SRS Citizens Advisory Board

Facility Disposition and Site Remediation Committee
North Augusta Community Center, North Augusta, SC
April 20, 2004

The SRS Citizens Advisory Board (CAB) Facility Disposition and Site Remediation Committee (FD&SR) met on Tuesday, April 20, 5:00 PM, at the North Augusta Community Center, North Augusta, SC. The purpose of the meeting was to discuss and receive updates on the SRS D&D Program Overview and the SRS Area Closure and National Priority List deletion.

Attendance was as follows:

CAB Members
- Perry Holcomb
- Wendell Lyon
- Bill Willoughby
- Murray Riley
- Harold Rahn
- Mary Drye
- Robert Meisenheimer
- Leon Chavous
- Danielle Mackie
- Donna Antonucci
- Cassandra Henry

Stakeholders
- Sam Booher
- Steve Conner, SAIC

DOE/Contractors
- Tony Polk, DOE
- De’Lisa Bratcher, DOE
- Paul Sauerborn, WSRC
- Frank England, DOE
- Michele Wilson, WSRC
- Helen Belencan, DOE
- Bill Austin, WSRC
- Jim Moore, WSRC
- Dave Freeman, WSRC
- Kim Cauthen, WSRC

Regulators
- Ted Millings, DHEC
- Rob Pope, EPA

*CAB Technical Advisor
- FD&SR committee members
+ Facilitator
^ Press

Perry Holcomb, Chair, opened the meeting at 5:00 p.m. and welcomed those in attendance. In addition, he asked do go around the room with introductions by all.

FD&SR Committee meeting schedule review:
Paul Sauerborn presented the schedule, which listed items the ER committee will be reviewing for 2004. Mr. Sauerborn stated that should anyone in the public have an item relevant to the ER committee scope to please notify him in order that he have those items reviewed and approved by the chairman of the FD&SR committee for future presentations.
D&D Program Overview:
Helen Belecan stated the purpose of her presentation was to inform the CAB in the D&D Program, review highlights of the integrated D&D Plan rev.1, the 2004-2006 implementing plans and a status to date. Ms. Belecan stated that there have already been several briefings on the D&D Program to the CAB, the first being in May of 2003. Ms. Belencan informed the attendees that the Integrated D&D Plan takes into consideration the following:

- **Inventory**
  - facilities
  - waste sites
  - waste tanks

- **Decision Models**
  - risk
  - cost
  - program

- **End States**
  - demolition
  - in-situ disposal

- **Ranking**
  - facilities

- **Baseline**
  - technical
  - cost
  - schedule

Ms. Belecan pointed out that the CAB has had the chance to provide input to the Integrated D&D Plan which was issued May 31, 2003. Subsequently the CAB was provided a workshop June 18, 2003 to further understand the Plan and provide another opportunity to make comment, and on September 30, 2003 the rev.1 Plan was made available. The key points of the D&D Plan are:

- 1013 facilities identified for D&D
  - 857 facilities with a demolition end state
  - 105 facilities with a in-situ disposal (ISD) end state
  - 51 tanks with a ISD end state

- Special emphasis on FY03-FY06 timeframe
  - prioritized and scheduled target case facilities based on model
  - prioritized maximum case facilities

- Used model to schedule remainder of facilities in FY07 to FY25 timeframe

As a part of the D&D projects certain interfaces must take place in order to proceed and accomplish the final facility end state, and they are as found below:

- **Soil and Groundwater Projects**
  - Ensure decommissioning facility end states are well documented to allow future area closure
Environmental Protection Agency (EPA) and South Carolina Department of Health and Environmental Control (SCDHEC)
  - Decommissioning performed according to the Memorandum of Agreement for achieving an accelerated cleanup vision
  - Input to end state conditions to support area closure

Stakeholders – CAB and the general public
  - Routine CAB briefings
  - Public briefings and comment period as required for the more complex facilities

State Historic Preservation Office
  - Ensure appropriate actions are taken according to the Programmatic Agreement and the Cultural Resource Management Plan

Ms. Belencan referenced the drivers of the D&D Plan process as:

- Decommissioning Framework
  - DOE G 431.1-4, "Decommissioning Implementation Guide"
- Formal process with involvement of EPA, SCDHEC and the public

Decommissioning uses a graded approach and consists of 4 models:

- Engineering Evaluation and Cost Analysis Model (30 day public review and comment)
  - Nuclear facility category or identified on FFA
  - Facilities that require the CERCLA program
- Streamlined Model (30 day public review)
  - Radiological facility category
- Integrated Sampling Model (informing CAB of plans)
- Simple Model (informing CAB of plans)

Ms. Belencan stated that between FY03 and FY04, 242 Facilities will be decommissioned (220 by demolition and 20 by in-situ). The to-date total number of buildings demolished is 78, which leaves 164 facilities remaining to be decommissioned through FY06. A pictorial status was provided showing the above accomplishments.

