SRS Citizen's Advisory Board

# Recommendation No. 68

September 29, 1998

## SRL Seepage Basin Contaminated Soils Disposal

**Background:**

Remediation of the SRL Seepage Basins requires the disposition of approximately 3200 cubic meters of contaminated soils. A Focus Group was convened in July 1997 to provide input to the remediation process. The Focus Group membership included CAB members, interested citizens, risk assessment specialists, WSRC, Bechtel, DOE, SCDHEC and EPA Region IV personnel.

The Focus Group recommended that two options be developed in detail: (1) remove the most contaminated material and dispose of it in the central part of SRS, or (2) stabilize the contaminated soils in place, backfill, and cap.

One of the goals of the Focus Group was to expedite the remediation process. The characterization of these basins began in the 1980s; the Federal Facility Agreement (FFA) process began in September 1996, but no remedial decisions had been made as of 1997. Since the convening of the Focus Group there have been extensive discussions on remediation of the SRL Seepage Basins (open and exposed to the environment since the early 1980s) among SRS, regulators, and Citizen Advisory Board (CAB) members. The CAB has passed three recommendations (Numbers 38, 53, and 64) on expediting the remediation. Some progress has been made in accelerating the documentation schedule, but the disposal decisions have been more difficult. EPA and SCDHEC, after reviewing the Remedial Investigation/Baseline Risk Assessment/Feasibility Study (RI/BRA/FS), Proposed Plan and draft Record of Decision (all submitted December 3, 1997), determined that the initial options proposed by the Focus Group may not be the best possible options and asked SRS to develop additional options.

After much review the regulators accepted two potential options for remediation of the SRL Basins. One would be to dispose of the most contaminated soils off of SRS and the least contaminated soils in the C-Area Reactor Seepage Basin. The other would be to ship all the contaminated soils off of SRS (to Utah for disposal in a licensed commercial disposal facility). Implicit in the choice of these two options by the regulators, and the acceptance of the latter one by DOE-SR as the preferred remedy, is the conclusion that these two new options are superior at protecting the public, workers, and the environment compared to the two earlier options chosen by the Public Focus Group of in situ and trench disposal.

The CAB does not agree that disposing of the soils in SRS E-Area slit trenches is less protective than the final two options. In August 1996, EPA Region IV approved disposal of low-level radioactive CERCLA waste at the E-Area slit trenches (letter, Green to Hennessey, Aug. 8, 1996). The contaminated vegetation from the SRL Seepage Basins will be disposed in the E-Area slit trenches under a Removal Action. Disposal of the contaminated soils in E-Area slit trenches would be as protective as other options being considered. It would ensure no risk to an individual standing on the closed trenches; there would be no releases above maximum contaminant levels at the 100 meter point of assessment; provisions are in place to act on the unlikely event of exceeding the waste acceptance criteria; and monitoring data will be available for EPA and

SCDHEC review. It would be less expensive and less dangerous (less probability of traffic and handling accidents) than transporting the waste to Utah.

Because disposal in the C-Area Reactor Seepage Basin could adversely affect its closure, the CAB does not support that disposal option. Because the primary goal of the SRL Seepage Basin remediation was to close those basins, the CAB agreed to the option of shipping the waste to Utah. This option would require the use of several hundred truck loads to SRS railway loading facilities and about 40 to 50 railroad cars, is more expensive and more dangerous (real transportation risks compared to modeled hypothetical risks to future trespassers on top of the E-Area trenches) than disposing of the soils in the E-Area slit trenches, but the CAB understood that disposal in the E-Area slit trenches was not an option EPA Region IV would consider because EPA did not want to set a precedent of disposing CERCLA wastes in DOE-regulated facilities.

However, the CAB recently learned that both Fernald and Rocky Flats have been disposing of CERCLA wastes at a DOE-regulated low level waste facility at the Nevada Test Site. And, the CAB also learned that EPA has already approved an affirmative determination of the acceptability of disposing CERCLA wastes in the E-Area trenches (referenced letter from Green to Hennessey). Therefore, no precedent would be set if these soils were disposed of in the SRS slit trenches. Regardless of this determination, the EPA Remedial Project Manager must approve of disposing the projects waste in the SRS facility. This approval is the approval that SRS has not received from EPA Region IV.

**Recommendation:**

The Savannah River Site Citizens Advisory Board recommends that:

1. SRS enact the preferred alternative of shipping the contaminated soils to Utah and backfilling to the original grade. The CAB does not believe that this is the most efficient, cost effective option and that it does not measurably increase health and safety but is concurring for the following reasons:
    - The agencies have finally agreed on a remedial option. To ask them to review their decision likely would further delay the closure, which the CAB has always considered the priority.
    - EPA last winter was not willing to entertain placing the CERCLA wastes in the SRS E-Area LLWDF slit trenches even though there has been an affirmative determination in place since 1996 and other DOE facilities have been disposing of CERCLA wastes in DOE-regulated facilities. The CAB has no reason to think that EPA Region IV would now consider disposal in the slit trenches an acceptable alternative.
    - The Environmental Remediation and Waste Management Subcommittee agreed in July 1998 to pursue the possibility of disposing CERCLA wastes in E-Area as an issue separate from the SRL Basin decision.

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**Agency Responses**

Department of Energy-SR

Department of Health and Environmental Control

United States Environmental Protection Agency