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Status Update for Implementation of Best Available Technology per DOE Order 5400.5

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ABSTRACT

This report provides an update, as of July 1999, on the implementation of best available technology to control or eliminate radionuclide discharges to soil columns at Lockheed Martin Idaho Technologies Company-operated facilities at the Idaho National Engineering and Environmental Laboratory in accordance with DOE Order 5400.5, "Radiation Protection of the Public and Environment." This report reviews the following facilities:

- Auxiliary Reactor Area
- Idaho National Engineering and Environmental Laboratory Block Areas
- Central Facilities Area
- Idaho Nuclear Technology and Engineering Center (formerly the Idaho Chemical Processing Plant)
- Idaho Falls Facilities
- Power Burst Facility
- Radioactive Waste Management Complex
- Test Area North
- Test Reactor Area.

The best available technology to reduce or eliminate radionuclide discharges to soil columns currently implemented by the different facilities appears to be generally effective. Therefore, the different facilities should continue their current best available technology approaches, and also implement the specific recommendations listed in this report for their respective facility.

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ACRONYMS

AEDL	Applied Engineering and Development Laboratory
ARA	Auxiliary Reactor Area
BAT	best available technology
BORAX	Boiling Water Reactor Experiment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFA	Central Facilities Area
CFR	Code of Federal Regulations
CTF/SMC	Contained Test Facility/Specific Manufacturing Capability
D&D	decommission and decontamination
DCG	Derived Concentration Guides
DOE	Department of Energy
DOE-ID	Department of Energy Idaho Operations Office
EBR-1	Experimental Breeder Reactor-1
ER	Environmental Restoration
INEEL	Idaho National Engineering and Environmental Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
IRC	INEEL Research Center
LMITCO	Lockheed Martin Idaho Technologies Company
LOFT	Loss-of-Fluid-Test
MCL	maximum contaminant level
OU	operable unit
PBF	Power Burst Facility
pCi/L	picocuries per liter
PEWE	Process Equipment Waste Evaporator
RESL	Radiological and Environmental Services Laboratory
RI/FS	remediation investigation feasibility study
RMA	radioactive management area
ROD	Record of Decision
RWMC	Radioactive Waste Management Complex
SDA	Subsurface Disposal Area
STP	sewage treatment plant
TAN	Test Area North
TSF	Technical Support Facility
TRA	Test Reactor Area
WAG	Waste Area Group
WERF	Waste Experimental Reduction Facility
WRRTF	Water Reactor Research Test Facility
WMO	Waste Management Office

Status Update for Implementation of Best Available Technology per DOE Order 5400.5

1. INTRODUCTION

The purpose of this report is to provide an annual update on implementation of best available technology (BAT) to control or eliminate radionuclide discharges to soil columns at Lockheed Martin Idaho Technologies Company (LMITCO)-operated facilities at the Idaho National Engineering and Environmental Laboratory (INEEL) in accordance with Department of Energy (DOE) Order 5400.5, Chapter II (3)(b)(1), "Management and Control of Radioactive Materials in Liquid Discharges and Phaseout of Soil Columns."¹ A soil column is defined as an in-situ volume of soil down through which liquid wastes percolate from ponds, cribs, seepage basins, or trenches. DOE Order 5400.5 also includes requirements for managing inactive "receptors" (soil columns) and the prohibition of liquid discharges—even if uncontaminated—to those receptors.

This report considers sources of liquid waste (wastewater) at the INEEL from:

- Sewage treatment plants (STPs)
- Routine operations that produce process wastewater
- Septic tanks
- Storm water (to or from areas with potential radionuclide contamination)
- Nonroutine projects, such as environmental restoration (ER), decommission and decontamination (D&D), surveillance and maintenance.

All wastewater contains some level of radionuclides. Radionuclides exist throughout nature, in rock, soil, water, and air, and therefore cannot be completely avoided. The primary focus of this report is on the reduction or elimination of process-derived radionuclide discharges to soil columns, the management of inactive receptor areas, and the potential spreading of radionuclides via wastewater, including storm water. To avoid redundancy, only select representative monitoring data is included in this report.

