Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

DEC 15 2022

Ms. Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Statement of Basis/Proposed Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-00202, Revision 1 Redline, December 2022) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 93

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy is submitting the subject information for your review and approval. The South Carolina Department of Health and Environmental Control (SCDHEC) and U. S. Environmental Protection Agency (EPA) provided comments on the Revision 0 Statement of Basis/Proposed Plan (SB/PP) on September 29, 2022, and October 31, 2022, respectively. Please note that editorial changes (e.g., addition of Administrative Record File/Information Repository File link) will be made to the Fact Sheet (SRNS-RP-2022-00528) prior to publication. Since this is an editorial change, the Fact Sheet is not enclosed for your review and approval. The effort and time that the SCDHEC and EPA have provided on this operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2022.12.13 13:24:10 -05'00'

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

IACD-23-113

Enclosures:
1. Statement of Basis/Proposed Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-00202, Revision 1 Redline, December 2022) SEMS Number: 93
2. SRS Responses to the South Carolina Department of Health and Environmental Control Comments on the Statement of Basis/Proposed Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-00202, Revision 0, July 2022) SEMS Number: 93
3. SRS Responses to EPA Comments on the Statement of Basis/Proposed Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-00202, Revision 0, July 2022) SEMS Number: 93

cc w/o encl:
J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
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T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
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K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:
M. McRae, TechLaw, Inc.

SRS Responses to South Carolina Department of Environmental Health and Control Comments on the Statement of Basis/Proposed Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U), SRNS-RP-2022-00202, Revision 0, July 2022, SEMS Number: 93
Savannah River Site, South Carolina

Comments Received September 29, 2022

SPECIFIC COMMENTS

1. **Section III. Operable Unit Background, page 4.** It should be noted that groundwater is not part of the operable unit and will be addressed as the Central Shops Groundwater Operable Unit.

Response: Agree.

The first paragraph in Section III. Operable Unit Background, will be updated as follows:

"This OU consists~~is comprised~~ of three subunits: ECODS N-1, CSSLP, and the Ford Building. Groundwater is not part of the OU and will be addressed under the Central Shops Groundwater OU."

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

GENERAL COMMENT

1. The SB/PP does not discuss the lateral and vertical extent of the contamination present in site media at each subunit as noted in Section 3.3.3 (Site Characteristics) of EPA's *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (EPA 540-R-98-031), dated July 1999 (the EPA Decision Guidance). The following issues for each subunit should be addressed:

    a. **Early Construction and Operational Disposal Site (ECODS) N-1 Subunit:** Section III (Operable Unit Background) of the SB/PP states that during the 2020 characterization, two of three sampled locations at the ECODS N-1 subunit encountered asbestos; however, the locations where the asbestos was found are not shown on Figure 3 (ECODS N-1 Subunit 2001, 2019, and 2020 Sample Locations). The extent of the asbestos at this subunit is unclear, and therefore the area and depth at the site to which the remedy should be applied is unclear.
    b. **Central Shops Scrap Lumber Pile (631-2G) (CSSLP) Subunit:** The results of the soil, sediment, and surface water samples collected during the 2020 characterization are not discussed; however, it appears that hotspots based on arsenic concentrations are identified on Figure 8 (CSSLP Subunit Alternative B-4 [Hotspot Removal] and Disposal). The text should clarify how these hotspots were characterized as it appears additional delineation is needed at the edges of the subunit (i.e., at the southern, western, and northern edges where hotspots are identified and not clearly defined).
    c. **Building 690-N, Process Heat Exchanger Repair Facility (Ford Building) Subunit:** Soil and concrete sampling is discussed for the Ford Building; however, it is unclear if the constituents of concern (COCs) on the concrete slab and in site soil have been delineated. For example, Figure 7 (Ford Building Subunit Cobalt-60 Data [0-1 ft]) indicates that the only sample collected on the south side of the former building detected cobalt-60, but the lateral and vertical extent of this contamination is unclear. Further, none of the figures show the locations of the concrete samples.

    The SB/PP should discuss and show on site figures the lateral and vertical extent of contaminated media to support the discussion of alternatives and selection of the preferred remedies. *Revise the SB/PP to include a description of the extent of the contaminated areas in each subunit.*

Response: Clarification.

