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### Memorandum

Ms. Ann Loadholt, Chairperson  
SRS Citizens Advisory Board  
P. O. Box 365  
Barnwell, South Carolina 29812

Subject: Recommendation Numbers 60, 67, 68, 71, and 76

Dear Ms. Loadholt:

The South Carolina Department of Health and Environmental Control (SCDHEC) has received and is responding to the following Savannah River Site (SRS) Citizens Advisory Board (CAB) Recommendations. The recommendations are Number 60: D-Area Oil Seepage Basin; Number 67: Disposal of low level radioactive waste from SRS CERCLA sites; Number 68: SRL Seepage Basin contaminated soils disposal; Number 71: Closure of the Old Radioactive waste Burial Ground; and Number 76: Plug-In Record of Decision.

Enclosed please find individual responses to each of the subject recommendations. We appreciate the Board's input and advice as we continue to implement this challenging cleanup program. If you should have any questions, please contact Ann Clark or Keith Collinsworth of my staff at (803) 898-3973 or (803) 896-4055.

Sincerely,

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

CC: John H. Hankinson, Jr., EPA Region IV  
Jeff Crane, EPA Region IV  
Greg Rudy, DOE  
Dawn Haygood, WSRC

**South Carolina Department of Health and Environmental Control Responses to the Savannah River Site Citizens Advisory Board Recommendations 60, 67, 68, 71, and 76:**

**CAB Recommendation # 60 - D-Area Oil Seepage 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 # 67 - Disposal of radioactive contaminated CERCLA Waste in the SRS Low Level Radioactive Waste Disposal Facility:**

This recommendation stated that EPA Region IV and South Carolina DHEC should determine under what conditions they would approve disposal of CERCLA wastes that meet the appropriate waste acceptance criteria in an SRS operated, DOE-regulated waste disposal facility, and particularly if they would approve disposing of CERCLA soils in the E-Area Trenches. SCDHEC has been working closely with the DOE and EPA to ensure the best sitewide strategy to manage radioactively contaminated soils at the CERCLA contaminated sites. Through these three party discussions, it does not appear at this time that DOE is pursuing using the E-Area trenches as part of its programmatic sitewide strategy for remediation of radioactively contaminated soils at CERCLA contaminated sites. Therefore, SCDHEC does not see any reason at this time to evaluate whether the E-Area Trenches is an appropriate remedial strategy for radioactively contaminated soils at CERCLA units. In the event that DOE pursues a sitewide strategy to dispose of radioactive contaminated soils from CERCLA units at the E-Area trenches, then SCDHEC would evaluate whether the E-Area Trenches are the appropriate disposal option.

**CAB Recommendation # 68 - SRL Seepage Basins Contaminated Soils Disposal:**

SCDHEC appreciates the CAB's endorsement of the preferred remedial alternative to be implemented at the SRL Seepage Basins.

**CAB Recommendation # 71 - Closure of the Old Radioactive Waste Burial Ground:**

This recommendation requested both EPA and SCDHEC dedicate representatives to participate on a focus group that would evaluate the best remedial approach for the Old Radioactive Waste Burial Ground. SCDHEC concurs with this recommendation and has made representatives available to work closely with the CAB focus group to arrive at a consensus remedial action approach for the Old Radioactive Waste Burial Ground.

#### **CAB Recommendation # 76 - Plug-in Record of Decision:**

This recommendation requested that the three parties to the FFA (DOE, EPA and SCDHEC) implement a Plug-In ROD for the four candidate OU's (i.e., C, K, L, and P reactor seepage basins) and provide an overall schedule to the Board by its May 24-25, 1999 meeting for the implementation of the Plug-In ROD and the initiation of field work for the four candidate OU's. The recommendation also asked the three parties to provide to the CAB a list of additional OUs that meet the specified criteria for this Plug-In ROD as they become identified. First, SCDHEC appreciates the commendation the CAB has given us in this recommendation for the plug-in ROD concept. In addition, SCDHEC concurs with this recommendation and is currently implementing the plug-in ROD for the for units listed in the recommendation. The implementation schedule will be presented to the CAB during the May 24th and 25th, 1999 CAB meeting.