

STATEMENT OF BASIS / PROPOSED PLAN FORMAT

I. INTRODUCTION AND BACKGROUND

Introduction

This Statement of Basis/Proposed Plan (SB/PP) [or Interim Action Proposed Plan (IAPP)] is being issued by the United States Department of Energy (USDOE), which functions as the lead agency for Savannah River Site (SRS) remedial activities, with concurrence by the United States Environmental Protection Agency (USEPA) and the South Carolina Department of Health and Environmental Control (SCDHEC). The purpose of this SB/PP is to describe the preferred remedial alternative(s) for the operable unit name (Bldg. No.) Operable Unit (OU) (unit acronym), and to provide for public involvement in the decision-making process. The unit acronym is located at the SRS in Aiken or Barnwell County, South Carolina (see Figures 1 and 2).

SRS manages certain waste materials that are regulated under the Resource Conservation and Recovery Act (RCRA), a comprehensive law requiring responsible management of hazardous waste. The unit acronym is a solid waste management unit under RCRA Section 3004(u). SRS received a RCRA hazardous waste permit from the SCDHEC, which was most recently renewed on September 30, 2003 (SC1 890 008 989). Module VIII of the Hazardous and Solid Waste Amendments portion of the RCRA permit mandates corrective action requirements for non-regulated solid waste management units subject to RCRA 3004(u).

On December 21, 1989, SRS was included on the National Priorities List (NPL). The inclusion created a need to integrate the established RCRA Facility Investigation (RFI) program with Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requirements to provide for a focused environmental program. In accordance with Section 120 of CERCLA 42 U.S.C. § 9620, USDOE has negotiated a Federal Facility Agreement (FFA) (FFA 1993) with the USEPA and SCDHEC to coordinate remedial activities at SRS into one comprehensive strategy which fulfills these dual regulatory requirements. The FFA lists the unit acronym as a RCRA/CERCLA unit

Figure 1. Location of the **Unit Acronym** within the Savannah River Site

Figure 2. Layout of the Unit Acronym

requiring further evaluation using an investigation/assessment process that integrates and combines the RFI process with the CERCLA Remedial Investigation (RI) process to determine the actual or potential impact to human health and the environment of releases of hazardous substances to the environment.

Both RCRA and CERCLA require the public to be given an opportunity to review and comment on the draft permit modification and proposed remedial alternatives. Public participation requirements are listed in South Carolina Hazardous Waste Management Regulations (SCHWMR) R.61-79.124 and Sections 113 and 117 of CERCLA 42 U.S.C. § 9613 and 9617. These requirements include establishment of an Administrative Record File that documents the investigation and selection of remedial alternatives and allows for review and comment by the public regarding those alternatives (See Section II). The Administrative Record File must be established at or near the facility at issue. The SRS Public Involvement Plan (USDOE 1994) is designed to facilitate public involvement in the decision-making process for permitting, closure, and the selection of remedial alternatives. SCHWMR R.61-79.124 and Section 117(a) of CERCLA, as amended, require the advertisement of the draft permit modification and notice of any proposed remedial action and provide the public an opportunity to participate in the selection of the remedial action. [Insert these sentences if there is a final action component to the interim action: Because this is an interim action for the (insert applicable media) for this OU, a RCRA permit modification is not required for this media. However, a permit modification is required for the (insert applicable media) because the action for this media is considered to be a final action. **OR** Insert this sentence if this is an interim action for all applicable media: Because this is an interim action for all media associated with this OU, a RCRA permit modification is not required.]

SCHWMR R.61-79.124 requires that a brief description and response to all significant comments be made available to the public as part of the RCRA Administrative Record. Community involvement in consideration of this evaluation of alternatives for the unit acronym is strongly encouraged. All submitted comments will be reviewed and considered. Following the public comment period, a Responsiveness Summary will be prepared to address issues raised during the public comment period. The Responsiveness Summary will be made available with the final RCRA permit modification and the Record of Decision (ROD). [Replace the previous sentence with these sentences if any media in the interim action has a final remedial action and there is a final action component to the interim action: The Responsiveness Summary will be made available with the final RCRA permit modification and the Interim Record of Decision (IROD) for those media whose remedial action is final. **OR** Replace the previous sentence with these sentences if this is an interim action for all applicable media: The Responsiveness Summary will be made available with the IROD. A RCRA permit modification will not be issued since this is an interim action.]

