



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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ATLANTA, GEORGIA 30303-8960

JUL 10 2000

4WD-FFB

Ms. Karen Patterson, Chairperson
Savannah River Site Citizens Advisory Board
1103 Conger Drive
Aiken, South Carolina 29803

SUBJECT: Savannah River Site Citizens Advisory Board
Recommendation Nos. 113, 114, and 117
Commendation, K-Area Reactor Seepage Basin Plug In Record of Decision


Dear Ms. Patterson:

The Environmental Protection Agency (EPA) has received the Savannah River Site (SRS) Citizens Advisory Board (CAB) recommendations noted above. We thank you for your recommendations concerning these important issues related to cleanup at this Department of Energy (DOE) facility. Individual responses to each of the recommendations are enclosed.

EPA is pleased to receive the CAB commendation on the successful development and implementation of the "Plug-In" approach to site remedy selection in support of cleanup at SRS. EPA, South Carolina Department of Health and Environmental Control, and SRS efforts to utilize "lessons learned" at other contaminated sites across the United States, such as Indian Bend Wash (Arizona) and the DOE-Hanford facility (Washington), are paying off at SRS in streamlined characterization and documentation, more efficient use of limited DOE environmental restoration funds, and achieving cleanups of more waste units faster than before. EPA Region 4 will also share the commendation with Mr. Tim Mott, EPA Headquarters, who originally brought the "Plug-In" tool to the table for consideration by the SRS Federal Facility Agreement Project Managers for use at SRS. The CAB's continued support of the cleanup at SRS is appreciated.

If you need further assistance, please contact Julie Corkran of my staff at (404) 562-8547.

Sincerely,


John H. Hankinson, Jr.
Regional Administrator

Enclosure

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Tim Mott, FFRRO, EPA-HQ

EPA Response to CAB Recommendation No. 113
Stakeholder Review of Integrator Operable Unit (IOU) Plans, Studies, and Reports

SRS CAB Recommendation No. 113 reiterates the Board's interest in the Integrator Operable Unit (IOU) cleanup strategy being employed by the three agencies at the Savannah River Site. This strategy has been developed by DOE, SCDHEC, and EPA to ensure that human health and environmental risks posed by releases of contaminants from SRS operations to the wetlands, streams, and rivers of SRS, including the Savannah River, are adequately addressed under the Federal Facility Agreement (FFA). Dovetailing the operable unit and IOU approaches results in a "big picture" strategy for characterization and cleanup within each SRS watershed. EPA is confident that this strategy will ensure that on-site and off-site risks posed to workers, community members, and the environment will be addressed in a cost-effective and protective manner. EPA anticipates that this strategy will evolve into a mechanism allowing early partial delisting from the National Priorities List (NPL) of portions of the SRS site which have been fully evaluated and remediated under the SRS Federal Facility Agreement.

EPA believes that the existing IOU review schedules achieve a necessary balance between maintaining timely progress on cleanup and providing sufficient opportunity for regulatory agency review and stakeholder participation. Although the three agencies have established rigorous timetables for our work under the FFA, stakeholders are free to review and comment on draft documents at any time. Given the inherently longer time frames associated with the IOU process, stakeholders will have repeated opportunities over many years to provide input on the characterization, early actions, and final remedial actions for these units. Thus, revisions to the IOU review schedules are not supported by EPA.

The Savannah River and the Savannah River Floodplain Swamp IOU have been collapsed into a single IOU document. Due to off-site releases of contaminants from SRS into the Savannah River and associated floodplain, this combined IOU unit has been accorded higher priority in the Federal Facility Agreement schedule. The draft Work Plan will be submitted for review by the Regulators and stakeholders during the summer of 2000. EPA urges the CAB to review this important document and provide their insight and comments to the agencies.

EPA Response to CAB Recommendation No. 114
Proposed Interim Action Plan for A-Area Burning/Rubble Pit

EPA, SCDHEC, and DOE-SRS have proposed final and interim actions for contaminated soils and groundwater at the A-Area Burning/Rubble Pit waste unit. The preferred final soils remedy is a soil cover with implementation of institutional controls to prevent industrial worker exposure. Active air sparging to strip volatile organic compounds from the shallow groundwater hot spot, combined with passive soil vapor extraction, will be used as an interim action while additional data are gathered to assess the potential for contaminants to migrate to the deeper aquifer. Employing an interim action strategy permits a holistic approach to final remedy selection through interpretation of additional data on the nature and potential extent of groundwater plume interactions between this operable unit, the A-Area Burning/Rubble Pit operable unit, and the A/M Area groundwater contamination.

SRS CAB Recommendation No. 114 supports the cleanup actions proposed by the three agencies and requests the opportunity to review the groundwater interim action performance evaluation reports as they become available. EPA supports the CAB's request and will ensure that DOE-SRS provides these reports for the CAB's use to support future stakeholder discussions toward identifying a final groundwater remedy.

EPA Response to CAB Recommendation No. 117
Alternatives for On-site Disposal of CERCLA Waste

Recommendation No. 117 summarizes the CAB's position on disposal of CERCLA low-level radioactive contaminated waste (LLW) generated by SRS during cleanups under the Federal Facility Agreement and makes two notification requests of the Department of Energy. EPA supports the CAB's request that DOE provide lists of operable units where excavation of LLW might be anticipated and the potential disposal alternatives for those wastes.

The CAB also requests that EPA, along with SCDHEC and DOE-SRS, involve the CAB and the public in the decision-making process for operable units with LLW at least six months prior to the Proposed Plan step in CERCLA. EPA has observed that the DOE-Savannah River Site consistently provides the CAB and the general public, through their support of CAB committees and issue-specific focus groups, with opportunities to impact cleanup decisions which extend beyond the basic public involvement requirements of CERCLA. Currently, the agencies are participating with the Environmental Restoration Committee to develop and implement an annual Work Plan reflecting CAB member interests and priorities. DOE has consistently provided copies of the Feasibility Studies (available more than six months prior to release of the Proposed Plan) to the CAB for individual waste units. In addition, detailed briefings are provided to the Environmental Restoration Committee throughout the characterization and cleanup process. These efforts have facilitated generation of several cleanup recommendations by the CAB, with input from other members of the public, to DOE and the regulatory agencies. Based on the efforts detailed above, EPA views the stakeholder process to be ongoing at early points in the CERCLA remedy selection process at SRS.

EPA will continue to support the efforts of the public and the CAB to take full advantage these many and varied opportunities to impact cleanup decisions at SRS. Similarly, EPA will support efforts by the CAB membership to enhance broader community involvement in the CAB processes. The advice offered by the CAB and other stakeholders is valued and carefully considered by the Agency during the decision-making process and EPA will always strive to communicate to the public how their advice impacted the cleanup decision for a waste unit.