

## Letter/Attachment for GTCC EIS Scoping Comment #146

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C. Earl Hunter, Commissioner

*Promoting and protecting the health of the public and the environment.*

September 14, 2007

Mr. James L. Joyce  
Document Manager  
Office of Regulatory Compliance (EM-10)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0119

Dear Mr. Joyce:

Please find attached comments from the South Carolina Department of Health and Environmental Control on the Department of Energy July 23, 2007 notice of intent to prepare an Environmental Impact Statement for the disposal of Greater-Than-Class-C low-level radioactive waste. If you have any questions related to the attached comments, please contact me at (803) 896-8955 or [sherrimd@dhec.sc.gov](mailto:sherrimd@dhec.sc.gov).

Sincerely,



Shelly Sherritt  
Federal Facilities Liaison  
South Carolina Department of  
Health and Environmental Control

cc: Rick Caldwell  
Richard Haynes

COMMENTS FROM THE  
SOUTH CAROLINA DEPARTMENT OF HEALTH  
AND ENVIRONMENTAL CONTROL  
ON THE  
DEPARTMENT OF ENERGY  
NOTICE OF INTENT TO PREPARE AN  
ENVIRONMENTAL IMPACT STATEMENT FOR THE DISPOSAL OF  
GREATER-THAN-CLASS-C LOW-LEVEL RADIOACTIVE WASTE

September 14, 2007

- 1) The Savannah River Site (SRS) is not an appropriate location for additional radioactive waste burden given its current waste management status. Approximately thirty-six million gallons of high-level mixed waste are stored in aging tanks with leak sites, while there is currently no operating treatment facility for the majority of that volume. A substantial volume of transuranic waste remains in storage at SRS awaiting appropriate disposition. Radioactive contamination remains in many areas slated for future cleanup decisions. Disposal of Greater-Than-Class-C (GTCC) and GTCC-like waste is inappropriate at SRS given the current cleanup backlog. Any new disposal activities at SRS would influence future cleanup and closure decisions, given the objective of the State to minimize residuals remaining at SRS for long-term care.
- 2) Any new mixed waste disposal activities at SRS would have to meet the requirements for new disposal facilities in R.61-104, Hazardous Waste Management Location Standards in addition to other disposal facility requirements including R.61-79, South Carolina Hazardous Waste Management Regulations.

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