



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 30 2001

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

Dear Ms. Patterson:

Thank you for your letter dated October 24, 2001, on behalf of the Savannah River Site (SRS) Citizens Advisory Board (CAB), sharing Recommendation No. 145 regarding the use of groundwater mixing zones at SRS. The recommendation requests that the Environmental Protection Agency (EPA), South Carolina Department of Health and Environmental Control (SCDEHC), and SRS complete two activities related to groundwater mixing zone applications. EPA's specific response to each of the CAB's requests are provided as a separate enclosure to this letter. Recommendation 145 also restates the CAB's continued interest in early stakeholder involvement in the remedy selection process at SRS.

EPA agrees with the SRS CAB that a groundwater mixing zone is a viable and cost-effective component of our groundwater cleanup toolbox at this Superfund site. Timely restoration of groundwater to beneficial use whenever practicable, however, remains our primary consideration and goal when evaluating groundwater cleanup remedies.

We appreciate the desire of the SRS CAB to protect and remediate the environmental resources at SRS and hope that the committee members find this information helpful. If you need further assistance, please contact Julie Corkran at (404) 562-8547.

Sincerely,

A. Stanley Meiburg
Acting Regional Administrator

Enclosure

cc: Lewis Shaw, SCDHEC
Keith Collinsworth, SCDHEC
Greg Rudy, DOE-SRS
Dawn Haygood, WSRC-SRS

EPA Response to CAB Recommendation No. 145

Groundwater Mixing Zones

Recommendation 145 requests that the Environmental Protection Agency (EPA), South Carolina Department of Health and Environmental Control (SCDEHC), and the Department of Energy (DOE) complete two activities related to the use of groundwater mixing zones in the groundwater cleanup strategies at SRS.

- (1) *The three agencies finalize a streamlined protocol, analogous to the Plug-In ROD concept, on mixing zone applications.*
- (2) *The three agencies provide a Plan of Action & Milestones (POAM) for the protocol and present it to the SRS CAB at the January 2002 Board Meeting.*

EPA is committed to employing strategies that streamline documentation and promote more efficient use of DOE environmental restoration funds, such as the Plug-In Record of Decision (ROD) tool. However, the Plug-In ROD and groundwater mixing zone applications are not functionally analogous. While the Plug-In ROD tool provides a "presumptive" remedy for a set of similar waste sites at SRS, a groundwater mixing zone (GWMZ) application is only one of several components of a monitored natural attenuation (MNA) groundwater cleanup remedy. EPA does not consider MNA (with GWMZ) to be a "presumptive" or default remedy for sites with groundwater contamination.

Timely restoration of groundwater to beneficial reuse (typically drinking water standards) through aggressive cleanup technologies whenever practicable remains our primary goal when evaluating groundwater cleanup remedies at SRS. Of course, MNA (with GWMZ) may be evaluated and compared to other viable remedial alternatives at any given site. This passive alternative should only be selected as the remedy when it meets all site-specific cleanup criteria and will meet these criteria within a reasonable timeframe compared to other cleanup alternatives. Finally, selection of MNA (with GWMZ) is most appropriate when used in conjunction with other site-specific remedial actions such as source control, groundwater and vadose zone treatment, and land use restrictions. For all of these reasons, EPA does not support development of a "plug-in" type protocol and Plan of Action and Milestones (POAM) for the groundwater mixing zone components of site remedies at SRS.

Recommendation 145 also restates the CAB's continued interest in early involvement in the remedy selection process at SRS.

- (3) *The three agencies continue to solicit stakeholder (SRS CAB and the public) during the initial phases of remedy selection on any restoration site.*

EPA will continue to support SRS's extensive public involvement efforts during the cleanup process. DOE-SRS continues to meet or exceed the standards set by the CERCLA and RCRA Corrective Action programs for providing opportunities for stakeholder participation in remedy selection, as evidenced by typically soliciting input as early as the Feasibility Study stage.