Since DOE Order 5400.5 does not establish de minimus radionuclide levels for wastewater that is discharged to soil columns, the INEEL used a number of different references, or screening values, to evaluate wastewater for its associated risk to human health and the environment. Three of these references are Derived Concentration Guides (DCGs),¹ Drinking Water Standards,² and release limits from the draft *INEEL Management Guidance for Disposal of Wastewater*.³ The object is to meet DOE requirements and protect human health, and also minimize potential future environmental characterization and cleanup liability at INEEL wastewater disposal sites. If any contaminant level in a particular wastewater batch or stream exceeds an applicable screening value—especially a DCG—the user is required to conduct a more detailed evaluation (and site-specific evaluation) that will justify the release. Otherwise, the user must implement alternative disposal options. Wastewater evaluations apply to wastewater discharges to rapid infiltration trenches, spray fields, percolation ponds, and also the ground surface. This evaluation process is not currently applied to releases to septic tanks, although this report reviews releases to septic tanks.

2. FACILITY REVIEW

The following sections describe applicable INEEL facilities (see Figure 1) and their respective wastewater disposal sites, review their potential to discharge radionuclides to the soil column, and list BAT plans, where applicable.

2.1 Auxiliary Reactor Area

The Auxiliary Reactor Area (ARA) facilities consist of ARA-I, -II, -III, and -IV. They are inactive, except for ARA-IV, and have no functional utilities other than electrical power. As a result, liquid discharges, including those to "inactive receptor" sites,⁴ have been discontinued. The ARA facilities, also known as the Waste Area Group (WAG) 5, have a number of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) operable units (OUs) within and around them. Except for ARA-IV, the ARA facilities are under the Decommission and Decontamination (D&D) Group's administrative control.⁵

To the east of ARA-I is a CERCLA OU that has three in-line septic tanks (ARA-746) still in the ground, and an associated drain field. The contents of all the tanks have been removed, and influent lines have been capped. The drain field has minor amounts of radionuclide contamination. Also to the east of the facility are two inactive wastewater ponds. A final decision regarding the tanks and ground area will be made in the OU5-12 Record of Decision (ROD), which is expected to be signed in late 1999.⁶

ARA-II is a radiation-controlled area and has undergone D&D. It has two leach fields outside the fenced boundary that are CERCLA sites; its remediation will be determined in the OU5-12 ROD.⁶

ARA-III has undergone D&D. It has one septic tank (ARA-740) still in the ground. There is one small radioactive management area (RMA) inside the facility; its final remediation will be determined by the OU5-12 Record of Decision (ROD). South of the facility is an inactive leaching pond.⁶

ARA-IV has two abandoned septic tanks in the ground. Historical information from operations indicate these tanks are not a radiological concern. Formerly, there was an associated leaching pit with radionuclide contamination, but it was removed and backfilled.^{6,7}

2.1.1 Recommendations

Without utilities, there is no wastewater effluent from any of the ARA facilities and little potential to release radionuclides to the soil column. Therefore, the current BAT approach appears adequate and should be maintained.

ARA	Auxiliary Reactor Area
ANL-W	Argonne National Laboratory-West
CFA	Central Facilities Area
CTF	Contained Test Facility
EBR-I	Experimental Breeder Reactor I
EBR-II	Experimental Breeder Reactor II
INTEC	Idaho Nuclear Technology and Engineering Center
IET	Initial Engine Test
NRF	Naval Reactors Facility
PBF	Power Burst Facility
RWMC	Radioactive Waste Management Complex
STF	Security Training Facility
TAN	Test Area North
TRA	Test Reactor Area
TREAT	Transient Reactor Test (Facility)
TSF	Technical Support Facility
WRRTF	Water Reactor Research Test Facility
ZPPR	Zero Power Plutonium Reactor

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Figure 1. Idaho National Engineering and Environmental Laboratory facilities.

2.2 INEEL Block Areas

Block areas include those buildings or structures not within fenced facilities or administrative areas. The INEEL is geographically divided into numerous block areas, some of which have mini-facilities and/or small operations. The block areas with radionuclide concerns are Boiling Water Reactor Experiment (BORAX) V and Experimental Breeder Reactor-I (EBR-I).

