



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-FFB

MAY 10 1996

Mr. Robert H. Slay
Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box 192
Beech Island, South Carolina 29842

Ms. Ann Loadholt
Vice Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box 365
Barnwell, South Carolina 29812

SUBJ: Savannah River Site
Citizens Advisory Board
EPA Response to CAB Recommendation 17

Dear Mr. Slay and Ms. Loadholt:

This is in reply to the Citizens Advisory Board's Recommendation Number 17 regarding the Department of Energy's Fiscal Year 1998 budget. The United States Environmental Protection Agency (EPA) agrees with the importance of this matter and commends the Board for its active role in this process. The following is a brief explanation of EPA's position with respect to the six specific points raised in the recommendation.

1. EPA concurs with the Board that those items that affect the health and safety of workers and the public and protect the environment (hereafter "risk") should receive the highest budget priority. Section III.A.1. of the Federal Facility Agreement (FFA) lists this objective as the primary purpose of the FFA. However, EPA is concerned that DOE's analysis of risk for budget prioritization (hereafter "relative risk") has many problems. Not only does the prioritization process attempt to equate cleanup projects with capital improvement and operation and maintenance projects, it attempts to do so in a manner which could be misleading to general stakeholders. Results obtained from the process do not assure compliance with the FFA. Further, EPA has concerns that meaningful public participation in the budget process is unlikely to occur given the complex nature of the prioritization process. It is even more unlikely that the public will be able to differentiate between "risk" and "relative risk".

2. A consensus on priorities has been formally established in the Federal Facilities Agreement and agreed to by DOE-SR and the regulators. Appendix F to the FFA provides a simple

the regulators. Appendix F to the FFA provides a simple assessment and ranking of the threat to human health and the environment for those sites subject to cleanup under the terms of the FFA.

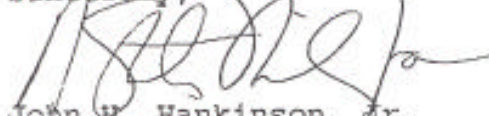
3. The FFA allows for schedule delays in the event that funds sought diligently are not received. If funding shortfalls occur and DOE can demonstrate that it diligently sought full funding, the FY98 compliance schedule will be adjusted so that those commitments of highest priority are completed. However, EPA remains concerned that DOE's current budgetary process does not lend itself to a clear demonstration of seeking adequate funds for all FFA Appendix E commitments.

4 & 5. Coordination with regulatory oversight agencies under the terms of the FFA should not necessarily lead to increased costs. The bulk of cleanup and overhead costs are more appropriately associated with degree of efficiency with which DOE-SR conducts its operations. EPA does agree, however, that there are regulatory efficiencies to be gained from continued State, DOE-SR and EPA streamlining initiatives that will result in faster and less costly evaluations to support cleanup decisions.

6. EPA agrees with the concept that new missions must be funded independently from the important ongoing missions which include cleanup of past releases to the environment.

If you have questions regarding this matter, please contact Ms. Camilla Warren or Mr. Jeff Crane of my staff at (404) 347-3016.

Sincerely,



John H. Hankinson, Jr.
Regional Administrator

cc: Lewis Shaw, SCDHEC
Mario Fiori, DOE-SRS
Jim Hall, ORR