

Mercury Export Ban Act of 2008
Current and Planned Facilities at the Savannah River Site (SRS)

Based upon a preliminary review, there is one current facility and one planned facility at SRS that, with appropriate regulatory or physical modifications, are potentially suitable for storage of mercury as required by the Act: (1) The existing Hazardous Waste Storage Facility (HWSF) in N-Area and (2) a proposed new Hazardous Waste/Mixed Waste storage facility to be built in E-Area as part of the SRS Recovery Act project scope.

1. The existing Hazardous Waste Storage Facility (HWSF) in N Area is RCRA permitted to store approximately 780,000 gallons of hazardous and mixed wastes. The HWSF consists of three buildings with a total of approximately 25,000 square feet of covered floor space. Two of the buildings are totally enclosed with metal walls while the third building possesses chain link fencing for perimeter walls. The latter building has secondary containment sumps to intercept and hold precipitation that blows in under the roof. The HWSF was built to meet rigorous siting criteria developed by the South Carolina Department of Health and Environmental Control (SCDHEC).

The RCRA permit for this facility currently does not allow the SRS to "receive hazardous or mixed waste from an off-site source unless as allowed by an order issued by SCDHEC pursuant to the Federal Facility Compliance Act (FFCA)". If more space were required (note the total storage space is at the low end of the 20,000 to 100,000 square feet of required storage space) a RCRA Part B permit modification would have to be prepared and submitted to SCDHEC for approval before construction could begin. In addition, the HWSF is currently slated for D&D as part of the SRS Recovery Act project. In order for the HWSF to be utilized for the proposed new mission, the Recovery Act project scope would have to be amended.

2. Construction of a new hazardous waste/mixed waste storage facility in E Area is part of the SRS Recovery Act Project. This facility would replace the existing HWSF and consolidate SRS hazardous waste management activities in E Area. The location of this new facility within E Area, which will probably encompass less than 10,000 square feet of covered floor space, has not yet been determined. SRS would have to significantly expand the footprint of the facility to accommodate the 20,000 to 100,000 square foot mercury storage requirement. The square footage would be a factor in siting the facility within E Area. The RCRA permit restrictions described above for the HWSF also apply to the proposed new facility.

In addition to existing and planned SRS facilities, there is the potential for constructing and operating a new mercury storage facility at SRS on either a brown or green field site. SRS possesses a well documented site selection process which could be used to identify candidate sites based upon (but not limited to) SCDHEC siting criteria, proximity to required infrastructure, and avoidance of environmentally sensitive areas.