



## **Recommendation No. 64**

**July 28, 1998**

---

### **Savannah River Laboratory (SRL) Seepage Basins Disposal Of Contaminated Vegetation And Soils Remediation Alternative Selection**

---

#### **Background:**

The Savannah River Site Citizens Advisory Board (CAB) has made two previous motions on remediation of the SRL Seepage Basin (Recommendation No. 38 on May 13, 1997 and Recommendation No. 53 on March 24, 1998). The SRL Seepage Basin Remediation had been a concern of the CAB Environmental Remediation and Waste Management Subcommittee since the Spring of 1997. The CAB believed that this remediation should be done expeditiously, cost effectively and should entail minimal risk to workers and the public both during remediation and in the future. We continue to be concerned that this remediation is being delayed by indecision over matters of policy, and not of health and safety.

CAB Recommendation No. 38 recommended an early action to cleanup the SRL basins, and it also recommended the establishment of a public focus group to develop a path forward to accelerate remedial action, conduct a public meeting, develop a plan of action to initiate field work, and report progress at CAB meetings. These have been done. In addition, the focus group accepted the request from the regulators to proceed with the normal review process instead of an early action in exchange for an expedited review, and the focus group recommended a limited number of remediation alternatives out of which one preferred alternative was to be chosen.

The focus group suggested two basic remedial approaches: (1) remove and relocate a finite amount of the contaminated soils and debris and backfill with structured soil that achieves the desired leachability requirements, or (2) leave contaminated soils and debris in place and backfill with a structured soil to achieve the desired leachability requirements.

CAB Recommendation No. 53 was specific about short-term regulatory decisions. Its key points were:

- Meet the March 1999 remediation field start.
- Resolve EPA and DHEC comments on the method of disposing the contaminated soils and vegetation and on the selection of a preferred remediation alternative by April 15, 1998.
- Review the decisions with the CAB and public focus group by May 1, 1998.

The Environmental Protection Agency (EPA) and South Carolina Department of Health and Environmental Control (DHEC) comments were resolved on April 15, 1998, but the three-agency agreement on the preferred alternative has not yet been completed. A revised Remedial Investigation/Feasibility Study (RI/FS) plan was submitted to the regulators June 15, 1998, with comments due to SRS by July 23rd. Issuance of the Proposed Plan and a public meeting on the Proposed Plan have not yet been scheduled. These delays have caused the March 1999 field start date to slip to a new one of around October 1999.

The CAB is disappointed that the milestone has slipped, and wants the three agencies to assure us that no further slippages will occur. This will require that the three agencies resolve the issue of disposal of contaminated vegetation and soils and agree on the preferred remediation alternative. Health, environmental protection, and cost effectiveness are not being served by further delay.

### **Recommendation:**

The CAB recommends that:

1. The Department of Energy (DOE), South Carolina (DHEC), and EPA resolve issues with the remediation of the SRL basin soils and vegetation and report to the CAB the preferred alternative before the public comment period begins.
2. The three agencies present a revised schedule to the CAB that regains as much of the time lost as possible, with a start date no later than the end of 1999.

---

### **Agency Responses**

[Department of Energy-SR](#)