare and mail to board members a completed form to use as an example.

Board members and staff discussed possible areas of focus for the board in upcoming meetings, similar to the work that was done to produce the *River Without Waste* report. One of the topics, or ‘themes,’ considered was an exploration of what is meant by “clean,” a determination of “how clean is clean” or “how dirty is acceptable?” Board members asked staff to bring a proposed agenda for a “theme year” to the next meeting.

Board members requested an updated list of members and staff.

Board members suggested a resumption of monthly mailings to members by staff, to keep them apprised of issues important to the board. Mr. Dyer suggested that such a mailing could be via email, and the other board members in attendance agreed. It was also suggested by Ms. Jarvis that the briefing papers for each meeting be organized in such a way that board members would easily be able to locate the documents during meeting discussions. Ms. Horst will develop an indexing method of some kind to identify the briefing papers for the next meeting.

It was suggested that staff arrange for a tour of the Hanford site for board members. The board would like to have as many members and staff participate as possible in order to take advantage of the combined knowledge and experience of members. Staff will look into arranging a tour.

A glossary of commonly used terms and acronyms was passed out to board members as a reference guide (and folks were reminded that speaking in acronyms was discouraged as a way to improve the quality of our communication. As a reminder of this board value, offenders are asked to contribute \$.25 per acronym).

Orientation manuals will be updated and prepared by staff and distributed to the newer board members soon.

Board members commended staff for their work on the briefing papers and presentations at the meeting.

Memorandum of Understanding

Mr. Niles reported to the board that the Oregon Department of Energy (ODOE) and U.S. Department of Energy, Richland Operations Office (DOE-RL) updated its Memorandum of Understanding (MOU) to include DOE's Office of River Protection (ORP). The purpose of the MOU is to document understandings and agreements between the agencies. Oregon does not have legal standing in the Tri-Party Agreement. In the MOU, USDOE-RL and ORP recognize in writing Oregon's unique role and interests at Hanford. This includes Oregon's concerns for protecting the resources of the Columbia River and its interest in sharing, facilitating, and accommodating the exchange of information.

Hanford Tanks Issues

A detailed discussion of current tanks issues was led by Mr. Huston, with contributions from Greg Jones and John Eschenberg of ORP and Jeff Lyon of the Washington Department of Ecology (Ecology). Cleanup of Hanford's underground waste tanks is a three-step process. The first step is interim stabilization. The liquids in the aging single-shell tanks are pumped to newer double-shell tanks. This is being done to minimize the possibility of further leaks of tank waste into the environment. The next step is the immobilization of the tank wastes. This involves retrieving the contents of the double shell tanks and the solids and sludges still remaining in the single-shell tanks and treating and immobilizing these wastes.

Once the tanks are emptied the final step begins. This final step is referred to as closure. Closure can be thought of as the process of formally completing the cleanup. It involves making decisions on the long-term fate of the tanks, equipment associated with the tanks, and the soils around the tanks. One of the issues surrounding closure at Hanford is what type of closure to do. The federal Resource Conservation and Recovery Act (RCRA) requires a "clean closure" unless it can be shown that a clean closure is not possible for some reason. A clean closure at Hanford would involve removal of the tanks from the ground and cleanup of the contaminated soils around the tank. If it can be shown that a clean closure is not possible, a "landfill closure" can be done. In a landfill closure, the tanks would be stabilized in the ground, some soil cleanup may occur, and the tank farms would be covered to minimize water infiltration. The impacts of these types of closures

will be analyzed in the upcoming Hanford Tank Waste Environmental Impact Statement (EIS) which currently is scheduled to be released in the spring of 2004.

Another closure issue is how to deal with the residual waste that will be left following retrieval of the tank contents. Finally, RCRA requires that a closure plan must be submitted for regulatory and public review. As agreed to by Ecology and DOE, the single-shell tank closure plan will have three tiers:

- Tier 1 addresses high-level closure issues pertaining to the single-shell tank system as a whole;
- Tier 2 addresses closures of specific groupings of one or more tank farms, which are referred to as “waste management areas;”
- Tier 3 addresses closure activities for specific components within a given waste management area.

