

## Summary of EnergySolutions Permit Modification

The Utah Department of Environmental Quality is requesting public comment regarding proposed changes by the Co-Executive Secretary of the Utah Water Quality Board to the existing EnergySolutions Ground Water Quality Discharge Permit UGW450005. This document summarizes some of the proposed changes to the EnergySolutions' Ground Water Quality Discharge Permit for the Low-Level and 11e.(2) radioactive waste disposal facility located near Clive, Tooele County, Utah by the Utah Division of Radiation Control (DRC). The Permit establishes criteria for the protection of ground water and ultimately the protection of public health and the environment. The Permit is in compliance with the provisions of the Utah Water Quality Act, Title 19, Chapter 5, Utah Code Annotated 1953, as amended. Changes considered major in the Permit are those that have a potential to impact ground-water quality and the protection of the environment. These changes to this Permit are:

- Reduced Ground Water Monitoring sampling frequency from semi-annual to annual sampling. The DRC has determine that an ample database for the determination of background conditions exist, travel times at the site are extensive, an adequate accelerated monitoring plan is in place, and that the overall poor water quality at the site makes the site amendable to annual sampling.
- Requirement for a revision of the Water Monitoring Quality Assurance Plan, to ensure data quality. With a change to annual water sampling, the Water Monitoring Quality Assurance Plan needs to be updated to incorporate this change to secure the reliability of water monitoring data.
- Reduced specific gravity sampling from semi-annual to annual sampling. Specific gravity is collected concurrently with ground water sampling and it is appropriate to still do so.
- Reduced other water sampling at the facility to annual to conform to the annual Ground Water Monitoring sampling frequency.
- Adjustment of some ground water protection levels for monitoring wells near the Class A North, 11e.(2), Mixed Waste, and LARW waste embankments. The Permit allows the Permittee to propose and justify adjustments of protection levels.
- Assessment of requested adjustment of universal protection levels for the 11e.(2) embankment, Table 1C of the Permit. Concerns over 11e.(2) embankment ground water monitoring parameters was raised and the DRC evaluated EnergySolutions requested changes to the Parameter list for the 11e.(2) embankment.

- Updated list of universal protection levels universal to all LARW, Class A, and Class A North wells, Table 1A, based on changes to the rules for Ground Water Quality Protection.

Changes considered minor in the Permit are those considered to have no impact on ground water quality and the protection of the environment. Some of the more important minor changes associated with this Permit modification include, but are not limited to:

- Removing references to PCBs and Appendix I from the Permit, PCB are now regulated under the State issued Part B Permit.
- Reference to 11e.(2) construction quality assurance/quality control manual and LLRW construction quality assurance/quality control manual were changed to reference the LLRW and 11e.(2) construction quality assurance/quality control Manual. The 11e.(2) and LLRW construction quality assurance/quality control manuals were combined in 2004.
- Adjustment to disposal cell location, due to recent survey work.
- Changes to As-Built Design Drawing to update Table 5 to reflect minor recent changes.
- Addition of horizontal hydraulic gradients requirements.
- BAT monitoring reporting frequency changed to semi-annual.

Written comments will be accepted if postmarked by the by the end of business on October 28, 2009. Written comments may be directed to the Utah Division of Radiation Control, 168 North 1950 West, P.O. Box 144850, Salt Lake City, UT 84114-4850, or by email to [charlesbishop@utah.gov](mailto:charlesbishop@utah.gov). All comments received within the comment period will be considered for inclusion in the final modified Permit. A public meeting will be held on Monday, October 26, 2009 from 6:00 to 8:00 P.M. at the Utah Department of Environmental Quality, 168 North 1950 West, Salt Lake City Utah, Room 101

For more details on these changes and other changes refer to the Statement of Basis, which includes the modified draft Permit. Additional information regarding the Permit changes may be obtained upon request by calling Charles Bishop at 801-536-4234, or by writing the Division of Radiation Control (DRC) at the aforementioned address.