The final remedial decision will be made only after the public comment period has ended and all the comments have been received and considered. The final remedial decision under RCRA will be in the form of a final permit modification, which is made by SCDHEC. Selection of the remedial alternative that will satisfy the FFA requirements will be made by USDOE, in consultation with USEPA and SCDHEC. It is important to note that the final action(s) may be different from the preferred alternative discussed in this plan depending on new information or public comments. The alternative chosen will be protective of human health and the environment and comply with all federal and state laws.

[Note: Delete reference to RCRA if a CERCLA only unit.]

Background

SRS occupies approximately 310 square miles of land adjacent to the Savannah River, principally in Aiken and Barnwell counties of South Carolina. SRS is located approximately 25 miles southeast of Augusta, Georgia, and 20 miles south of Aiken, South Carolina.

SRS is owned by the USDOE. Management and operating services are provided by Westinghouse Savannah River Company (WSRC). SRS has historically produced tritium, plutonium, and other special nuclear materials for national defense. Chemical and radioactive wastes are byproducts of nuclear material production processes. Hazardous substances, as defined by CERCLA, are currently present in the environment at SRS.

II. COMMUNITY PARTICIPATION

The FFA Administrative Record File, which contains the information pertaining to the selection of the response action, is available at the following locations:

US Department of Energy
Public Reading Room
Gregg-Graniteville Library
University of South Carolina – Aiken
171 University Parkway
Aiken, South Carolina 29801
(803) 641-3465

Thomas Cooper Library
Government Documents Department
University of South Carolina
Columbia, South Carolina 29208
(803) 777-4866

Hard copies of the SB/PP (or IAPP) are available at the following locations:

Reese Library
Augusta State University
2500 Walton Way
Augusta, Georgia 30910
(706) 737-1744

Asa H. Gordon Library
Savannah State University
Tompkins Road
Savannah, Georgia 31404
(912) 356-2183

The RCRA Administrative Record File for SCDHEC is available for review by the public at the following locations:

The South Carolina Department of Health
and Environmental Control
Bureau of Land and Waste Management
8911 Farrow Road
Columbia, South Carolina 29203
(803) 896-4000

Edisto Savannah District
Environmental Quality Control Office
206 Beaufort Street, Northeast
Aiken, South Carolina 29801
(803) 641-7670

The public will be notified of the public comment period through mailings of the SRS Environmental Bulletin, a newsletter sent to citizens in South Carolina and Georgia, and through notices in the *Aiken Standard*, the *Allendale Citizen Leader*, the *Augusta*

Chronicle, the *Barnwell People-Sentinel*, and *The State* newspapers. The public comment period will also be announced on local radio stations.

USDOE will provide an opportunity for a public meeting during the public comment period if significant interest is expressed. The public will be notified of the date, time, and location. At the meetings, the proposed action will be discussed, and questions about the action will be answered.

To request a public meeting during the public comment period, to obtain more information concerning this document, or to submit written comments, contact one of the following:

Jim Moore
Westinghouse Savannah River Company
Public Involvement
Savannah River Site
Building 742-A
Aiken, South Carolina 29808
1-800-249-8155
jim02moore@srs.gov

The South Carolina Department of Health
and Environmental Control
Attn: J. T. Litton, P. E., Director
Division of Waste Management
Bureau of Land and Waste Management
2600 Bull Street
Columbia, South Carolina 29201
(803) 896-4000

Following the public comment period, a ROD will be signed, and a final decision for the SRS RCRA permit will be issued. The ROD and RCRA permit will detail the remedial alternative chosen for this operable unit and include responses to oral and written comments received during the public comment period in the Responsiveness Summary. [Insert the following sentence if the remedial action is an interim action for only a particular media: Since this is an interim action for (insert the applicable media), a RCRA permit modification is not required for that media. **OR** Insert the following sentence where the remedial decision for all media associated with the OU is an interim action: Since this is an interim action, a RCRA permit modification is not required.]

If there were any SRS Citizens Advisory Board (CAB) activities or recommendations regarding the OU, include a summary in this section.

For a CERCLA only unit, delete references to RCRA.