Several questions arose from the presentation as follows:

Harold Rhan – what about H-Area?
Helen Belencan - it is not to be addressed in this contract period.
Sam Booher – Why is the K-Area cooling tower to be torn down?
Helen Belencan – Its design does not support any of the new missions
Sam Booher – If we get new missions, will they be located at the same locations as the ones being demolished?
Helen Belencan – Not necessarily.
Sam Booher – To what degree are areas being demolished?
Helen Belencan – They are being left in a position that would not represent a risk.
Perry Holcomb for Lee Poe – I am concerned that there will not be adequate public input time
during an EE/CA level D&D job such as the canyon buildings or the reactors, and I don’t believe that two options such as entombment or in-situ disposal is enough?
Helen Belencan – I don’t disagree with your comment, however you must understand that in-situ disposal has a great number of alternatives associated with it.

**Deletion from the National Priorities List (NPL):**
Kim Cauthen opened by stating that deletion of waste units from the NPL publicly proclaims the successes of the SRS cleanup program. Mr. Cauthen stated that the agenda consists of the following:

- Area Closure Review
- What is the NPL?
- What the NPL means to you
- What is "deletion" from the NPL?
- What the NPL means to SRS
- What does deletion mean to SRS
- And wrap-up

**Area Record of Decision:**

- Bundles units into an Area Closure
- Streamline and consolidate documents
- Use screening tools
- Evaluate residual risks after remedial action
- Use site specific risk scenarios based on anticipated end state
- Document remedial decisions for waste units and D&D facilities that lead to NPL deletion

**What is the National Priority List (NPL)?**

- A listing of facilities across the US that have legacy contamination in the environment which must be addressed
- Determines which sites warrant further investigation to assess the nature and extent of the human health and environmental risks associated with a site
- Notifies the public of sites EPA believes warrant further investigation

**What the NPL means to the Public**

- Identification of the worst waste sites in the country
- Available for review by EPA
- Seeks public input in the remediation process
- Seeks public input in the deletion of waste sites from the list

**What is Deletion from the NPL?**

The intent of the EPA is to get completed waste sites off the list.
• Remediation is complete
  o All site cleanup goals have been met
  o Site is protective of human health and the environment
  o Operation and maintenance are all that remains
• Remediation is unnecessary
• Remediation is accomplished under other authorities

What is deletion from the NPL?

• Published procedures in January 2000 (updated 2002)
• Sets the requirements and criteria for deletion
• Uses existing data and documents
• Does not establish new cleanup goals or standards

What is partial deletion?

According to the close out procedure in the NPL quote: "…Previously EPA’s policy had been to delete only after cleanup of the entire site.

However, deletion of entire sites does not communicate the successful cleanup of portions of that site. Total cleanup may take many years, while portions of the site may have been cleaned up and available for productive use. Such portion may be a defined geographic unit, or may be a specific medium at the site, e.g., groundwater, depending on the nature and extent of the release(s)…"

Deletion does not end responsibility.

• Regulatory requirements under CERCLA, RCRA and the FFA do not change due to deletion
• Recently discovered waste sites can be added to the remaining NPL listing or just addressed under the FFA
• 5-year remedy review is still required

What is the deletion process?

• It is the final step in the CERCLA process
• Requires that both EPA and the State are satisfied with the end state of the waste unit
• Gives the public the opportunity to review and comment on action

What does the NPL mean to SRS?

• SRS NPL listing became effective December 21, 1989
• Listed as the Savannah River Site
  o nature and extent of contamination not known at that time
  o "Listing" is neither equal to nor confined to the property boundaries
• Includes all SRS identified waste units
• Federal Facility Agreement is the result of the NPL listing

Why deletion is important to SRS?

• Is universal acknowledgement that work is complete
• Doesn’t leave "things hanging"
• Allows EPA and SCDHEC to shift resources to other sites
• Defines a clear end-state for the cleanup mission

How do we accomplish deletion?

• Steps
  o waste site assessed and remediation /physical work complete as agreed to in the Record of Decision
  o petition is made to delete from the NPL
  o package of information (Docket) is prepared for review by EPA
  o state reviews and concurs on petition
  o public reviews and comments on petition
  o notice of deletion is published by EPA
• Where are we know…..
  o working with EPA and SCDHEC to ensure informational needs and schedules
  o finalize process late this year

Mr. Cauthen stated that all of this story leads to just one conclusion and that means success.

Questions arising from the presentation are as follows:
Sam Booher - How does one know about a site on the NPL?
Kim Cauthen – They are advertised in the newspaper, web sites and the national register
Casandra Henry – Who assures that the site meets goals and schedules for cleanup?
Kim Cauthen – EPA, SCDHEC and the DOE
Mary Drye – When projects go further out in time to complete, don’t they cost more money?
Kim Cauthen – Not necessarily, as there are many circumstances that come into play

Public Comments:
Perry Holcomb thanked all who come and participate in the meeting. A especially thanked the three parties, EPA, SCDHEC and DOE for making a special effort to make the meetings because they bring valued perspective to the issues that are raised.

Mr. Holcomb adjourned the meeting at 6:30 p.m.

Meeting handouts may be obtained by calling 1-800-249-8155.