



### **Recommendation No. 113**

January 25, 2000

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#### **Stakeholder Review of Integrator Operable Unit (IOU) Plans, Studies, and Reports**

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##### **Background**

The Federal Facility Agreement (FFA) sets the standards and schedules for the comprehensive remediation of SRS. Distinct geographic areas or media-specific units requiring cleanup are called Operable Units (OUs).

Remediating Operable Units are discrete actions taken as part of an overall site cleanup. The FFA groups the SRS OUs by watersheds or streams into which any effluent from the OU will discharge via surface or groundwater (e.g., P-Area Burning/Rubble Pit, 131-P, is an example of an OU for the Steel Creek Watershed-see Appendix C.3 of the FFA).

Each stream is called an Integrator Operable Unit (IOU) because it integrates the effluent from the Operable Units within its watershed. SRS has six Integrator Operable Units (Fourmile Branch, Lower Three Runs, Pen Branch, Savannah River Floodplain Swamp, Steel Creek, and Upper Three Runs). In addition, the Savannah River has been defined as the seventh IOU as it integrates effluent from the other six.

The three agencies (DOE, EPA Region IV, and SCDHEC), with the involvement of the Natural Resource Trustees (who act on behalf of the public to assess damages for injury to, destruction of, or loss of the natural resources at SRS), have agreed to Work Plans and dates for milestones to remediate the IOUs as necessary. Preceding these agreements, SRS had developed a work plan for the Savannah River IOU Study. That study was issued in 1997 (Ref. 1), and received comments from EPA, SCDHEC, an Independent Scientific Peer Review (ISPR; CAB Recommendation 39, May 1997 (Ref. 2)), and the CAB.

Dr. Joel Massmann, University of Washington directed the ISPR. (Ref. 3) The ISPR report concluded that the initial IOU study was performed without clear guidance from the three agencies on the purpose and goals of an IOU study. The ISPR report also suggested that IOU studies should follow general guidance and not the details of a RI/FS process, and that models should be developed to describe the interactions within and between the watersheds. The majority of the ISPR recommendations have been incorporated in the new IOU Work Plans. The Savannah River Site Citizens Advisory Board agreed with the ISPR, supported the IOU process, and made further recommendations to ensure the protection of human and environmental health, to reduce the time to initiate remedial actions in the field, and to reduce the cost of remedial actions during the IOU process (CAB Recommendation 59, May 1998(Ref. 4)).

The IOUs are being evaluated because they provide a possible pathway for the release of hazardous substances from OUs within a watershed to other receptors. The investigation of the IOUs is three-phased. Phase I is the submittal of a Work Plan which assesses all existing data, identifies new data needs, and potential early action opportunities. Phase II formally begins after EPA and SCDHEC approval of the Work Plan and includes initiation of IOU-specific sampling in the field (water, sediment, or fish). After all actions for OUs within a watershed have been completed, Phase III begins with subsequent RFI/RI Investigation. Currently, public involvement is not requested until Phase III of the IOU process. A recent example of this was the submittal of the Steel Creek IOU Work Plan to the regulators on September 30, 1999, but unlike the SR-IOU, neither the public nor the SRS CAB have been given a formal opportunity to review this Work Plan.

##### **Comment**

Since 1997, the SRS CAB voiced concerns that the IOU process not place additional burdens on SRS with additional and significant operational and administrative costs that do not improve the protection of the environment, public or SRS workers. Further, as expressed over the past 6 years, the Board wants to participate in the decisions between the three agencies as they are made. Neither the Board nor the

public wants to be a rubber stamp for approving decisions that have already been made.

### **Recommendation**

Because of the importance of these reports in assessing risks from SRS waste sites, and the concerns previously expressed by the Board, the SRS CAB recommends that the three agencies:

1. Revise the current IOU study process to provide the SRS CAB and the public with the opportunity to review both Phase I and Phase II plans, studies, and reports during the same review periods provided to the regulators.
2. Document this change in the IOU review schedule and provide a copy of the change to the Board by March 15, 2000, for ongoing and future IOU studies.

The SRS CAB also requests that DOE provide cost estimates for individual IOU studies as well as total costs associated with the IOU program.

### **References**

1. Savannah River Integrator Operable Unit Study, Westinghouse Savannah River Company, Report WSRC-RP-96-460, September 25, 1996,
2. SRS CAB Recommendation 39, "Savannah River Integrator Operable Unit Study" dated May 13, 1997,
3. Final Report Independent Scientific Peer Review, The Savannah River Integrator Operable Unit Study, April 1, 1998,
4. SRS CAB Recommendation 59, "SRS Integrator Operable Units", dated May 19, 1998.

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### **Agency Responses**

[\*Department of Energy-SR\*](#)

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[\*Department of Health and Environmental Control\*](#)

[\*U.S. Environmental Protection Agency\*](#)