



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

MAR 23 2000

4WD-FFB

Ms. Karen Patterson, Chairperson
Savannah River Site Citizens Advisory Board
1103 Conger Drive
Aiken, South Carolina 29803

SUBJECT: Savannah River Site Citizens Advisory Board
Recommendation Nos. 75, 80, 83, 86, and 87


Dear Ms. Patterson:

The Environmental Protection Agency (EPA) has received the Savannah River Site (SRS) Citizens Advisory Board (CAB) recommendations noted above. We thank you for your recommendations concerning these important issues related to cleanup at SRS. Individual responses to each of the recommendations are enclosed.

In Recommendation No. 75, the CAB recommends that the Department of Energy (DOE), South Carolina Department of Health and Environmental Control (SCDHEC), and EPA increase the opportunity to involve the public very early, before decisions are made on significant interim and final response actions at SRS. EPA appreciates the CAB's interest in early public participation in the remedial decisions at SRS. EPA has observed that procedures for early public involvement, which are built into the regulatory process, are strictly adhered to by DOE and are often augmented at SRS with additional opportunities for input through CAB focus group, committee, and Board activities. EPA will support the CAB in their efforts to take increased advantage of those opportunities to impact the environmental cleanup program at SRS.

We value the Board's feedback and the sustained level of commitment demonstrated by the SRS CAB members and the many additional volunteers from the Savannah River Region who serve on the committees and focus groups. If you need further assistance, please contact Julie Corkran of my staff at (404) 562-8547.

Sincerely,



John H. Hankinson, Jr.
Regional Administrator

Enclosure

cc: Lewis Shaw, SCDHEC
Ann Clark, SCDHEC
Greg Rudy, DOE-SRS
Dawn Haygood, WSRC-SRS

EPA Response to CAB Recommendation No. 75
Interim Corrective Measures
Southwest Plume from Old Radioactive Waste Burial Ground

EPA appreciates the Minority Report opinion supporting all aspects of the proposed interim corrective measure and the spirit of cooperation in which it was offered. EPA agrees that the rationale for implementing the interim measure should be stated clearly and supported adequately in the interim measures work plan. The Agency also agrees that the expected interim remedial goals (i.e., effectiveness of the interim measure) for all contaminants of concern should be presented in the work plan. A realistic goal for tritium concentrations at Four Mile Branch, however, is a more complicated issue which will require consideration of tritium contributions from all sources and is more appropriately determined on an Integrator Operable Unit scale.

EPA appreciates the CAB's interest in early public participation in the remedial decisions at SRS. EPA has observed that procedures for early public involvement, which are built into the regulatory process, are strictly adhered to by DOE and are often augmented at SRS with additional opportunities for input. EPA will support the CAB in their efforts to take increased advantage of those opportunities to impact the environmental cleanup program at SRS.

EPA Response to CAB Recommendation No. 80
Miscellaneous Chemical Basins/Metals Burning Pit

EPA acknowledges the Board's support for the selected interim remedy at the Miscellaneous Chemical Basins/Metals Burning Pit (MCB/MBP) waste unit. Recommendation No. 80 also requests that a Maximum Contaminant Level (MCL) waiver for ground water cleanup be provided after 5 years of *in situ* aeration well system operation.

Per the National Contingency Plan (NCP), EPA expects ground water remedies at SRS to restore ground water to beneficial reuse as a potential drinking water source by achieving MCLs. EPA recognizes, however, that the cleanup of ground water to meet MCLs may be an unattainable goal in some instances. Thus, the CERCLA regulatory program provides the opportunity for MCL waivers. MCLs may be waived, and an alternate remedial goal selected, if SRS demonstrates to EPA and SCDHEC that achieving MCLs is technically impracticable at the MCB/MBP waste unit.

Given site conditions and land use expectations, the feasibility study for the MCB/MBP will consider the feasibility of achieving MCLs over varying time frames and utilizing various cleanup technologies, to achieve the best balance of trade-offs among the nine CERCLA criteria for remedy selection. However, it is not prudent at this time to set an arbitrary 5 year time trigger on waiving MCLs at this unit. If necessary, that decision will be informed by data collected during the interim action and carefully considered by the three agencies, along with stakeholder input.

**EPA Response to CAB Recommendation No. 83
Chemicals, Metals, and Pesticides (CMP) Pits**

EPA acknowledges the Board's support for the selected interim remedy at the Chemicals, Metals, and Pesticides (CMP) Pits. Recommendation No. 83 also requests that a plan be developed to establish "point of diminishing returns criteria for determining when a remediation can be completed for all of the sites at SRS that are undergoing remediation or will be remediated" by September of 1999.

EPA agrees with the CAB that, where technically feasible, the estimated time-frame for achieving both interim and final remedial action objectives should be specified in the Record of Decision. Under certain site conditions, however, EPA guidance provides for a more flexible phased-in remedy strategy where the effectiveness of an initial cleanup phase is evaluated prior to determining final remedial action objectives and time frames. Regardless of the approach to cleanup, periodic progress reports provided to the regulatory agencies and stakeholders should evaluate DOE's progress in establishing and achieving these time-based objectives.

In each of the cases described above, time frames and "point of diminishing returns" criteria are based on substantial site characterization data. Such data are not currently available for those Federal Facility Agreement waste units that are slated for future investigation, therefore criteria for determining remedy completion for those units cannot be identified by September of 1999. EPA will continue to expect that all SRS Proposed Plans and Records of Decision include clear statements identifying remedial goals, estimated time frames for cleanup, and criteria for switching from one remedial phase to the next.

**EPA Response to CAB Recommendation No. 86
Corrective Measures Study/Feasibility Study for the Old Radioactive Waste Burial Ground**

SRS CAB Recommendation No. 86 forwards comments to DOE-SRS on the Corrective Measures Study/Feasibility Study (CMS/FS) for cleanup of the Old Radioactive Waste Burial Ground. No specific recommendation was directed to EPA, however, the CAB has requested a response from this Agency. EPA agrees with the CAB that the CMS/FS provides a good basis for making decisions about the cleanup of this waste unit. EPA submitted limited comments on the vast array of cleanup alternatives presented in the Rev. 0 CMS/FS and the three agencies are working toward starting field work in 2002.

EPA Response to CAB Recommendation No. 87
Proposed Permit Modification, Mixed Waste Management Facility at SRS under South
Carolina Hazardous Waste Management Regulations and Resource Conservation and
Recovery Act (RCRA)

SRS CAB Recommendation No. 87 forwards comments to DOE-SRS and SCDHEC on the proposed RCRA permit modification for the Mixed Waste Management Facility (MWMF) at SRS. No specific recommendation was directed to EPA, however, the CAB has requested a response from this Agency.

The permit modification addresses interim measures to control tritium-contaminated ground water releases to the Four Mile Branch through surface water management and pine plantation irrigation. SCDHEC is fully authorized to implement RCRA Corrective Actions and is the regulatory lead for this permit activity and EPA supports SCDHEC's timely critical analysis of the permit issues related to the MWMF. In addition, EPA supports DOE's proposal for pump and drip irrigation of an SRS pine plantation as an innovative and cost-effective solution to the technical challenge presented by tritium-contaminated ground water at the MWMF.