



# Innovative Approaches for Environmental Restoration at SRS

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*Promoting and Protecting the Health of the Public and the Environment*



## **SRS Regulatory Framework**

- Federal Facility Agreement (1993) established joint decision making between DOE-SR, EPA Region 4, and SCDHEC.
- FFA governs the corrective action process from site investigation through remediation and describes procedures for setting annual work priorities for that process.
- Integration of the CERCLA & RCRA processes.



## **SRS History: Time-Out**

- Unclear problem definition
- Unnecessary/ incomplete data collection
- Difficulty transitioning from RI to FS
- Continuous delays and major revisions of submittals
- Ineffectual CMS/FS scoping
- Inadequate CMS/FS documentation



## **SRS History: RED Team**

- Remedy Evaluation Design (RED) Team established to evaluate problems and develop solutions.
- Recommendations:
  - Decision-based approach to communicate project information (Core Team)
  - Meet & align on status of project (Scoping meeting)
  - Project-specific documentation of understanding & agreements (Scoping summary)



## **Core Team Approach**

- Formal, consensus-based approach to decision making.
- Designate a decision maker from each agency, but technical support staff and stakeholders are also involved.
- Regulators still maintain enforcement authority; DOE still responsible for managing project resources.



# Characteristics of an Effective Core Team

- Recognition of decision-making responsibility
- Identification of key decisions
- Consensus on decisions
- No ambiguity
- Sufficient decision-making authority
- Attend all meetings
- Decisions & underlying rationale are documented

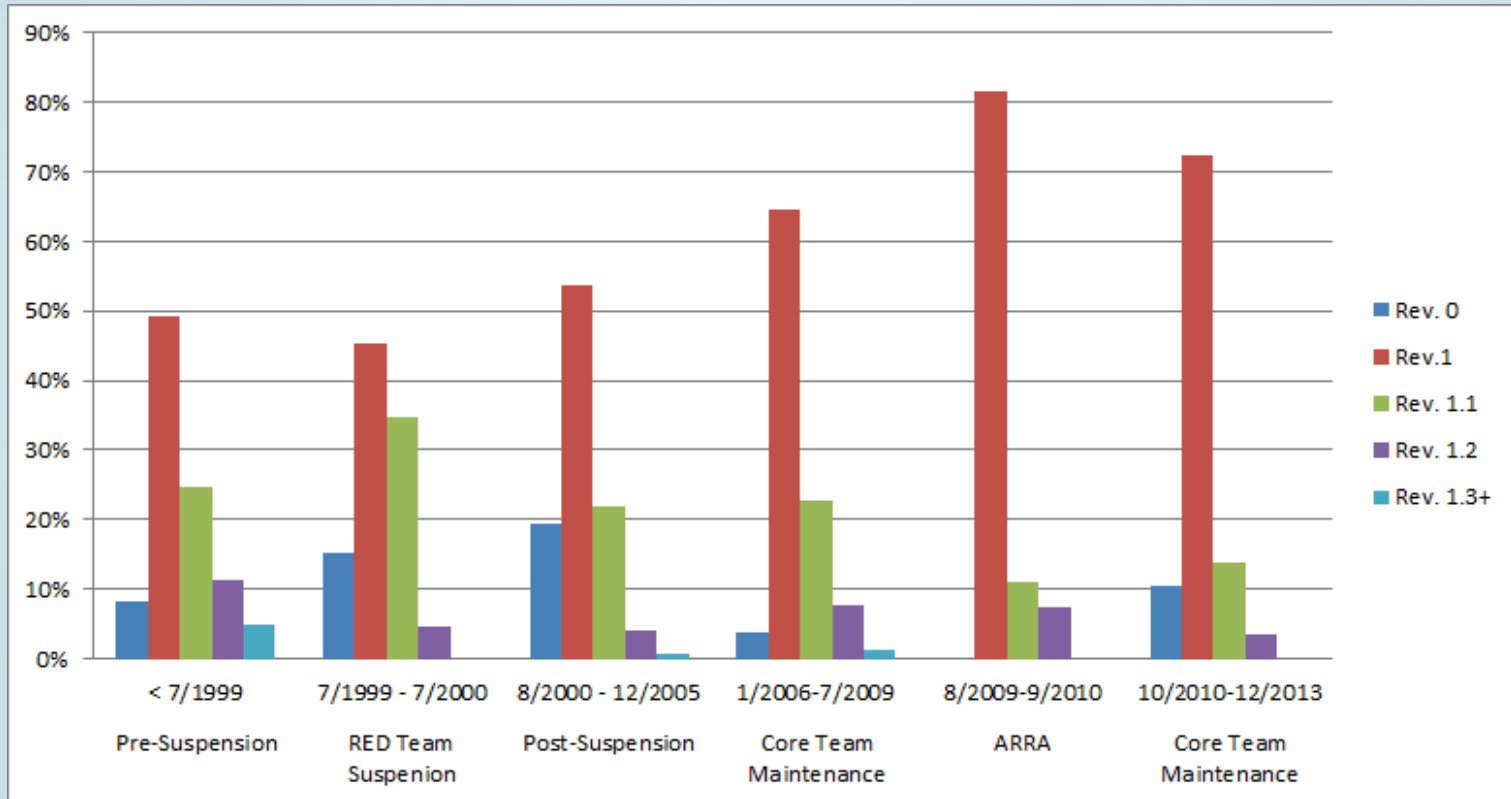


## **Benefits of Core Team Approach**

- Improves Project Focus
- Streamlines documentation
- Minimizes comment/review/revise process
- Increased participation & trust

