

## Savannah River Site

# CITIZENS ADVISORY BOARD

A U.S. Department of Energy Site-Specific Advisory Board

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June 14, 2001

The Honorable Spencer Abraham  
Secretary, U. S. Department of Energy  
1000 Independence Avenue  
Washington, DC 20585

Dear Secretary Abraham:

The Savannah River Site (SRS) Citizens Advisory Board (CAB) is aware of your review of environmental management activities at Department of Energy (DOE) sites and would like to be a part of this process. We support this review and recognize that input from local DOE officials and site contractors is important to its success. We feel that local taxpaying citizens also have a unique and important perspective on what is cost-effective cleanup. Often the CAB has advocated a less aggressive approach to cleanup than either the regulators or the contractor. The CAB feels that remediation decisions should be based on sound scientific judgments, realistic future use scenarios, and the reduction of actual, not perceived, risks. Based on our experiences as stakeholders involved in the environmental management decision process, we strongly support including informed stakeholder input in your review. We look forward to providing citizen insights into your review of environmental management at DOE sites.

As an organized body of citizens focused on environmental management decisions at SRS, the CAB has, and will continue to be, strong advocates for cleanup activities that protect and restore the environment, and protect the health and safety of workers and the public. As a result we have sometimes provided strongly worded recommendations to DOE related to funding priorities at SRS. While the CAB is concerned about maintaining adequate funding at the Site, we are equally concerned that tax dollars are used wisely and effectively to reduce real risks. We have always supported cost-effective work at SRS and have made numerous recommendations regarding this to DOE, the U.S. Environmental Protection Agency (EPA) and the South Carolina Department of Health and Environmental Control (SCDHEC). Although we have an excellent rapport with DOE, EPA, and SCDHEC, we sometimes disagree with decisions made by DOE and the regulators regarding the level of cleanup needed to protect humans and the environment. For emphasis, let me provide some examples:

- Recommendation No. 2 on January 24, 1995 recommended that both industrial and residential use alternatives be used for CERCLA clean up decisions. This recommendation recognized that SRS would remain an industrial site for an extended period of time, and that funds should not be spent trying to clean up an industrial site to residential standards.
- Recommendation No. 35 on March 25, 1997 recommended that DOE, EPA and SCDHEC develop early action framework for high risk units, develop screening criteria to identify lowest risk RCRA/CERCLA sites and shorten the process for reaching limited or no action decisions. This would minimize the "paperwork exercises" and expedite fieldwork.

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• Recommendation No. 87 on May 25, 1999 recommended that the RCRA permit for the Old Radioactive Waste Burial Ground (ORWBG) be modified so that the point of compliance for the drinking water standard would be the point of potential exposure to the public, rather than the edge of the Burial Ground, in the interior of SRS.

The CAB further recommended that monitoring data be reviewed annually and, if SCDHEC found remediation necessary, to take a long-term phased approach considering alternative options and budget constraints.

The CAB very much appreciates the need to be cost-effective and indeed has used that as a major decision criterion in our recommendations. However, we also feel very strongly that some issues at SRS are urgent and need resolution now, regardless of cost. We hope that your review will elicit those urgent needs from less critical ones, and that you will ensure that adequate funding is directed to those needs.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen K. Patterson", with a stylized flourish at the end.

Karen Patterson, Chair  
SRS Citizens Advisory Board

cc: Martha Crosland, EM 11  
Greg Rudy, DOE-SR  
Tom Heenan, DOE-SR  
SSAB Chairs