



Recommendation No. 3

March 28, 1995

ISPR of Groundwater Remediation at F/H Area

Our review of the operational results of the A&M groundwater pump-airstrip remediation project and the proposed F&H groundwater pump-treat-reinject remediation project has raised significant questions and uncertainties associated with the efficacy to achieve significant risk reduction, ecological and regulatory benefits. As a result, the SRS CAB recommends to the Department of Energy, the South Carolina Department of Health and Environmental Control and the Environmental Protection Agency:

1. that DOE initiate an Independent Scientific Peer Review (ISPR) (e.g. cost-benefit analysis) of the risk reduction to human health and worker safety and the ecological and regulatory benefits derived from the proposed F&H groundwater pump-treat remediation activity and the operational A&M groundwater pump-treat remediation project; that DOE and the regulators review the ISPR conclusions and incorporate them into the Resource Conservation and Recovery Act (RCRA) Part B Permit post-closure corrective action plan currently undergoing a 45-day public comment period from March 1, 1995; and that the SRS CAB notify the regulators and DOE that it agrees/disagrees with the ISPR conclusions;
2. that DOE, in concert with the regulators and the SRS CAB, develop the scope of the ISPR and, to minimize any delay on current operations and the proposed action, manage the ISPR contract so that its conclusions are available for the CAB's timely consideration prior to the start of FY-1996 (i.e., six months from now);
3. that the scope of the review include a CBA evaluation of treatment and regulatory alternatives to the proposed corrective action of pump-treat-inject contaminated groundwater from the area of the closed F&H Seepage Basins, and that the conclusions specify a recommended treatment and proposed changes to the Part B permit;
4. that an ISPR report and a briefing by the ISPR team be provided to DOE, the regulators and the CAB on or before the September 25-26, 1995, SRS CAB meeting; and,
5. that DOE and the regulators develop Part B changes and review them with the SRS CAB.

Agency Responses

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