The format and level of detail presented in this SB/PP are consistent with the ACP Regulatory Document Handbook, Statement of Basis/Proposed Plan Format, approved by the USEPA and SCDHEC in June 2012. A detailed discussion of the nature and extent, and figures indicating the lateral and vertical extent for the ECODS N-1, CSSLP, and Ford Building OU, is provided in the RFI/RI/BRA/CMS/FS (SRNS-RP-2021-00548, Revision 1, April 2022). For clarity, the following language will be added to the end of Section III, Background:

"The results of the characterization activities and risk evaluations for the ECODS N-1, CSSLP, and Ford Building OU are documented in the RFI/RI/BRA/Corrective Measures Study (CMS)/Feasibility Study (FS) (SRNS 2022), which provides a detailed discussion on the nature and extent of contamination."

Specific details in reference to the comment above are discussed below.

a) **The location where asbestos was found within the ECODS N-1 subunit was not identified on a figure in the RFI/RI/BRA/CMS/FS (SRNS-RP-2021-00548, Revision 1, April 2022). As identified in the SB/PP, 24 samples were collected during the 2020 characterization effort from six locations. Three samples were collected from within the subunit boundaries and three background locations outside of the subunit boundaries. The asbestos was found to be present in two of the three samples at location ECN1-044. These three samples were all taken around 1 m (3 ft) in depth within the subunit boundary. It is conservatively assumed that the entire subunit potentially contains asbestos and therefore the remedy shall be applied to the subunit as a whole. Language as follows will be added to Section III, Operable Unit Background, ECODS N-1 Subunit, sixth paragraph.**

"…was recovered by hand auger at a depth of ~1 m (3 ft). Two of the three samples collected at sampling location (ECN1-044) were verified positive for asbestos, indicating the potential presence of ACM within the entire subunit boundary (Figure 3)."

b) The results of the soil and sediment samples are discussed in Section IV, Scope and Role of Operable Unit or Response Action and Section V, Summary of Site Risks. Surface water results were not discussed because no RCOCs were identified. Section IV, Scope and Role of Operable Unit or Response Action, CSSLP Subunit, first paragraph, will be updated as follows:

"Arsenic was determined to be a potential threat to HH within surface soil and sediment at the CSSLP subunit. No surface water RCOCs were identified within the CSSLP Surface Water Impoundment Area. No ecological or CM RCOCs were identified at the CSSLP subunit, and no PTSM was found to be present."

The hotspots at the CSSLP subunit were identified based on the sampling locations where arsenic was identified greater than the most likely preliminary remedial goal (8.2 mg/kg) and the boundaries of the subunit. Natural or physical boundaries make the likelihood of contamination outside of the subunit boundary unlikely. However, as discussed in Section VII, Summary of Remedial Alternatives, pre-excavation sampling would be conducted to confirm the lateral extent of the area to be excavated at the time of remedial action implementation.

c) Figures that identify the locations of the concrete and soil samples are provided in the Human Health Risk Screening Evaluation for 690-N Ford Building (SDD-2019-00030, Revision 0, April 2019), referenced within the SB/PP. It should be noted that the SB/PP, Section VI, Remedial Action Objections, states the concrete cover that now exists over the Ford Building remnant slab eliminates any exposure to the contamination that exists on the slab.

Cobalt-60 was identified as a COC at the Ford Building subunit due to SRS selectively speciating the ten highest non-volatile beta results, even though none of the original samples exceeded the 50 pCi/g non-volatile beta screening threshold for soils. During this speciation, cobalt-60 was identified as exceeding the 1E-06 risk level for resident and industrial worker scenarios at only one location (FBFA-21) identified on Figure 7 of the SB/PP. The other locations were below the detection limit. The three closest soil locations to FBFA-21 were not speciated, as they were not among the highest non-volatile beta results. SRS proposed additional sampling for the soils surrounding the Ford Building if radiological surveys detected any additional contamination after the demolition of the building. As indicated in the RFI/RI/BRA/CMS/FS

(SRNS-RP-2021-00548, Revision 1, April 2022), Section 3.2.3, Ford Building, the radiological survey did not detect any additional contamination in the surrounding soil, so the additional sampling was not required. Further, the area along the building slab where FBFA-21 was collected was covered by crush and run during completion of the slab cover. Therefore, the COCs on the concrete slab and in site soil have been delineated sufficiently. No changes to the document are proposed.

