



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

OCT -7 2020

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: Facility Decommissioning Evaluations (FDEs): Building 710-16D, Storage Building (G-FDE-D-00046, Revision 1, September 29, 2020), Building 484-5D, D-Area Powerhouse Storage Building (G-FDE-D-00047, Revision 1, September 29, 2020), Building 483-3D, Electrical Control Building (G-FDE-D-00049, Revision 1, September 29, 2020), Building 484-9D, D-Area Valve House (G-FDE-D-00055, Revision 1, September 29, 2020), and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 FDEs for Buildings 480-3D, 704-7D, 710-16D, 484-5D, 483-3D, 485-D and 482-2D, 484-9D, and 717-3D, Simple Model

The U. S. Department of Energy (DOE) is submitting the subject information for your review. The DOE submitted the Revision 0 FDEs for Buildings 480-3D, 704-7D, 710-16D, 484-5D, 483-3D, 485-D and 482-2D, 484-9D, and 717-3D for regulatory review on May 28, 2020. All FDEs were Simple Model. On June 29, 2020, the Savannah River Site (SRS) received the South Carolina Department of Health and Environmental Control's (SCDHEC) approval of the FDEs for Buildings 480-3D, 704-7D, 485-D and 482-2D, 484-5D, 484-9D, and 717-3D. On June 29, 2020, SRS received SCDHEC's comments on the FDEs for Buildings 483-3D and 710-16D. On July 13, 2020, SRS received the EPA's comments on the FDEs for Buildings 480-3D, 704-7D, 483-3D, 485-D and 482-2D, 710-16D, 484-5D, 484-9D, and 717-3D. In their letter, EPA concurred on the use of the Simple Model for all FDEs, pending DOE's responses to the EPA's comments. Based on the responses to the comments, Revision 1 FDEs are included for Buildings 710-16D, 484-5D, 483-3D, and 484-9D.

Please review the enclosures and provide your response 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

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

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2020.10.06 11:04:37 -04'00'

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

IACD-21-101

Enclosures:

1. Facility Decommissioning Evaluation for Building 710-16D, Storage Building (G-FDE-D-00046, Revision 1, September 29, 2020) Simple Model
2. Facility Decommissioning Evaluation for Building 484-5D, D-Area Powerhouse Storage Building (G-FDE-D-00047, Revision 1, September 29, 2020), Simple Model
3. Facility Decommissioning Evaluation for Building 483-3D, Electrical Control Building (G-FDE-D-00049, Revision 1, September 29, 2020), Simple Model
4. Facility Decommissioning Evaluation for Building 484-9D, D-Area Valve House (G-FDE-D-00055, Revision 1, September 29, 2020), Simple Model
5. Final SRS Responses to SCDHEC Comments on the Facility Decommissioning Evaluation (FDE): Storage Building, 710-16D, G-FDE-D-00046, Revision 0, April 27, 2020, Cover letter dated May 28, 2020
6. SRS Responses to SCDHEC Comments on the Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building, G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020
7. Final SRS Responses to the EPA Comments on the Revision 0 Facility Decommissioning Evaluations for Buildings 480-3D, 704-7D, 710-16D, 484-5D, 483-3D, 485-D and 482-2D, 484-9D, and 717-3D

Ms. Susan Fulmer
Mr. Jon Richards

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cc w/o encl:

J. Blalock, SCDHEC - Columbia

G. K. Taylor, SCDHEC - Columbia

S. French, SCDHEC - Columbia

M. Reece, SCDHEC - Columbia

T. R. Fuss, SCDHEC – Aiken Environmental Affairs Office

G. N. O'Quinn, SCDHEC – Aiken Environmental Affairs Office

B. Cameron, SCDHEC – Aiken Environmental Affairs Office

R. H. Pope, EPA - Atlanta

cc w/encl:

D. Lloyd, EPA-Atlanta

K. L. Beatty, SCDHEC – Aiken Environmental Affairs Office

**Final SRS Responses to EPA Comments on the
FACILITY DECOMMISSIONING EVALUATIONS FOR:
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Dated May 11, 2020
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Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020**

D-Area Operable Unit

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EPA General Comments:

- 1) Please notify the D Area core team member (Diedre Lloyd) via email or phone if, during decommissioning of a Simple Model facility, some condition is identified that may contradict the Simple Model assumptions.

Response: Agree.