III. OPERABLE UNIT BACKGROUND

Briefly describe site history including:

- History of waste generation or disposal that led to current problems
- History of Federal, State, and local site investigations
- Identification of contaminated media at the site (e.g., soil, air, groundwater, and surface water)
- Description of removal or previous remedial actions conducted under CERCLA or other authorities
- Briefly describe site characteristics including: Geographical or topographical factors that had a major impact on remedy selection (e.g., resources affected or threatened by site contamination such as current or potential drinking water sources or wetlands)
- Type of contamination and its vertical and lateral extent
- A site map that shows location of roads, buildings, drinking water wells and other characteristics that are important to understanding why the remedial objectives and preferred alternative are appropriate for the site
- Principal and low-level threat wastes (e.g., location of mobile/high toxicity/high concentration source material and immobile/low toxicity/low concentration source material)
- A schematic cross section (Figure 3) drawing (from the Scoping Summary) depicting subunits, constituents of concern (COCs), principal threat source material (PTSM), migration route, etc.

IV. SCOPE AND ROLE OF OPERABLE UNIT OR RESPONSE ACTION

This section of the Proposed Plan should summarize the lead agency's overall strategy for remediating the site and describe how the action being considered in the Proposed Plan fits into that overall strategy. This section should:

- Summarize the overall cleanup strategy for SRS
- Describe the scope of problems addressed by the OU.
- Describe how the action, being addressed in the Proposed Plan, relates to removal or other OUs at SRS (include purpose of each OU and sequence of the action in relation to other OUs or removals)
- Identify how the action addresses source materials constituting principal threat(s)

V. SUMMARY OF SITE RISKS

This section of the Proposed Plan should summarize the extent of contamination at the site and the risks posed to human health and the environment using information developed during the RFI/RI. The summary of site risks should include key findings made in the baseline risk assessment conducted as part of the RFI/RI. This section should clearly link the site risks to the basis for action for the unit or subunits as appropriate. This discussion should be broken down into the following two subsections: (1) human health risks and (2) ecological risks.

Figure 3. Schematic Cross Section of the Unit Acronym

Generally, the risk summary in the Proposed Plan should be a narrative description rather than a tabular presentation. Risk tables are more appropriate for the level of detail needed in a ROD than for the Proposed Plan. The length of most risk descriptions in the Proposed Plan should be limited to no more than two or three paragraphs (for each subunit, if applicable). For sites that are complex or for sites where there is heightened public interest, more risk assessment information may be needed in the Proposed Plan. A risk assessor should be consulted if a streamlined risk summary table is presented in the Proposed Plan to ensure that it is consistent with the summary tables in the risk assessment.

Summary of Human Health Risk Assessment

- Major human health COCs in each medium
- Land and groundwater use assumptions
- Potentially exposed populations in current and future risk scenarios (e.g., worker currently on site, adult or children living on site in the future)
- Exposure pathways (routes of exposure) and how they relate to current or reasonably anticipated future land, groundwater, and surface water use
- Estimated cancer and non-cancer risks associated with exposure pathways for COCs that are driving the need to implement the preferred alternative

Summary of Ecological Risk Assessment

Summary of the ecological risk assessment (e.g., the basis of environmental risks associated with specific media, how these risks were determined, and the potential risks to endangered species).

- Major ecological COCs
- Potential ecological receptors, i.e., plant and animal populations, communities, habitats, and sensitive environments
- Potential exposure pathways, i.e., how ecosystems or other ecological receptors are likely to become exposed to COCs
- Describe potential ecological effects from exposure

Summary of Contaminant Fate and Transport Analysis

- Major contaminant migration constituents of concern (CMCOCs)
- Modeled concentration and time to exceed a groundwater protection standard [e.g., maximum contaminant level (MCL)] or a risk-based concentration (RBC)

Identify whether PTSM or low-level threat source material exists at the unit (waste can not always be characterized as either one or the other; it is not a mandatory classification).

Conclusion

Conclude the risk section with a standard statement that supports the need for taking action, unless it is a “no action” situation.

Actual or threatened releases of hazardous substances from this waste unit, if not addressed by the Preferred Alternative or one of the other active measures considered, may present a current or potential threat to public health, welfare, or the environment.

VI. REMEDIAL ACTION OBJECTIVES

Briefly describe the proposed remediation objectives [i.e., remedial action objectives (RAOs)] for the OU and how they mitigate site risks (e.g., prevent contamination from reaching the groundwater by treating the contaminated soils).

Present remediation goals (will become cleanup levels in the ROD) and their basis for major COCs (e.g., preliminary remediation goal of 5 ppm for TCE is based on the Federal MCL for drinking water). Include a table summarizing remedial goal options (Table 1).

Identify potential applicable or relevant and appropriate requirements (ARARs) for all alternatives in a table format. Include a table summarizing ARARs (Table 2).