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

2. The description of the remedial alternatives in Section VII (Summary of the Remedial Alternatives) does not discuss the common elements of the alternatives for each subunit, so that the distinguishing features can be highlighted in the alternative-specific discussions (e.g., if a disposal facility is needed, the expected outcomes for compatibility with future land use, timeframe for completion, etc.) as noted in Section 3.3.7 (Summary of Remedial Alternatives) of the EPA Decision Guidance. Also, this overview of the remedial alternatives for each subunit should identify the preferred alternative at the beginning of the discussion. Further, the SB/PP does not provide figures for each proposed alternative to show the difference in the extent of the potential actions (e.g., different land use control [LUC] boundaries) under each alternative. Currently, only a figure for the hotspot removal at the CSSLP is provided (see Figure 8, CSSLP Subunit Alternative B-4 [Hotspot Removal] and Disposal). Revise Section VII to include discussions of the common elements of each alternative by subunit and to identify the preferred alternative at the beginning of this discussion. Please also provide figures showing the extent of the proposed remedial alternatives.

Response: Clarification.

The SB/PP does not discuss the common elements of each alternative as they are described in detail in the RFI/RI/BRA/CMS/FS (SRNS-RP-2021-00548, Revision 1, April 2022). A reference to the RFI/RI/BRA/CMS/FS will be provided in the first paragraph of Section VII, Summary of Remedial Alternatives, as follows:

"…Remedial Alternatives were developed for each subunit as described below. A detailed description of each alternative is provided in the RFI/RI/BRA/CMS/FS (SRNS 2022). A detailed cost analysis…"

The preferred alternative is described in Section IX, Preferred Alternative, of the SB/PP and it is therefore not necessary to duplicate this information at the beginning of Section VII, Summary of Remedial Alternatives.

In response to providing figures to show the extent of the proposed remedial alternatives, the extent of the proposed alternatives is defined as the subunit boundaries in Section VII, Summary of Remedial Alternatives, unless otherwise noted (pre-confirmation sampling for excavation scenarios). It is not necessary to include a figure for all of the alternatives evaluated. However, Figures 5 and 7 (attached) will be revised to include a subunit boundary for the Ford Building as it was not included and is the approximate LUC boundary of the preferred alternative for the subunit.

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

3. The SB/PP should explain additional technical terms and acronyms that may be unfamiliar to the public (i.e., in addition to the terms in the glossary). For example, Section V (Summary of Site Risks) should explain the exposure point concentration (EPC) and $1x10^{-6}$ risk level that was used to identify COCs. In addition, the Savannah River Site background concentration included in the remedial action objectives should be explained. Also, it is recommended that each term or acronym that is included in the glossary be highlighted when first used, so readers know that these terms are defined in the glossary. *Revise the SB/PP to include definitions for these technical terms and consider highlighting the first use of all terms defined in the glossary.*

Response: Agree.

Definitions for the terms identified in the comment (i.e., EPC, 1E-06 risk level and SRS background concentration) will be included in Section XII, Glossary, as follows:

"Exposure Point Concentration (EPC): The concentration of a contaminant that an individual would be exposed to in the exposure medium of concern and is used in the formal risk calculation. Specifically, the EPC is the lower of the 95% upper confidence limit on the mean concentration and the maximum detected concentration.

Risk Level: 1E-06 risk level indicates a probability of 1 out of 1,000,000 individuals developing cancer under the exposure scenarios evaluated.

SRS Background Concentration: The Background Soils Statistical Summary Report for the Savannah River Site (WSRC 2006) is a very robust dataset that has been approved by the regulators for risk screening and provides statistical summaries for many naturally-occurring constituents at SRS. The SRS background concentration can be used to establish cleanup levels."

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

SPECIFIC COMMENTS

1. **Section I, Introduction and Background, Page 1 to 2 of 46:** The SB/PP should include a reference to the National Contingency Plan (NCP) §300.430(f)(2) as specified in Section 3.3.1 (Introduction) of the EPA Decision Guidance. *Revise the text to include this reference*.

Response: Agree.

The first sentence in the first paragraph in Section I, Introduction and Background, will be revised as follows:

"This Statement of Basis/Proposed Plan (SB/PP) is being issued by the United States Department of Energy (USDOE), which functions as the lead agency…Department of Health and Environmental Control (SCDHEC) and fulfills the requirements of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Section 300.430(f)(2)."

