



Recommendation No. 106

November 16, 1999

Resource Conservation And Recovery Act (RCRA) Permit Modification for the Mixed Waste Management Facility at SRS

Background

The Office of Environmental Quality Control, Bureau of Land & Waste Management, South Carolina Department of Health and Environmental Control (SCDHEC) issued a modification to Permit SC1 890 008 989 to the United States Department of Energy/Savannah River Site on September 30, 1999 (Ref. 1). This permit is for the operation and post-closure care of hazardous waste management facilities located at the Savannah River Site (SRS). The permit expiration date was October 5, 2000.

The proposed permit modifications were discussed extensively in Spring, 1999, by the Public Focus Group investigating the SRS Old Radioactive Waste Burial Ground (ORWBG) in response to a request by the Environmental Restoration and Waste Management (ER & WM) Subcommittee of the SRS Citizens Advisory Board (CAB). These discussions by the Public Focus Group and subsequent actions by the CAB resulted in a formal recommendation to SCDHEC with five specific recommendations (Ref. 2). SCDHEC responded to these recommendations in the permit modification (Ref. 1).

The principal concern raised by the CAB (Ref. 2) was that the proposed corrective actions should reflect the actual and planned conditions associated with SRS, i.e., comparisons to drinking water standards as part of the remediation should occur only at the point of exposure to the public. But, rather than responding to the CAB recommendation on this issue, SCDHEC restated their position without providing the justifications for or the benefits of their decision. The Public Focus Group investigating the ORWBG raised significant concerns about SCDHEC responses in the permit modification and presented these concerns to SCDHEC within the 15 days allowed for appeal (Ref. 3). This letter opposed the initiation of long-term remediation of the South West (SW) Plume as dictated in the permit since SCDHEC had not provided the Focus Group or the CAB with the evidence to allow the public to conclude that the SW Plume has had an adverse effect on human health.

In addition, and in agreement with early CAB recommendations (Ref. 4), since remediation funds remain scarce, since the CAB has tried to establish that not all risks may require action (e.g., Ref. 5), and since DOE will maintain control of SRS and not permit residential uses of the land, the inventories of radionuclides addressed by SCDHEC should be those the public is most likely to be exposed to at the end of institutional control, not those which exist at SRS today. In the words of the regulators, this means that the cleanup requires a "common sense approach to better risk management and decision making" (EPA-DHEC responses to Ref. 4, February 26, 1996).

Recommendation

The SRS Citizens Advisory Board recommends that the three agencies:

1. Schedule and hold a meeting with the public, CAB, stakeholders and the Public Focus Group by March 8, 2000, to review agency responses to the CAB recommendations on the SW Plume (Ref. 2) in order to develop a "common sense approach" to remediating the SW Plume.
2. As part of a common-sense approach, during this meeting provide to the CAB, stakeholders, and the Public Focus Group a list of the adverse health effects, the criteria that determine these health effects, and the justification of the Costs and Benefits of the remediation planned for the SW plume.
3. Also during this meeting, provide to the CAB, stakeholders, and the Public Focus Group a comparison of the remediation costs and benefits based on the inventory of contaminants in the SW plume today and at the end of institutional control (approximately 3 half-lives of Cesium-137 fission products) using computational models to determine the contaminant inventories existing at the end of institutional control (e.g., composite analyses; Ref. 6).

References

1. Letter from John Litton, DHEC to J. V. Odum, SRS on September 30, 1999 transmitting Office of Environmental Quality Control, Bureau of Land & Waste Management, Hazardous and Mixed Waste Permit SC1 890 008 989.
2. SRS Citizens Advisory Board Recommendation 87, Proposed Permit Modification, Mixed Waste Management Facility at SRS under South Carolina Hazardous Waste Management Regulations and Resource Conservation and Recovery Act (RCRA), adopted May 25, 1999.
3. Letter from Karen Patterson and W. Lee Poe, Jr., Public Focus Group, to John Litton, DHEC on October 18, 1999.
4. SRS Citizens Advisory Board Recommendation 8, Future Land use, September 26, 1995.
5. SRS Citizens Advisory Board Recommendation 19, Long Term Cleanup, September 26, 1995.
6. SRS Citizens Advisory Board Recommendation 55, Composite Analyses, March 24, 1998.

Criteria for Closure of this Recommendation

1. Completion of meeting between DHEC and ORWBG Public Focus Group.
2. Completion of the actions that result from the meeting.

NOTE: There was a change in the wording in Recommendation 1. above from " public meeting" to "meeting with the public" due to discussions during the November 16, 1999, CAB meeting and were inadvertently omitted from the final Recommendation.

Agency Responses

[Department of Energy-SR](#)

[Department of Health and Environmental Control](#)

[ORWBG Interim Remedial Action Disagreement Letter dated November 6, 2000](#)
[ORWBG Focus Group Documentation of the CAB's Disagreement with the SRS Planned Interim Action for Remediation of Releases](#)
[Appendix 1. Dose Calculations Supporting Irrigation with Tritiated Water](#)
[Attachment 1. Comments by E. Rollins](#)
[Attachment 2. Onsite Population Dose Calculations](#)
[Appendix 2. Final Report to CAB Concerning Corrective Measures to Remediate the ORWBG](#)