



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

June 16, 2014

Dr. Ernest Moniz, Secretary
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

RE: Savannah River Site - Liquid Waste Milestones

Dear Secretary Moniz:

On May 29, 2014, the South Carolina Department of Health and Environmental Control (DHEC) received Revision 19 of the Savannah River Site (SRS) Liquid Waste System Plan. This plan projects that every single liquid waste milestone will be missed. This would result in a total cumulative delay of over 200 years for waste removal, tank closure, treatment startup and waste treatment completion milestones. These delays will not be tolerated by the State of South Carolina.

The thirty-seven million gallons of highly radioactive and toxic waste, stored in aging and degrading tanks at SRS, is the single largest environmental threat in South Carolina. DHEC has worked hard in concert with SRS to ensure waste treatment and tank closure. The path forward for success is clear, but the Department of Energy is not continuing to make waste treatment and tank closure at SRS a priority. The Liquid Waste System Plan acknowledges that lack of adequate funding is a major reason behind predicted program failure. DOE allocated significantly reduced funding for SRS in FY14, and inadequate funding is projected in FY15 and beyond. DOE decisions to disregard its commitments to SRS will be met with penalty assessments by the Department.

The Liquid Waste System Plan Revision 19 projects failure to meet all liquid waste milestones, including:

- 12 bulk waste removal milestones (FY16-FY19)
- 18 tank closure milestones (FY15-FY22)
- 1 Salt Waste Processing Facility (SWPF) startup date (October 2015)
- 2 SWPF treatment rate milestones (FY17 and FY18)
- 1 liquid waste treatment completion milestone (FY2028)

Based on current Department of Energy completion projections, penalties through the end of FY16 alone could be assessed at more than \$193 million, with ongoing daily penalties of \$105,000 (stipulated) for failure to startup SWPF and \$10,000 per day for failure to close the agreed upon tanks.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Mills/Jarrett Complex • Box 101106, Columbia, SC 29211-0106 • 1751 Calhoun Street, Columbia, SC 29201 • www.scdhec.gov

June 16, 2014
Dr. Ernest Moniz, Secretary
Page Two

The high level waste risk reduction milestones agreed to by DHEC and DOE are for the protection of the citizens and environment of South Carolina. DHEC will not agree to milestone extensions sought because of inadequate funding for SRS. DHEC calls upon DOE to take appropriate action to fund existing and additional processing capacities needed to meet its commitments. DHEC will fully exercise its authority for hazardous waste oversight, along with other environmental authorities, if satisfactory commitment to the high level waste schedule is not reached.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Templeton".

Catherine B. Templeton

cc: Dr. David Moody, SRS