

Federal Facility Agreement Appendix E

Brian Hennessey

Savannah River Site Federal Facility Agreement Project Manager Department of Energy - Savannah River

Facility Disposition & Site Remediation Committee
April 13, 2016

Purpose

- Provide information discussed in responses to Citizens Advisory Board Recommendation #279, Federal Facility Agreement Update Provided Annually
 - Information briefing on Revision 1 Fiscal Year 2016 Appendix E Submittal
- Meet Citizens Advisory Board Facilities Disposition and Site Remediation Committee Annual Work Plan Commitment

Federal Facility Agreement Appendix E

- Provides a lifecycle list of cleanup milestones for Savannah River Site Waste Sites
 - Made up of Appendices E.1, E.2, and E.3
 - Appendix E.1 contains Enforceable Milestones for the current Fiscal Year + 1
 - Appendix E.2 contains Enforceable Milestones for current Fiscal Year + 2
 - Appendix E.3 contains Planning Milestones for current Fiscal Year + 3 and beyond
- Department of Energy updates Appendix E annually and submits for approval to South Carolina Department of Health and Environmental Control and Environmental Protection Agency – Region 4 in November.

E.1 Current Fiscal Year + 1 Enforceable (Fiscal Year 2017)

E.2 Current Fiscal Year + 2 Enforceable (Fiscal Year 2018) E.3
Out Year Fiscal Year +3
Planning
(Fiscal Year 2019+)

Federal Facility Agreement Milestones

Documents

- Remedial Investigation Work Plan
 - Plan used as the basis to determine the extent of contamination
- Remedial Investigation Report with Baseline Risk Assessment
 - An assessment of the nature and extent of contamination and the associated health and environmental risks
- Feasibility Study
 - Development and analysis of the range of cleanup alternatives for the unit

Federal Facility Agreement Milestones (continued)

Documents (cont.)

- Proposed Plan
 - Identifies the remedial alternative preferred by Department of Energy, South Carolina Department of Health and Environmental Control, and Environmental Protection Agency for the unit, and allows for public comment
 - 30 days Comprehensive Environmental Response, Compensation and Liability Act only
 - 45 days for Resource Conservation and Recovery Act/Comprehensive Environmental Response, Compensation and Liability Act
- Record of Decision
 - The official report documenting the chosen remedy and why it was selected, after consideration of public comments
- Remedial Action Implementation Plan
 - Plan describing how the selected remedy for the unit will be done: design summary, construction & operation, maintenance, land use controls

Federal Facility Agreement Milestones (continued)

Work Activities

- "Field Start" beginning of remedial investigation (typically sampling or well construction) after approval of RI Work Plan
- Remedial Action Start beginning of construction or site preparation activities after approval of RA Implementation Plan

For liquid waste tanks

- "Complete Operational Closure" isolated and filled with grout, in accordance with Industrial Wastewater Closure Module
- "Complete Bulk Waste Removal Efforts" -- completing efforts to remove bulk (most) of the waste (incl. salt cake, sludge solids, and contaminated liquids) from a tank, leaving only a residual heel

Fiscal Year 2016 Appendix E Major Changes

Five-Year Remedy Review

- The review of remedies every five years to ensure their continued protectiveness and effectiveness is required by CERCLA, whenever the remedy (cleanup) results in hazardous substances remaining at levels that do not allow unrestricted/residential use
- Last comprehensive five-year review was issued in January 2014
 - 52 remedies reviewed; over 2,000 pages
- DOE, SCDHEC, and EPA agreed to divide the remedies into five groups/types, and review one group per year, to make reviews more manageable
- This year's Appendix E is the first to incorporate milestone dates for the phased remedy reviews:

Milestone	Revision 0 Submittal Date	Issuance Date
Fifth Five-Year Remedy Review Report for Savannah River	December 22, 2015 (Actual)	February 5, 2017
Site Operable Units with Groundwater Remedies		
Fifth Five-Year Remedy Review Report for Savannah River	December 20, 2016	February 7, 2018
Site Operable Units with Compacted Clay Cover Systems		
Fifth Five-Year Remedy Review Report for Savannah River	December 21, 2016	February 7, 2018
Site Operable Units with Geosynthetic or Stabilization /		
Solidification Cover Systems		
Fifth Five-Year Remedy Review Report for Savannah River	December 21, 2017	February 7, 2019
Site Operable Units with Operating Equipment		

Fiscal Year 2016 Appendix E Major Changes (continued)

 An implementation schedule for the G-Area Oil Seepage Basin(761-13G) Operable Unit was agreed upon by the U. S. Environmental Protection Agency and the South Carolina Department of Health and Environmental Control.

Milestone	Submittal Date
Field Start (Characterization)	September 30, 2016
RCRA Facility Investigation / Remedial Investigation Report with Baseline Risk Assessment and Corrective Measures Study / Feasibility Study (Revision 0)	September 29, 2017
Statement of Basis / Proposed Plan (Revision 0)	June 11, 2018
Record of Decision (Revision 0)	January 28, 2019
Issue Record of Decision	September 30, 2019
Remedial Action Start	September 30, 2020

Other Key Milestones FY 2017-2018

D-Area Operable Unit

	D Area Operable Offic	
	 488-1D Ash Basin Removal Action Start 	10/2016
	 Early Action Statement of Basis/Proposed Plan 	2/2018
•	Wetland Area at Dunbarton Bay	
	Issue Record of Decision	6/2017
	Remedial Action Start	9/2018
•	Lower Three Runs Integrator Operable Unit	
	 Remedial Investigation Report w/ Baseline Risk Assessment 	7/2017
•	Liquid Waste Tanks	
	 Complete Bulk Waste Removal Efforts for 3 Tanks 	9/2017
	 Complete Operational Closure of 2 Tanks 	9/2017



Fiscal Year 2016 Appendix E Conditional Approval Actions

- The South Carolina Department of Health and Environmental Control and U.
 S. Environmental Protection Agency conditionally approved the Revision 1
 Appendix E for Fiscal Year 2016 on February 22, 2016 and March 2, 2106, respectively. The conditions are:
 - Report on the outcome of efforts to explore options for the disposition of heavy water stored in the C Reactor Building – August 30, 2016
 - Schedule a meeting to discuss the use of the C Reactor Building for national training and technical exercises with respect to the Early Action Record of Decision for In-Situ Disposition – September 30, 2016

Upcoming Remedial/Removal Decision Documents

- Submit Revision.0 D-Area Ash Basin (488-1D) Removal Site
 Evaluation Report/Engineering Evaluation/Cost Analysis to the
 South Carolina Department of Health and Environmental Control
 and Environmental Protection Agency February 24, 2016
 (actual)
 - Projected to be made available for a 30-day public comment period, starting in May 2016

Summary

The Federal Facility Agreement and Supporting Documentation, including Federal Facility Annual Progress Report for Fiscal Year 2015, Land Use Control Assurance Plan, Savannah River Site Community Involvement Plan, etc. is available online at:

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

The Federal Facility Agreement for the Savannah River Site is available at

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

Questions and Answers

7