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

2. **Section II, Community Participation, Page 3 of 46:** The text indicates hard copies of the SB/PP are available at two locations, the Reese Library and the Asa H. Gordon Library; however, the text does not state that the Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study (RFI/RI/BRA/CMS/FS) (SRNS 2022) is also available for public review. Consistent with the EPA Decision Guidance, the lead agency is charged with making the relevant documents, such as the Proposed Plan and the RI/FS Report, available to the public at the time the newspaper notification is made (see Section 2.6.2, Public Comment Period). The EPA Decision Guidance also states the lead agency must ensure that any information that forms the basis for selecting the response action is included as part of the Administrative Record file and is available to the public during the public comment period. As such, it is recommended that the SB/PP text state that the RFI/RI/BRA/CMS/FS and that the *Decommissioning Project Final Report Building 690-N, Process Heat Exchanger Repair Facility* (SRNS 2020) that documents the Deactivation and Decommissioning completion phase of the Ford Building (690-N) is also made available for public review. *Revise the SB/PP to include this information*.

   Response: Clarification.

   As stated in Section II of the SB/PP, Community Participation, the Federal Facility Agreement Administrative Record File (ARF), which contains the information pertaining to the selection of the response action, is available at the DOE Public Reading Room (University of South Carolina-Aiken) and at the Thomas Cooper Library. The ARF contains the documents referenced in the comment. The ARF for this OU is available electronically at http://www.srs.gov/general/programs/soil/arf/arfirf.html. Section II, Community Participation, will be revised as shown below to provide URL for the ARF. The Fact Sheet will also be revised to include the URL.

   "The FFA ARF, which contains the information pertaining to the selection of the response action, is available at the following locations:

**US Department of Energy
Public Reading Room
Gregg-Graniteville Library
University of South Carolina – Aiken
471 University Parkway
Aiken, South Carolina 298031
(803) 641-35043456**

**Thomas Cooper Library
Government Information and Maps Department
University of South Carolina
1322 Greene Street
Columbia, South Carolina 29208
(803) 777-4841**

The FFA ARF is available electronically at the following address: http://www.srs.gov/general/programs/soil/arf/arfirf.html."

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

3. **Section II, Community Participation, Page 3 of 46:** The text states that a public meeting to discuss the SB/PP will be held only if significant interest is expressed, but this meeting must be held if requested by any single member of the public. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 113(k)(2)(B)(iii) and 117(a)(2); and the NCP at 40 CFR §300.430(f)(3)(i)(D) require "[t]he lead agency, after preparation of the proposed plan and review by the support agency, shall...[p]rovide the opportunity for a public meeting to be held during the public comment period at or near the site at issue..." They also require the agency to take a "transcript of the public meeting" and "make such transcript available to the public. *Revise the SB/PP to indicate that the public meeting for the SB/PP will be held if requested and ensure that the date of the public meeting is included if planned.*

Response: Clarification.

The Environmental Bulletin informs the public of the availability of a public hearing

upon request. The term "significant interest" does not imply that a specific number of people must request a meeting. The term is meant to suggest that other factors including quality of comment, type of comment, number of comments, means of request, etc. will be considered before a meeting is held. This hearing (i.e., meeting) can be held if significant interest is expressed by any member of the public during the public comment period. A date for a public meeting will not be included in the SB/PP or the Environmental Bulletin as one is not currently planned. If a public meeting is held, the requirements of CERCLA and the NCP regarding transcripts will be followed. No change to the document is proposed.

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

4. **Section V, Summary of Site Risks, Page 11 of 46:** The depth of surface soil that was found to exceed risk at the CSSLP Subunit is "0 to 0.3 [0 to 1 ft])." *Revise the units of these depths to include "meters" for the 0 to 0.3 depth level to be consistent with other reported depths*.

Response: Agree.

The 0 to 0.3 depth level will be revised in Section V, Summary of Site Risks to include the units of meters.

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

5. **Section V, Summary of Site Risks, Page 11 of 46:** The first bullet point for the Ford Building Subunit states that concentrations of polychlorinated biphenyls (PCBs) and Cesium-137 at the Ford Building exceeded the $1x10^{-6}$ resident and industrial risk levels, but the calculated risk levels are not specified. *Revise the text to include the calculated residential and industrial risk levels for the PCBs and Cesium-137 at the Ford Building.*

Response: Agree with clarification.

The calculated risk levels were not specified in the problem warranting action statement

for the Ford Building remnant slab because an engineered concrete cover breaks the pathways of concern and there is no exposure under the current baseline configuration. This was intentional so that it could be distinguished from other exposure areas that were evaluated in the formal baseline risk assessment.