SRNS will notify EPA core team member as requested. No changes to the documents are proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 2) Please provide one figure that depicts the relationship between the 8 buildings and their ancillary structures. This figure should also include all previously approved FDEs buildings and ancillary structures.

Response: Agree.

See the attached aerial view of D-Area (Attachment 1) which shows the 9 total buildings within the scope of these eight subject FDEs (one FDE included 2 buildings) and their relationship to the 484-D Powerhouse, the D-Area Boiler and Process Water Treatment Facility, and the 115 KV power company substation. Attachment 1 shows each building's number and name. Ancillary structures are too small to show on the aerial photo. See each individual FDE for photo(s) of ancillary structures.

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Attachment 2 shows both the 9 current buildings and those buildings covered by previously approved FDEs.

Due to limited amount of space for labelling, Attachment 2 shows only each building's number. Showing each building name would obscure some of the respective facilities in the photo. No changes to the documents are proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 3) Please inform EPA/SCDHEC upon property disposition to the SRS Community Reuse Organization (SRS CRO) from all DAOU FDEs via letter.
 - a. Please included a brief, estimated timeline and items (property disposition) in the letter.

Response: Clarification.

Regarding the eight FDEs (9 buildings) addressed by EPA's letter, none of the subject facilities is being dispositioned to the SRS CRO. No changes to the documents are proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 4) Please provide further detail that explains how the electrical services have been isolated/properly abandoned prior to facility decommissioning activities for all FDEs. Each of the FDEs mentions that electrical items will be isolated and not air gapped.

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Response: Clarification.

Each building was electrically isolated during completion of the deactivation project scope. Power was globally disconnected in D-Area as follows: 1) Main electrical feeders were air-gapped; 2) Power lines were disconnected and air-gapped; 3) Main power to the Powerhouse and all ancillary buildings was globally disconnected (the exceptions being only feeds to the 681-3G Pump House, Primary Domestic Water Well 905-3D, Back-up Domestic Water Well 905-136D, Domestic Water Production Facilities 483-7D, Elevated Domestic Water Storage Tank 905-5D, and D-Area Replacement Telecommunications Building 702-D); 4) All power busses were removed; 5) All transformers were de-energized; 6) Most D-Area transformers were removed; and 7) Breakers were racked out and removed.

Prior to demolition, each facility must have been rendered and verified to be “Cold & Dark” as is a typical practice based on our D&D procedures and protocols. No changes to the documents are proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

EPA SPECIFIC COMMENTS:

- 5) Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020
 - a. Summary of Existing Characterization Section: Please include the November 11, 2019 asbestos survey in this FDE which identified ~2,560 square feet of asbestos containing

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materials (ACM) along with 31 square feet of presumed asbestos containing materials (PACM).

Response: Agree.

A pdf file of Asbestos Inspection Report of Building 480-3D, Q-APG-D-00010, is being provided with these comment responses. No change to the document is proposed.

- b. Process History Section: This FDE identifies 2 drains/hubs/clean-outs that were not plugged and grouted in the process history in the former Lime Storage Room (1 hub and 1 floor drain) and in the former chlorine Cylinder Tank Room (one clean-out and 1 floor drain). The FDE indicates that these remain in good working order.
 - i. The current status of the 2 above identified drains/hubs/clean outs remains unclear. Specifically, do the drains/hubs/clean-outs remain unplugged/ungROUTED?
 - ii. If the 2 above drains/hubs/clean-outs remain in operating status – please provide additional detail/clarity how operating status will be maintained during demolition and future operations.

Response: Clarification.

i. The current status of the subject 2 floor drains/1 hub/and 1 cleanout is as stated in the 4th paragraph of the FDE’s Process History section and shown in Figure 2. They are in good condition and currently still connected to the Storm Sewer drain

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system. Also as stated in the same paragraph, “Remaining hub, cleanout, and floor drains will also be plugged and grouted.” No change to the document is proposed.

ii. Plugging and grouting will occur prior to demolition, therefore no maintenance will be required during demolition. Neither will there be any future operations. No change to the document is proposed.

- c. Please include interior pictures of the building slab/interior along with additional views of the building exterior.**

Response: Agree.

Figures 2A through 2E provide interior and exterior views of Building 480-3D. No change to the document is proposed.

