



U.S. DEPARTMENT OF
ENERGY



Environmental Compliance – SRS Permits

Avery Hammett

DOE-SR, FFA/Regulatory Integration Program Manager

CAB Full Board Meeting

May 21, 2024



Oversight of the Environmental Compliance Program

- **Environmental Compliance Technical Assistance to all Site Operations and Contractors:**
 - Environmental programmatic support:
 - *Subject Matter Expert (SME) personnel provide all organizations regulatory guidance on permit/regulatory requirements such as the CAA Title V Air Permit, CWA NPDES Permit, RCRA Hazardous Waste Permit, etc.*
 - Operational Compliance:
 - *Environmental Compliance Authority (ECAs) are assigned to organizations throughout the site to support and ensure facility environmental compliance*
- **Regulatory Inspections and Audits:**
 - Provide oversight/support to all regulatory compliance inspections (i.e., Landfill, RCRA CEI, Underground Storage Tanks, Water, Sanitary Surveys) in a safe compliant manner
- **Regulatory Reporting:**
 - 600+ environmental regulatory deliverables & commitments are submitted each year



SRS Environmental Policy

Leadership in Environmental Excellence

The goal of the environmental policy is to protect our families, and future generations from any impacts of the site's operations.

Our commitments are to: (P2C2)

- **Promote** sound environmental stewardship
- **Prevent** pollution on site and in our communities
- **Conduct** science and energy research
- **Continue** our nation's national security mission

We do this through the 4 C's:

- **Comply** with environmental laws and regulations
- **Continue** process improvements
- **Conduct** safe operations
- **Communicate** with our workforce, public and stakeholders

Oversight of the Environmental Compliance Program (continued)

- **Site Wide Environmental Permitting:**
 - Obtain and maintain environmental permits (Air, Water, Waste & Hazardous Materials, etc.) to support Site & Facility operations (600+ permits)
- **Natural and Environmental Resource Management:**
 - Ensures compliance with Migratory Bird Treaty Act (i.e., Protection of birds, nests, and eggs at SRS) and Endangered Species Act
- **NEPA Environmental Planning and Regulatory Reporting:**
 - Review and approval of EAs, EIS, and over 1000+ Environmental Evaluation Checklist (ECC) are performed annually for the Evaluation of Projects and Activities at the Savannah River Site
- **Regulatory Interface:**
 - Partner with all Site contractors, DOE managed sub-contractors (i.e., Ameresco) and grantees/awardees (USFS, SREL, SCIAA, SCDNR) to ensure interface/interactions with regulators are in the best interest of the SRS

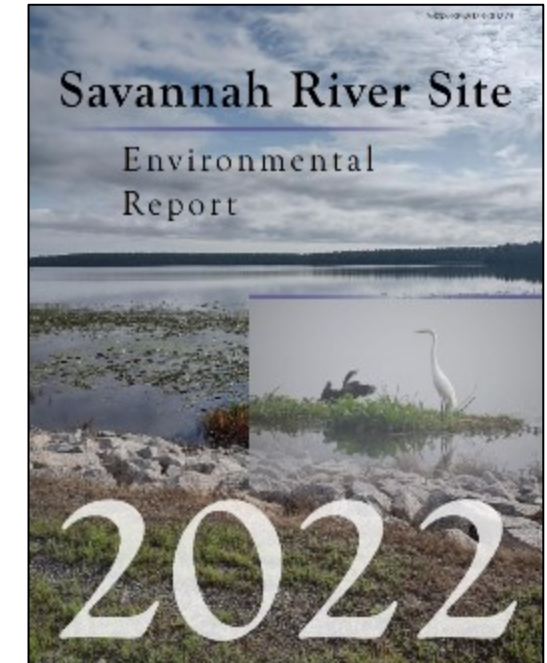
Environmental Compliance - Permits

- **Site Wide Environmental Permitting:**

- Obtain and maintain environmental permits (Air, Water, Waste & Hazardous Materials, etc.) to support Site & Facility operations
- 600+ permits

Table 3-3 SRS Permits

Type of Permit	Number of Permits
Air	6 ^a
U.S. Army Corps of Engineers (USACE—Nationwide Permits)	8
Asbestos Demolition Licenses/Abatement Licenses/Temporary Storage of Asbestos Waste Notices	276
Asbestos Abatement Group License	1
Asbestos Temporary Storage of Waste License	1
Domestic Water	101
Industrial Wastewater Treatment	57
National Pollutant Discharge Elimination System (NPDES) Permits	9 ^b
Construction Stormwater Grading Permit	12
Resource Conservation and Recovery Act (RCRA) Hazardous and Mixed Waste	1
Solid Waste	3
Underground Storage Tank	7
Sanitary Wastewater	95
South Carolina Department of Health and Environmental Control (SCDHEC) 401	0
SCDHEC Infectious Waste Registration	1
SCDHEC Bureau of Drug Control Controlled Substances Registration	2
Nondispensing Drug Outlet License	4
SCDHEC Navigable Waters	0
Underground Injection Control	10
Scientific Collecting Permits ^c	7
Groundwater Withdrawal	13
Surface Water Withdrawal	1
Total	615



