

Draft Questions and talking points for 12/9 Public Hearing on Revised LLNL Hazardous Waste Permit Renewal with CA DTSC

This is a list of initial questions that resulted from Tri-Valley CAREs preliminary review of the DTSC's revised permit renewal materials. These questions will be asked at the 12/9 public hearing.

The revised permit is said to include the following general conditions: "DTSC's authority to revoke or suspend the permit or suspend the facility operation for cause; a limitation of liability clause for the State of California/ DTSC; and a severability clause." Were these added to the revised version or are they present in the previous version?

The facility is being permitted for 913,270 gallons of liquid and solid hazardous waste in 12 container storage units. Permitted to treat 45,000 gallons of waste per day.

- Are waste accumulation areas included in the 913,270 gallon permitted waste cap?
- Are those accumulation areas included in the DTSC's authority?
- At what point are the wastes accumulated in the waste accumulation areas reported to DTSC, if ever?
- Is there a difference between a waste accumulation areas and units?
- As the 9 closure units in areas 612 and 614 become new 90-day Waste generator accumulation Units adding to the existing waste accumulation units, or are some existing units being closed?

Page 6 of the HRA supplement states that the Macroencapsulation "Unit has no emission, since the treatment operations consist of sealing a container of waste either by welding a polyethylene lid to the body of a container." What about welding fumes from melting the lid?

There have been new Chemicals of Concern (COC) added to the permit since the 2010 HRA but the Supplement states that even if a present COC's Reference Exposure Level changed, the change did not alter the overall risk-level to human health." Did some REL's change because there are now houses closer to the DWTC than there was in 2010?

- It appears that the Lab did not use the new housing (constructed in the last 5 years) Located on Flurry Drive near Vasco Rd. and Brisa St. as a specific point to analyze health impacts. Can you explain why?

According to the HRA, "To determine risk in this Supplemental Analysis, rather than using the SCREEN3 air quality dispersion model, LLNL used the U.S. EPA preferred air dispersion model, AERMOD, based on site-specific terrain and land-cover data, and three years of on-site meteorological data. Consequently, from the AERMOD model results, LLNL found much lower concentration numbers for both on- and off-site receptors, compared to concentrations found in 2010 using the SCREEN3 estimating tool." Pg 7 of HRA. Why not include that data from both models? It is now comparing apples and oranges. It is acknowledged that if the SCREEN3 estimating tool was utilized using the data from the current estimated emissions, the results would have been higher than in 2010, but we do not know how much higher. Was the AERMOD model not available in 2010?