

Shelia Mcfalls

From: Shelia Mcfalls
Sent: Tuesday, June 22, 2021 12:47 PM
To: 'Jon Richards (richards.jon@epa.gov)'; fulmersb@dhec.sc.gov
Cc: Rob Pope (pope.robert@epa.gov); jeannenjr@aol.com; HENNESSEY, BRIAN; ADAMS, KAREN; Chris Bergren; Robert Shirley; Thelesia Oliver; Ross Fanning; Jeffcj Ward; Amy Meyer; J Ross; Steven Conner; Joao Cardoso-Neto; Dena Brett; Joseph Burch; Fuss, Travis R.; Greggory N. O'Quinn (oquinngn@dhec.sc.gov); Bethany Cameron; K. Leigh Beatty (beattykl@dhec.sc.gov); Hannah Herlong
Subject: Request for Approval for the Battelle Savannah River Alliance to Expand the Previously Approved Area of Excavation within the M-Area Operable Unit Land Use Control Boundaries
Attachments: Figures 1 and 2.pdf

SRNS-J2000-2021-00539

Jon and Susan,

Battelle Savannah River Alliance (BSRA) (formerly Savannah River National Laboratory) has requested approval to conduct construction activity within the M Area Operable Unit (MAOU) land use control (LUC) boundaries but outside the recognized Resource Conservation and Recovery Act/Comprehensive Environmental Response, Compensation and Liability Act (RCRA/CERCLA) areas of known contamination. BSRA is currently using a portion of the MAOU (Figure 1) for Department of Homeland Security (DHS) activities at the On Dock Rail (ODR) site. A request for this site was approved in 2010 to allow excavation up to 18 inches deep to remove a paved parking lot and replace it with a concrete foundation in the form of a concrete slab (References: ARF #017221, 017240, 017247).

BSRA currently uses the area as a facility for outdoor testing of radiation detection equipment. The immediate plan is to install a utility pole (excavation to 10 ft) and guy wire with anchor (to 6 ft deep); a small concrete pad for electrical equipment (4 x 6 ft x 4-inches deep) with two support posts (excavation to 6 ft); and 6 to 10 ground rods driven to 20 ft connected by wires buried 2.5-ft deep. These activities will be in the soil strip (labeled "Open Ground Surface") adjacent to the existing concrete slab (Figure 2). BSRA has a FY2021 funding limit for this activity and requires construction start by August 1, 2021.

At present, BSRA is developing plans to support DHS for testing medium and high voltage power equipment, perform drop testing of new and existing radiological packaging designs, and applications for 5G communication. The contemplated tests would require localized excavations or ground penetrations for installation of utility poles, pilings for drop towers, driving ground rods, and construction of other structures at various locations within the ODR boundary that overlaps with the MAOU LUCs area. To avoid multiple future approval requests, BSRA would like to expand the area of excavation to 1) include the existing concrete slab and a strip of land to the north (Figure 2) and 2) increase the approved depth of excavation (to a depth of up to 20 ft). The overall dimensions of the approved area would be 420 feet by 250 feet and a depth of 20 feet.

The requested area is within the MAOU LUCs boundary, but outside the areas of known contamination warranting action (Figure 1) as identified by the RCRA Facility Investigation/Remedial Investigation (RFI/RI) Work Plan, RFI/RI Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for MAOU (WSRC-RP-2006-4060, Revision 1, July 2007). In addition, the request is outside the LUCs boundary for the M-Area Inactive Process Sewer Lines Operable Unit (WSRC-RP-2006-4068, Revision 1, April 2007), which provides an offset of approximately 25 ft between potential contamination associated with the sewer line and any contemplated excavation or penetration.

Please note that the Site Use permit for the area remains in force for this request—the permit includes appropriate spill response measures and the fact that another waste unit will not be created.

All email correspondence will be placed in the Administrative Record File to document the request and regulatory decision regarding the requested expansion.

Please review the information contained in this email and reply by COB, July 13, 2021 if the request is acceptable to you. If you would like any additional information, or to discuss any aspect of this request, please contact Brian Hennessey or Karen Adams.