# SRS Scoping Success

Document Approval





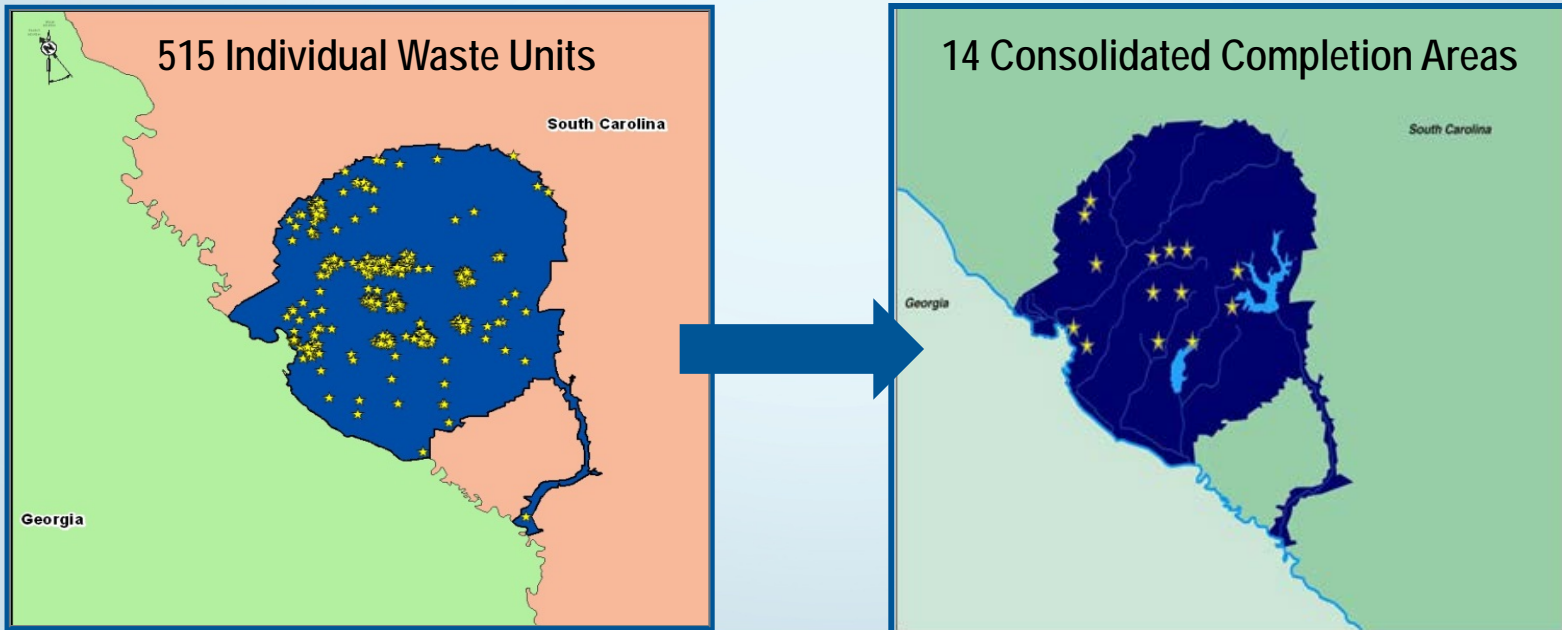


## **Comprehensive Cleanup Plan**

- 2003, Memorandum of Understanding for Achieving an Accelerated Cleanup Vision
- Reduce operations footprint (Buffer Zone)
- Area Completion Strategy

# Area Completion Strategy

- Geographical approach to integrating soil and groundwater cleanup and Deactivation & Decommissioning (D&D)





## **Area Completion Success**

- Economies of scale in sampling, remediation and documentation (one set of documents for each of the 14 areas).
- Typical schedule from Work Plan to ROD is reduced by 35% through implementation of the Area Completion Strategy, resulting in a 4-5 year cost savings.
- Currently, 85% of Site is cleaned with approval from SCDHEC and EPA.



## Current Challenges

- Closure of High-Level Waste Tanks
  - CARAT (Closure And Regulatory Action Team)
  - Expedited reviews of draft Closure Models to reduce regulatory review time.
    - Tank closure schedule improved 48 days.



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