

# Vermont Department of Environmental Conservation

## Regulatory Overview

Vermont Nuclear Decommissioning Citizens Advisory Panel

June 23, 2016

# Regulatory Overview

- RCRA Hazardous Wastes
- Mixed Wastes (Hazardous and Radiological)
- Discharge Permits
- Hazardous Site Cleanup

# RCRA – Hazardous Wastes

- Vermont is delegated (authorized by EPA to administer HW program)
- Must maintain regulations that are at least as stringent as the federal RCRA regulations.
- VHWMR – WMPD

# RCRA – Hazardous Wastes

- “Cradle-to-grave” framework
  - ID HW
  - Establish management standards for generation, transportation, treatment storage or disposal
- ENVY is regulated as a “generator” under the VHWMR
- Closure/decommissioning activities - generating waste paints and solvents, oily debris, and lead/PCB-contaminated debris.

# Mixed Wastes

- Under the VHWMR, such “low level mixed waste” (LLMW) is managed under a specific set of federal EPA regulations that largely defer to specific NRC requirements (e.g., container management, documentation for off-site shipments, emergency planning)
- Under the LLMW rule, ENVY is required to provide notification to the Agency that includes specific information about its management of LLMW.

# Mixed Wastes

- MOU between DEC/VDH
- Collaboration of the Departments - LLRW mixed with HW.
- Contemplates periodic evaluation by EPA to demonstrate that Vermont is meeting the requirements of RCRA HW rule requirements.

# HW Program info

DEC website:

- <http://dec.vermont.gov/waste-management/hazardous>
- <http://dec.vermont.gov/waste-management/hazardous/regulations>

# Discharge Permits

- Thermal Discharge
- MSGP (stormwater)



# Discharge Permits

- MSGP – general permit; incorporates sites like Entergy
- Entergy currently shipping intrusion water to several southern states.
- Entergy is developing a plan for characterization and discharge to the existing stormwater system.
- Analyticals (radiological, RCRA metals, SVOCs, VOCs, PCBs, pesticides and herbicides)
- Management plan - sampling, analysis and monitoring

# Discharge Permits

- DEC website – Watershed Management
- <http://dec.vermont.gov/watershed/permits>
- <http://dec.vermont.gov/watershed/wastewater/discharge-permits>
- <http://dec.vermont.gov/watershed/stormwater>

# Hazardous Site Cleanup

VT Haz Sites Cleanup Program

Complements Federal Superfund

Superfund ~~\$\$\$~~

Enforcement vs. Voluntary Cleanup

# Hazardous Site Cleanup

- Settlement agreements and Brownfields
- Site cleanup to future use standards
- Liability settled, site returned to productive use
- Community benefits

# Hazardous Site Cleanup

IROCP Procedure

Investigation and Remediation of Contaminated Properties

# Hazardous Site Cleanup

Site Characterization

Site Investigation

Conceptual Site Model

Risk Evaluation

Feasibility Study

Corrective Action Plan

Institutional Controls

Monitoring

# Hazardous Site Cleanup

DEC website – Waste Management Division

- <http://dec.vermont.gov/waste-management/contaminated-sites>
- <http://dec.vermont.gov/sites/dec/files/documents/IROCP.pdf>

# Questions

- Contact: Regulatory programs or me: [George.desch@vermont.gov](mailto:George.desch@vermont.gov)