Please note that interim actions should present interim RAOs as well as final RAOs (if known).

VII. SUMMARY OF REMEDIAL ALTERNATIVES

Provide a brief narrative description of alternatives evaluated including remedy components and distinguishing features unique to each alternative. For each alternative, identify capital cost, operations and maintenance cost, and present worth cost (Table 3),

time to construct, and cleanup time. Detailed cost estimates may be included in an appendix.

Present worth costs should include a statement listing the basis for those costs. The discount rate (2.1% for 1 to 3 years, 2.8% for 4 to 5 years, 3.0% for 6 to 7 years, 3.1% for 8 to 10 years, and 3.9% for 11 years or longer) and the length of time used for O&M costs must be stated. Use the actual expected length of time in the calculations. If the costs are expected to continue beyond 30 years without a definite end point, use 500 years.

Remedy components should include:

- Treatment technologies employed and how they will reduce the intrinsic threat posed by the contamination
- Engineered controls including temporary storage and permanent on-site containment

Table 1. Summary of the RGOs for the Unit Acronym

Table 2. Summary of Potential ARARs for the Unit Acronym

Table 3. Summary of the Present Value Costs of the Alternatives

- Institutional controls that will restrict future activities that might result in exposure to contamination (e.g., deed restrictions)

Distinguishing features may include:

- RAOs to be achieved by the alternative (e.g., return surface water to recreational use)
- Estimated quantities of material to be addressed by major components
- Implementation requirements (e.g., the need for an off-site disposal facility)
- Key ARARs or waiver of ARARs and any RCRA treatability or no migration variances
- Reasonably anticipated future land use and whether or not it will be achieved by the alternative
- Use of presumptive remedies or innovative technologies
- Estimated time to construct and implement the remedy until RAOs are met
- Expected outcomes (e.g., RAOs that the alternative will attain)
- Estimated costs

In instances where a CMS/FS report was not required: state that the Core Team agreed that a CMS/FS was not needed (include reasons) and that the SB/PP must be modified to add some items that normally would have appeared in the CMS/FS. In general, the screening of alternatives, comparison of alternatives, and detailed present value cost estimates for the alternatives should be added to the Appendix. Do not put all of this information in the body of the SB/PP. The SB/PP is written primarily for the public. It should be easy to understand and concise; but thorough enough to describe the logic involved in selecting the preferred alternative. Detailed information, if needed, should be placed in the Appendix for those readers that want it.

VIII. EVALUATION OF ALTERNATIVES

Explain the nine evaluation criteria and how they are used to analyze the alternatives. The nine criteria are categorized into three groups: threshold criteria, primary balancing criteria, and modifying criteria. The threshold criteria must be satisfied in order for an alternative to be eligible for selection. The primary balancing criteria are used to weigh major tradeoffs among the alternatives. Generally, the modifying criteria are taken into account after public comment is received on the Proposed Plan. A glossary that defines the criteria may be used. The evaluation of alternatives may be presented in a matrix format (Table 4) along with text that explains the matrix.

The nine criteria are:

Threshold Criteria

- Overall protection of human health and the environment

Table 4. Comparison of Alternatives against the Nine Criteria

- Compliance with ARARs (or justify a waiver)

Primary Balancing Criteria

- Long-term effectiveness and permanence
- Reduction of toxicity, mobility, or volume through treatment
- Short-term effectiveness
- Implementability
- Cost

Modifying Criteria (if this information is not available yet, include a statement to that effect).

- State acceptance (include a statement indicating that the state has reviewed the Preferred Alternative; however, approval of the ROD will constitute approval of the preferred alternative by the regulatory agencies)
- Community acceptance

IX. PREFERRED ALTERNATIVE

Briefly, state the Preferred Alternative and provide the most compelling reason(s) for selecting this alternative.

- Use maps and figures, as necessary, to illustrate the preferred alternative
- If groundwater monitoring is required, describe monitoring and performance/effectiveness requirements (use maps and figures, as appropriate)
- For remedies that include institutional controls, use the following language.

If a selected alternative is and/or includes Institutional Controls, the following words should be inserted after the paragraph that states the selected alternative is and/or includes Institutional Controls.

Institutional controls will be implemented by:

- Providing access controls for on-site workers via the Site Use Program, Site Clearance Program, work control, worker training, worker briefing of health and safety requirements and identification signs located at the waste unit boundaries.
- Notifying the USEPA and SCDHEC in advance of any changes in land use or excavation of waste.
- Providing access controls against trespassers as described in the 2000 RCRA Part B Permit Renewal Application, Volume I, Section F.1, which describes the security procedures and equipment, 24-hour surveillance system, artificial or natural barriers, control entry systems, and warning signs in place at the SRS boundary.

