

**SOUTH CAROLINA DEPARTMENT OF HEALTH
AND ENVIRONMENTAL CONTROL**

**RESPONSE TO RECOMMENDATION NO. 11
NOVEMBER 28, 1995**

**FROM THE SAVANNAH RIVER SITE
CITIZENS ADVISORY BOARD**

According to the South Carolina Hazardous Waste Management Regulations (SCHWMRs), the Savannah River Site (SRS) must ensure that containers holding hazardous waste are in good condition (R.61-79.265 Subpart I). Specifically, the SCHWMRs state that "If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part". For this reason the South Carolina Department of Health and Environmental Control (SCDHEC) supports the repackaging of hazardous transuranic (TRU) waste which is currently held in containers of poor condition.

The future plan for management and disposition of hazardous TRU waste is covered in the SRS Site Treatment Plan (STP). The SRS STP has been conditionally approved by SCDHEC and made enforceable through an order under the Federal Facility Compliance Act. The current management plan for the majority of hazardous TRU waste is shipment to the Waste Isolation Pilot Plant (WIPP). The STP contains a schedule for permitting, construction, and operation of a facility in which TRU waste will be prepared for shipment. In light of this plan for future management, SCDHEC believes that SRS should take all steps necessary to prepare and ship the hazardous TRU waste before the WIPP closure date. As the necessary steps for preparation become more clearly defined, SCDHEC believes that the schedules for these activities should be included in appropriate documents, such as the STP.

Since the preferred path for management of hazardous TRU waste has been established in the SRS STP, it is questionable whether the WIPP Supplemental Environmental Impact Statement-II will reveal any information which may affect the current STP status. If at any point SRS develops a preference for management of the hazardous TRU waste in any way other than preparation and shipment to WIPP or if WIPP implementation ceases, SRS must request approval from SCDHEC for a change in management strategy.