Federal Facility Agreement Appendix E: Major Proposed Changes for Fiscal Year 2014

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DOE-Savannah River

SRS Citizens Advisory Board
Facilities Disposition and Site Remediation Committee
April 22, 2014
• Provide information discussed in responses to Citizens Advisory Board Recommendation #279, Federal Facility Agreement (FFA) Update Provided Annually
  — Information briefing on Revision 0 FY 2014 Appendix E Submittal

• Meet Citizens Advisory Board Facilities Disposition and Site Remediation Committee Annual Work Plan Commitment
Acronyms

- **BRA** – Baseline Risk Assessment
- **CERCLA** – Comprehensive Environmental Response, Compensation and Liability Act
- **CPRB** – Coal Pile Runoff Basin
- **CMI/RAIP** – Corrective Measures Implementation/Remedial Action Implementation Plan
- **CMS/FS** – Corrective Measures Study/Feasibility Study
- **DOE** – U. S. Department of Energy
- **EPA** – U. S. Environmental Protection Agency
- **FFA** – Federal Facility Agreement
- **FY** – Fiscal Year
- **LUCIP** – Land Use Control Implementation Plan
- **NBN** – No Building Number
- **RA** – Remedial Action
- **RCRA** – Resource Conservation and Recovery Act
- **RFI/RI** – RCRA Facility Investigation/Remedial Investigation
- **ROD** – Record of Decision
- **RSER/EE/CA** – Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis
- **SB/PP** – Statement of Basis/Proposed Plan
- **SCDHEC** – South Carolina Department of Health and Environmental Control
- **SRS** – Savannah River Site
Federal Facility Agreement (FFA)

- **Established August 1993**
  - A legally binding agreement among Department of Energy (DOE), Environmental Protection Agency (EPA), and South Carolina Department of Health and Environmental Control (SCDHEC).
  - Includes administrative requirements, enforceable schedules, and milestones for actions and documents.
  - Lists the Resource Conservation and Recovery Act (RCRA)/Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) “waste units” and other potential releases that must be addressed, and describes a process for any additional ones.
  - Includes requirements for Removal from Service of some of the SRS Liquid Waste tanks.
  - Spells out authorities and responsibilities of the three agencies, and procedures for resolving disputes.
Provides a lifecycle list of cleanup milestones for SRS Waste Sites

- 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 Fiscal Year + 2
  - Appendix E.3 contains Planning Milestones for Fiscal Year + 3 and beyond

DOE updates Appendix E annually and submits for review to SCDHEC and EPA in November. Due to government shutdown, the submittal date was extended to December 3, 2013.
FFA Appendix E Schedule

- **DOE submits Revision 0 on 12/3**
- **SCDHEC and EPA comments due on 1/18**
- **DOE submit Revision 1 on 4/19**
- **FD & SR Briefing**
- **SCDHEC and EPA approval requested 30 days after Revision 1 submittal**
- **FD & SR Briefing**

**Appendix E dates (per FFA)**
**Actual FY 2014 Appendix E dates**
**FD & SR Briefing**
FFA (RCRA/CERCLA) Documents

- RCRA Facility Investigation/ Remedial Investigation (RFI/RI) Work Plan
  - Plan used as the basis to determine the extent of contamination
- RFI/RI Report w/ Baseline Risk Assessment (BRA)
  - An assessment of the nature and extent of contamination and the associated health and environmental risks
- Corrective Measures Study/ Feasibility Study (CMS/FS)
  - Development and analysis of the range of cleanup alternatives for the unit
Statement of Basis/ Proposed Plan (SB/PP)
  - Identifies a preferred remedial alternative for the unit and allows for public comment
    - 30 days CERCLA Only
    - 45 days for RCRA/CERCLA

Record of Decision (ROD)
  - The official report documenting the chosen remedy and why it was selected

Corrective Measures Implementation/ Remedial Action Implementation Plan (CMI/RAIP)
  - Plan used to implement the selected remedy for the unit
FFA Document Flow

RFI/RI = RCRA Facility Investigation/Remedial Investigation
BRA = Baseline Risk Assessment
CMS/FS = Corrective Measures Study/Feasibility Study
SB/PP = Statement of Basis/Proposed Plan
CMI/RAIP = Corrective Measures Implementation/Remedial Action Implementation Plan
LUCIP = Land Use Control Implementation Plan
RA = Remedial Action
At the time of preparation and submittal of this Appendix E (September-November 2013), a Continuing Resolution for FY 2014 was anticipated, so...

