



SRS Citizens Advisory Board

Strategic and Legacy Management Committee Meeting

Aiken Municipal Conference Center, Aiken, SC

June 19, 2006

The Savannah River Site (SRS) Citizens Advisory Board (CAB) Strategic and Legacy Management (SLM) Committee met on Monday, June 19, 2006, 5:00 PM, at the Aiken Municipal Conference Center, Aiken, SC. The purpose of the meeting was to discuss the SRS National Pollution Discharge Elimination System (NPDES) Permit Revision, the End State Vision and to hear public comment. Attendance was as follows:

CAB Members

- Jimmy Mackey *
- Wade Waters *
- Madeleine Marshall *
Donna Antonucci
Mary Drye
Leon Chavous
Joe Ortaldo
Wendell Lyon
Kuppuswamy Jayaraman
Manuel Bettencourt

Stakeholders

Russ Messick
Murray Riley
Mike French
Jack Roberts
Liz Goodson
Ron Schroder

**Rick McLeod

DOE/Contractors

Helen Belencan, DOE
Wade Whitaker, DOE
Gary Hoover, DOE
Lee Davis, DOE
Charles Harris, DOE
de'Lisa Bratcher, DOE
Dawn Gillas, DOE
Brian Hennessey, DOE
Stuart Stinson, WSRC
Frank England, WSRC
Jim Moore, WSRC

Regulators

Jim Barksdale, EPA

* *SLM committee members* ** *CAB technical advisor*

Note: Barbara Paul, Gloria Williams-Way, Judy Greene-McLeod, Ranowul Jzar and Meryl Alalof, members of the SLM Committee were unable to attend.

Welcome and Introduction:

Jimmy Mackey, Chair, welcomed all those in attendance and asked them to introduce themselves. Mr. Mackey referred to the meeting ground rules requesting that everyone abide by them.

Before reviewing the agenda, Mr. Mackey suggested that CAB Recommendation #165 – SRS NPDES Permit Revision – be closed. This recommendation was for the ephemeral streams. The only item left open is an annual update which will occur. He suggested that the committee review the recommendation in the next two weeks and let him know if anyone disagreed with closing it.

SRS National Pollution Discharge Elimination System (NPDES) Permit Revision:

Mr. Mackey commented that this topic was developed from the NPDES presentation on ephemeral streams on March 2. It was mentioned at that meeting during discussions of the NPDES ephemeral streams permit application that the South Carolina Department of Health and Environmental Control (SCDHEC) was developing new general permits for storm water discharges associated with industrial activity. It was requested at that time that the site give the committee an overview presentation. The committee's interest will be the cost of implementation to the site compared to the risk benefit.

Stuart Stinson, Washington Savannah River Company (WSRC) Environmental Services Section, and program owner of the Industrial Storm Water Program, discussed the impacts of the new SCDHEC general permit for storm water discharges associated with industrial activity. He explained that storm water is the precipitation from storm water runoff, snow-melt, surface runoff and drainage. This permit revision is for storm water associated with industrial activity. A discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.

The method that SCDHEC expects the site to use to satisfy the permit is Best Management Practices (BMP). The BMP are basically pollution prevention practices and focus on good

housekeeping measures and management techniques. BMPs may also encompass production modifications, operational changes, procedures, materials substitution, materials and water conservation and engineered constructions ranging from silt fencing and check dams to retention/detention basins or wetlands.

Mr. Stinson reviewed the regulatory history starting with the Clean Water Act in 1972 leading up to the first general permit issued by South Carolina in 1993. The general permit requires that facilities utilize BMPs to improve discharge water quality. In July 2004, SCDHEC issued a new general permit for industrial storm water. The permit was implemented in July 2005. The permit required that storm water discharges not cause or contribute to the exceedance of any applicable water quality standard. Compliance was required in 120 days. The analysis of existing data indicated that 31 of 35 sampled outfalls exceeded one or more water quality standards. SRS entered into an agreement with SCDHEC to ensure that the site was in compliance with the general permit within the 120 day window. Key dates to achieve compliance are:

- January 31, 2006 – Submitted data to SCDHEC
- April 1, 2006 – SCDHEC specifies outfalls requiring an individual permit application
- June 30, 2006 – SRS submits individual permit application
- August 31, 2008 – Complete BMP installation for outfalls not on individual permit.

The site submitted data to SCDHEC for evaluation of need for individual permit January 31, 2006, and is now in the process of evaluating alternative options. The outfall evaluation now has a total of 42 outfalls.

- 12 outfalls – Require an Individual Permit
- 7 outfalls – BMPs required but individual permit not required
- 4 outfalls – Data not yet available
- 19 outfalls – No further action required
- 3 outfalls – Projected new outfalls

The general problem with the outfalls is the metal content, particularly, copper, zinc and iron.