To clarify, text will be added to Section V, Summary of Site Risks, Problems Warranting Action, Ford Building Subunit, as follows:

> **"Ford Building (690-N) slab: Before an engineered concrete cover system was installed in 2021, PCBs (Aroclor 1254 and 1260) and Cs-137(+D) were present at the Ford Building remnant concrete slab at concentrations that exceed the 1E-06 risk level for the resident and industrial worker scenarios (Aroclor 1254 residential risk = 6.3E-06, industrial worker risk = 1.5E-06; Aroclor 1260 residential risk = 2.3E-06, industrial worker risk < 1E-06; Cs-137(+D) residential risk = 2.8E-05, industrial worker risk = 1.7E-05)."**

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

6. **Section VIII, Evaluation of Alternatives, Compliance with ARARs, Page 18 of 46, and Table 8. Comparative Alternative Analysis for the ECODS N-1, CSSLP, and Ford Building OU, Page 45 of 46:** The discussion of the Compliance with ARARs [Applicable or Relevant and Appropriate Requirements] for the Ford Building states that chemical-specific ARARs apply to all three alternatives and that Alternatives C-2 and C-3 meet this requirement while Alternative C-1 does not. However, Table 8 lists "N/A" for Alternatives C-1 and C-2 in the Compliance with ARARs column. *Revise Section VIII and Table 8 to address this discrepancy in the reported compliance with ARARs for the Ford Building alternatives*.

Response: Agree.

Table 8, which was revised to Table 9 based on these comment responses, will be updated to address the compliance with the chemical-specific ARARs at the Ford Building subunit for Alternatives C-1 and C-2. The "N/A" will be changed to "No" for Alternative C-1 and "Yes" for Alternative C-2. No change to Section VIII, Evaluation of Alternatives, is proposed as it is correct as written.

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

7. **Section IX, Preferred Alternative, Pages 19 to 20 of 46:** The text states on page 20 that the preferred remedy for all subunits will leave hazardous substances in place that require land use restrictions indefinitely, but the description of the preferred alternative for the CSSLP subunit states that further action after completion of the remedial action is not required. *Revise Section IX to clarify if hazardous substances will be left in place at the CSSLP subunit such that land use restrictions will be necessary for the preferred remedy.*

Response: Clarification.

Section IX, Preferred Alternative, states "The preferred remedy for the ECODS N-1, CSSLP, and Ford Building OU leaves hazardous substances in place that pose a potential future risk to HH and will require land use restrictions indefinitely." It does not specifically list the individual subunits rather it states the name of the entire OU. However, for clarity the text in Section IX, Preferred Alternative, eighth paragraph, will be revised as follows:

"The preferred remedy for the ECODS N-1~~, CSSLP,~~ and Ford Building subunits~~OU~~ leaves hazardous substances in place that pose a potential future risk to HH and will require land use restrictions indefinitely."

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

LEGAL COMMENTS

1. **Page 6 states:** "Sediment and surface water data (unfiltered and filtered) were also collected from the CSSLP surface water impoundment area and analyzed for TAL metals, including Cr (VI)." *Please add a figure indicating location of the CSSLP surface water impoundment area, sampling locations, and sampling results. Summarize surface water data and whether above or below actionable levels.*

Response: Clarification.

The CSSLP Surface Water Impoundment Area and sampling locations are provided on Figure 4. Sampling results are summarized in Section IV, Scope and Role of Operable Unit or Response Action, and Section V, Summary of Site Risks. As stated in Section V, only the sediment within the Surface Water Impoundment Area was identified as a problem warranting remedial action. However, the text in Section IV, Scope and Role of Operable Unit or Response Action, CSSLP Subunit, first paragraph, will be updated as follows:

> **"Arsenic was determined to be a potential threat to HH within surface soil and sediment at the CSSLP subunit. No surface water RCOCs were identified within the CSSLP Surface Water Impoundment Area. No ecological or CM RCOCs were identified at the CSSLP subunit, and no PTSM was found to be present."**

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

2. **Page 6 states:** "The process sewer pipeline and underground retention tank were removed in 1998." Were these areas sampled? *Please clarify and indicate sampling results and whether above or below actionable levels.*

Response: Agree with clarification.