The final closure plan is expected to be issued by the end of January 2004.

Staff reported that ORP has been investigating the feasibility of using technologies other than the current baseline technology - borosilicate glass - to immobilize the tanks' low activity waste. ORP has been doing this in an effort to reduce the costs and reduce the overall duration of the tank waste treatment project. The three potential technologies studied were:

- Steam Reforming – the waste is introduced into a high temperature fluidized bed and converted to solid, granular form.
- Bulk Vitrification – immobilization of the low activity waste in an aluminosilicate glass instead of a borosilicate glass. In addition, the melters used to create the aluminosilicate glass are used as part of the container for disposing of the resultant immobilized waste.
- Cast Stone – immobilization of waste in a cement-like material (newer formulation of grout).

In December 2003, ORP decided to proceed only with further testing of bulk vitrification.

Staff reported that ODOE is concerned that the rush to “close” tanks in order to show progress will, in the long run, actually delay final completion of cleanup. Closure is a legally defined cleanup term and staff is not convinced that its use in this situation is justified. Staff also is concerned that once a tank is declared “closed” it will be difficult to justify to those controlling the cleanup funds that it is necessary to do further work on that tank should it be discovered that these interim “closures” are not legally or technically satisfactory.

Staff believes supplemental technologies could be used to immobilize the majority of Hanford's tank waste. However, staff has significant concerns about the ability of these waste forms to immobilize these wastes for the extremely long periods of time that will be necessary before they cease being a threat to people and the environment.

Board members voiced concerns about bulk vitrification. They are not convinced that ORP can ensure only low-activity waste will make it into bulk vitrification.

Ecology staff believe that all wastes in the 53 million gallon tanks must be pre-treated prior to vitrification. The waste appropriate for a supplemental technology (low-activity) can then be immobilized using whatever supplemental technology is ultimately approved.

John Eschenberg, DOE Project Manager for the Waste Treatment and Immobilization Plant (WTP), provided a project overview to the board. Mr. Eschenberg discussed five areas of the project:

- Bechtel National, Inc. (BNI) Safety Performance – Over 14 million hours worked with two lost workday cases since start of WTP construction. Thirty-seven recordable injuries since project inception. Seven reportable occurrences during 2003. Up to 1,000 employees on site.
- Quality Issues – Low concrete strength tests and field fabrication deficiencies have been resolved. Mr. Eschenberg answered board members' clarifying questions about these tests and deficiencies.
- Technology Risks:
 - Mr. Eschenberg explained that Pulse Jet Mixers (PJM) are used to mix waste in 40 holding/processing tanks to prevent solids from settling, among other things. There is a risk in relying entirely on PJMs because their use has not been proven for mixing non-Newtonian fluids (fluids that do not have normal flow characteristics). The WTP design calls for seven holding tanks (vessels) that are to hold non-Newtonian fluids. To use the PJMs in these vessels would require 4 to 5 times what BNI originally planned for air volume in order to assure proper mixing. The PJM Optimization Program is researching alternatives to assure adequate mixing in these vessels. The schedule provides for final design parameters by March 2004.
 - Cesium Ion Exchange Resin and System Design – Ion exchange resins are to be used in the Pretreatment facility to remove cesium, but this concept is not without problems. The preferred method, so far, is to use "Superlig 644" resin, which costs \$8,000/gallon and is produced by a single supplier/manufacturer. The resin design is proprietary and comes from a mom-and-pop supplier that owns the formula. This approach would require \$50 million/year for resin. As an alternative, they are testing a different resin, "resorcinol formaldehyde" which is readily available at a cost of \$800/gallon, although it is not yet proven to work.
- Project Costs – Mr. Eschenberg reviewed the project costs of \$5.781 billion. There was some reprogramming in fiscal year 2004 to adjust for reduced funding. As part of fiscal year 2004 funding legislation, the US Army Corp. of Engineers must

conduct an independent cost estimate of the project, which is due in April, 2004. Upon completion, this will be a publicly available document.