BORAX V has undergone D&D, and is now under surveillance and maintenance by the respective WAG organization. The only radiological concern is the reactor parts in the subfloor of the old reactor building. The potential for radionuclide release from these parts, however, is very low because of their lack of contact with water. Remediation work on this former facility is finished.⁶

EBR-I had four septic tanks. The two Waste Management Office (WMO) tanks were removed, and the remaining two tanks are still operating. The contents of the two operating tanks have been characterized as not radiologically contaminated.⁸ The seepage pit for the former WMO septic tanks had some radiological contamination but was remediated, and the contaminated soil, brick, and piping were sent to Radioactive Waste Management Complex (RWMC) for disposal.⁹

Storm water is not a significant radiological concern for the block areas. The BORAX and EBR-I areas are managed under a storm water pollution prevention plan to minimize run-off through these areas and to minimize erosion and potential transport of radionuclides.

2.2.1 Recommendations

The current BAT approach appears adequate and should be maintained.

2.3 Central Facilities Area

The primary effluent discharge to the environment at the Central Facilities Area (CFA) is from the Sewage Treatment Plant (STP). The STP consists of a series of three compacted soil/polymer-mixture lined evaporation treatment lagoons followed by sprinkler irrigation of the effluent. This system replaced the old CF-691 STP and drainfield, which were phased out of operation in 1995 and are now undergoing D&D.

Tritium concentrations in the CFA STP effluents are the result of groundwater tritium contamination, which has affected CFA water systems for many years. Effluent concentrations generally are less than 1% of applicable DCG and approximately equal to the tritium concentrations observed in the CFA drinking water wells. Other potential contributors of radionuclides include discharges from the Radiological and Environmental Sciences Laboratory (RESL) and the potentially contaminated sewer lines that formerly led to the old STP. At RESL, administrative controls limit radionuclide discharges to less than one DCG.¹⁰ Within the sewer lines, low-level contamination is suspected, but has not been verified.¹¹ As a safety measure, the access ports leading to the sewer system have radiological warnings.

The CFA-617 Laundry and Respirator Facility, inactive since 1993, used to be a significant potential source of radionuclide discharges to the soil column. When operating, wastewater from the facility went to the CF-691 STP and the CF-716 septic tank, both of which led to the old CFA drainfield. Since closure, the wastewater lines to the old CF-716 septic tank have been capped. The CF-691 STP, CF-716 septic tank, and lift station (part of WAG 4) are currently undergoing D&D and scheduled to be removed by the end of 1999. The drainfield, a CERCLA site and also part of WAG 4, will most likely be remediated in 2003.^{9,12}

During 1997 and 1998, there were no storm water or snow melt sampling events from which radiological data were obtained.

2.3.1 Recommendations

With the administrative controls at RESL and the new STP in operation, wastewater from the CFA area is not a significant radiological concern. Therefore, the current BAT approach appears adequate and should be maintained.

2.4 Idaho Nuclear Technology and Engineering Center

The main discharges to the environment from the Idaho Nuclear Technology and Engineering Center (INTEC) are wastewater effluent from the STP to the rapid infiltration trenches and wastewater effluent from the Service Waste System to the Percolation Ponds (CPP-1779). Other discharges include storm water and effluent from septic tanks.

In 1997 and 1998, radiological parameters (gross alpha and beta) in the effluent from the STP to the rapid infiltration trenches averaged less than 10% of the DCGs for the most restrictive alpha- and beta-emitting radionuclides with listed DCGs.¹³

The Percolation Ponds receive service wastewater from various sources, such as noncontact cooling water, steam condensate, and water treatment/demineralizer effluents. The practice of discharging radionuclides to the service waste system was discontinued in 1993. Currently, service wastewater that has the potential to contain process-derived radionuclides, either from residual contamination in the lines or from a single point system failure (such as a heat exchanger), pass through a number of monitoring and diversion systems designed to prevent the release of radioactivity. If the wastewater contains radioactivity levels above predetermined setpoints ($6E+05$ pCi/L - gamma), it is diverted to the service waste-diversion collection tank, VES-WM-191, where it is sampled. If analysis shows radionuclides above limits in 10 CFR 20, Appendix B, Table II, column 2, the wastewater is sent to the Process Equipment Waste Evaporator (PEWE) system. If radionuclide levels are below the limits, it is returned to the service waste system for discharge to the percolation ponds.¹⁴ Because of redundant safety features, the probability of an accidental release to the ponds is less than $1E-06$.¹⁵ Monthly composites, consisting of 24-hour daily aliquots, are taken from the wastewater stream and evaluated against the criteria in 10 CFR 20, Appendix B, Table II, column 2. In 1998, radionuclides in wastewater going to the ponds averaged less than 1% of applicable DCGs.¹⁶