The Ford Building Seepage Basin (904-91G) and associated underground tank and pipeline were characterized and then remediated in 1998 as documented in the *Record of Decision Remedial Alternative Selection for the Ford Building Seepage Basin (904-91G) Operable Unit* (WSRC-RP-2000-4156, Revision 1, August 2001). To address this comment, the text in Section III, Operable Unit Background, Ford Building Subunit, second paragraph, will be updated as follows:

> **"Depending on the results, the wastewater was either released to the Ford Building Seepage Basin (904-91G) through an underground process sewer pipeline or transferred to other SRS operations for proper disposal ~~(SRNS 2019a)~~. ~~The process~~**

~~sewer pipeline and underground retention tank were removed in 1998.~~ The Ford Building Seepage Basin (904-91G) and associated underground tank and pipeline were characterized and then remediated in 1998 as described in the *Record of Decision Remedial Alternative Selection for the Ford Building Seepage Basin (904-91G) Operable Unit* (WSRC 2000).”

The following reference will also be added to the Section XI, References:

“WSRC, 2000. *Record of Decision Remedial Alternative Selection for the Ford Building Seepage Basin (904-91G) Operable Unit*, WSRC-RP-2000-4156, Revision 1, August 2001, Westinghouse Savannah River Company, Savannah River Site, Aiken, SC”

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

3. **Page 13, first paragraph, last sentence.** Delete sentence stating: “No ARARs were identified at the ECODS N-1 subunit.” *Add the attached ARARs table for ECODS N-1 Asbestos requirements pertaining to selected LUCs. Renumber ARARs tables accordingly and add the ECODS N-1 ARARs table to the list of tables in the SB/PP table of contents.*

Response: Agree.

The ECODS N-1 ARAR table will inserted in the document per the attachment and subsequent tables will be renumbered accordingly.

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

4. **Page 15.** *Modify the following sentence as indicated by underlined text*: “Alternative B-4 would not require LUCs or five-year remedy reviews because removing the contaminated media would result in concentrations not exceeding ~~the cleanup level~~ levels acceptable for unrestricted use/unlimited exposure.”

Response: Agree.

The text will be revised in Section VII, Summary of Remedial Alternatives, CSSLP Subunit, Alternative B-4: Excavation (Hot Spot Removal) and Disposal, as follows:

> **"…presented in the Corrective Measures Implementation/ Remedial Action Implementation Plan (CMI/RAIP). Alternative B-4 would not require LUCs or five-year remedy reviews because removing the contaminated media would result in concentrations not exceeding levels acceptable for unrestricted use/unlimited exposure~~the cleanup level~~."**

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

5. **Page 16**. ECODS N-1 subunit. Compliance with ARARs. *Delete sentence* stating: "No ARARs exist for Alternative A-1 or A-2." Replace with: "There are no ARARs for Alternative A-1. Alternative A-2 will comply with the Asbestos ARARs in Table [ ] that are relevant and appropriate to the selected LUCs, which include warning signs, fencing and deed notices for asbestos disposal sites."

Response: Agree.

The ARAR table will be revised per the attachment. Section VIII, Evaluation of Alternatives, Comparative Analysis of Alternatives, ECODS N-1 Subunit, Compliance with ARARs, will be revised as follows:

> **"~~No ARARs exist for Alternative A-1 or A-2.~~There are no ARARs for Alternative A-1. Alternative A-2 will comply with the Asbestos ARARs in Table 2 that are relevant and appropriate to the selected LUCs, which include warning signs, public access controls and deed notices for asbestos disposal sites."**