There was much discussion with board members about the costs, projections and incentives. Sen. Ferrioli pointed out that the board isn't as concerned about cost as it is about human health, environmental risks and seeing that the job is completed, although the board recognizes the need for cost controls. Mr. Eschenberg made it clear that if the project is not funded as projected, the project will not get done.

- Schedule Milestones– a handout was provided detailing key project schedule milestones for various parts of the project, including the high-level waste facility, low-activity waste facility, pretreatment facility, analytical laboratory, and the balance of the facilities, with contract completion scheduled for 2011.

Following Mr. Eschenberg's presentation, Greg Jones from ORP and Jeff Lyon from Ecology provided information to the board. Suzanne Dahl from Ecology participated by phone during this presentation.

Mr. Jones went through ORP's budget, which includes the funds designated for the WTP as discussed by Mr. Eschenberg.

Mr. Jones explained that in addition to the WTP, plans are moving forward on construction of a facility that will process transuranic mixed waste (TRUM) in the tanks that can then be sent to the Waste Isolation Pilot Plant (WIPP) in New Mexico for disposal. Some of the tanks have been identified as containing TRUM, which can be disposed of at WIPP. The other waste will be processed in the WTP. Ms. Dahl from Ecology explained that ORP has a contract to do off-site fabrication, but there is no permit, yet, for the TRUM treatment facility.

The Tri-Party Agreement (TPA) provides that the waste in the single-shell tanks must be retrieved by 2018, and the tanks closed by 2024. The TPA further provides that all waste in all the tanks must be vitrified by 2028. ORP intends to retrieve the waste in all 149 single-shell tanks by 2018, and close those tanks by 2024.

Mr. Jones discussed the tanks environmental impact statement (EIS) that is to be issued in May or June of 2004. The tanks EIS will evaluate the impacts of various closure alternatives for final closure of all the single-shell tanks. A record of decision on the EIS is expected within fiscal year 2004.

There is a demonstration project planned for 2004 in which Tank C-106 will be "interim" closed. Tank C-106 is a 530,000 gallon single-shell tank located in C-Farm in the 200 east area of Hanford. The tank was built in 1944. It is one of 7 tanks identified in the TPA for demonstration of retrieval technologies. Interim closure of the tank will not result in actual removal of the tank from the ground. Board members expressed concern that DOE should remove the tank to determine what, if anything, has leaked out of the tank, and to determine the extent of any leaking. It is not clear to the board how DOE

can claim the tank is closed if contamination in the soil and groundwater beneath the tank is not cleaned up or otherwise dealt with.

Mr. Repasky from CTUIR explained that the tribes would like to see the tanks removed and disposed of now, rather than leaving them in place to possibly be removed at a later date. There has not been sufficient discussion about the contamination in the soil and groundwater under the tanks and how that will be managed long-term.

Mr. Dyer reminded the board that removing the tanks from the ground does not necessarily mean that the tanks will be removed from the Hanford site. This must be considered when determining what should be done.

Mr. Lyons from Ecology brought a short video showing the current condition of the inside of tank C-106.

Staff questioned Ecology about discrepancies in the models being used to determine the movement of uranium in the soil and groundwater. Ecology acknowledged that the discrepancies have not yet been resolved, but there is ongoing research in an attempt to do so.

There was further discussion about the residuals that would be left in the tanks, the “tank heels.” DOE and Ecology have not reached an agreement on how to deal with the heels. Ecology would like to see DOE issue a separate EIS for the heels themselves.