FY 2013 funding level (as reduced by sequestration) was the assumed available funding for FY 2014

Environmental Management guidance to SRS was to assume that funding would remain at the FY 2014 level through FY 2015-2016

These were the assumptions on which the Revision 0 Appendix E for FY 2014 was built. However:

As of today, a federal budget for FY 2014 has been passed, but...

It is not yet known how the FY 2014 budget will affect the funding available for cleanup (and out year milestones) under the FFA

The Revision 1 Appendix E submitted on April 21; update when available
**D Area Projects**
- D Area Ash Basin (488-1D): Two year delay in regulatory documents and Removal Action Start
- D-Area Ash Basin (488-2D): Two year delay in regulatory documents and Removal Action Start
- D-Area Ash Landfill (488-4D): Two year delay in Removal Action Start
- D-Area Coal Pile Runoff Basin (CPRB) (489-D): Two year delay in regulatory documents and Removal Action Start

<table>
<thead>
<tr>
<th>Operable Unit</th>
<th>RSER/EE/CA Current Date</th>
<th>Proposed Date</th>
<th>Action Memorandum Current Date</th>
<th>Proposed Date</th>
<th>Removal Action Start Current Date</th>
<th>Proposed Date</th>
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<tbody>
<tr>
<td>D-Area Ash Basin (1D)</td>
<td>02/29/2016</td>
<td>03/01/2018</td>
<td>08/31/2016</td>
<td>08/31/2018</td>
<td>10/01/2016</td>
<td>10/01/2018</td>
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<tr>
<td>D-Area Ash Basin (2D)</td>
<td>02/26/2015</td>
<td>02/26/2017</td>
<td>08/31/2015</td>
<td>08/31/2017</td>
<td>10/01/2015</td>
<td>10/01/2017</td>
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<tr>
<td>D-Area Ash Landfill (4D)</td>
<td>02/27/2014</td>
<td>No change.</td>
<td>08/28/2014</td>
<td>No change.</td>
<td>10/01/2014</td>
<td>10/01/2016</td>
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<tr>
<td>D-Area CPRB (489-D)</td>
<td>02/26/2015</td>
<td>02/26/2017</td>
<td>08/31/2015</td>
<td>08/31/2017</td>
<td>09/28/2015</td>
<td>09/28/2017</td>
</tr>
</tbody>
</table>
### Wetland Area at Dunbarton Bay

- One year delay in regulatory documents and RA Start

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Current Due Date</th>
<th>Proposed Due Date</th>
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</thead>
<tbody>
<tr>
<td>Issue ROD</td>
<td>08/06/2014</td>
<td>08/06/2015</td>
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<tr>
<td>RA Start</td>
<td>11/05/2015</td>
<td>11/05/2016</td>
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</table>

### Consolidated Incineration Facility

- Three year delay in regulatory documents and RA Start

<table>
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<tr>
<th>Milestone</th>
<th>Current Due Date</th>
<th>Proposed Due Date</th>
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<tbody>
<tr>
<td>Issue Early Action ROD</td>
<td>9/2017</td>
<td>9/2020</td>
</tr>
<tr>
<td>Early RA Start</td>
<td>9/2018</td>
<td>9/2021</td>
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</tbody>
</table>
FY 2014 Appendix E
FY 2015 and FY 2016 Proposed Milestones

- **E.1 (FY 2015) and E.2 (FY 2016)**

  **FY 2015**
  - Field Starts
    - Upper Three Runs Integrator Operable Unit Fourth Phase II
  - Statement of Basis/ Proposed Plan (SB/PP)
    - C Area Groundwater Operable Unit (Castor Creek) Interim Action
  - Record of Decision
    - C Area Operable Unit Early Action
    - C Area Groundwater Operable Unit (Castor Creek) Interim Action
  - Issue Record of Decision
    - A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A) and Stormwater Outfall A-013 (NBN) Interim Action
    - Wetland Area at Dunbarton Bay
    - C Area Operable Unit Early Action
  - Post-Record of Decision Documents
    - A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), and Stormwater Outfall A-013 (NBN) Interim Corrective Measures Implementation/ Remedial Action Implementation Plan (CMI/RAIP)
  - Post-Remedial Action Start Documents
    - Ten (10) Reports that Discuss the Performance of the Selected Remedial Action (RA)
  - Integrator Operable Unit Periodic Reports
    - Pen Branch Integrator Operable Unit Periodic Report #4
  - High Level Radioactive Waste Tanks
    - Complete Operational Closure of Four (4) Tanks (unchanged)
E.1 (FY 2015) and E.2 (FY 2016)

