

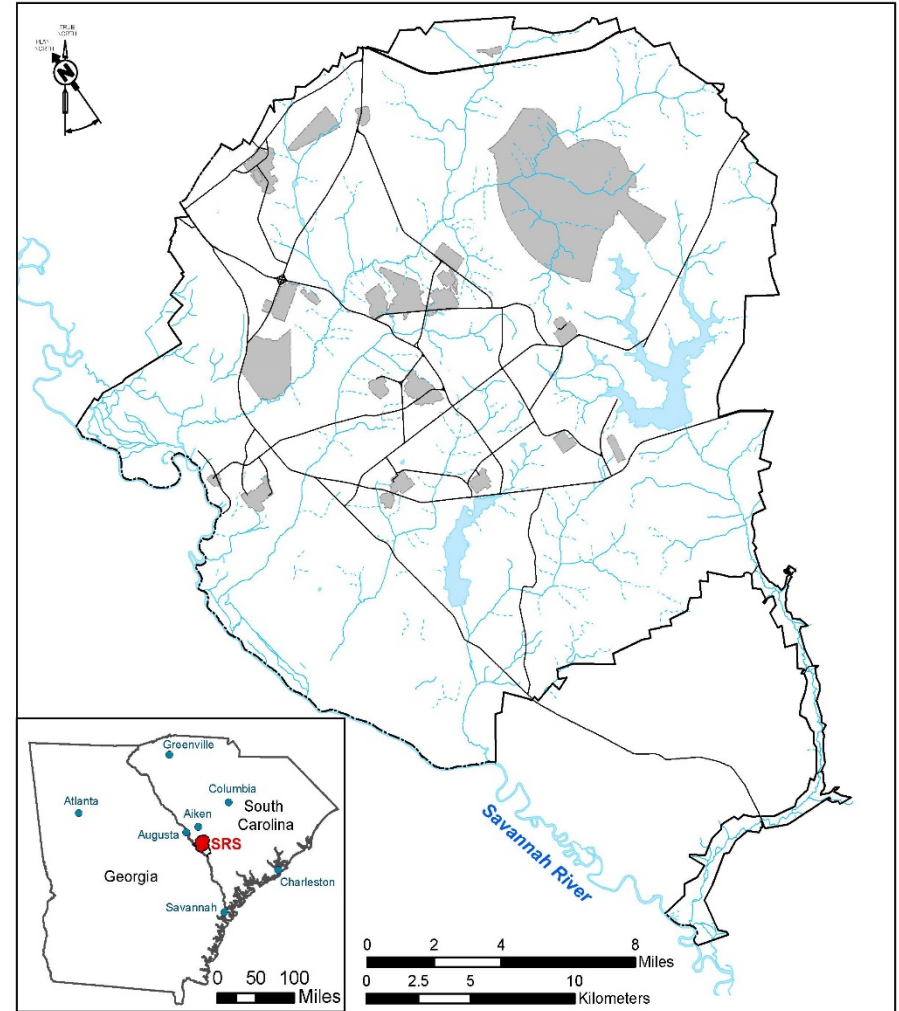


Case Study – Dispute Resolution at SRS

South Carolina Department of Health and Environmental Control
Healthy People. **Healthy Communities.**

Savannah River Site

- ~310 mi² adjacent to the Savannah River
- Constructed 1950s in support of national defense
- NPL site with 3-party FFA



High-Level Liquid Waste

- Generated as by-products from the processing of nuclear materials
- Approximately 35 millions gallons of waste stored in 43 underground carbon-steel waste tanks among two “tank farms”
- **Greatest risk to human health and the environment in South Carolina**



HLW Tank Cleanup & Closure

- March 2006, DOE requested an extension for Tanks 18 and 19.
- A non-concurrence was issued by South Carolina.
- October 22, 2007 – Dispute elevated to the DRC
- November 19, 2007 – Formal dispute resolved

Results of Formal Dispute

- Bulk waste removal and operational closure dates for each remaining tank created and documented in Appendix L of the FFA
- Annual Report
- Quarterly calls

More Disputes

- Delays in SWPF and programmatic issues
- More extension requests in 2014 & 2016 led to additional disputes



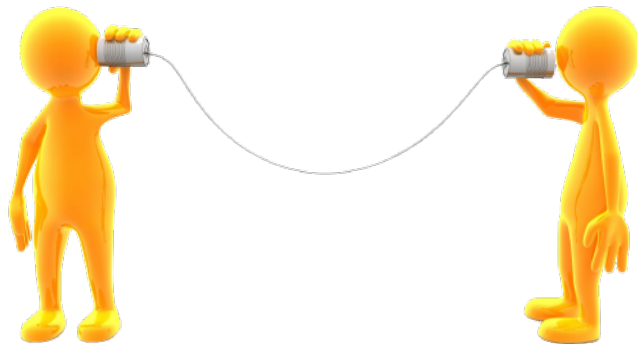
2014 Dispute

- Informal Dispute – 3 months
- Elevated to DRC
- Partially resolved in 28 days
- SEC resolved remaining issue in 46 days



2016 Dispute

- DOE extension request not approved
- Invoked informal dispute
- Multiple technical exchange meetings
- Resolved within 6 months
- Commitment for additional discussions



A New Approach

- Aggressive tank closure schedule no longer achievable
- September 2017 extension request
- Did not want to enter dispute again
- Parties agreed to suspending the milestones while furthering our ***shared interest*** in continuing risk reduction.

Finding Common Ground

- EPA and SCDHEC requested that DOE look at activities outside of the tank farms.
- Identified projects to accelerate for further risk reduction.
- Milestones suspended pending rerack.
- Signed by DRC although not a dispute.



Where are we today?

- The milestones are still suspended while SRS prepares for SWPF startup.

HOWEVER

- Work occurring on accelerated projects
- Milestones for the accelerated projects placed on the FFA
- DOE remains in constant communication with EPA and SCDHEC regarding the Liquid Waste program

Takeaways

- Make a good faith effort to resolve informally
- Elevate when necessary
- Stick to timeframes
- Look for common ground
- Be creative
- Make sure agreements are detailed





South Carolina Department of Health and Environmental Control
Healthy People. Healthy Communities.

CONTACT US

Susan Fulmer, P.G.
fulmersb@dhec.sc.gov

Heather Cathcart
cathcahe@dhec.sc.gov

Stay Connected

