



Recommendation No. 53

March 24, 1998

SRL Seepage Basins Remediation

Background

The Savannah River Laboratory (SRL) Seepage Basins were used for the disposal of low-level radioactive waste water from the SRL laboratories from 1954 until 1982. The four (4) SRL basins are located in the SRS A-Area about 4500 feet from the nearest off-site resident. The basins were fenced in during 1982 to keep out animals. After 1982, SRL Low-Level radioactive waste was trucked to the 200 areas for processing. Studies were done on the basin contents in the mid 1980's. Further studies were done in the middle 1990's and contaminated vegetation in the basins was removed and chipped in the Summer, 1997, and awaits further disposition. Remediation of the basins is scheduled to begin in March, 1999.

The SRS Citizens Advisory Board passed Recommendation No. 38 on the SRL Seepage Basins on May 13, 1998, with the following recommendations:

- Initiate an early action clean up process for remediation.
- Establish a schedule of events to (1) convene a focus group within 60 days to develop a path forward to accelerate remedial action. This focus group should include a wide cross section of citizens from Georgia and South Carolina as well as DOE, DHEC and EPA representatives; (2) conduct a public meeting; (3) develop a plan of action and initiate field clean up work; and, (4) report progress at the CAB meetings in July, September and November 1997.

The early action process was initiated by the three agencies; a focus group meeting reviewed the plans in July 1997; and the focus group established a schedule that included having SRS complete the documentation by December 3, 1997, and the regulators review and comment on the documents by March 3, 1997, in order to initiate field work in March, 1999. For progress on these milestones, the CAB and the public focus group have been kept informed. As of today, the milestones agreed to by the three agencies have

been met and have resulted in combined regulatory documents and a draft Record of Decision that are now available.^(1, 2 & 3)

The focus group meeting in July 1997 developed two basic approaches to cleanup the four basins (the primary concern raised was the contamination in basin sediments). They were to either: (1) stabilize in place the contaminated material in the seepage basin sediments (about the top foot of sediments), backfill and cap; or (2) remove most of the contaminated sediments and dispose of them near the center of SRS in E-Area, backfill and cap the basins.

The DOE preferred alternative is to excavate about 1 foot of contaminated soil from basins 1 and 2, dispose of the excavated soil at SRS (ie approx. 3 ci will be removed to in the Low-Level Waste Disposal Facility, or LLWDF while currently holds ~ 10m ci) and place an earthen cover over all four basins.^(2 & 3) This alternative was agreeable to those in attendance at a focus group meeting preceding a CAB Environmental Remediation and Waste Management subcommittee meeting on November 3, 1998. Some contamination will probably remain but the basins are in an industrial area, no residents are to be permitted in this zone, institutional controls will be maintained, and deed restrictions will be placed on the land should it ever be transferred to nonfederal ownership.

Since the contaminated vegetation removal in Summer, 1997, there have been extensive discussions among the three agencies (DOE, EPA and DHEC) on what to do with the vegetation piles residing in the basins. Under the preferred alternative, the vegetation and the removed soils would go to the LLWDF on SRS. This material will meet the DOE Waste Acceptance Criteria for disposal in the LLWDF trenches. The LLWDF is in the center of SRS surrounded by production facilities and high-level waste tanks and will never be opened to the public. However, until recently, EPA and DHEC have opposed this action because the LLWDF is not a DHEC permitted facility. The CAB considers that the issue is one of jurisdiction and control rather than health and environmental protection.

Recently, EPA and DHEC sent letters with comments on the WSRC reports listed below.^(4 & 5) These letters have many detailed comments and request consideration of additional remediation alternatives. At a subsequent public meeting, concern was expressed that the comment resolution may cause slippage in the schedule. However, the regulators and the public strongly spoke against letting the schedule slip.

Recommendation:

The SRS Citizens Advisory Board (CAB) is pleased that CERCLA documents have been combined to expedite the schedule and eliminate redundancy. However, the CAB is concerned that a lack of resolution among the three agencies (DOE, EPA and DHEC) on the issues of contaminated vegetation and soils and remediation alternatives may defeat our goal of an early action starting by March 1999. These basins ceased operations in 1982, 16 years ago. Health and environmental protection will not be served by delaying the schedule to start remediation.

Therefore the SRS Citizens Advisory Board recommends that:

1. The three agencies (DOE, EPA and DHEC) not permit slippage in the currently scheduled remediation field start date of March 1999.
2. The three agencies resolve all of the EPA and DHEC comments including agreeing on a preferred alternative and the method of disposing the contaminated soils and vegetation by April 15, 1998. To expedite comment resolution, we urge that those comments that are not substantive be dismissed by the agencies.
3. The three agencies review the decisions with the CAB and the public focus group by May 1, 1998.

(1) RFI/RI/BRA/Focused CMS/FS for the SRL Seepage Basins OU (904-53G, -54G and -55G), Report WSRC-RP-97-846, Rev. 0, December 1997

(2) Statement of Basis/Proposed Plan for the SRL Seepage Basins OU (904-53G, -54G and -55G), Report WSRC-RP-97-847, Rev. 0, December 1997

(3) Record of Decision Remedial Alternative Selection for the SRL Seepage Basins OU (904-53G, -54G and -55G), Report WSRC-RP-97-848, DRAFT Rev. 0, December 1997

(4) Letter from Constance Allison Jones, EPA to Brian T. Hennessey, DOE, March 16, 1998, Review and Comment on the Revision 0 RCRA/Facility, Investigation/Remedial Investigation Report Including the Baseline Risk Assessment and Focused Corrective Measures Study/Feasibility Study for the SRL Seepage Basins OU (904-53G, -54G and -55G), December 1997

(5) Letter from Keith A. Collingsworth, DHEC to Brian T. Hennessey, DOE, March 17, 1998, RCRA Facility, Investigation/Remedial Investigation (RFI/RI) and the Baseline Risk Assessment (RBA) Report including Focussed Corrective Measures Study/Feasibility Study (CMS/FS) Report (WSRC-RP-97-846, Revision 0); Statement of Basis/Proposed Plan (WSRC-RP-97-847, Revision 0); and the Record of Decision (Report WSRC-RP-97-848, DRAFT Revision 0) for the SRL Seepage Basins OU (904-53G, -54G and -55G), December 1997

Agency Responses

[Department of Energy-SR](#)

[Department of Health and Environmental Control](#)