The Environmental Restoration Group is presently conducting an in-depth study on the service wastewater stream to assist in the construction and operation of new percolation ponds for INTEC. When the study is finalized, the results will be reviewed and changes, if any, to the current monitoring arrangements on the service wastewater stream will be made accordingly.¹⁷

There are seven active septic tanks at INTEC (see Table 1). None of the septic tanks at INTEC have been sampled and characterized.^{18,19,20} The old cesspool for buildings CPP-626 and CPP-603, which has been replaced with a septic tank system, has been sampled. Some radiological contamination was found, but it was investigated and declared a CERCLA no-action site, which ER now manages. Based on process knowledge, none of the active septic tanks at INTEC are likely to have radiological contamination above background levels.

Table 1. Active septic tanks at the Idaho Nuclear Technology and Engineering Center.

Tank	Comments
VES-YDB-102	For CPP-T1 & T5
VES-MA-107	For CPP-662
VES-CW-100	For CPP-655
ST-SFE-102	New tank for CPP-603 annex
VES-CA-101	For CPP-656
VES-CFE-6012	For CPP-696
VES-CFE-6013	For CPP-696

In 1998, storm water radiological parameters were monitored at the culvert leading to the infiltration (retention) basin on the east side of the facility. The infiltration basin is currently an environmentally controlled area (ECA-37A) and under review. The outcome of the review may affect whether or not the diversion of storm water to it will be allowed to continue.²¹ In 1997, one storm water sample was collected from the culvert to the retention basin. Gross alpha and beta were less than 10% of the DCGs for the most restrictive alpha- and beta-emitting radionuclides with listed DCGs.²² In 1998, one of three storm water samples collected had gross alpha concentration of 52 pCi/L, almost two times the listed DCGs referenced.²³ Soil disturbing activities in the INTEC facility were the likely cause.

Water from precipitation and snow melt periodically accumulates in the INTEC utility tunnels. Because this water has the potential to pick up radionuclides that may be present on and in the ground, utility tunnel water is sampled and analyzed for radionuclide contamination before final decisions are made regarding disposal. Waste Generator Services is currently pursuing the use of drinking water Maximum Contaminant Levels (MCLs) (published numeric limits or 1/25 DCGs) as the criteria for determining disposal methods or routes for accumulated water.¹⁴

2.4.1 Recommendations

Recommendations are that (a) the septic tanks be characterized, (b) the criteria for disposal of utility tunnel storm water be finalized and implemented, and (c) the current approach for the other wastewater disposal areas be maintained.

2.5 Idaho Falls Facilities

The only potential source for radionuclide discharge to the environment from the Idaho Falls facilities is from the INEEL Research Center (IRC) laboratories. Using Applied Engineering and Development Laboratory (AEDL) procedures for independent hazard review, all radiological work done at the IRC is reviewed to ensure systems are in place to prevent process-derived radionuclide discharges to the sewer system and/or soil column. Sanitary wastewater goes to the City of Idaho Falls sewer system. All wastes with process-derived radionuclides are containerized and shipped to an appropriate facility for disposal; no contaminated liquids go down sanitary sewer drains.²⁴

2.5.1 Recommendations

With the administrative controls in place, it is extremely unlikely that wastewater with process-derived radionuclides would be discharged from the Idaho Falls Facilities to the sewage system or environment. Therefore, the current BAT approach appears adequate and should be maintained.

2.6 Power Burst Facility

The Power Burst Facility (PBF) area has no central sewage disposal facility and relies solely on septic tanks. The septic tanks are designed to receive only sanitary and janitorial wastewater. Currently, there are seven tanks (Table 2), all of which have been characterized, with none showing radionuclide levels above background levels.⁸ Because of this, and administrative controls, none of the septic tanks have a significant potential to discharge radionuclides to the soil column.

In 1997 and 1998, surface water samples collected at the Waste Experimental Reduction Facility (WERF) showed occasional levels of cesium-137 at concentrations less than 1% of applicable DCG.^{22,23} In 1997, one detection of cobalt-60 was noted; it too was less than 1% of applicable DCG. Levels and frequency of detection for radionuclides during this period were consistent with data from previous years.