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Figure 2A – Exterior Looking West



Figure 2B – Exterior Looking North



Figure 2C – Exterior Looking Southeast



Figure 2D – Interior West Side

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Figure 2E – Interior East Side

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 6) Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020
a. Please indicate if sanitary sewer drains/hubs/clean-outs have been plugged/abandoned?

Response: Clarification.

The sanitary sewer system that is tied to the facility is no longer in operation. There is no treatment facility in operation supporting D-Area. Sanitary sewer drains/cleanouts/hubs in 704-7D have not yet been plugged and grouted. As is a typical practice based on our D&D procedures and protocols, all sanitary sewer drain lines from within the structure will be cut off flush with grade, plugged, and

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grouted as part of the decommissioning scope. No change to the document is proposed.

- b. Has electrical service in all buildings and feeder boxes been abandoned in addition to being disconnected?

Response: Clarification.

Yes. See response to EPA General Comment 4. No change to the document is proposed.

- c. Summary of Existing Characterization Section: Please include the November 18, 2019 asbestos survey in this FDE which identified small amount of asbestos containing materials (ACM).

Response: Agree.

A pdf file of Asbestos Inspection Report of Building 704-7D, Q-APG-D-00016, is being provided with these comment responses. No change to the document is proposed.

- d. Please include interior pictures of the building slab/interior along with additional views of the building exterior, inclusive of fencing.

Response: Agree.

Figures 3A and 3B provide additional exterior views of Building 704-7D. No interior photos are provided due to the rotten condition of the wood floor making it unsafe for anyone to enter the building to take the photos. Figure 3A shows the addition added to the rear of the building. Figure 3B shows the western portion of

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**the main (original) building and the chain link fence with privacy slats to its west.
No change to the document is proposed.**



Figure 3A – Exterior Looking Northwest



Figure 3B – Exterior Looking Southwest

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 7) Building 483-3D, Electrical Control Building Rev. 0, Dated April 28, 2020
 - a. Please provide additional information/clarity as to what below grade structure will remain intact and what equipment will be removed with respect to the N. Cable Trench area.

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Response: Clarification.

As stated in the Scope section of the FDE, “Below grade equipment and components will be removed during decommissioning.” Equipment and components entail cable trays and cables as discussed in the 5th paragraph of the Facility Description section of the FDE. Also as stated in the Scope section of the FDE, the proposed end state of the concrete N. Cable Trench is In Situ Disposal.

- b. Please indicate if the 2 floor drains and 1 cleanout have been capped/plugged prior to decommissioning activities. If so, please state the activities. If not, please indicate this and provide rationale to support this decision.

Response: Clarification.

Although not yet plugged and grouted, the two floor drains and the one cleanout will be plugged and grouted prior to commencement of any building demolition activity as is a typical practice based on our procedures and protocols. No change to the document is proposed.

- c. Please provide rationale for filling the remaining below grade structure with rock, gravel and soil instead of concrete.

Response: Clarification.

The North Cable Trench will be filled with controlled low strength material (CLSM) or a flowable, self-leveling grout mix. The next to last paragraph of the FDE’s Scope section will be revised as follows:

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“The proposed decommissioning end state for the North Cable Trench is In Situ Disposal. The structure is essentially concrete and predominantly below grade. Demolition is therefore impractical, and consequently, a portion of the structure will remain intact after decommissioning. Below grade equipment and components will be removed during decommissioning. Remaining below grade structure will be filled to grade with CLSM or a flowable, self-leveling grout mix~~rock, gravel, soils, and/or controlled low strength material (CLSM).~~”

- d. Facility Description Section: Building construction of the siding and roof contains corrugation asbestos. Please include the November 25, 2019 asbestos survey for this structure.

Response: Agree.

A pdf file of Asbestos Inspection Report of Building 483-3D, Q-APG-D-00020, is being provided with these comment responses. No change to the document is proposed.

- e. Figure 1 and Figure 2/associated Facility Description:

- i. The text in Facility Description indicates that the red dot/dash line in Figure 1 is the boundary for the FDE activity for Building 483-3D however, the Transformer AT2W that has been drained and disconnected is NOT included in this FDE but is inside the red dot/dash line boundary. Please provide clarity in the report text and a map legend that indicates the significance of all colors and symbols in each figure 1 and figure 2.

Response: Clarification.

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The various colors held no particular significance. Figures 2 and 3 have been converted to black and white, with only yellow used to highlight the 483-3D slab and equipment pads/containment foundations.

