Public Comment Michelle Wilson Federal Facilities Liaison South Carolina Department of Health and Environmental Control

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Since the advent of environmental regulation in the 1970s, the South Carolina Department of Health and Environmental Control has overseen reduction of environmental liabilities at the Savannah River Site. These liabilities, mainly legacy waste from the Cold War and various contaminated areas across the site, represent two negatives: 1) risk to people and the environment and 2) potential long term stewardship burdens for South Carolina. Although we have made a great deal of progress in both legacy waste disposition and area cleanup, there is still quite a ways to go before the risk is mitigated. One of the highest priorities for DHEC is the closure of the high level waste tanks at SRS, aging tanks, some of which have leak sites, holding 37 million gallons of liquid, radioactive and toxic waste. South Carolina currently holds more than its fair share of proportionate risk from the nation's cold war legacy. Again, DHEC's direction is to reduce that risk and mitigate long term stewardship burdens.

If the federal repository at Yucca Mountain is no longer available, the risk reduction in South Carolina becomes uncertain and may call into question the previous regulatory decisions that have been made at SRS. DHEC has several regulatory mechanisms in place that guide and document the enforceable cleanup decisions that have been made for SRS. These decisions may no longer be suitable if the risk in South Carolina remains or increases. Indefinite or long term management of vitrified waste, commercial spent nuclear fuel or related waste streams may all impact the cleanup decisions that have been and will be made in relation to the magnitude of risk material present in the State. Any potential directional changes should be discussed with affected states well in advance to engage political, technical and equity considerations.