2.6.1 Recommendations

It is unlikely that wastewater discharges from any of the septic tanks to the soil column will contain radionuclides above background levels. Therefore, the current BAT approach appears adequate and should be maintained.

Table 2. Active septic tanks at the Power Burst Facility.

Tank	Comments
PBF-724	Control Area
PBF-744	Control Area
PBF-767	Control Area
PBF-728	Reactor Area
PBF-725	Waste Engineering Development Facility Area
PBF-726	Waste Experimental Reduction Facility Area
PBF-727	Mixed Waste Storage Facility Area

2.7 Radioactive Waste Management Complex

The main source of liquid effluent from the Radioactive Waste Management Complex (RWMC) is the sewage system leading to the wastewater ponds on the south side of the facility. The ponds have a geo-textile liner. There is no indication of leakage and therefore no discharge to the soil column. Based on results of a risk-based statistical evaluation of effluent data, the radiological concern was low enough that radiological monitoring was discontinued at the RWMC sewage lagoons in 1997.¹³

In 1997 and 1998, surface water runoff samples showed occasional low levels of gamma-emitting radionuclide cesium-137, the maximum reading being 0.1 % of the DCG.^{22,23} Concentrations were consistent with data from previous years, indicating no changes or trends.

2.7.1 Recommendations

With current controls, neither wastewater effluent nor storm water appears to be a significant radiological concern. Therefore, the current BAT approach appears adequate and should be maintained.

2.8 Test Area North

Test Area North (TAN) has a number of wastewater disposal sites, including the TAN-740 disposal pond, Water Reactor Research Test Facility (WRRTF) wastewater ponds, and Contained Test Facility/Specific Manufacturing Capability (CTF/SMC) disposal pond.

The TAN-740 disposal pond is unlined and receives wastewater from the TAN-655 lift station, which receives process wastewater from TAN-607 and treated sanitary wastewater from the TAN-623 STP. The east end of the pond is known to have some radionuclide contamination. Soil sampling down to a depth of 11 feet below ground surface revealed that little contamination appears to be migrating below pond sediments and underlying soil.²⁵

The TAN-655 lift station was remediated in August–September 1993 as part of a CERCLA interim action.²⁵ However, there may be some residual radioactive contamination in the TAN-Technical Support Facility (TSF) process wastewater lines, which could result in some continued radiological contaminant discharges to the STP and disposal pond. For 1997 and 1998, gross alpha and beta levels averaged less than 10% of the DCGs for the most restrictive alpha- and beta-emitting radionuclides with listed DCGs.^{22,23}

Because of past discharges and possible residual contamination in wastewater lines, sludge from the TAN-TSF STP normally has detectable amounts of radioactive contamination, and will, therefore, continue to be disposed of at the RWMC.

The CTF/SMC pond is double-lined with high-density polyethylene and has interstitial monitoring to detect any leakage in the first liner. Effluent to the pond is monitored quarterly by a composite sampler; radionuclide levels have been below DCGs since the pond was put into operation.²⁶ Secondary heat exchangers are used in the processes at SMC to ensure that radiological contaminants are not accidentally discharged. Recently, liquid has been detected in the interstitial space of one of the cells of the pond. Discharges to that cell have subsequently been rerouted. The installation contractor is scheduled to repair it in the summer of 1999.

For years, the Loss of Fluid Test (LOFT) structure has had rainwater and snow melt entering the basement and migrating to one of the sumps with radiological contamination, creating an ongoing wastewater disposal concern. A number of solutions have been tried to minimize rainwater and snow melt from entering the basement, such as capping select pipes and redirecting rainwater that had been leaking through the roof, but were only partially successful. In calendar year 1998, collected water was transferred to the TAN-607 Three Mile Island (TMI) pool. That practice, however, was discontinued because of conductivity issues. Collected water is now stored in tanks while other disposal options are pursued.²⁷ Water with radionuclide levels less than drinking water MCLs (published numeric limits or 1/25 DCGs) will be disposed of to the TSF disposal pond. Water with levels greater than MCLs will first be treated by BAT (e.g., portable treatment unit) then disposed of to the pond. Otherwise, disposal will be by another route/method (e.g., drum evaporator, treatment at ANL-W). This disposal criteria and methodology will also be applied to other wastewater at TAN.²⁸

At WRRTF, the TAN-642A sewage wastewater and TAN-642B process wastewater ponds were constructed in 1981. Due to the limited number of personnel and operations at the facility, discharge

volume to the ponds is low and intermittent. Little potential exists for radionuclides to be discharged to either pond. Because of this, radiological sampling is not performed.