For remedies that include institutional controls, include the following language:

In the long term, if the property is ever transferred to nonfederal ownership, the US Government will take those actions necessary pursuant to Section 120(h) of CERCLA. Those actions will include a deed notification disclosing former waste management and disposal activities as well as remedial actions taken on the site. The contract for sale and the deed will contain the notification required by CERCLA Section 120(h). The deed notification shall, in perpetuity, notify any potential purchaser that the property has been used for the management and disposal of waste. These requirements are also consistent with the intent of the RCRA deed notification requirements at final closure of a RCRA facility if contamination will remain at the unit.

The deed shall also include deed restrictions precluding residential use of the property. However, the need for these deed restrictions may be reevaluated at the time of transfer in the event that exposure assumptions differ and/or the residual contamination no longer poses an unacceptable risk under residential use. Any reevaluation of the need for the deed restrictions will be done through an amended ROD with USEPA and SCDHEC review and approval.

In addition, if the site is ever transferred to nonfederal ownership, a survey plat of the OU will be prepared, certified by a professional land surveyor, and recorded with the appropriate county recording agency.

The preferred remedy for the unit acronym or OU subunit name leaves hazardous substances in place that pose a potential future risk and will require land use restrictions for an indefinite period of time. As negotiated with USEPA, and in accordance with

USEPA - Region IV Policy (*Assuring Land Use Controls at Federal Facilities*, April 21, 1998), SRS has developed a Land Use Controls Assurance Plan (LUCAP) to ensure that land use restrictions are maintained and periodically verified. The unit-specific Land Use Controls Implementation Plan (LUCIP) that will be referenced in the ROD for this unit acronym or OU subunit name will provide details and specific measures required for the Land Use Controls (LUCs) selected as part of this preferred remedy. The USDOE is responsible for implementing, maintaining, monitoring, reporting upon, and enforcing the LUCs described in this SB/PP. The LUCIP, developed as part of this action, will be submitted concurrently with the Corrective Measures Implementation/Remedial Action Implementation Plan (CMI/RAIP), as required in the FFA for review and approval by USEPA and SCDHEC. Upon final approval, the LUCIP will be appended to the LUCAP and is considered incorporated by reference into the unit acronym or OU subunit name ROD, establishing LUC implementation and maintenance requirements enforceable under CERCLA. The approved LUCIP will establish implementation, monitoring, maintenance, reporting, and enforcement requirements for the unit. The LUCIP will remain in effect until modified as needed to be protective of human health and the environment. LUCIP modification will only occur through another CERCLA document.

State that the Preferred Alternative can change in response to public comment or new information.

Provide a descriptive paragraph that thoroughly details the logic behind selecting the preferred alternative. This should compare the preferred alternative to each of the other alternatives and point out the most decisive considerations for making the selection. The argument should be convincing and not leave questions as to why some other alternative was not preferred.

- Discuss how it meets key ARARs and the RAOs.
- Detail any uncertainties or contingency measures.
- Describe the expected outcomes of the Preferred Alternative, including risk reduction (how risk identified in the baseline risk assessment will be addressed).
- Summarize the support agency's concurrence or non-concurrence with the Preferred Alternative, if known.

Include a summary statement by the lead agency at the end of this section similar to:

Based on information currently available, the lead agency believes the Preferred Alternative provides the best balance of tradeoffs among the other alternatives with

respect to the evaluation criteria. The USDOE expects the Preferred Alternative to satisfy the statutory requirements in CERCLA Section 121(b) to: (1) be protective of human health and the environment, (2) comply with ARARs (or justify a waiver), (3) be cost-effective, (4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable, and (5) satisfy the preference for treatment as a principal element (or justify not meeting the preference).

[This statement is not necessary for a No Action decision.]

X. POST-ROD SCHEDULE

For interim actions, include an implementation schedule (Figure 4) showing interim submittals and interim actions, additional documents leading to the final ROD, post-ROD documents, and the Final Remedial Action start.

For final actions, include an implementation schedule showing ROD date, post-ROD document submittals, and Remedial Action Start date.

Figure 4. Post-ROD Schedule

XI. REFERENCES

Provide a list of the references that are referred to in the SB/PP. (Those listed below are referenced in the generic SB/PP language and should be retained).

