



SRS Citizens Advisory Board

Facilities Disposition and Site Remediation

Committee Meeting

Aiken Municipal Conference Center, Aiken, SC

February 27, 2006

The Savannah River Site (SRS) Citizens Advisory Board (CAB) Facilities Disposition and Site Remediation Committee (FD&SR) met on Monday, February 27, 2006, 5:00 PM, at the Aiken Municipal Conference Center, Aiken, SC. The purpose of this meeting is to review and discuss the SRS 221-1F A-Line EE/CA; the SRS FFA Appendix K, and public comments. Attendance was as follows:

CAB Members

Bob Meisenheimer
Madelene Marshall
- Wendell Lyon
- Mary Drye
Manuel Bettencourt
Joe Ortaldo
Mercredi Giles
Jayaraman
Judith Greene-McLeod
Jerry Devitt
Dave Dawson
Wade Waters
Alex Williams
- *FD&SR committee members*

Stakeholders

Jack Roberts
Liz Goodson
Lee Poe
Murray Riley
Cynthia Gilliard
Mike French
Perry Holcomb
Regulators
Jim Barksdale, EPA
Chuck Gorman, SCDHEC
Dawn Taylor, EPA
Bob Adams, SCDHEC
Rob Pope, EPA
* *CAB technical advisor*

DOE/Contractors

Joe Yanek, WSRC
de'Lisa Bratcher, DOE
Jesse Roach, WSRC
Helen Belencan, DOE
Paul Sauerborn, WSRC
Ray Hannah, DOE
Steve Etheredge, WSRC
Teresa Haas, WSRC
Bob Hiergosell, SRNL
Brian Hennessey, DOE

Welcome and Introduction:

Mary Drye, Chair, welcomed those in attendance and asked that they introduce themselves.

Decommissioning of 221-1F A-Line: Ray Hannah stated that the purpose of the presentation was to provide an overview of the Removal Site Evaluation Report/Engineering Evaluation and Cost Analysis (RSER/EE/CA) for Decommissioning of A-Line, 221-1F. Mr. Hannah explained the graded approach used in the D&D project with this RSER/EE/CA being the highest level. A-Line for this project, consists of 221-1F, ancillary facility 727-F and three Aprons (exterior concrete pads) which are contiguous to 221-1F and located entirely within F-Area. 221-1F is a four story structure with an elevated concrete slab first floor 4.25 feet above the surrounding grade elevation and steel framing for the upper floors. There are two sumps in the basement, one sump on the North Apron, two sumps on the Center Apron, and two sumps on the South Apron. The aprons have dikes for containment purposes. 727-F is a prefabricated metal building on a concrete slab.

Mr. Hannah then provided a background on the facilities history of operations. A-Line was constructed in the early 1950's and operations began in December 1954. A-Line provided general support to F-Canyon operations. A-Line's primary purpose was to receive depleted uranium nitrate from F-Canyon solvent extraction process and convert that material into uranium trioxide powder. A-Line processing ceased in early 1990's, and until early 2004, facility provided storage of uranyl nitrate solution. 727-F housed operations supplies and contaminated equipment from the A-Line, including small quantities of paint and cleaning products.

Mr. Hannah talked to the nature of the existing contamination. The evaluation considers physical scope represented by project boundary, and using biased sampling to identify contaminant levels, which focused on deteriorated/stained concrete, sumps, and areas with elevated radiological readings. Cesium-137 and Uranium 238 are the primary radiological contaminants of concern, with maximum amounts found in the Center Apron. Uranium and Aroclor 1254 polychlorinated biphenyl (PCB) are the primary chemical contaminants of concern, with maximum amounts of uranium found in the basement and PCB found in the Denitrator Pot Room at levels above 50 parts per million.

Mr. Hannah stated a streamlined risk assessment was completed. The streamlined risk assessment identifies the risk and potential groundwater impacts associated with the configuration and contamination present before decommissioning starts. Human health risk is estimated in terms of potential. Mr. Hannah also stated that none of the contaminants of concern were projected to have an impact on groundwater. The streamlined risk assessment assumes the entire area is uniformly contaminated at the maximum measured concentrations.