FY 2016

- Site Evaluation Reports
  - Combined Spills from 701-1F Spill
- Field Starts
  - Pen Branch Integrator Operable Unit Fourth Phase II
  - D-Area Groundwater Operable Unit
  - G-Area Oil Seepage Basin Operable Unit
- Corrective Measures Study/ Feasibility Study (CMS/FS)
  - P Area Groundwater Operable Unit Focused
- Record of Decision
  - D Area Operable Unit
- Issue Record of Decision
  - C Area Groundwater Operable Unit (Castor Creek) Early Action
- Remedial Action Start
  - A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), and Stormwater Outfall A-013 (NBN) Interim
- Post-Remedial Action Start Documents
  - Eleven (11) Reports that Discuss the Performance of the Selected Remedial Action
- Integrator Operable Unit Periodic Reports
  - Fourmile Branch Integrator Operable Unit Periodic Report #5
- High Level Radioactive Waste Tanks
  - Complete Bulk Waste Removal Efforts for Two (2) Tanks (unchanged)
Separation of operable units to meet the EPA and SCDHEC expectations set forth in their approval of the FY 2013 Appendix E.

<table>
<thead>
<tr>
<th>Operable Unit</th>
<th>Dates**</th>
<th>Field Start</th>
<th>Issue ROD</th>
<th>RA Start</th>
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<tbody>
<tr>
<td>N Area Operable Unit</td>
<td></td>
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<tr>
<td>• Central Shops Scrap Lumber Pile, 631-2G</td>
<td>Current</td>
<td>FY 2034 (12/31/2033)</td>
<td>FY 2037 (03/31/2037)</td>
<td>FY 2038 (6/30/2038)</td>
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<tr>
<td>• ECODS N-1, NBN</td>
<td>Proposed</td>
<td>FY 2020 (9/30/2020)</td>
<td>FY 2023 (9/30/2023)</td>
<td>FY 2025 (12/31/2024)</td>
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<tr>
<td>• Sandblast Area CMN-001, NBN</td>
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<td></td>
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<tr>
<td>• Building 690-N, Process Heat Exchanger Repair Facility</td>
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<tr>
<td><em>(Ford Building)</em></td>
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<tr>
<td>L Area Operable Unit</td>
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<tr>
<td>• ECODS L-3, NBN</td>
<td>Current</td>
<td>FY 2034 (9/30/2034)</td>
<td>FY 2041 (10/30/2041)</td>
<td>FY 2041 (1/31/2041)</td>
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<tr>
<td>• L-Area Ash Basin, 188-L</td>
<td>Proposed</td>
<td>FY 2022 (9/30/2022)</td>
<td>FY 2025 (9/30/2025)</td>
<td>FY 2027 (12/31/2026)</td>
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<tr>
<td>• L-Area Rubble Pit, 131-1L</td>
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<tr>
<td>• L-Area Rubble Pit, 131-4L</td>
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<tr>
<td>A Area Operable Unit</td>
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<tr>
<td>• Building 716-A. Automotive Repair Facility (Remnants)</td>
<td>Current</td>
<td>FY 2035 (9/30/2035)</td>
<td>FY 2039 (10/31/2038)</td>
<td>FY 2039 (1/31/2039)</td>
</tr>
<tr>
<td>• Building 725-A, Paint Shop (Remnants)</td>
<td>Proposed</td>
<td>FY 2024 (9/30/2024)</td>
<td>FY 2027 (9/30/2027)</td>
<td>FY 2029 (12/31/2028)</td>
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<tr>
<td>H Area Operable Unit</td>
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<tr>
<td>• Sandblast Area CMH-002, NBN</td>
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<td>FY 2039 (9/30/2039)</td>
<td>FY 2040 (1/31/2040)</td>
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<td>• Spill on 02/01/57 of Unknown Seepage Basin Pipe Leak</td>
<td>Proposed</td>
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<td>FY 2027 (9/30/2027)</td>
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<td>from 904-44G, NBN</td>
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<td>K Area Operable Unit</td>
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<td>• K-Area Ash Basin, 188-K</td>
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<td>FY 2040 (10/31/2039)</td>
<td>FY 2040 (1/31/2040)</td>
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<td>• K-Area Ash Basin, 188-K</td>
<td>Proposed</td>
<td>FY 2024 (9/30/2024)</td>
<td>FY 2027 (9/30/2027)</td>
<td>FY 2029 (12/31/2028)</td>
</tr>
</tbody>
</table>

* Currently listed in Appendix K.1. The proposal will include D&D of this facility under a remedial action.
** The Current Dates remain applicable to the respective Area Operable Units. The Proposed Dates are applicable to the units that are separated from their respective Area Operable Units. The actions for the separated units are proposed as final actions.
The regulatory approved FY 2013 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