

Department of Energy

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

DEC 2 2 2003

Mr. Wade Waters, Chair Savannah River Site Citizens Advisory Board 308 Pinewood Drive Pooler, GA 31322

Dear Mr. Waters:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 175 – Monitored Natural Attenuation and Enhanced Passive Remediation (MNA/EPR), (Your letter, 11/19/03)

Thank you for your recommendation regarding the MNA/EPR Technology Alternative Project. The following is my response to the four elements of your recommendation.

1. The Department of Energy Headquarters (DOE-HQ) and Savannah River Site (SRS) should disseminate the current successes of MNA/EPR to stakeholders across the DOE complex to build a foundation of trust concerning the new approach and identify ongoing, possible or planned uses for SRS by March 22, 2004.

DOE-HQ and the SRS team will be initiating an electronic newsletter to provide stakeholders, end users and regulators updates on the current successes and ongoing work associated with SRS and the new MNA/EPR paradigm. The first newsletter will be sent out by March 22, 2004. The newsletter will supplement the planned stakeholder regulatory meetings that are in the project schedule. The newsletter will also provide links to full electronic copies of all project reports (which are made available through the DOE Office of Science and Technology Information – www.osti.gov).

2. SRS should determine how aggressive technologies, such as in situ heating and in situ chemical destruction methods, affect the subsequent use of MNA/EPR in cleanup of reduced contaminant concentrations in the same vadose zone and/or groundwater plume and should begin to report the findings of the investigation by March 22, 2004.

SRS, through the Interactive Working Group (IWG), will evaluate the effect of aggressive technologies on the subsequent use of MNA/EPR. A summary paper will be prepared and presented to the SRS CAB by March 22, 2004.

3. The three agencies continue to work together to set clear boundaries for expanding the use of MNA/EPR at appropriate SRS contaminated sites and develop consensus on appropriate regulatory protocol for their use. Special emphasis should be placed on reaching accord regarding the longer times required for cleanup via MNA/EPR and to educate stakeholders about this.

Mr. Wade Waters

SRS continues to work with both the Environmental Protection Agency (EPA) Region IV and the South Carolina Department of Health and Environmental Control (SCHDEC) to develop consensus on appropriate use of MNA at viable sites. The IWG will also work with EPA and SCHDEC, as well as the Inter-State Technology Regulatory Council (ITRC), to develop the technical guidance, which will build upon the original EPA MNA protocol and introduce and define the new concept of EPR. The project team has spoken to several groups (i.e., regulators, stakeholders and end users). One of the important topics, that has been identified, is longer times for cleanup associated with MNA/EPR. That, along with other topics, will be addressed during the remaining life of this project. As part of the work with the ITRC, it is the intent of the IWG and Technical Working Group to develop and conduct training courses on the technical guidance developed in this project. This project will be completed in June 2006. Periodic updates on the progress will be presented at the request of the SRS CAB.

4. SRS should provide periodic updates on the status of the work performed by the IWG in establishing and documenting new MNA/EPR paradigms.

The IWG will provide periodic updates to the SRS CAB at their request. The project team plans on conducting annual updates at SRS, the Hanford Site and the Oak Ridge Site. The chairperson of the Facility Disposition and Site Remediation Committee of the SRS CAB will be added to the distribution for the project newsletter. The results of all these meetings will be documented in public reports that are identified in the MNA/EPR newsletter and available at <u>www.osti.gov</u>.

If you have any questions or need additional information, please contact me or Tony Polk, of my staff, at (803) 952-8394.

Sincerely,

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