Please contact me if you have any questions, comments, or concerns.

Thanks

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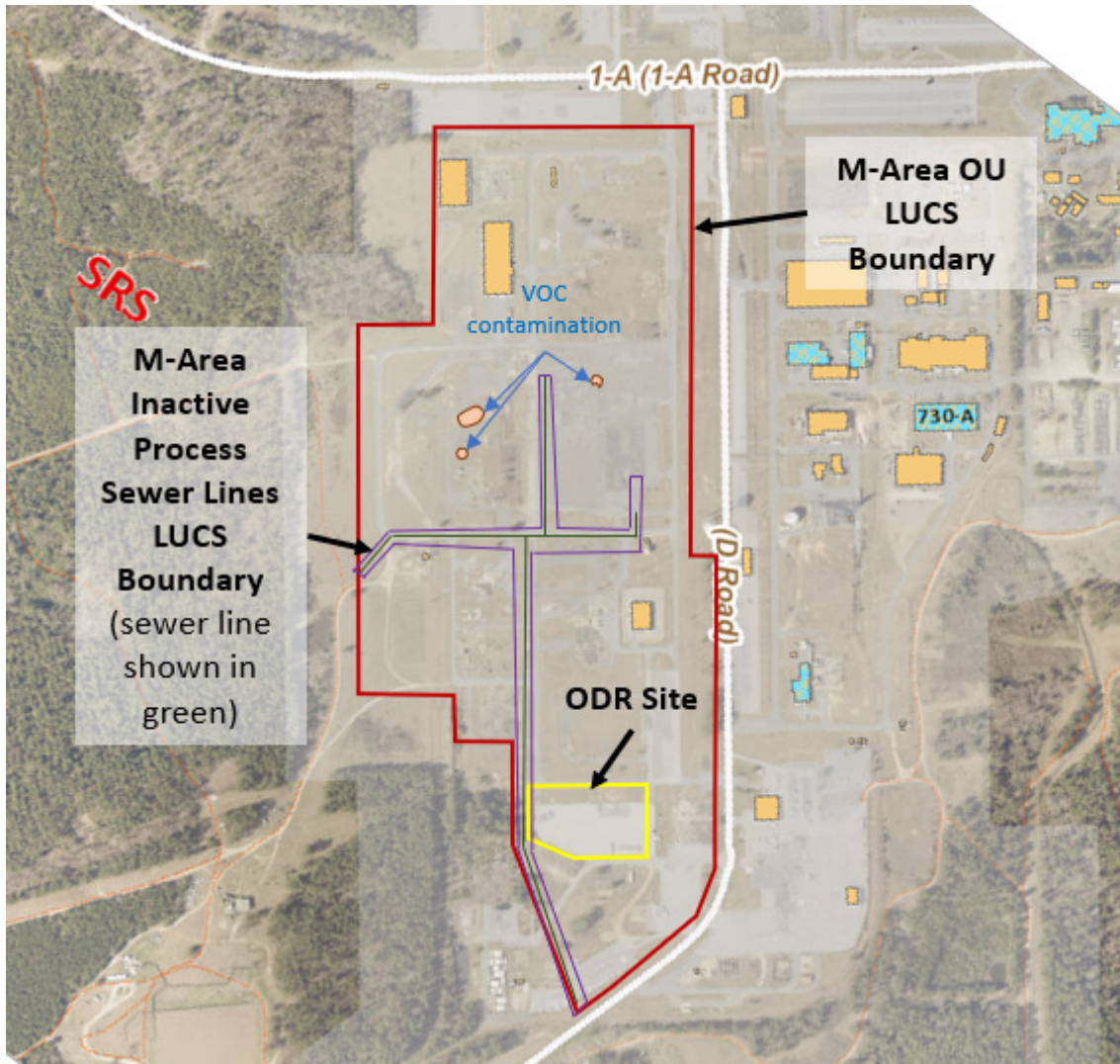


Figure 1. M-Area LUCs boundary and ODR Site.

