



ENVIRONMENTAL COMPLIANCE &

October 25, 2021

OCT 25 2021

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Infrastructure and Area Completion Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

Re: Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis for the F-Area
Material Storage Building (235-F) (U) (SRNS-RP-2021-00001, Revision 0, August 2021) received
August 27, 2021.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/DHEC comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Travis Fuss, Aiken Environmental Affairs Office (via email)
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Health and Environmental Control Comments on:
Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis
for the F-Area Material Storage Building (235-F) (U)
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Specific Comments

1. Section 2.2, Previous Action, page 8. The last sentence of the first full paragraph on this page regarding core sampling from the abandoned capped stack states: "The radioactivity of the waste material was less than 400 picocuries/gram (pCi/g) and PCB contamination was not detected." Please explain the relevance of this value. Is it some type of benchmark?
2. Section 2.5, Nature and Extent of Contamination, page 10. The second paragraph on page 10 states an inspection identified 9,643 m² of asbestos transite-containing material; however, there is no intent to remove this material unless it is determined to be friable or is disturbed by deactivation activities. Does the cost analysis on Tables D-2, D-3, and D-4 account for this possible asbestos abatement? Please verify.
3. Section 2.7, Contamination Migration Risk to Groundwater, page 13-15. According to Appendix B, two other scenarios were also evaluated - Grout First Level Scenario and Grout First and Second Level Scenario. These scenarios should also be noted in this section.
4. Table D-1, Building 235-F Cost Analysis, Alternative A-1 No Action, page D-3. Please itemize and/or explain the annual costs associated with Alternative A-1 No Action.