



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

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4WD-PFB

Mr. Robert H. Slay
Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box 192
Beech Island, SC 29842

Ms. Ann Loadholt
Co-chairperson
Savannah River Site Citizens Advisory Board
P.O. Box 365
Barnwell, SC 29812

Subject: Savannah River Site
Citizens Advisory Board (CAB)
Recommendations 8, 9, and 10

Dear Mr. Slay and Ms. Loadholt:

This is in reply to three (3) Savannah River (SR) Citizens Advisory Board (CAB) formal recommendations of September 26, 1995, regarding future land use, remediation in the F&H Areas, and strategic planning for cleanup. The U.S. Environmental Protection Agency (EPA) and the South Carolina Department of Health and Environmental Control (SCDHEC) are pleased in the Board's meaningful and significant contributions to the environmental restoration process at the U.S. Department of Energy (DOE) SR.

The CAB's recommendations are a significant contribution to consensus development for environmental remediation of DOE-SR. Our detailed review comments for each of these recommendations, as well as a discussion of EPA and SCDHEC's ongoing efforts to fully address the issues raised in these important recommendations, are enclosed.

We generally concur with Recommendations 9 and 10 as outlined in the enclosure. However, there is a discussion of several points in Recommendation 8 for which we do not concur. Nevertheless, EPA and SCDHEC will consider Recommendation 8 at each remedy selection phase.

EPA and SCDHEC have two chief concerns about Recommendation 8. First, precluding consideration of future residential use, while at the same time encouraging increased recreational uses, which could entail similar exposures, does not appear to be an

internally consistent approach. Indeed, from a risk communication perspective alone, this position may be difficult for the CAB to explain. EPA and SCDHEC believe that an effective risk management strategy for SRS cleanup of waste sites should include consideration of future residential use. By bringing residential land use into focus during remedy selection phase, regulatory agencies and the public may become better informed decision makers regarding impacts (budgetary and otherwise). This does not mean that EPA or SCDHEC will necessarily require cleanup of all portions of SRS to residential standards.

Importantly, apart from the specifics of each recommendation, EPA, SCDHEC, and DOE must promptly and simultaneously address issues that these recommendations will undoubtedly raise. EPA and SCDHEC's concerns regarding future land use are based in the broader goal of environmental protection for both humans and ecological communities.

EPA and SCDHEC congratulate the CAB for taking a common sense approach to better risk management and decision making. EPA believes that the CAB is increasing citizen involvement at SRS and that this can only lead to improved environmental policy and better decisions.

If you desire additional discussions or have any questions regarding these matters, please contact Camilla Bond Warren at EPA at (404) 347-3016 or Keith Collinsworth at SCDHEC at (803) 896-4055.

Sincerely,


John H. Hankinson, Jr.
Regional Administrator



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

Enclosure

cc: Mario Fiori, DOE-SRS

Recommendation No. 8

Comment to Part 1

If national needs are "unforeseen", it is difficult to imagine how they can be planned for. "Unforeseen" national needs probably should not be considered to be inconsistent, with the consideration of cleanup to levels protective of future residential use.

Although it is possibly true for the site as a whole, the comment on fair market value would probably be difficult to substantiate through independent economic analysis, for all areas on SRS.

Comment to Part 2

EPA and SCDHEC has no comment on this part of Recommendation 8.

Comment to Part 3

The CAB's prohibition of residential land use is not sufficiently justified from a risk management/risk communication perspective. It appears that the recommendation is based upon a concern that including an evaluation of future residential exposure to waste units will necessitate costly and potentially inappropriate cleanup to residential levels. This apparent concern is not accurate and should not be the basis for precluding the consideration of more protective cleanup goals (i.e., residential or recreational). Future land use is an uncertainty that should be considered in all risk management decisions. This uncertainty should be effectively managed and communicated to the public in an overall effort to set cleanup goals which are not assumed to be based on requiring or precluding residential cleanup goals. Rather, waste unit-specific factors (e.g., waste type/quantity, migration potential, waste-unit location), remedial action evaluation criteria (e.g., cost, effectiveness, permanence) and a "two-way" risk communication strategy effectively incorporating public input should all be carefully considered in managing the risks and the inherent uncertainty of these risks (including the uncertain risks of future land use). This approach could aid the CAB in explaining an appropriate waste unit-specific remedy selection. The CAB's future land use expectations, along with other stakeholder's expectations, shall be an important consideration in any final remedy selection decision.

In summary, federal facilities are no longer necessarily more permanent than a private facility, and consideration of a range of future land uses must be a significant part of the cleanup decision for DOE sites, including SRS. Ultimately, DOE has a long-term responsibility and must maintain an active commitment to a clean up program that provides current and future protection of public health and the environment. Therefore, it is important not to limit consideration of future land use, including residential use, so that where practicable, some SRS sites may be remediated to more protective cleanup levels. Finally, this approach should improve risk management/communication with respect to implications of future land uses in the remedy selection process.

Comment to Part 4

EPA and SCDHEC have no comment on this part of Recommendation 8.

Comment to Part 5

EPA and SCDHEC cannot separate considerations of ecological risk and human health from future use considerations. For instance, roughly 90% of the SRS Carolina Bays (sensitive wetlands) are being placed in an industrial zone. There are other important ecological considerations which should be addressed in future use considerations at SRS:

- a. Alligators and aquatic turtles (especially soft back and snapping turtles) have not been included in this risk screening. Even though these species are known to be harvested by local fishermen, creel survey-type data on these edible game species have not been located to date..
- b. Another species of special interest are catadromous eels of the genus *anguilla*. These eels are apparently a favorite delicacy of local residents, some adult eels reaching about three feet in length. These eels migrate from the Savannah River to the Sargossa Sea (part of the North Atlantic between the West Indies and the Azores) to spawn. Some of these eels have been found on the Savannah River Site, specifically in Par Pond. However, to date, EPA (or GA Department of Natural Resources or SCDHEC)