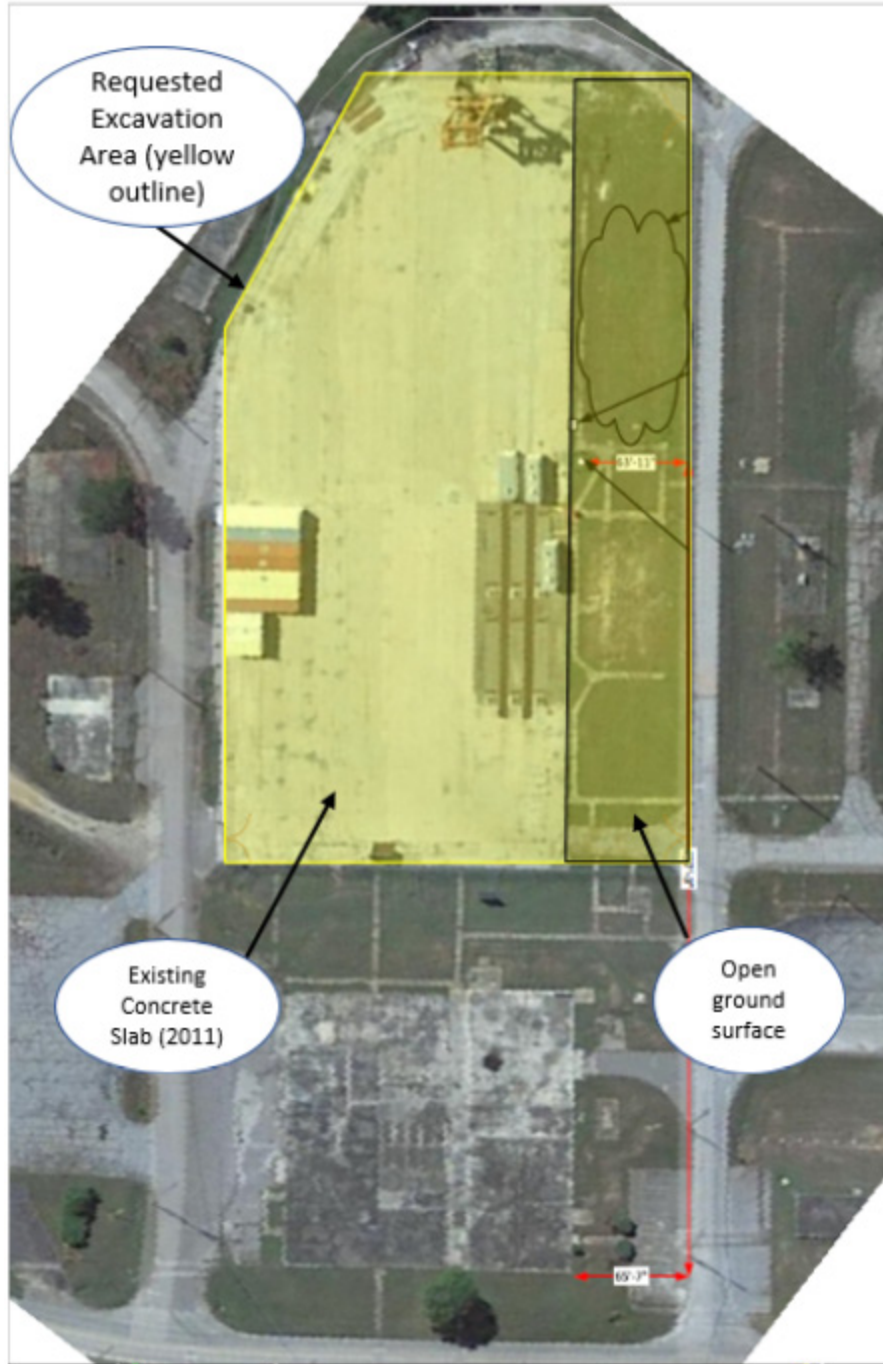


Figure 2. ODR requested area of excavation and current surface cover.