



Recommendation No. 87

May 25, 1999

Proposed Permit Modification Mixed Waste Management Facility at SRS Under South Carolina Hazardous Waste Management Regulations and Resource Conservation and Recovery Act (RCRA)

Background:

The draft permit, prepared by the South Carolina Department of Health and Environmental Control (SCDHEC), contains conditions for the general Postclosure care of the Mixed Waste Management Facility (MWMF) including 13 acres of the Solvent Rag Portion of the Low Level Radioactive Waste Disposal Facility (LLRWDF). The purpose of this motion is to present comments to SCDHEC from the SRS Citizens Advisory Board (CAB).

The MWMF consists of 58 acres that were used from 1972 to 1986 to dispose of untreated hazardous, radioactive and mixed wastes in trenches. Some wastes were uncontained, some were encapsulated in concrete and some were contained in concrete or steel boxes. Constituents included metals, spent and ignitable solvents and a number of radionuclides. The MWMF was closed in 1990 following a regulatory approved plan.

The interspersed Solvent Rag Portion of the LLRWDF includes trenches similar to the MWMF early trenches, engineered low level trenches and a greater confinement disposal area. This area received waste from 1986 to 1995 and is currently undergoing final closure.

Closures of surface units at the Burial Ground Complex are being conducted under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process as illustrated by closure of the Old Radioactive Waste Burial Ground (ORWBG) (see Ref. 1 and CAB Motion on Corrective Measures Study/Feasibility Study for the Old Radioactive Waste Burial Ground). By agreement between SRS and the regulators, RCRA regulations apply to the groundwater, including radioactive constituents, resulting from the MWMF and the ORWBG. There are four groundwater plumes migrating from the MWMF and the ORWBG. This permit application (Ref. 2) focuses on the Southwest Plume Area that is being considered under an Interim Corrective Measure and was considered in CAB Recommendation 75 (Ref. 3). Clean up standards for the other three plumes will be considered in the March 2000 permit renewal application.

The proposed permit modification (Ref. 2) addresses Postclosure Procedures, Use of Property; Notices and Certifications; Postclosure Permit Modifications; Reporting, Record keeping, and Monitoring; and Groundwater Requirements.

Recommendation:

The Savannah River Site CAB has the following comments/recommendations on the proposed permit modification:

1. Remedial actions for groundwater should not be under taken just because a standard is exceeded at a Point of Compliance adjacent to the Waste Management Area. Any corrective action should reflect the actual and planned conditions associated with the SRS. For example, the public is currently not drinking groundwater taken from the Point of Compliance. Comparisons to drinking water standards should be at the point of exposure for the public, which should be defined by the three agencies.
2. Any comparisons of monitoring data at the Point of Exposure of the public with drinking water standards should be done on an annual average basis to be consistent with the basis of the standards.
3. If SCDHEC finds remediation necessary, because of the slow movement of groundwater,

SCDHEC should consider a long-term phased approach to the remediation of the contaminated groundwater and consider alternative options, such as natural attenuation.

4. Remedial actions should take into account the possibility of future budget constraints.
5. Preparation of a summary, in every day language, of the draft permit and its conditions/requirements would greatly facilitate public participation in the review process.

References:

1. Corrective Measures Study/Feasibility Study for the Old Radioactive Waste Burial Ground, 643-E (U), Westinghouse Savannah River Company Report, WSRC-RP-98-4012, Rev. 0, March 1999.
2. Public Notice of Proposed Permit Decision, South Carolina Department of Health and Environmental Control, Proposed Modification to the Hazardous Waste Permit for the Postclosure Care of the Mixed Waste Management Facility (MWMF) at Savannah River Site (SRS), Facility Number SC1 890 008 989, comments due by May 27, 1999.
3. Interim Corrective Measures Southwest Plume from Old Radioactive Waste Burial Ground, CAB Recommendation 75, adopted January 26, 1999.

Agency Responses

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