



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

MAR 23 1995

4WD-FFB

Ms. Mildred McClain  
Interim Co-chairperson  
Savannah River Site Citizens Advisory Board  
720 Maupas Avenue  
Savannah, Georgia 31401

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

SUBJ: Savannah River Site  
Citizens Advisory Board  
DHEC/EPA Response to CAB Recommendation on  
Guidelines for use of Future Residential/Industrial  
Exposure Scenarios

Dear Ms. McClain and Mr. Slay:

This letter is in response to your letter of January 31, 1995, in which the Savannah River Site (SRS) Citizens Advisory Board (CAB) requested a response to the Board's second formal recommendation by March 27, 1995. As requested, the Environmental Protection Agency (EPA) and the Department of Environmental Control (DHEC) have coordinated their response with this letter. EPA and DHEC are pleased in the Board's continuing development, as exemplified by the first two recommendations, and looks forward in continuing to further expand the Board's input into the environmental restoration process at SRS.

EPA and DHEC concur with the CAB's recommendation to establish guidelines for the consideration of future land use scenarios for the near term development of environmental restoration decisions required under the provisions of the Federal Facility Agreement. Procedures incorporating these guidelines will be included in the Federal Facility Agreement (FFA) Implementation Plan currently under development. It is anticipated that the SRS CAB's Environmental Restoration Subcommittee will participate in a review of the FFA Implementation Plan during its development. EPA and DHEC acknowledge the long term strategy for consideration of future land use in the environmental restoration decision making framework may be modified pending the outcome of the Department of Energy's Future Use Initiative and EPA's policy developments in this area.

The CAB's recommendation is based on the expectation that future land use at SRS will be consistent with the current land use. Guidelines are provided in the recommendation for considering future land use in the documentation which support cleanup decisions. This recommendation will be an important factor in risk management considerations for final cleanup decisions. However, EPA and DHEC believe that the supporting documentation for cleanup decisions should not preclude consideration of plausible future use scenarios, including the future residential scenario. Limiting the evaluation to industrial future use too early in the cleanup evaluation process may limit the ability to achieve cleanup objectives which are more permanent and which may ultimately be more consistent with the consensus future use of the site.

The following discussion clarifies EPA's and DHEC's expectations in implementing some of the six guidelines included in the recommendation. The discussion is numbered consistent with the numbering of the recommendation's individual guidelines. The procedures incorporating these guidelines will be included in the FFA Implementation Plan.

Recommendation No. 1:

A primary purpose of the Baseline Risk Assessment is to determine if remedial action is required and support the development of remediation goals (e.g., contaminant cleanup concentrations). Including both future industrial and residential use in this assessment will provide upper and lower bound remediation goals and the implications of achieving these goals can be further assessed. If cleanup decisions do not achieve future residential goals, long term maintenance costs may be incurred and periodic review of the decision will be necessary.

Recommendation No. 4:

Generally, EPA and DHEC expect that at least one alternative will be evaluated in the Feasibility Study which can attain residential remediation goals. Where remediation to attain residential remediation goals is not plausible, due to the nature of the waste (e.g., large volumes of low concentrations of material, complex wastes too difficult to handle or treat), remedial alternatives may be limited to those capable of achieving industrial remediation goals.

EPA and DHEC are pleased with the recent formation of the Environmental Restoration (ER) Subcommittee and the issues discussed during the ER Subcommittees recent meetings. This Subcommittee's involvement at critical stages in cleanup

evaluation/decision making process will advance the ability of the SRS CAB to provide informed recommendations on both specific and general environmental restoration issues.

If you questions regarding this matter, please contact Ms. Camilla Warren or Mr. Jeff Crane of my staff at (404) 347-3016 at EPA, and/or Mr. Keith Collingsworth at (803) 896-4055 at DHEC.

Sincerely,

*John H. Hankinson, Jr.*  
John H. Hankinson, Jr.  
Regional Administrator

*R. Lewis Shaw*

R. Lewis Shaw, P.E.  
Deputy Commissioner  
Environmental Quality Control  
Department of Health and  
Environmental Control

cc: Mario Fiori, DOE-SRS