



Department of Energy
Savannah River Operations Office
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Aiken, South Carolina 29802

MAR 21 2023

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 Remediation Project Manager
Superfund and Emergency Management Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Decommissioning Project Final Report for Building 683-D, D-Area Chlorine Unloading and Storage (V-PCOR-D-00045, Revision 1, March 14, 2023) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document

The U. S. Department of Energy (DOE) is submitting the subject information for your review and approval. The Savannah River Site (SRS) submitted the Decommissioning Project Final Report (DPFR) for Building 683-D, D-Area Chlorine Unloading and Storage (V-PCOR-D-00045, Revision 0, August 11, 2022) on August 24, 2022. The SRS received the South Carolina Department of Health and Environmental Control's (SCDHEC) and the U.S. Environmental Protection Agency's (EPA) comments on the Revision 0 DPFR on October 20, 2022 and October 24, 2022, respectively. The draft SRS' responses to the regulatory comments on the Revision 0 DPFR were emailed on November 29, 2022. SCDHEC requested a comment resolution conference call, which was held on January 30, 2023, to discuss the draft responses. Based on the results of the conference call, the draft responses were revised and re-submitted to SCDHEC and EPA for review. Based on that review, SCDHEC requested that a Revision 1 DPFR be submitted to address the response directly in the document in accordance with Section 7.0 of the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 1, August 2022).

Please review the enclosures and provide your response with the goal of responding within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject facility are greatly appreciated.

Ms. Susan Fulmer
Mr. Jon Richards

2

MAR 21 2023

Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Operable Unit Manager, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2023.03.21 10:56:59 -04'00'

Brian T. Hennessey
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-23-001

Enclosures:

1. Decommissioning Project Final Report Building 683-D, D-Area Chlorine Unloading and Storage (V-PCOR-D-00045, Revision 1, March 14, 2023)
2. Final SRS Response to South Carolina Department of Health and Environmental Control (SCDHEC) Comment on the Decommissioning Project Final Report (DPFR): Building 683-D, D-Area Chlorine Unloading and Storage (V-PCOR-D-00045, Revision 0, August 11, 2022)
3. Final SRS Response to Environmental Protection Agency (EPA) Comment on the Decommissioning Project Final Report (DPFR): Building 683-D, D-Area Chlorine Unloading and Storage (V-PCOR-D-00045, Revision 0, August 11, 2022)

cc w/o encl:

J. Blalock, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. R. Stewart, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office

cc w/encl:

D. Lloyd, EPA-Atlanta
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
M. McRae, Tech Law, Inc.

Comments Received on 10/20/2022

Page 1 of 1

SCDHEC COMMENT

- 1) Section 1.0, Summary states, “No hazardous, chemical or radioactive materials were associated with this structure.” This statement, and a similar statement in Section 6.02, Risk Assessment Summary (2nd paragraph, line 2), are contradicted by the Facility Description, Section 2.01 which states that the Chlorine Unloading and Storage Building housed a sodium hypochlorite injection system. Please address the apparent discrepancy.

Response: Agree.

The statements “no hazardous, chemical, or radioactive materials were associated with this structure” in Section 1.0 and “no chemical, hazardous, or radioactive materials were associated with these structures” in Section 6.02 were both made in error. The statements are inaccurate because the sodium hypochlorite used was a low-hazard (chemical) material as stated in the Facility Decommissioning Evaluation (FDE) for 683-D (Reference 8.01: G-FDE-D-00040). SRS will ensure that future DPFRs contain accurate and consistent statements throughout the document.

Sections 1.0 and 6.02 of the Revision 1 DPFR will be revised to state “No release of hazardous, chemical, or radioactive materials was associated with this structure.”

Responsible Party: Ira (Alex) Davis (803-522-0481), Ira.Davis@srs.gov

**FINAL SRS RESPONSES TO ENVIRONMENTAL PROTECTION AGENCY (EPA)
COMMENT ON THE DEPARTMENT OF ENERGY, SAVANNAH RIVER (DOE-SRS)
SITE FACILITY DECOMMISSIONING PROJECT FINAL REPORT (DPFR) FOR
DPFR 683-D, D-AREA CHLORINE UNLOADING AND STORAGE, DATED 08-11-22**

Comments Received: 10/24/2022

Page 1 of 1

EPA COMMENT

- 1.) Section 2.01, Facility Description, Page 7 of 15: The DPFR states that the original building comprised a gaseous chlorination room, storage pad, and was also used for “storage of chemicals and construction materials and for minor maintenance activities;” however, the text in Section 1.0 (Summary) states no hazardous, chemical, or radioactive materials were associated with this structure and it is unclear what types of chemicals and construction materials were stored. Please revise the text to clarify the types of chemicals and construction materials that were stored in Building 683-D to ensure that no chemical, hazardous, or radioactive materials were associated with this structure.

Response: Agree.

The statements “no hazardous, chemical, or radioactive materials were associated with this structure” in Section 1.0 and “no chemical, hazardous, or radioactive materials were associated with these structures” in Section 6.02 were both made in error. The statements are inaccurate because the sodium hypochlorite used was a low-hazard (chemical) material as stated in the Facility Decommissioning Evaluation (FDE) for 683-D (Reference 8.01: G-FDE-D-00040). SRS will ensure that future DPFRs contain accurate and consistent statements throughout the document.

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