The site received a letter from SCDHEC on April 20, 2006, requiring SRS to submit an individual permit application for 12 outfalls. The application originally due August 1, 2006, has been extended to November 1, 2006. On May 19, 2006, a letter was sent to SCDHEC with supplemental information, attempting to remove certain outfalls from those requiring an individual permit.

Details of the permit will not be known until a draft is prepared by SCDHEC and negotiations begun. The implementation date of individual permits could be tied in with other modifications to the existing NPDES permit which expires in two years. Based on conversations with the regulators, SRS anticipates to have monitor and report limits, increased sampling and reporting and compliance periods similar to compliance periods issued for industrial waste water outfalls.

The path forward includes the alternative options study complete by June 30, 2006. The site will submit individual permit applications by November 1, 2006, which is an extended period from the original August 1, 2006. Preferred options will be selected. Sample data from additional outfalls and those outfalls with identified problems will continue. Design, estimating and funding will be initiated. The individual permits will be negotiated. The site will install the BMPs for outfalls not requiring individual permit by August 2008 and as required by negotiated compliance dates in individual permit for other outfalls. The SLM committee requested that they be kept up to date on this program.

End State Vision:

Brian Hennessey, DOE SRS Federal Facility Agreement Project Manager, reviewed the status of the SRS End State Vision. The first End State Vision was published in July 2005. In the End State Vision, DOE committed to “Annually review the end states with key stakeholders to include the SRS mission requirements and land use.” This is that annual review.

The Environmental Management (EM) mission is scheduled to be complete by the end of 2025. Some of the assumptions made in the document are:

- SRS will continue under federal control with no residential use
- All nuclear materials and spent fuel will be dispositioned by reuse or disposal
- All reactors, canyons and the Defense Waste Processing Facility (DWPF) will be decommissioned in situ

- All other EM facilities will be demolished to the foundation or decommissioned in situ
- All liquid radioactive waste will be vitrified for geologic disposal; all 51 tanks will be emptied and closed (grouted)
- All Transuranic (TRU), hazardous and low level mixed waste will be disposed of off-site
- All inactive waste units will be cleaned up; all groundwater remediation will be complete or in operation

There are no significant changes to the SRS planned end state. There are some changes in the schedule such as:

- Salt Waste Processing Facility will begin operation in 2011, rather than 2009
- Mixed Oxide Fuel Fabrication will begin operation later than originally planned
- Plutonium (Pu) will no longer be managed in F-Area after fiscal year 2006

Mr. Hennessy reviewed some of the changes in performance measures from the End State Vision in July 06 to the present.

Appendix B of the End State Vision had some alternatives. Alternative #1 was the future land use and exposure scenario modifications. DOE Headquarters has been notified that legislation establishing perpetual federal government ownership of SRS would be beneficial. This is necessary to enhance credibility and reliability of long-term DOE land use control. Alternative #2 is the disposal for Pu-238 contaminated TRU waste which is still under evaluation for regulatory and technical feasibility. There is discussion of disposing this onsite instead of shipment to the Waste Isolation Pilot Plant in New Mexico. CAB Recommendation #216 still remains open until disposal of Pu-238 is determined.

While there are no plans to update the End State Vision, the SLM committee will receive an annual update.

Other:

Jimmy Mackey requested that the committee members review the Future Land Use Vision for comments. Mr. Mackey wants to start reviewing the Vision in the committee.

Mr. Mackey suggested that everyone review the DOE EM Headquarters organization structure to see how EM is organized. Ms. Belencan suggested that an update organization chart be forwarded to the members.

Public Comment:

With no public comment, the meeting was adjourned.

Follow-Up Actions:

- Jimmy Mackey said that CAB Recommendation 165 - SRS National Pollution Discharge Elimination System Permit Revision - could be closed. The only item open was a request for an annual update. He requested that the committee look the recommendation over and if they objected to closing it, let him know within the next two weeks. - Committee/Jim Moore
- Joe Ortaldo asked if the definition on slide four, "Storm water discharge associated with industrial activity - discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant." was written into the law. - Stuart Stinson/Jim Moore – (Since the meeting this has been answered and the answer is yes, it is written into the law.)
- Jimmy Mackey suggested that we pay close attention to what was happening at Hanford. Hanford had to go back into some of their closure sites and re-open them for more cleanup. Brian Hennessey said he would look into it. - Brian Hennessey
- In relation to the End State Vision, Joe Ortaldo said that if a major facility was dropped such as MOX, then the public would expect a revision to the End State Vision. - Brian Hennessey/Jim Moore

- Jimmy Mackey requested that the CAB members on the committee review the Future Land Use Vision and let him know if they had any comments. He said the committee would be addressing that in a couple of months. - Committee members.

- Jimmy Mackey said that the committee might want to look at the DOE Headquarters Organization Chart to see how they are structured. - Helen Belencan/Jim Moore