A presentation to the
SRS Citizens Advisory Board

Federal Facility Agreement
Appendix E

Presentation By
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September 25, 2012
Purpose

• Provide information discussed in response to Citizens Advisory Board Recommendation #279, Federal Facility Agreement (FFA) Update Provided Annually
  – Existing FY2012 Appendix E Update
  – Anticipated Effects to FY2013 Appendix E Submittal
Federal Facility Agreement

- **Established August 1993**
  - A legally binding agreement among DOE, EPA, and SCDHEC governing the comprehensive cleanup of the SRS
  - Includes administrative requirements, enforceable schedules, and milestones for actions and documents
  - Includes Removal from Service of some Liquid Waste tanks
  - Spells out authorities and responsibilities of agencies and procedures for resolving disputes
FFA Appendix E

- Provides a lifecycle list of cleanup milestones for SRS Waste Sites listed in Appendix C
  - Made up of Appendices E.1, E.2, and E.3
    • Appendix E.1 contains Enforceable Milestones for the next Fiscal Year (FY+1)
    • Appendix E.2 contains Enforceable Milestones for FY+2
    • Appendix E.3 contains Planning Milestones for FY+3 and beyond
- DOE updates Appendix E annually and submits for review to SCDHEC and EPA in November
- Developing the annual update starts with current approved milestones, with adjustments to reflect:
  - Site mission schedules
  - Regulator-approved implementation schedules for individual projects
FFA Appendix E Schedule

- DOE submits Revision 0 on 11/15
- FD & SR Briefing
- SCDHEC and EPA comments due on 12/31
- DOE submit Revision 1 on 1/31
- DOE submitted Revision 0 on 11/15/11
- SCDHEC comments submitted on 12/22/11
- EPA comments submitted on 12/22/11
- DOE submitted Revision 1 on 1/31/12
- SCDHEC conditional approval received on 2/29/12; final approval received 8/1/12
- EPA conditional approval received on 3/5/12; final approval received 8/6/12

Appendix E dates (per FFA)
Actual FY 2012 Appendix E dates
FD & SR Briefing
FY 2012 FFA Appendix E - Major Changes

• Added milestone for the issuance of the Second Explanation of Significant Differences (ESD) for the Revision 1 TNX Area Operable Unit Record of Decision (ROD)
  – The ESD will be issued in FY2013.
  – Allow formal termination of the T-1 Air Stripper for groundwater remediation
  – Allow use of edible oil technology as needed with natural attenuation as the final remedy for groundwater remediation
  – Passive soil vapor extraction system, groundwater monitoring, and land use controls (LUCs) would remain

• Added Early Action Land Use Control Implementation Plan (LUCIP) milestone for the Lower Three Runs Integrator Operable Unit (Lower and Middle Subunits)
  – Time critical removal action (i.e., soil excavation in three discrete locations where the cesium-137 concentrations exceeded risk-based limits, confirmatory sampling and analysis, and installation of fencing) was performed in 2012.
  – An ESD to the PAR Pond ROD was also prepared and submitted to the regulators for review in 2012. The ESD is planned to be issued in September 2012.
  – The EA LUCIP will document the LUC objectives and actions necessary to ensure that the LUCs will be maintained. The EA LUCIP will be submitted in FY2013.
### SRS Area Completion Plan

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**Legend:**
- **Yellow:** Decontamination
- **Green:** Demolition
- **Red:** Demolition
- **Blue:** Operational Support
- **Orange:** Access
- **Gray:** Ongoing
- **White:** No Action
- **Gray with Red:** Remediation Action Required
- **Gray with Yellow:** Remediation Action Initiated
- **Gray with Blue:** Remediation Action Initiated

*The dates for these site areas are based on the Liquid Waste System Plan (SRS-LWS-0000-40000, Rev. 16, December 6, 2016), which has been approved by DOE.*
Anticipated Effects to Fiscal Year 2013 Appendix E

• Current-Year Performance Impacts
  – Wetland Area at Dunbarton Bay milestones extended due to performance of wetland delineations.
  – Castor Creek (C-Area Groundwater Operable Unit) milestones for early remedial action for tritium exceedance in the creek were approved by the SCDHEC and EPA on August 1, 2012 and August 6, 2012, respectively. Accelerates cleanup four (4) years (Issue Interim ROD – May 2016) in advance of Final ROD for C-Area Groundwater Operable Unit (Issue ROD – March 2020).
  – D-Area milestones are being negotiated at coal and ash facilities.

• Programmatic Impacts
  – None at this time.
Summary

THE FY 2012 FFA APPENDIX E IS AVAILABLE ONLINE AT:

http://www.srs.gov/general/programs/soil/ffa/ffa.html

– Accesses the Savannah River Site Area Completion Projects Federal Facility Agreement and supporting documentation pages

Questions and Answers

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