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May 14, 1998

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Ms. Ann Loadholt
Chairperson
Savannah River Site Citizens Advisory Board

Dear Ms. Loadholt:

Attached are the South Carolina Department of Health and Environmental Control responses to Savannah River Site Citizens Advisory Board recommendations # 31, 34, 35, 37, 38, 39, 46, 47, 48, 50, 51, 52, and 53. Should you have any questions or comments, please contact Ann Clark at 803-734-4721 or Keith Collinsworth at 803-896-4055.

Sincerely,

R. Lewis Shaw, PE
Deputy Commissioner
Environmental Quality Control

South Carolina Department of Health & Environmental Control Responses to the Savannah River Site Citizens Advisory Board Recommendations 31, 34, 35, 37, 38, 39, 46, 47, 48, 50, 51, and 53.

CAB Recommendation #31 - Shutdown of the River Water System:

This recommendation has been superseded by a Department of Energy NEPA Record of Decision of No Further Action for the River Water System Shutdown. Therefore, no response appropriate for Recommendation 31.

CAB Recommendation #34 - Soils Consolidation Facility:

This recommendation states that the CAB does not endorse a plan to consolidate numerous sites contaminated with radionuclides into a single waste management area. A meeting was held between the three parties to the Federal Facility Agreement (FFA) (DOE, EPA, SCDHEC) on February 26, 1997 to discuss the findings of the Alternatives Screening Report for Radioactive Soils/Debris Consolidation Facility/Off Unit Disposal. This meeting concluded that the number of areas being considered for consolidation could be reduced to focus on those sites outside of the expected future land use of heavy industrial/nuclear. Those sites within the area of expected future land use of heavy industrial/nuclear will be considering in-place closure options.

In conclusion, SCDHEC agrees that it may not be feasible to consolidate all radionuclide contaminated sites into one unit, however, SCDHEC believes it is still appropriate to evaluate consolidation of sites on a limited scale, as appropriate, to facilitate footprint reduction of sites that would require long term management into the future.

CAB Recommendation #35 - SRS Waste Site Cleanup Actions:

SCDHEC agrees with Recommendation #35 that the cleanup process at SRS should be accelerated. The three parties to the Federal Facility Agreement (FFA) are continuing to develop strategies such as ASCAD, the Plug-in ROD, and the Early Action Strategy Framework to streamline administrative processes and to focus more resources on in-field cleanup. These strategies have facilitated early cleanup actions at the Burial Ground Complex, D-Area Oil Seepage Basin, Coal Pile Runoff Basins, Ford Building Waste Unit, and Radionuclide Vegetation removals. The streamlining strategies when fully developed will address specific Issues 1 and 2 of the recommendation. SCDHEC welcomes CAB input throughout the development of the above strategies.

SCDHEC also concurs with specific Issue 3 of Recommendation #35 that the Site Evaluation process be accelerated. However, acceleration should only include those sites which pose a potential threat to human health and the environment and yield an

opportunity for early response actions consistent with the strategies listed above. SCDHEC does not believe additional resources should be focused on the Site Evaluation program to focus on sites which may be suited for no further action.

CAB Recommendation #37 - L-Area Oil & Chemical and Acid Caustic Basin:

SCDHEC appreciates the CAB's endorsement of the preferred remedial alternative to be implemented at the L-Area Oil & Chemical and Acid Caustic Basin.

CAB Recommendation #38 and 53- SRL Seepage Basins:

SCDHEC concurs with CAB Recommendation #38 and #53 that an early action cleanup be implemented at the SRL Seepage Basins. DHEC participated in the recommended focus group to scope remedial alternatives for the remediation of the basins on July 21, 1997. DHEC has participated in all briefings to the CAB ER Subcommittee regarding the status of the early action implementation. Based on the current status of the documentation to support the early action, it appears the cleanup at these unit will begin in early 1999, two years earlier than the current FFA schedule.

CAB Recommendation #39 - Savannah River Integrator Operable Unit Study:

SCDHEC concurs that an Independent Scientific Peer review would provide useful input into the sitewide strategy to investigate the SRS in a large scale view (integrator operable units) while continuing the unit by unit investigations and cleanups (operable units).

CAB Recommendation #46 - Plug-in ROD Approach:

SCDHEC concurs with the recommendation to pursue the Plug-in ROD approach at sites which are amenable a prescriptive remedy such as in place closure of Radioactive contaminated Basins. As with all RODs, public participation would be diligently pursued when a plug-in ROD is developed. SCDHEC will participate with DOE and EPA to brief the CAB on the development of all streamlining strategies, including the plug-in ROD.

CAB Recommendation #50 - Early Action Strategy:

SCDHEC appreciates the CAB's endorsement of the Early Action Strategy being developed for inclusion into the FFA Implementation Plan (FIP). SCDHEC concurs with the recommendation that the implementation of early actions be coordinated with the public and the CAB.

**CAB Recommendation #47- Environmental Management Integration and some SRS
Specific Recommendations**

**CAB Recommendation #48- Complex Wide Environmental Management
Integration (EMI)**

CAB Recommendation #51- Environmental Integration High Level Waste

**CAB Recommendation #52- Draft Environmental Impact Statement on
Management of Certain Plutonium Residues and Scrub Alloy Stored at
Rocky Flats.**

The South Carolina Department of Health and Environmental Control concurs with the CAB that there are benefits to EMI across the DOE complex. However these wastes across the DOE complex must be looked at holistically with the other waste and nuclear material management issues to ensure that equitable integration is achieved. The Department is working closely with the Governor's Office to evaluate all of these options and will consider the CAB recommendations in any decision making process.