



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

AUG 06 2003

Mr. Wade Waters
Savannah River Site Citizens Advisory Board
308 Pinewood Drive
Pooler, GA 31411

Dear Mr. Waters:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 165 – Savannah River Site (SRS) National Pollution Discharge Elimination System (NPDES) Permit Revision

Thank you for submitting the subject recommendation regarding continued investigation of NPDES permit negotiation strategies and cost-benefit analyses. We offer the following responses to the three parts of the subject recommendation:

Recommendation 165.1 – SRS agrees with the recommendation and notes that we have been working with the South Carolina Department of Health and Environmental Control (SCDHEC) regarding compliance periods and have submitted to SCDHEC the justification package for 3- and 5-year compliance periods, as appropriate.

Recommendation 165.2 – We respectfully decline this recommendation. Based on regulatory discussions, the development of a cost-benefit analysis in an effort to rebut the tighter limitations would not result in any changes in the upcoming NPDES permit. Please be advised that SCDHEC's approach of severely restricting discharges into ephemeral streams is performed pursuant to South Carolina's Pollution Control Act and the associated state water quality regulations as mandated and approved by the US Environmental Protection Agency (EPA). SRS must comply with the water quality law and regulations in this regard.

Recommendation 165.3 – We agree with this recommendation in that SRS is in continual discussions with SCDHEC regarding compliance alternatives, such as site-specific stream standards. The regulations do allow site-specific standards to be developed for an individual stream segment and SRS is presently conducting preliminary studies to support such standards. Please be advised that, while site-specific standards in concept allow some relief from the current severe restrictions, there is no guarantee that an outcome of a site-specific standard study for an ephemeral stream would be successful and of benefit to SRS. Nevertheless, SRS will continue to work with SCDHEC (and the EPA) regarding compliance alternatives and will brief the CAB regarding our progress in this matter.

If you have any questions, please call me or Ben Gould at (803) 952-9323.

Sincerely,
Original Signed By
Jeffrey M. Allison
Jeffrey M. Allison
Manager