



Recommendation No. 46

November 18, 1997

Plug-in Rod Approach

Background

The Plug-In ROD approach was developed by EPA to streamline the evaluation effort for remediation of similar sites under CERCLA^{1,2}. Under the normal CERCLA process, a full range of technical options for remediation have to be evaluated in the Feasibility Studies (FS) report for each site. Under the Plug-In ROD approach, a Presumed Remedy is selected for a group of similar sites. This is done before complete characterization of each site. Instead of matching several remedies to a single site, the Plug-In Approach matches several sites to a single general remedy with savings in time, effort and costs over the normal CERCLA process. Individual site evaluations then only consider the Presumed Remedy and the No Action Alternative.

A Plug-In ROD contains a range of conditions which the Presumed Remedy is able to address and criteria for determining whether contamination is serious enough to require clean up (for deciding between the Presumed Remedy and the No Action Alternative). After sufficient focused data are collected for each individual site, comparisons are made with the conditions and criteria in the Plug-In ROD and a decision made whether to "plug in" to the selected remedy or not. A site specific Decision Document is then issued. Provisions are made for public input prior to the issuance of the Plug-In ROD and prior to issuance of the site specific Decision Document.

The initial application of this process at SRS is being made for 22 radiologically contaminated seepage basins and ponds.

Recommendation

The SRS Citizens Advisory Board commends DOE, EPA and SCDHEC for implementing this Plug-In ROD approach at SRS. The Board continues to support reduction in regulatory paperwork and costs, and improvements in the efficiency of the clean up process. Past CAB recommendations have continued to push this theme³.

The SRS Citizens Advisory Board recommends that DOE:

1. Review the conditions and decision criteria developed for Plug-In RODs with the CAB and public prior to issuance².
2. Review the basis for selection of candidate sites for a Presumed Remedy and the actual sites to be selected with the CAB and the public prior to issuance of the Plug-In ROD².
3. Review site specific Decision Documents with the CAB and the public prior to issuance.
4. Move forward with implementation of the first SRS Plug-In ROD for contaminated seepage basins and ponds at SRS. Maximize the number of seepage basins and ponds to be included in this Plug-In ROD. Provide the CAB with a list of operable units to include in the first Plug-In ROD.
5. Provide a schedule for the first Plug-In ROD and all of the activities under this Plug-In ROD by March 24, 1998.
6. Complete the Plug-In ROD itself by September 1998 or sooner.
7. Initiate field work for the first clean-up action under this first Plug-In ROD by July 13, 1999 or sooner if possible.
8. Look for other opportunities at SRS to apply the Presumed Remedy and Plug-In ROD approach.

The CAB recognizes that DOE believes a savings in documentation and characterization costs of \$1,000,000 per operable unit is possible. The CAB challenges DOE to realize those savings and to better them each year.

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1. EPA Superfund Record of Decision: Indian Bend Wash Site, Tempe, AZ, EPA/ROD/R09-94/105, July 1994
 2. Plug-In ROD Process, letter to Mr. William Lawless and Ms. Kathryn May from W. Lee Poe, Jr., September 8, 1997
 3. CAB recommendations 2, 8, 9, 10, 11, 17, 18, 28, 35, 37, 38, 40 and 45.

Agency Responses

[Department of Energy-SR](#)

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