SRS Clean Air Act Permits

- **Currently Six Air Permits**

- Two Title V Part 70 Air Quality Permit

- *SRS TV-0080-0041 (includes EM and NNSA facilities)*
- *Ameresco TV-0080-0144 – no SRNS involvement but collocated with TV-0080-0041*

- Three Construction Air Quality Permits under SRS Title V (TV-0080-0041)

- *SRMC Switch from Formic Acid to Glycolic Acid 0080-0041-C5*
 - Submitted minor mod to TV 7/25/2022
- *SRNS Surplus Plutonium Disposition (SPD) 0080-0041-C4*
- *BSRA SRNL Stack Modification Permit Number - CP-50000078 Agency Air Number - 0080-0041*

- One Construction Air Quality Permit

- *SRPPF Permit Number - CP-50000085 Agency Air Number – 0080-0194*



SRS Clean Water Act Permits

Category	Total
Construction Stormwater Grading Permit	10 ^{1,2}
National Pollutant Elimination System (NPDES)	
SC0000175 Permit for Discharge to Surface Water (Industrial Wastewater)	
SCR000000 General Permit for Stormwater Discharges Associated with Industrial Activities (except Construction)	
SCR1000000 General Permit for Stormwater Discharges from Construction Activities	
SCG250000 General Permit for Utility Water Discharges	9
SCG580000 General Wastewater Construction Permit	
ND0072125 (Sludge) Land Application Permit (No Discharge)	
SCG160000 (SRNS Cert. #SCG160155) General Permit for Discharges from Application of Pesticides (M&O)	
SCG160000 (DOE Cert. #SCG160118) General Permit for Discharges from Application of Pesticides	
Ameresco – SC0049107 Permit for Discharge to Surface Water (Industrial Wastewater)	
Industrial Wastewater Treatment	55 ^{1,2}
Domestic Water	
201268 General Construction Permit Water Supply Distribution System	99 ¹
Sanitary Wastewater	92 ^{1,2}
Groundwater Withdrawal	12 ²
Surface Water Withdrawal	1

SRS Resource Conservation and Recovery Act (RCRA) Permits

- **SRS has one RCRA permit for the entire site – EPA ID# SC1890008989**
 - Large Quantity Generator of Hazardous Waste (LQG)
- **Permitted Treatment/Storage/Disposal Facility (TSDF)**
 - Large Quantity Handler of Universal Waste (LQH)
 - Used Oil Generator
 - Medical Facility
- **SRS has two additional areas outside the SRS boundary**
 - Savannah River Research Campus (SRRC) – Aiken County Technology Lab (ACTL) – EPA ID# SCR000762401
 - *Small Quantity Generator of Hazardous Waste (SQG)*
 - Applied Research Center (ARC) – Hydrogen Technology Research Lab/Energy Material Research Lab (HTRL/EMRL) – EPA ID#SCR000767517
 - *Very Small Quantity Generator of Hazardous Waste (VSQG)*



Operational waste management facilities in E Area



Other SRS Permits

- **Asbestos– 278 (varies based on Site activities)**
 - Demolition/Renovations
 - Asbestos Abatement Group License
 - Temporary Asbestos Storage Containment Area
- **Underground Storage Tanks - 7**
 - Various SRS locations
- **Solid Waste (Landfills) - 3**
 - Z-Area Saltstone
 - 288-F Dry Ash Landfill
 - 632-G Landfill
- **Scientific Collecting Permits - 7**
 - SREL - 4
 - SRNS - 3



Environmental Monitoring Program

- **Environmental Monitoring Program Oversight**

- Ensures environmental samples are collected and analyzed with DOE and regulatory requirements.
 - *More than 5,000 samples are collected on an annual basis on and off site.*
 - Environmental monitoring includes the collection of air, water, soil, food products, vegetation, and wildlife.
 - Samples are analyzed for radionuclides, metals, and other chemicals.
- Monitor and Report on Environmental Monitoring and Surveillance
- Wildlife Monitoring Program
- Manage (>70 years) SRS Environmental Data
- Collaborate with other environmental groups (SRNL, Forestry, Ecology Lab) onsite and offsite (SCDHEC and Southern Company) for sharing of knowledge, data and technical expertise in environmental studies

- **Annual Site Environmental Report (ASER)**

- The ASER is mandated by DOE Order 231.1B (Environment, Safety, and Health Reporting), and is the primary document that the Department uses to inform the public of environmental performance and conditions at SRS.