Mr. Hannah explained that the removal action alternatives purpose is to determine the appropriate end state of the contaminated concrete aprons, basement floor, first level floor, and 727-F floor to reduce risk to human health and the environment. Demolition and removal

(D&R) of the above grade 221-1F and 727-F building structures is part of the base case for all action alternatives. The following alternatives were considered:

- Alternative 1 – The facility remains in the deactivated state
- Alternative 2 – D&R structures; fill basement, aprons and sumps; and provide 6 inch and 8 inch concrete cover
 - o A minimum of 8 inches of concrete to be installed over the 221-1F dissolver room
 - o A minimum of 6 inches of concrete over all other areas, including the 727-F slab
- Alternative 3 – D&R structures, remove sumps, decontaminate floors, fill basement and aprons, and provide 6 inch concrete cover
- Alternative 4 – Remove the entire A-Line facility including building foundations and slabs and backfill the area to surrounding grade elevation

The preferred alternative is Alternative 2, which meets the threshold criteria of overall protection of human health and the environment and complies with Applicable and Relevant and Appropriate Requirements; satisfactorily addresses all removal objectives for effectiveness and implementability; and meets the substantive requirements of the risk-based disposal of bulk PCB waste as prescribed in 40 CFR 761.62(c).

Mr. Hannah stated that DOE briefed SCDHEC and EPA about the document on December 20, 2005 and formally transmitted the document for review on December 22, 2005. The regulator comments were received by the end of January 2006, with the following responses:

- SCDHEC comments concerned providing additional information about the sumps, the document was revised to include the requested information; EPA did not agree with the preferred alternative, however DOE did not change from alternative 2 because it keeps hazard exposure to the worker at a minimum while still achieving risk reduction objectives.

The final end state for 221-1F will be determined during the CERCLA F-Area Completion process.

Mr. Hannah provided the following implementation schedule:

- Issue EE/CA for Public Comment March 2006

- Complete Comment Resolution April 2006
- Issue Action Memorandum April 2006
- Complete Decommissioning February 2007
- Close Out Project April 2007

Questions that arose from the presentation are as follows:

Q. Lee Poe asked at what time do you address the soils and groundwater beneath the slabs?

A. They will be addressed by Soil and Groundwater Projects separate from the D&D activities.

Q. Will this area be under Government control in perpetuity?

A. Yes, the area will be under the Government control.

Q. Are there models used to ensure that the COC's don't reach the groundwater?

A. Yes there are specific and particular models that are used in order to assure the contamination would not reach the groundwater.

Q. Does the DOE have to comply with regulatory oversight in order to perform a removal action?

A. No, under CERCLA the DOE has lead agency authority for removal actions.

Integration of D&D and Soil and Groundwater – Appendix K Modification to the FFA:

Helen Belencan stated the purpose of the presentation is to explain what Appendix K is and why it was developed. Ms. Belencan explained that Appendix K is a new Appendix in the Federal Facility Agreement (FFA), developed to address EPA and DHEC concerns over S&GW and D&D Integration, which allows documentation of decisions made regarding D&D to facilitate Area Completion.

Ms. Belencan explained how the FFA was modified:

- Two new parts were added to the FFA
 - Section XL – Decommissioning Facilities
 - Appendix K

- Section XL: Decommissioning Facilities
 - Defines decommissioning as the first post-operational stage for the facility, when residual hazards are eliminated permanently or reduced to a safe condition
 - Establish DOE as the lead agency for preparing and finalizing decommissioning documents and coordinating all decommissioning activities with EPA and DHEC
 - Describes the disposition path for all decommissioned facilities – essentially “tracks” decisions made on decommissioning projects
- Appendix K: comprised of 2 lists (K-1 and K-2) – this is where the “tracking” is done
 - Appendix K-1: Facilities planned for decommissioning (presently all 1013 EM facilities)
 - Facility use decisions not subject to dispute
 - Appendix K-2: Facilities the agencies agree will not require further evaluation or response action during area closure – these are typically facilities decommissioned using the “Simple Model”
 - Provides a linkage to Appendix C for facilities that may warrant response action – Integrated Sampling Model or EE/CA Model projects
 - Appendix C contains the list of RCRA and CERCLA units (i.e., waste sites) that need investigation and cleanup Record of Decision
 - These facilities become “sub units” of the Area Completion scope

In conclusion, Ms Belencan stated that Appendix K implements the 2003 Memorandum of Agreement in context of the FFA, resolves regulator concerns on D&D implementation and integration process, tracks and institutionalizes decisions with no additional enforceability and no milestones for D&D, with D&D scheduled to support the Area Completion schedule. All this enables SRS to proceed with area Completion, with regulator confidence that all potential releases/risks will be addressed.

The following questions arose from this presentation:

Q. Where will 221-1F A-Line be listed in the FFA?

A. It will be listed as a “sub-unit” in Appendix C-4

Q. Is there anything found in the FFA as to how a particular project will be evaluated?

A. No, the FFA and its Appendices do not address how a particular project will be evaluated

Public Comment: Lee Poe requested a presentation on the T-Area Closure and emphasis on the floodplain swamp area of contamination.

Adjourn:

Mary Drye adjourned the meeting at 6:45 P.M.