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ENVIROCARE OF UTAH, INC.

THE SAFE ALTERNATIVE

February 18, 1993

U.S. Department of Energy
Weldon Spring Site Remedial Action Project
Attn: Steve McCracken
7295 Highway 9400 South
St. Charles, MO 63303

Re: RI/FS-EIS Document: DOE/EIS-0185D

Dear Mr. McCracken:

Envirocare is providing the following information in response to the public comment opportunity for the Remedial Investigation/ Feasibility Study for the Weldon Springs project. Envirocare of Utah, Inc. is pleased to be considered as one of the off-site alternatives for the Weldon Spring project. We have reviewed the above-mentioned document and would like to comment on some specific issues relating to the Envirocare alternative.

First and foremost, our estimates show that the actual cost of disposal at Envirocare would be considerably lower than the estimate presented in the report for the following reasons:

1. Because of our anticipated license with the NRC, treatment may not be required prior to disposal at Envirocare. This could greatly reduce the cost of the Envirocare option and may also reduce the amount of volume that would need to be shipped.

2. NRC and Envirocare have mutually agreed that the date of issuance for the 11e.(2) by-product disposal license will be the third quarter of 1993. Therefore, the Envirocare option should be available within 6 months. This may greatly reduce inflation costs associated with other options.

3. Bulk waste shipments are more economical than containerized waste shipments. Therefore, the transportation costs would be significantly lower.

4. The unit price for disposal at the Envirocare site has been reduced since our previous quote was based on the overall anticipated volumes of 11e.(2) by-product to be disposed of at Envirocare.

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5. Based on quotes received by Envirocare, the truck option may be more economical than the rail option. This is contingent on the fact that the transfer station would not be necessary if the truck option were to be used.

Other questions which would help Envirocare better understand the nature of the project as it pertains to the Envirocare option include:

1. Some places in the document suggest that the Envirocare option would not include treatment and yet these costs seem to be included in the overall cost. Is treatment expected for the Envirocare option?

2. What is the basis for the statement that "impacts to groundwater could be comparable" between the Envirocare option and the onsite option? Have any groundwater models been run for the two different options?

3. Has a comparison been done using the Envirocare and the onsite option concerning the potential health and environment impacts if cell failure occurs?

4. Does the onsite proposal meet all of the requirements of 40 CFR 192, 40 CFR 264, subpart G, 10 CFR 40, Appendix A and 10 CFR 20?

5. What is the reason for stating on page 46 under the Envirocare alternative that "If the waste were exposed....wind dispersal of untreated material would be higher than Alternative 7a". Long term plans at Envirocare include covering the waste.

6. Have any models been run to support the statement on page 46 under the Envirocare alternative that states, "potential groundwater contamination could be similar" to onsite disposal? What is the permeability of the overburdens assumed to be for the onsite option and the Envirocare option?

7. Have the synthetic liners suggested for onsite disposal been accepted as providing the necessary long term protection required (200 to 1000 years)?

8. What is the basis for stating that possibility of cell failure is similar for onsite and offsite options? What is the basis for stating that the effects of cell failure would be similar?

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Envirocare has considerable information concerning our South Clive site that may be helpful in comparing our site to the onsite option. Envirocare would like to have the opportunity to discuss these comments in the near future. We feel it is especially important to discuss with you the reduction in costs associated with the Envirocare option. Please contact me or Al Rafati at (801) 532-1330 for further information.

Sincerely,

Charles A. Judd

Charles A. Judd
Executive Vice President