Link to Annual Site Environmental Reports (ASERs): <https://www.srs.gov/general/pubs/ERsum/index.html>

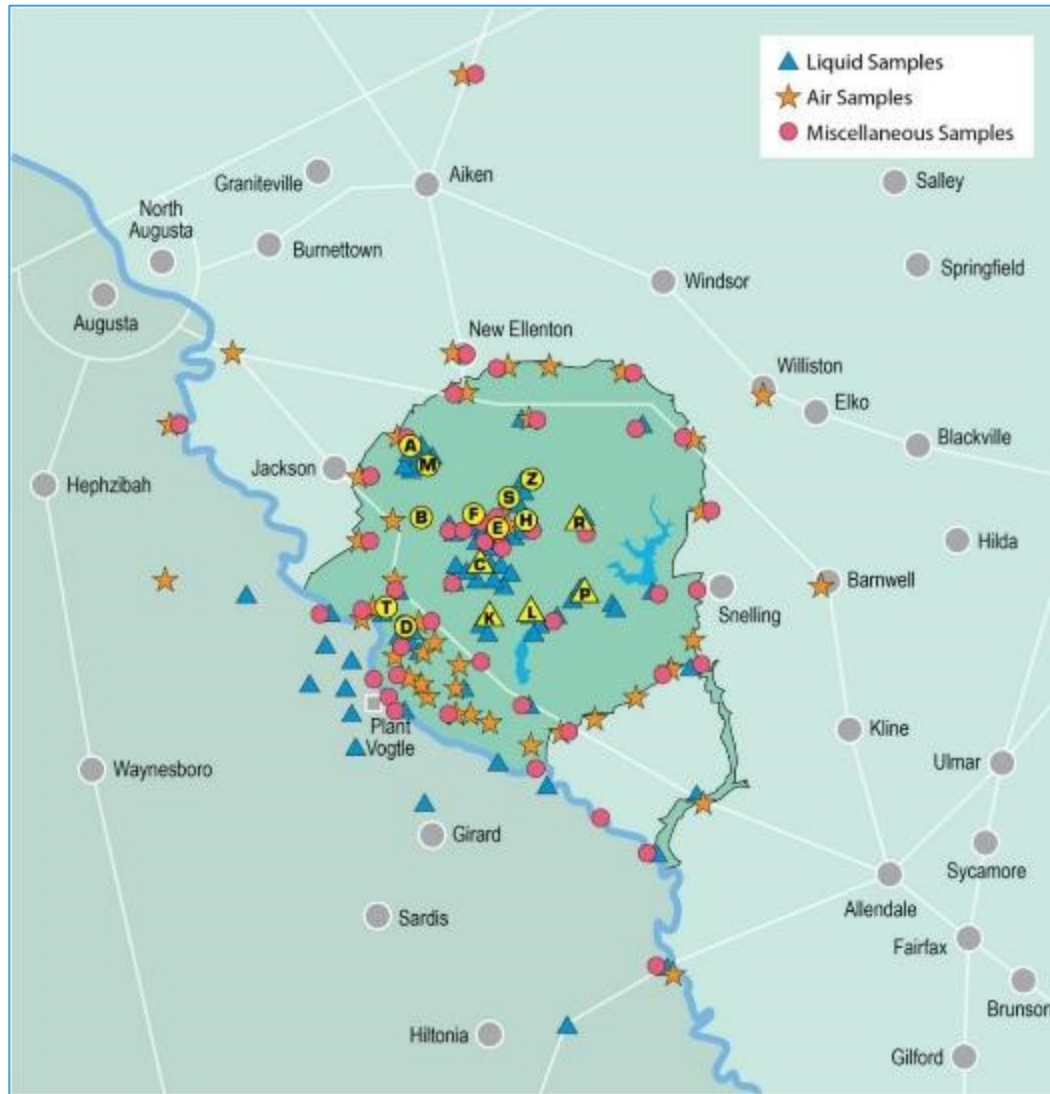


Fish Sampling



Monitoring of Turkey from Wounded Warrior Hunt

Environmental Monitoring Program (continued)



River surveyor taking Doppler flow measurements

???

Questions