The 1st paragraph of the FDE Facility Description section will be revised as follows:

“Building 483-3D (Figure 1), Electrical Control Building, is at the southeast corner of the boiler and process water treatment facilities’ Softener Building, 483-D, of D-Area in the Savannah River Site (SRS) (Figure 2). Note that Figure 2 shows the boundaries of the scope of this decommissioning in red dot-dash-dot dash outline. ~~The blue dot-dash-dot line is a portion of the boundary for the boiler and process water treatment facilities (Buildings 483-D Softener Building, 483-1D Water Filtration and Treatment Plant, 483-2D Softener and Silica Absorber Building, and 487-D Process Water Storage Tank), another decommissioning project not within the scope of this evaluation.~~ Construction of the building was completed and operations began circa 1952. The building is steel frame construction sitting on a concrete slab. The siding and roof are corrugated asbestos. The dimensions of the structure are 32.5’ by 62.5’ by 14’ high (Figure 3). There is a 8.5’ wide roll-up door on the south wall of the structure and a standard swinging door on the north wall of the structure. The building had electrical power supplied at 13.8 kilovolts (kV), which has been cut off and isolated. A Public Address system was present inside the structure. Heat to the structure used to be provided by overhead electric heaters inside the structure.”

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Only the containment foundation for Transformer AT2W, not Transformer AT2W itself, is shown inside the red dash line boundary of Figure 2. Transformer AT2W is shown on its foundation in Figures 3 and 5.

The 4th paragraph of the FDE's Facility Description section will also be revised as follows:

“On the east side of the structure is one transformer, AT2W (southeast) (Figure 5), still remaining to be removed as a maintenance action outside the decommissioning scope of this FDE. On the west side of AT1W transformer pad and containment dike is a 12” thick, 16’ wide, 6’ high concrete wall. The former location of transformer AT1W (Figure 6) has a 16’ by 20’ gravel-filled containment with an 18” x 18” x 12” deep sump in the northwest corner, while transformer AT2W is mounted on a concrete pad in an 8’ by 10’ gravel-filled containment. Each transformer was designed to step down 13.8 kV to 2.4 kV.”

- f. Please include the below requested information for each of the transformer locations (AT2W, AT1W, and W4):
- i. Please address the presence/absence of physical evidence/releases for each transformer location inclusive of photographic and descriptive evidence of the concrete pad/containment dike and sump, etc.
 - ii. Have any of the transformers contained PCBs?

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**Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev 0,
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Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020

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- iii. Has the ground surface below the gravel associated with AT1W been inspected?
If so, please include this photo. If not, please explain, why not?

Response: Clarification.

- i. **Visual inspections of all transformer pads, AT2W and W4 surrounding soil, AT1W containment dike area, and the Transformer AT1W containment dike area sump all show no evidence of any spills or leaks having occurred. Reference Figures 4A through 4F. Also as stated in the FDE's Summary of Existing Characterization, a review of the SRS ORPS/SIRIM database and FFA show no record of any spill having occurred at or in this facility. No change to the document is proposed.**

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Figure 4A: Transformer AT1W Foundation and Gravel Containment Dike Area Looking Southwest

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Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020
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Figure 4B: Transformer AT1W Foundation and Gravel Containment Dike Area Looking Northwest

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Figure 4C: Transformer AT1W Gravel Containment Dike Area Sump (With Expanded Metal Gravel Barrier Cage Removed) Looking Down Facing South

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Figure 4D: Transformer AT2W and Pad (Looking West)

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Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020

Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020

Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020

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Figure 4E: Pad and Gravel Containment Area Beneath Transformer AT2W

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Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020
Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020**

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Figure 4F: Dry-type Transformer W4A - Concrete Pad Looking North

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- ii. **None of the three transformers (AT1W, AT2W, or W4A) contained PCBs. While Transformers AT1W and AT2W contained oil, the oil did not contain PCBs. Reference Figure 5 for supporting paperwork. No change to the document is proposed. See also Figures 5A-5C for photos of the transformers.**



To: Timothy Bowman/SRNS/Srs@Srs, Julia West/SRNS/Srs@Srs,
Cc: Doris Kaney/SRNS/Srs@Srs, Maletia Brown/SRNS/Srs@Srs, Robert
Backer/SRNS/Srs@Srs, Andrew Albanesi/SRNS/Srs@Srs, Bonnie Yon/SRNS/Srs@Srs,
Bcc:
Subject: Fw: DAA201501690 - D-Area - AFS-SRSCRO - TANKS, CYLINDERS, AND OIL FILLED
TRANSFORMERS
From: Carlos Lucha/SRNS/Srs - Tuesday 12/01/2015 02:49 PM

