



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

February 10, 2020

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Brian Hennessey, 730-B  
SRS Remedial Project Manager  
Savannah River Operations Office  
Area Completion Projects  
Post Office Box A  
Aiken, South Carolina 29802



Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the DOE-SRS Facility Decommissioning Evaluations (FDEs) for: Building 484-4D Power House Maintenance Facility, Rev. 0, Dated November 13, 2019; Building 484-12D, D-Area Storage Building, Rev. 0, Dated November 18, 2019; Building 484-7D, D-Area Storage Building, Rev. 0, Dated November 13, 2019; Building 683-D, Chlorine Unloading and Storage, Rev. 0, Dated November 13, 2019; Building 454-D, D-Area Diesel Fuel Tank, Rev 0, Dated November 13, 2019; Building 484-13D, D-Area Storage Building, Rev. 0, Dated November 18, 2019; Building 484-15D, D-Area Storage Building, Rev. 0, Dated November 18, 2019.

EPA concurs on the Simple Model for Building 683-D. EPA conditionally concurs on the simple model for Buildings 484-12D, 484-7D, 484-13D, and 484-15D pending the responses to our comments. At this time, EPA requests that Buildings 484-4D and 454-D be decommissioned using the integrated sampling model. Should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely,

A handwritten signature in black ink, appearing to read "Diedre Lloyd".

Diedre Lloyd  
Remedial Project Manager  
Restoration & Sustainability Branch  
Superfund Division

cc: Angelia Holmes, DOE-SRS, Brian Hennessey, DOE-SRS, Phil Prater, DOE-SRS, Karen Adams, DOE-SRS, Chris Bergren, SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

## EPA COMMENTS on the

### FACILITY DECOMMISSIONING EVALUATIONS FOR:

**Building 484-4D Power House Maintenance Facility, Rev. 0, Dated November 13, 2019;**  
**Building 484-12D, D-Area Storage Building, Rev. 0, Dated November 18, 2019;**  
**Building 484-7D, D-Area Storage Building, Rev. 0, Dated November 13, 2019;**  
**Building 683-D, Chlorine Unloading and Storage, Rev. 0, Dated November 13, 2019;**  
**Building 454-D, D-Area Diesel Fuel Tank, Rev 0, Dated November 13, 2019;**  
**Building 484-13D, D-Area Storage Building, Rev. 0, Dated November 18, 2019;**  
**Building 484-15D, D-Area Storage Building, Rev. 0, Dated November 18, 2019**

#### D-Area Operable Unit

#### SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

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#### EPA COMMENTS:

- 1) Please call the D Area core team member (Diedre Lloyd) if during decommissioning of a Simple Model facility, some condition is identified that may contradict the Simple Model assumptions.
- 2) EPA requests a site walk-down for all 7 of the D Area Facilities in this grouping of FDEs with special emphasis on Building 484-4D Power House Maintenance Facility and Building 454-D, D-Area Diesel Fuel Tank Facility.
- 3) Please provide one figure that depicts the relationship between the 7 buildings and their ancillary structures
- 4) **FDE for the Power House Maintenance Facility**
  - a. EPA has requested and is awaiting additional information with respect to the Power House Facility during the previous D Area Scoping Meeting. EPA also expressed concern during the D Area Scoping meeting about the potential for soil and groundwater contamination near the powerhouse and requested additional information about the depth and construction of the basement and what items have been stored and/or utilized within the powerhouse building.
  - b. In accordance with the information for the Power House, EPA requests additional information regarding the Maintenance Facility and in relation to the Power House. EPA requests a more thorough discussion of history of operations, process information, and any previous or planned sampling of soil for the Maintenance Facility
  - c. Please include the activities/function for the buildings surrounding the 484-D Power House Facility
    - i. 482-2D, 485-D, 484-1D, 4844-7D
  - d. Please include exterior and interior pictures of the 2 small storage buildings and the covered area between them
  - e. Please include pictures of the small covered area on the east side of the power house facility
  - f. Do any interior floors, ceiling panels or other interior building structures contain asbestos?
    - i. Please submit the results of the Asbestos survey conducted on October 18, 2019 and listed in reference 9 to this document
  - g. Will fencing surrounding the laydown yard be removed?
  - h. Please indicate all hazardous substances were used within this facility
    - i. Solvents, PCB Oil, lead paint, petroleum products, etc.

