

State Regulatory Oversight

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Federal Facilities Liaison

DHEC Coverage

- Do not cover
 - Storage of spent nuclear fuel
 - Nuclear materials
- Exempted by Congress

DHEC Environmental Roles

- Protection
- Oversight
- Emergency Preparedness
- Improvement

Protection

- Federal and State Laws/Regulations
- EPA delegates implementation to State
- DHEC has been delegated authority for
 - Air
 - Water
 - Waste
 - Cleanup

Protection

- Issue permits in accordance with Federal/State requirements
- Inspect for compliance
- Take enforcement action when necessary

Protection Programs

- Air
- Underground Injection Control
- Underground Storage Tanks
- Asbestos
- 401 Certification (Wetlands)
- Stormwater
- Wastewater Treatment
- Navigable Waters
- Drinking Water
- Laboratory Certification
- National Pollutant Discharge Elimination System
- Radioactive Waste Transportation
- Solid Waste (Landfills)
- Hazardous Waste (RCRA)

Oversight

- DHEC monitors SRS and surrounding area to determine impact of SRS activities.
 - Air, water, soil, sediment, vegetation, milk, fish and game animals
 - <http://www.scdhec.gov/environment/envserv/esop.htm>
- DHEC maintains frequent presence at SRS through office in Region.



United States
Department of Energy



Savannah River Site

Operated by Westinghouse Savannah River Company
Bechtel Savannah River, Inc.

Security by Wackenhut Services Inc.

National Environmental Research Park

Emergency Preparedness

- South Carolina has a comprehensive emergency operations plan for disasters:
 - Natural (hurricanes, earthquakes, etc.)
 - Man-made (acts of terrorism)
- DHEC takes extra measures for SRS
 - Maintain responders with Q Clearance
 - Hold practice drills specifically geared to SRS
 - Meet quarterly

Improvement - Cleanup

- Hazardous Waste Permit
 - Requires assessment and cleanup of all waste contaminated areas at SRS
 - Covers some major areas/plumes (F, H, M, MWMF)
- Federal Facility Agreement
 - DHEC-Resource Conservation and Recovery Act authority
 - EPA-Comprehensive Environmental Response, Compensation and Liability Act authority
 - Marries process by which DHEC, EPA and DOE conduct cleanup

Improvement - Cleanup

- Hazardous Waste Permit versus Federal Facility Agreement (FFA)
 - Problem
 - Permit violation => enforcement
 - FFA disagreement => dispute resolution
 - Form
 - Permit is a defined regulatory mechanism (can not cancel)
 - FFA is an agreement (can opt out)
- Federal Facility Agreement
 - Has worked well
 - Run by a well established, highly efficient cleanup team
 - Always current due to yearly updates

Improvement – Legacy Waste

- Site Treatment Plan
 - Enabled by Federal Facility Compliance Act
 - Requires treatment of legacy waste by an approved schedule, enforced by order
 - Covers legacy mixed low level, transuranic and high level waste
- Requires State approval for any haz/rad waste shipment proposed to SRS
- Milestone example: Treatment of high level waste by 2028

High Level Waste

- Section 3116 of 2005 National Defense Authorization Act
- Residuals remaining must be under
 - Energy Secretary determination in consultation with NRC, and
 - “a State-approved closure plan or State-issued permit”

High Level Waste

- Regulated under State Wastewater Program
 - Operation through Wastewater Permit
 - Closure through Wastewater Closure Plan
 - General Closure Plan
 - Closure Modules (Tank Specific)
- Also covered by Hazardous Waste Permit cleanup authority
- Addressed through FFA process

Status

- Maintain
 - Permits and inspections
 - Oversight
 - Emergency preparedness
- DHEC will focus on
 - High Level Waste treatment and tank closure
 - Site cleanup
 - Legacy waste disposition
 - Transition from ARRA

Special State Concerns

- Budget, Waste Transfers, Regionalization
- DHEC maintains open communication through
 - National Governors Association Federal Facility Task Force
 - Environmental Council of the States Federal Facilities Forum
 - Contact with elected officials
 - Governor's Nuclear Advisory Council
 - Other Entities