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2600 Bull Street
Columbia, SC 29201-1708

January 9, 2004

Mr. Wade Waters, Chair
SRS Citizens Advisory Board
308 Pinewood Dr.
Pooler, GA

SUBJECT: South Carolina Department of Health & Environmental Control response to the Citizens Advisory Board **Recommendation 174** – Low Curie Salt Waste Stream Characterization and **Recommendation 175** – Monitored Natural Attenuation and Enhanced Passive Remediation.

Dear Mr. Waters:

The South Carolina Department of Health and Environmental Control (DHEC) has received the Savannah River Site (SRS) Citizens Advisory Board (CAB) recommendations 174 and 175.

Enclosed please find DHEC's responses to the subject recommendations. We appreciate the Board's input and wish to encourage continued active participation in the challenging issues we face in the regulation and cleanup at the Savannah River Site. If you need further assistance, please contact Keith Collinsworth of my staff at (803) 896-8955.

Sincerely,

R. Lewis Shaw, P.E.
Deputy Commissioner
Environmental Quality Control

cc: J. I. Palmer, Jr., EPA Region IV
Dawn Taylor, EPA Region IV
Jeffrey M. Allison, DOE-SRS
Alice C. Doswell, DOE-SRS
Charlie Hanson, DOE-SRS
Charles Gorman, EQC-BLWM
Myra Reece, EQC-Edisto Savannah

DHEC RESPONSE TO THE SRS CITIZENS ADVISORY BOARD (CAB) RECOMMENDATION NO. 174

Citizens Advisory Board Recommendation 174 pertains to the management of the salt waste portion of the High Level Waste currently stored at the Savannah River Site (SRS). The subject recommendation was separated into three parts. The first part of the recommendation requested South Carolina Department of Health and Environmental Control (SCDHEC) to reconsider their suspension of all permitting activities regarding the onsite disposal of low curie salt waste at SRS. The second portion of the recommendation requested SRS and SCDHEC work together to determine the quantity of low curie waste than can be disposed of onsite at SRS. The third part of the recommendation requested SRS and SCDHEC to plan and conduct public education meetings with interested stakeholders regarding the salt waste management issue.

SCDHEC is currently working with the Department of Energy (DOE) in consultation with the Governor's Nuclear Advisory Council to develop a comprehensive salt waste management strategy at the SRS. Until such time that DHEC, in consultation with Governor's Nuclear Advisory Council, concurs with a comprehensive site-wide salt waste strategy as a whole, DHEC will continue to suspend all permitting activities associated with the disposal of low curie salt waste. Regarding the request for public education meetings regarding this issue, DHEC has participated in two education forums hosted by the Citizens Advisory Board Waste Management Committee (May 6, 2003 and May 22, 2003). As with any SCDHEC permitting decision, all proposed new permits or permit modification decisions will have full public participation.

DHEC RESPONSE TO THE SRS CITIZENS ADVISORY BOARD (CAB) RECOMMENDATION NO. 175

Citizens Advisory Board Recommendation 175 pertains to the use of Monitored Natural Attenuation (MNA) and Enhanced Passive Remediation (EPR) on contaminated sites at the SRS. The Department concurs that natural processes, either alone (MNA) or enhanced with some other technology (EPR), can be an acceptable cleanup alternative for a site. The Department, along with the DOE and EPA, will continue to consider MNA/EPR when selecting cleanup alternatives for sites at SRS. The use of MNA/EPR as a cleanup alternative at a site must consider both short-term and long-term protection of human health and the environment. The short-term impact on human health and the environment usually is simple to assess and quantify. Often a long time is required for MNA/EPR to be effective at a site; consequently, the long-term protection of human health and environment is an important issue when considering the use of MNA/EPR for a site. As the recommendation requests, the Department will continue to work with DOE and EPA regarding the appropriate use of MNA/EPR at SRS and will focus on the important issue of how much time should MNA/EPR be allowed to be the sole cleanup alternative for a site (i.e., should more aggressive cleanup technologies also be used at a site). Finally, the Department is happy to educate stakeholders about MNA/EPR issues and how they apply to SRS.