



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

March 03, 2023

ENVIRONMENTAL COMPLIANCE &

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

MAR - 6 2023

AREA COMPLETION PROJECTS

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Energy, Savannah River (DOE-SRS) Site Decommissioning Project Final Report (DPFR) for D Area Coal Handling Houses and Associated Facilities, dated November 30, 2022.

EPA cannot approve the above mentioned document until the comments below are addressed. Should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely,

DIEDRE LLOYD

Digitally signed by DIEDRE
LLOYD
Date: 2023.03.03 17:46:38
-05'00'

Diedre Lloyd
Remedial Project Manager
Restoration & Sustainability Branch
Superfund Emergency & Management Division
61 Forsyth Street, Region 4
Atlanta, Ga 30303

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
DECOMMISSIONING PROJECT FINAL REPORT
D-AREA COAL HANDLING HOUSES AND ASSOCIATED FACILITIES**

REVISION 0

NOVEMBER 30, 2022

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

EPA GENERAL COMMENTS:

1. According to the Facility Decommissioning Evaluation (FDE) (Reference 8.01) of the DPFR, Conveyor #3 is to be decommissioned and removed only up to the first concrete support column, and the remainder of Conveyor #3 decommissioning will be included with the 484-D Powerhouse at the time of D-Area Operable Unit (OU) final remediation or sooner. However, the DPFR does not include this information to clarify when/how the remainder of Conveyor #3 will be decommissioned. In addition, Appendix A (Before and After Photos of the Facility/Structure) Figure A-21 (484-21D [Looking Southwest] Before Decommissioning), does not identify the section of Conveyor #3 that was removed. Please revise the DPFR to clarify when and how Conveyor #3 will be decommissioned and identify the section of Conveyor #3 that was removed in Figure A-21.

EPA SPECIFIC COMMENTS:

1. **Section 1.0, Summary, Page 7 of 30; Section 4.0, Decommissioning Activities Completed, Page 11 of 30; and Section 6.01, Final Facility Condition and Remaining Hazards, Page 13 of 30:** The text indicates that the leading door from Conveyor #3 to the 484-D Powerhouse was barricaded on the exterior and interior to prevent unsafe access; however, it is unclear how the door was barricaded as this information is not included in the text or depicted on a figure. Please revise the DPFR to describe how the leading door from Conveyor #3 was barricaded to provide protectiveness and prevent unsafe access.
2. **Section 1.0, Summary, Page 6 of 30; Section 4.0, Decommissioning Activities Completed, Page 10 of 30; and Section 6.01, Final Facility Condition and Remaining Hazards, Page 13 of 30:** The text states that the tunnels for both Conveyor #1 and Conveyor #4 were refilled with riprap, excavated dirt and additional fill material, and graded; however, there are no photos documenting the decommissioning refilling and grading activities. Please revise the DPFR to consider adding photos documenting the refilling of tunnels with riprap, excavated dirt and additional fill, and the grading processes at Conveyors #1 and #4.
3. **Section 6.02, Risk Assessment Summary, Pages 13 of 11:** The DPFR states, "A review of the existing characterization data, process/building history, and sample data, along with walkdowns of the facilities conducted prior to decommissioning..." however, Section 3.0 (Decommissioning Model Approval) notes that a walk down was not prescheduled with the South Carolina Department of Health and Environmental Control (SCDHEC) or the United States Environmental Protection Agency (EPA), and that a regulator walkdown of the facility did not occur due to COVID-19 travel restrictions. As such, it appears that USDOE was the only Core Team member that participated in the walkdown of the facilities. Please revise the text to clarify that USDOE was the only Core Team member that participated in the walkdown assessments prior to decommissioning of the Coal Handling Houses and Associated Facilities.