The 3 transformers included in DAA201501690 have no PCB's. From 11/17/2015 West email; left to right on the pictures below please note the following:

The first 2 photos of Transformers are 483-AT2W ,1W which were sampled and the analysis results are with sample Job 13003. The results show no PCB's and total metals were below limits for RCRA metals. No PCB type components in these transformers, such as oil filled bushings.

The last photo on the right is a dry transformer so no oil to sample, and has no PCB type component This is transformer **EN-D484-2000-60**. I have included these photos immediately below for reference. Please note the DAA may need editing to distinguish the transformers.

Figure 5

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Figure 5A: Former Transformer AT1W

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Figure 5B: Transformer AT2W and Pad

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Figure 5C: Former Transformer W4A

- iii. Gravel has not been removed from within the AT1W containment dike area to inspect the ground surface beneath the gravel. As stated in above response to comment 7.f.i., visual inspections of the AT1W transformer pad, AT1W containment dike area, and the AT1W containment dike area sump show no evidence of any spills or leaks having occurred. Reference Figures 4A through 4F. If any spills had occurred, the concrete pad and gravel would show evidence of staining. Further, any spill(s) would have drained to the sump. As can be seen in Figure 4C, there is no evidence of staining in the sump. Also as stated in the FDE's Summary of Existing Characterization, a review of the SRS ORPS/SIRIM database and FFA show no record of any spill having occurred at or in this facility. No change to the document is proposed.

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- g. Please provide clarity as to the boundaries of the proposed activities and the items included/associated with this FDE, it isn't clear what activities/structures are and are not included, perhaps a table could be provided that would provide additional clarity and information.

Response: Clarification.

Figure 2 of the FDE delineates the boundary of this FDE's scope, as discussed in above response to EPA comment 7.e.i. The Scope section of the FDE defines the items included in the 483-3D decommissioning scope as follows, "The scope of this evaluation includes the following buildings and ancillary structures, which are further described in the next section:

Building 483-3D and the following ancillary structures:

Exterior North Cable Trench

Pipe and Conduit Bridge

The proposed decommissioning end-state for this facility is demolition to the building slab, with the exception of the North Cable Trench ancillary structure. The proposed decommissioning end state for the North Cable Trench is In Situ Disposal." No change to the document is proposed.

- h. Please include the November 25, 2019 asbestos survey in this FDE which identified several areas that tested positive for asbestos containing materials (ACM) and provide locations/descriptions of the areas that tested positive.

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Response: Clarification.

Duplicate comment. See above response to comment 7.d.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 8) Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev. 0,
Dated May 11, 2020
- a. Were the underground lines/pipes that led from Building 480-3D to the cooling tower basin abandoned/capped? If so, please state their disposition in this FDE. If not, please explain the end state of the underground piping.

Response: Clarification.

As stated in the Process History section of the FDE for 480-3D, G-FDE-00044 Rev. 0, “In the period of 1976–1977, plans were made and executed to convert the building to office space. All equipment was removed, and domestic water service was installed for the conversion. Alterations were made to the drainage and process water supply lines within the facility. ... The facility also had a 3” process water supply which has now been disconnected exterior to the building and capped. A hub to the Storm Sewer drain lines was removed and the piping was filled with grout. The process water piping and valves were removed to the floor and the remaining pipe filled with grout.” D-Area Site utilities have been isolated (i.e., cut, plugged, and no longer operable as is a typical practice based on our D&D procedures and protocols). No change to the document is proposed.

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- b. Please include the November 30, 2019 and January 13, 2020 asbestos surveys in this FDE which identified areas that tested positive for asbestos containing materials (ACM).

Response: Agree.

Pdf files of Asbestos Inspection Report for Building 485-D, Q-APG-D-00026, and Asbestos Inspection Report for Building 482-2D, Q-APG-D-00006 are being provided with these comment responses. No change to the document is proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

9) Building 710-16D, Storage Building, Rev. 0, Dated April 27, 2020

- a. Figure 2: The picture indicates that the spill impacted the area of intersection of wall with concrete. Has the exterior section of concrete/dirt area on the outside of this intersection been inspected/evaluated? Please include a photograph of this area.