In 1997 and 1998, storm water samples collected at TAN showed gross alpha and beta at less than one-fourth of the DCGs for the most restrictive alpha- and beta-emitting radionuclides with listed DCGs.^{22,23}

2.8.1 Recommendations

Administrative controls at TSF appear to be effective in keeping radionuclide discharges near background levels. WRRTF does not appear to be a significant concern given the current activities. The CTF/SMC lined wastewater pond and administrative controls make the likelihood of process-derived radionuclide discharges to the soil column remote. Efforts to stop the water migration to the contaminated sump in the LOFT basement should continue, and disposal of collected sump water by the most practical and effective means should also continue. Overall, the current BAT approaches at TAN appear adequate and should be maintained.

2.9 Test Reactor Area

The Test Reactor Area (TRA) has three active wastewater disposal sites:

- TRA-702 Cold Waste Pond
- TRA-715 Warm Waste Evaporation Pond
- TRA-735 and -736 Sewage Lagoons.

Former wastewater disposal sites include the TRA-701 Chemical Leaching Pond, TRA-758 Warm Waste Pond, and TRA-624 STP Sewage Lagoons.

The TRA-701 Chemical Waste Pond was taken out of service in April 1999 and will be filled and capped with native soils by June 1999. Effluent to the pond came from the treatment processes at the TRA demineralizer facility (TRA-608). When in operation, the pond was not a radiation-controlled area, and there were no radiological sources likely to have contributed to the wastewater stream.²² Effluent samples taken generally showed no detectable radiological constituents.^{13,29}

The TRA-702 Cold Waste Pond, which consists of two cells, is not a radiation-controlled area. Operational monitoring includes a 24-hour composite sampler at TRA-764 that collects daily effluent samples, which are subsequently analyzed for gross alpha and beta. Samples taken generally show no detectable radiological constituents.²⁹

The old TRA-758 Warm Waste Leaching Pond, taken out of service and capped with a layer of native soil in 1993, was replaced by the new TRA-715 Warm Waste Evaporation Pond.³⁰ The TRA-715 pond has two sections, both of which are double-lined with high density polyethylene, and have an interstitial leak detection system. Effluent to the pond comes from low-level radioactive waste drains in laboratories, craft shops, and reactor facilities throughout TRA. Effluent streams are collected at the inlet distribution box of the TRA-712 Retention Basin. The retention basin (excluding the inlet portion) was taken out of service in 1993 because of leakage. The extent of the radionuclide contamination outside the basin is unknown. Current plans for the retention basin, which will likely be implemented in FY 2000, are to disconnect and cap the inlet distribution box and reroute piping directly to the pump station for the evaporation pond. After that, the retention basin will be transferred to D&D.^{31,32}

The old TRA-624 STP and lagoons are out of service. The lagoons were a radiation controlled area and have been filled and capped with native soils under CERCLA action OU 2-13.³³ The sewage plant is scheduled for D&D. Without an effluent stream, there is no potential for new radionuclide discharges to the soil column.

The new TRA-734 and -735 Sewage Lagoon Ponds, when originally built, had compacted soil/polymer mixture liners. In 1996, it was determined that Pond #2 (TRA-735) had a leak. In 1997, the pond was drained and a geotextile liner installed, which corrected the leak and eliminated the potential to discharge to the soil column. Radiological parameters in the effluent that year were less than 1% of applicable DCGs. As a result of that and an evaluation of previous historical data showing no risk, regular radiological monitoring was discontinued.^{31,32}

There are two storm water monitoring locations outside the TRA perimeter fence on the north side. Neither have had storm water flows since monitoring began in 1993.^{31,32}

2.9.1 Recommendations

TRA should (a) pursue plans to by-pass the retention basin and pump directly to the pump station to the evaporation pond, and (b) maintain its current BAT approach to other wastewater disposal areas.

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