There was also discussion about DOE’s desire not to remove Technetium 99 from the tanks. Ecology is of the opinion that all the tank waste must be pre-treated, which includes removing Technetium 99. Ecology and DOE are in discussions about pre-treatment issues.

Board members discussed the difficulty in defining “clean” when talking about the tanks. Some of the contaminants will be dangerous for hundreds or thousands of years. Clean seems to mean “stabilized” so it does not move while it decays. Board members expressed a desire to pursue this further.

Public Comment

Following the tanks presentation, members of the public were invited to raise issues of concern to them. Maura McLoughlin of Hanford Watch expressed concern about cancer risks to workers at Hanford and children of tribal members. Ms. McLoughlin wondered if the children’s higher cancer rates were the result of eating fish from the Columbia River. Staff reported that several studies had been done on cancer rates in the Hanford area and they generally showed that cancer rates downwind of the Hanford site are no greater than normal, although many of these studies remain controversial. Mr. Repasky provided information about fish tissue studies done on fish in the Columbia as they relate to tribal members.

There was further discussion between the board and staff about the idea of a letter from the board to DOE expressing concerns about current tanks issues. It was decided that Mr. Huston would draft a letter and the board would review it the following day.

The meeting was adjourned at 5:00 p.m. on January 27, and resumed at 8:30 a.m. on January 28, 2004.

- Mr. Rogelstad moved that the board write a letter to DOE about tanks issues; Dr. McFarlane seconded; the motion passed unanimously.

There was a spirited discussion about the letter from the board to DOE on the tanks issues. It was determined that staff would codify the comments into a letter to be sent by the board to DOE.

Groundwater Issues

An updated version of the “pump and treat” briefing paper was passed out, entitled “Update for Groundwater Remedial Actions.” An earlier version was included in the document packet sent to members before the meeting, and subsequently staff received more current information about contaminant removal.

Mr. Dunning provided a general overview of Hanford history, the location and genesis of the pump and treat operations, and the mechanics of pump and treat. He then went into specifics for each pump and treat operation, and discussed problems that these operations have encountered. Pump and treats are not good at removing sources of contamination, but are intended to reduce contaminants until a permanent solution can be found. It is not known yet what will be done with the radioactive material removed by a pump and treat operation. At another site, radioactive resin was disposed of as low level waste.

Following a brief discussion of Technetium 99 and its properties, Mr. Dunning discussed in-situ redox manipulation. The idea is to change the chemistry of the soil to immobilize the contaminants in place. However, it has been recently discovered that contaminants are bypassing the redox wall and increasing in concentration.

There was also discussion about new tritium plumes that have been discovered near the K-basins. Monitoring detected an unexpected increase in the tritium levels. It is not yet known what the source of the increased tritium is. Potential sources include burial grounds, cribs, and historically used drain fields in the K-area. Mr. Repasky mentioned that the CTUIR is developing an independent groundwater model.

There was discussion about DOE’s determination that tritium removal is too expensive, too difficult and therefore DOE does not intend to pursue it.

Columbia River sampling

Mr. Niles briefed the board on the current status of the Columbia River sampling that had been recommended by the Board in its *River Without Waste* report. There will be another round of sampling later this summer, which will focus on the two upriver dams. It was recommended that the board write a letter in support of continued sampling and thanking the labs for their work.

- Ms. Germond moved that such a letter be written; Ms. Knight seconded the motion after clarification of technical details; the motion passed unanimously.

Mr. Repasky provided a summary of what kinds of sampling the CTUIR is planning.

U-Area Issues

Mr. Dunning provided an overview and explanation of the U-area issues, including the U area regional closure and U-plant closure plans. The regional closure concept is based on the idea that facilities or areas in close physical proximity and with similar operations can be treated as one waste area. DOE is planning to clean and close 29 waste sites around the U plant canyon. This is separate from but related to a similar plan to clean up and close the U plant canyon itself and the sites immediately around the building.