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

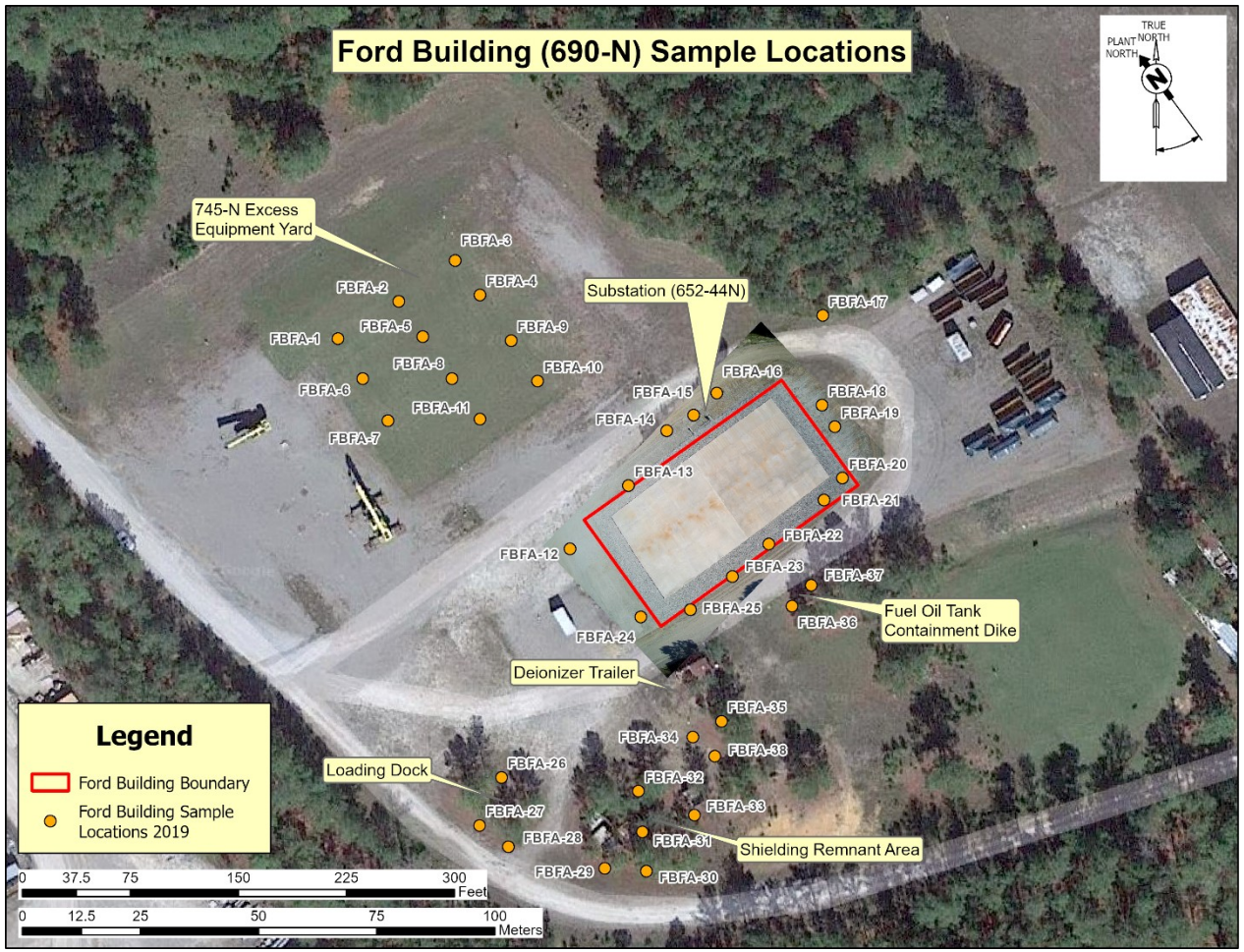

Figure 5. Ford Building Subunit 2019 Sample Locations

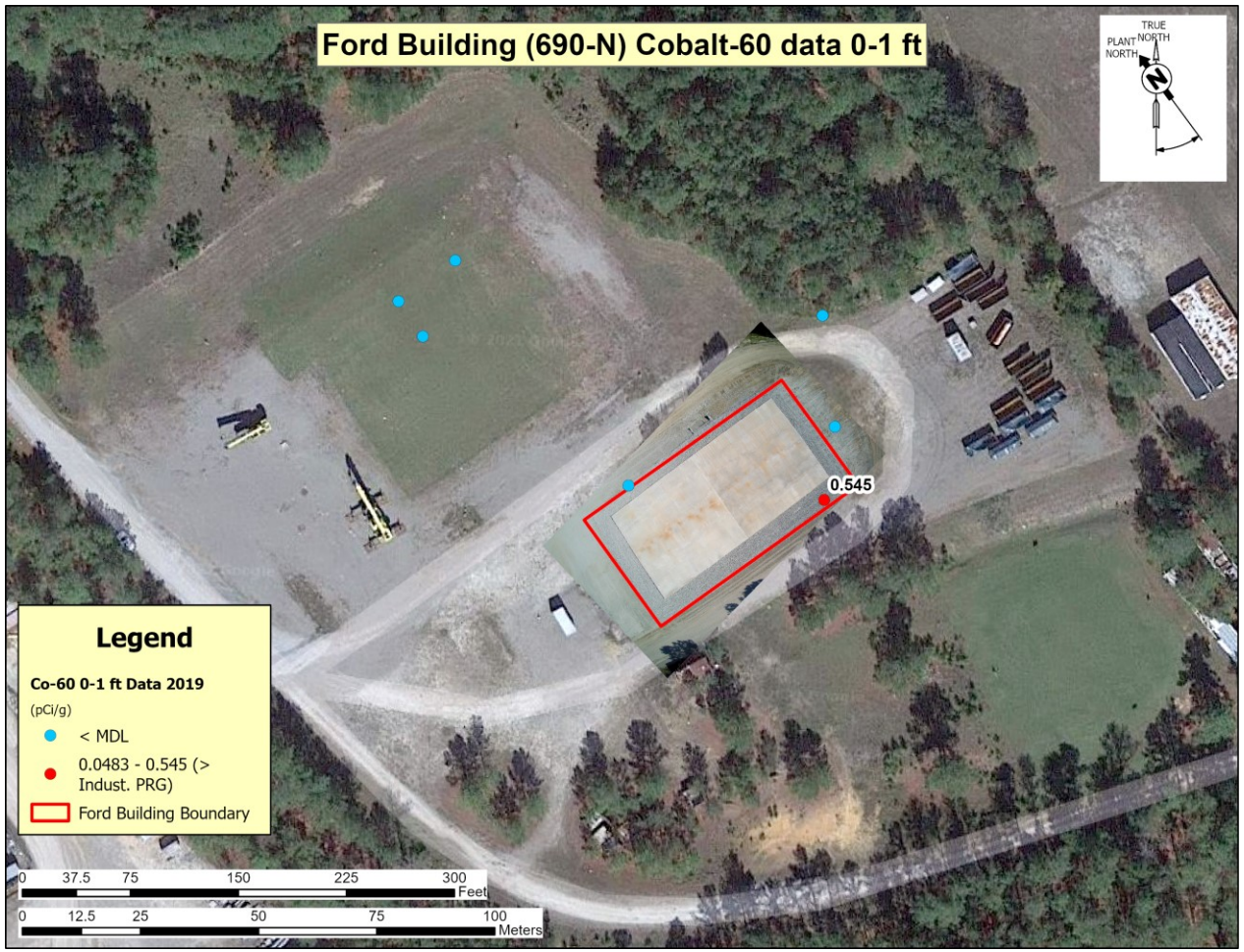

Figure 7. Ford Building Subunit Cobalt-60 Data (0-1 ft)

Table [2]. Potential ARARs for the Preferred Remedial Alternative for the ECODs N-1 Subunit

Action	Requirements	Prerequisite	Citation(s)	RESPONSE
	Institutional Controls / LUCs			
Warning signs for disposal site	Display warning signs at all entrances and at intervals of 100m (328 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited.	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public **– relevant and appropriate**	40 CFR § 61.151(b)(1)	**Agree: Implementation of signage will be documented in the LUCIP**
	The warning signs must: (i) Be posted in such a manner and location that a person can easily read the legend; and (ii) Conform to the requirements for (20”x14”) upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and (iii) Display the legend as prescribed in § 61.151(b)(1)(iii) located in the lower panel with letter sizes and styles of visibility at least equal to those specified in § 61.151(b)(1)(iii).	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public **– relevant and appropriate**	40 CFR § 61.151(b)(1)(i)-(iii)	**Agree: Sign requirements will be detailed and defined as part of the OU LUCIP**
Fence for disposal site	Fence the perimeter of the site in a manner adequate to deter access by the general public.		40 CFR § 61.151(b)(2)	**Agree w/clarification: Access control at SRS boundary meets this requirement to deter general public**

Table [2]. Potential ARARs for the Preferred Remedial Alternative for the ECODs N-1 Subunit *(continued/end)*

Action	Requirements	Prerequisite	Citation(s)	RESPONSE
Institutional Controls / LUCs				
Deed notice for asbestos waste disposal site	Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that: • The land has been used for disposal of asbestos-containing waste material; and • The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site required in § 61.154(f) have been filed with the Administrator; and • The site is subject to 40 CFR part 61, Subpart M. NOTE: Recordation of deed notice that informs potential purchaser on the waste disposal site is considered a substantive requirement for post-closure.	Closure of an inactive disposal area that received asbestos containing waste materials **– relevant and appropriate**	40 CFR § 61.151(e)(1)-(3)	**Agree w/clarification:** **SRS complies with the Land Use Control Assurance Plan (LUCAP) (WSRC 1999) to ensure that land use restrictions are maintained including deed restrictions.**

ARAR = applicable or relevant and appropriate requirement
CFR = *Code of Federal Regulations*