FFA, 1993. *Federal Facility Agreement for the Savannah River Site*, Administrative Docket No. 89-05-FF (Effective Date: August 16, 1993)

USDOE, 1994. *Public Involvement, A Plan for the Savannah River Site*, Savannah River Operations Office, Aiken, SC

XII. GLOSSARY

Administrative Record File: A file that is maintained and contains all information used to make a decision on the selection of a response action under the Comprehensive Environmental Response, Compensation and Liability Act. This file is to be available for public review, and a copy is to be established at or near the Site, usually at one of the information repositories. Also a duplicate file is held in a central location, such as a regional or state office.

ARARs: Applicable, or Relevant and Appropriate Requirements. Refers to the federal and state requirements that a selected remedy will attain. These requirements may vary from site to site.

Baseline Risk Assessment: Analysis of the potential adverse health effects (current or future) caused by hazardous substance release from a site in the absence of any actions to control or mitigate these releases.

Characterization: The compilation of all available data about the waste units to determine the rate and extent of contaminant migration resulting from the waste site, and the concentration of any contaminants that may be present.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 1980: A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act.

Corrective Action: A USEPA requirement to conduct remedial procedures under RCRA 3998(h) at a facility when there has been a release of hazardous waste or constituents into the environment. Corrective action may be required beyond the facility boundary and can be required regardless of when the waste was placed at the facility.

Exposure: Contact of an organism with a chemical or physical agent. Exposure is quantified as the amount of the agent available at the exchange boundaries of the organism (e.g., skin, lungs, digestive tract, etc.) and available for absorption.

Federal Facility Agreement (FFA): The legally binding agreement between regulatory agencies (USEPA and SCDHEC) and regulated entities (USDOE) that sets the standards and schedules for the comprehensive remediation of the SRS.

Media: Pathways through which contaminants are transferred. Five media to which a release of contaminants may occur are groundwater, soil, surface water, sediments, and air.

National Priorities List : USEPA's formal list of the nation's most serious uncontrolled or abandoned waste sites, identified for possible long-term remedial response, as established by CERCLA.

Operable Unit (OU): A discrete action taken as one part of an overall site cleanup. The term is also used in USEPA guidance documents to refer to distinct geographic areas or media-specific units within a site. A number of operable units can be used in the course of a cleanup.

Operation and Maintenance (O&M): Activities conducted at a site after a response action occurs to ensure that the cleanup and/or systems are functioning properly.

Overall Protection of Human Health and the Environment: The assessment against this criterion describes how the alternative, as a whole, achieves and maintains protection of human health and the environment.

Proposed Plan: A legal document that provides a brief analysis of remedial alternatives under consideration for the site/operable unit and proposes the preferred alternative. It actively solicits public review and comment on all alternatives under consideration.

Reasonable Maximum Exposure (RME): This is the value that the average concentration will fall below 95 percent of the time.

Record of Decision (ROD): A legal document that explains to the public which alternative will be used at a site/operable unit. The record of decision is based on information and technical analysis generated during the remedial investigation/ feasibility study and consideration of public comments and community concerns.

Resource Conservation and Recovery Act (RCRA), 1976: A Federal law that established a regulatory system to track hazardous substances from their generation to disposal. The law requires safe and secure procedures to be used in treating, transporting, storing, and disposing of hazardous substances. RCRA is designed to prevent the creation of new, uncontrolled hazardous waste sites.

Responsiveness Summary: A summary of oral and/or written comments received during the proposed plan comment period and includes responses to those comments. The responsiveness summary is a key part of the ROD, highlighting community concerns.

Statement of Basis: A report describing the corrective measures/remedial actions being conducted pursuant to South Carolina Hazardous Waste Management Regulations, as amended.

Superfund: The common name used for CERCLA; also referred to as the Trust Fund. The Superfund program was established to help fund cleanup of hazardous waste sites. It also allows for legal action to force those responsible for the sites to clean them up.

Target Risk Range: USEPA guidance for carcinogenic risk due to exposure to a known or suspected carcinogen between one excess cancer in an exposed population of ten thousand (1.0×10^{-4}) and one excess cancer in an exposed population of one million (1.0×10^{-6}). Risks within this range require risk management evaluation of remedial action alternatives to determine if risks can be reduced below one excess cancer in one million (1.0×10^{-6}). Risks greater than 1.0×10^{-4} indicate that remedial action is generally warranted.