There are four proposals for cleaning up the regional U area waste sites, including monitored natural attenuation, which means allowing the waste to decay in place. Mr. Dunning reviewed these proposals and much discussion was had about the pros and cons of each.

The initial plan for the U plant canyon closure, using the canyon or the canyon dissolver cells for waste disposal, is being reconsidered. There was much discussion about the canyon and its associated waste areas.

The board discussed writing a letter to DOE about its concerns with the U area regional closure and the U plant closure. Some issues to be addressed in the letter include concern about public involvement in the decision process and the use of monitored natural attenuation. The board believes there should be proper characterization of the waste sites before a decision is made on the path to take for cleanup.

- Ms. Germond moved that staff write a letter on behalf of the board; Ms. Knight seconded; after a modification to request the letter include an invitation to the regulator and affected agencies to appear before the board, the motion passed unanimously.

Hanford Solid Waste Environmental Impact Statement (EIS)

Staff reported that the final Hanford Solid Waste EIS was due out shortly; there had been a conference call between staff and DOE about the issuance of the final EIS the previous morning. Staff provided the board with (limited) information about what was going to be in the EIS.

Transportation Update

Mr. Niles discussed the increased number of shipments to WIPP and the effects of winter weather on these shipments. There has been a tremendous increase in the number of shipments, 48 last year – the goal is 96 this year. The rough estimate is that over the life of this program there will be about 2,500 shipments.

One of the concerns is that these shipments will go on year round. The winter months are of particular concern. It may be that, ultimately, the economics of winter shipments will be prohibitive. There are some limitations in what the state can do about the winter shipments. If the roads are open, the state can not prohibit shipments. However, there are negotiated conditions under which WIPP shipments will not go even if the roads are open.

Staff has been documenting the problems with the shipments this season. Once the winter passes, staff will ask DOE to reconsider the number of shipments scheduled during the winter. It may make economic sense to postpone or delay some of the shipments, particularly since this winter there have been problems of some kind with almost every shipment.

The board proposed that staff write a letter once winter is over to ask DOE to reconsider this issue. Staff will draft the letter and route it around to board members via email.

- Ms. Knight moved that the letter be written; Ms. Germond seconded. The motion passed unanimously.

There was further discussion about the shipments and what happens when there are problems. Safe parking areas were described, and questions regarding hazmat notification of stopped shipments were answered.

Public Involvement Update

Ms. Hughs reviewed the last years' public involvement statistics and memorable opportunities. She reviewed with the board how to report their public presentation experiences. If board members would like resources for public participation and involvement, members are urged to contact staff.

There was a brief discussion about the upcoming State of the Site meetings, put on by DOE, Ecology, and EPA to review the current status of the Hanford site cleanup. There will be four meetings, two in Oregon and two in Washington. Mr. Grainey mentioned that this is one of the few times that Oregon is invited to "sit at the table" with the tri-parties at the Oregon meetings, and the agency also will seek invitation to the Washington meetings.

Ms. Hughs gave a brief description of Washington State Initiative 297. This initiative, sponsored by a broad coalition of environmental and community groups, could

potentially prohibit the Hanford site from accepting waste from other sites, among other things. The initiative has been submitted to the Washington legislature for action and may appear on the ballot in November.

Luncheon

The luncheon speaker on Wednesday, January 28, was Christopher Swain of the Columbia River Conservancy. Mr. Swain swam the entire length of the Columbia River, beginning in June 2002. His presentation about the swim, the river, and the people he encountered along the way, was outstanding and fascinating. There were many questions from the board. Those wanting to know more about him and his organization can find information on their website, www.columbiaswim.org.

Following the luncheon, Ms. Jarvis left the meeting to catch her flight home, and vice-chair Mr. Dyer took over the meeting.

Tri-Party Agreement milestones M-91 and M-16

Laura Cusack from Ecology and Mark French from DOE-RL provided information to the board on the TPA milestones M-91 and M-16.