- ii. Were PCE/TCE used as solvents within the facility?
- i. Were or are the drains within this facility still connected to the sanitary sewer?
- j. EPA requests sampling of all drains, stained areas, and or sumps in the facility.
- k. Additional information for waste disposal generated during the proposed activities is requested to be included in this FDE and needs to be in the DPFR.

**5) FDE for Building 454-D, D-Area Diesel Fuel Tank Facility**

- a. Please identify the function/activities for the buildings that surround the Diesel Fuel Tank Facility (454-1D and 454-D)
- b. FDE for Building 454-D D-Area Diesel Fuel Tank, Rev. 0 dated November 13, 2019, Facility Description, Page 6 of 17: The discussion of the unloading facility sump does not include a description of the condition of the inside of the sump that would indicate whether staining was observed and whether the integrity of the sump was compromised or remained intact.
- c. EPA requests sampling of the sump for the facility, as well as any drains or stained areas..
- d. In addition, the facility description should include information about whether soils surrounding the sump were inspected to identify if any fuel may have leaked outside the sump.
- e. Information regarding when the facility was removed from service should be provided in order to understand the complete history and use of this facility.
- f. Please revise the Facility Decommissioning Evaluation (FDE) for the Building 454-D D-Area Diesel Fuel Tank to include a description of the visual inspection of the inside of the unloading facility sump and surrounding soils to support the conclusion that spills were confined within the existing structure.
- g. Will the electrical panels be sampled for asbestos?
- h. Will the asbestos gaskets be left in place indefinitely? If not, what are the future plans?

**6) FDE for Building 484-15D, D Area Storage Building**

- a. Please provide an image of the interior area of Bldg 484-15D and include the stained area illustrated in Figure 2.
- b. Please identify the activities/function of the buildings that surround Bldg 484-15D
  - i. 484-D, 484-6D, 484-2D, 484-9D
- c. Page 6 of 11, 2<sup>nd</sup> paragraph discusses a list that is “non-inclusive representation” of items previously stored within the structure and in the laydown yard. The above phrase in quotations is vague and lacks clarity.
  - i. Please provide additional clarity in the form of additional items that were stored within the building/laydown yard or explain why the list may not be inclusive or is merely a representation of what “may” have been stored within these areas.

**7) FDE for Building 484-12D, D-Area Storage Building**

- a. Please provide interior pictures for the 484-12D building
- b. Please provide pictures of the laydown yard
- c. What was stored in the laydown yard?
- d. Please include information of the activities/function of the buildings surrounding 484-12D
  - i. 483-3D, 484-10D, 484-5D, 454-D, unlabeled buildings in the bottom right hand corner of figure 3.
- e. Please provide brief information about what materials/processes were involved in the fabrication of insulation

- f. Page 8 of 10, Part 2 Evaluation: Clean Facilities, #3
  - i. Please provide additional details as to why the Evaluation Criteria for #3 under Clean Facilities is N/A (Not Applicable)
    - 1. The matrix indicates that if this answer is Yes, then this building cleanup/deconstruction would be conducted under the Clean Facility Building demolition
    - 2. Additional details should be included in the Justification Column

**8) FDE for Building 484-7D, D-Area Storage Building**

- a. Please include information of what was temporarily stored in the lay down yards for Building 484-7D.
- b. The temporary storage of powerhouse parts was mentioned, did these parts include any PCB containing transformers or other parts with PCB oils?
- c. Was the laydown yard used to overpack drum or other constituents? If so, please included the type of contaminants that were drummed or overpacked.
- d. Please provide interior pictures of the 484-7D Building

**9) FDE for Building 484-13D, D-Area Storage Building**

- a. Page 7 of 11, the text mentions that the storage of equipment for the 484-D Powerhouse were stored in the Bone Yard and inside the building storage areas
  - i. Was PCB oil containing equipment stored in either the laydown yard (bone yard) or building 484-13D?
- b. Please include the function/activities of the Buildings surrounding 484-13D
  - i. 80-22D, 483-3D, 484-13D, 80-22D, 485-5D, 454D
- c. Page 7 of 11, 3<sup>rd</sup> paragraph discusses buried domestic water and process raw water piping and outlines that a portion (drawing M-MA-D\_0071) of the process raw water system is no longer used and is disconnected from any pressure source.
  - i. Has the process raw water system line been abandoned?