Ms. Cusack provided a brief overview of the TPA. It contains milestones, which represent due dates for specific projects during the cleanup. She explained the history behind the dispute over the M-91 milestone. In recognition of the delays caused by the dispute, Ecology and DOE ultimately agreed on changes to some of the milestones to address those issues that both could agree on, while leaving out the items still in dispute. The changes are codified in "change packages" that are out for public comment. The change packages include retrieval and treatment schedules for TRU waste not in dispute, including transuranic mixed waste, or TRUM.

The M-91 milestones deal with post-1970 TRU waste because that waste is covered under RCRA. Pre-1970 TRU waste is covered under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and is dealt with in the M-16 milestones.

Mr. French discussed the history of TRU waste definition, which results in some confusion as to what TRU waste actually is. Generally, it is waste composed of or contaminated with elements having an atomic number greater than that of uranium. Some of the waste will not be characterized until the waste sites are excavated. The waste must be characterized to determine its retrieval and disposal methods.

Mr. French detailed the sequence and methods of retrieval of suspect TRU waste. Contact handled TRU waste must be removed from the burial grounds by 2010. Remote handled TRU waste must be removed by 2018. In response to questions, he acknowledged that this schedule was aggressive. There are about 15,000 cubic meters of TRU waste in retrievable storage. As the waste site is excavated, the waste containers are

characterized to determine the type of waste inside. There was discussion about worker safety related to this process and how the wastes are analyzed. There was discussion about the problems associated with different types and sizes of containers.

Risk Based End States

As previously reported, DOE has proposed using Risk-Based End-States (RBES) to decide how to clean up many sites around the country, including Hanford. Under the RBES guidance, the sites first establish what the future site use is expected to be. Next, they determine an acceptable level of risk for that use. Then the level of cleanup required to meet that level of risk is calculated. This is the opposite of the requirements under state and federal law. There has been widespread criticism of DOE's RBES process by its stakeholders at this and other sites.

ODOE believes that a risk-based approach to cleanup at Hanford already exists in the Tri-Party Agreement. There are concerns that DOE's current RBES effort would undermine cleanup at Hanford. ODOE sent a letter to DOE in December detailing its concerns with the proposal and a copy of that letter was included in the handouts. The board discussed the idea of sending a letter to DOE in support of Oregon's position on RBES.

- Mr. Lei moved that the board write a letter in support of Oregon's position on RBES; Ms. Germond seconded; the motion passed unanimously.

K-Basins/Spent Nuclear Fuel Project update

Mr. Dunning provided a summarized update on the status of the spent nuclear fuel project (also known as K-basins). The project is still off-schedule but is improving. In order to meet current milestones for fuel canister removal and storage, the contractor must process, on average, 12 canisters per month from now on. Currently, they are processing 11.8 canisters per month. It is doubtful that this level of processing could continue unabated. Nonetheless, the project has completed processing three-fourths of the spent fuel in the K-West and K-East basins, which is a major accomplishment.

The board discussed sending a congratulatory letter upon completion of the project. All board members should sign the letter individually to signify that the board considers this a 'big deal.' This issue will be taken up at the next meeting.

Low Activity Waste Rule

Staff provided the board with an overview of a proposal by EPA that would allow disposal of "low activity" radioactive waste in commercial RCRA landfills. By "low activity," EPA is referring to wastes that contain levels of radioactivity below a certain, as yet unspecified, value. EPA is asking if the radiation risk is no greater than the risk posed by other types of materials normally disposed of in these types of landfills, would it be acceptable to dispose of these "low activity" wastes there, as well.

Staff is reviewing the proposal, which is quite broad. Staff plans to work with Oregon's Department of Health and the Oregon Department of Environmental Quality to develop comments on behalf of the state in response to the proposal. It was decided that the board would not take a position at this time.

The meeting was adjourned about 4:15 p.m.