Response: Clarification.

Exterior section of concrete/dirt area on the outside was inspected. Visual inspection of the concrete, exterior to the building wall, and soil in close proximity shows no evidence that the apparent spill in Storage 8 migrated outside the facility. Reference Figures 6A through 6C showing the area directly outside the wall from the apparent spill in Storage 8. Note there is no indication of any staining of the concrete or soil that would indicate the apparent spill ever migrated outside the building wall. No change to the document is proposed.

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Figure 6A: 710-16D Opposite Side Of Wall From Storage 8 Spill Looking North

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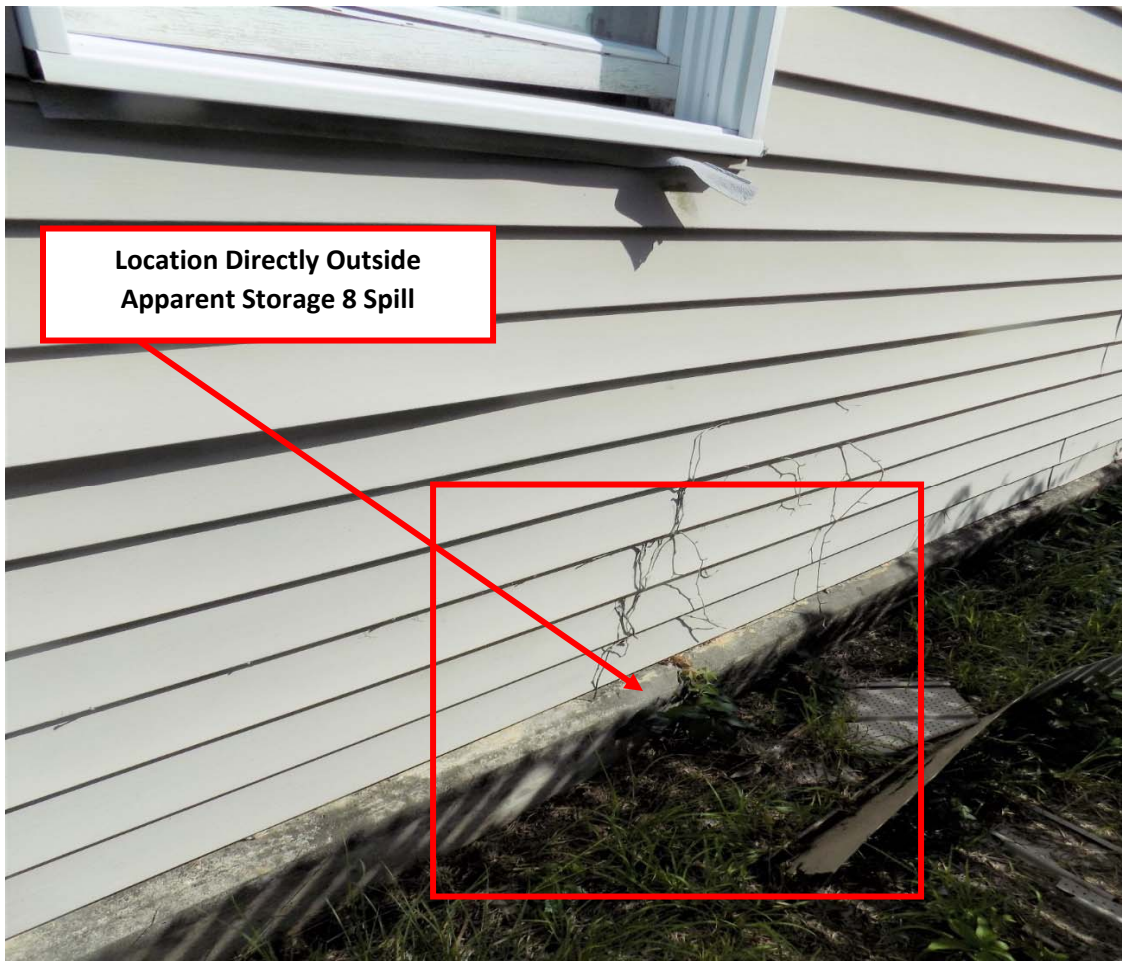


Figure 6B: 710-16D Opposite Side Of Wall From Storage 8 Spill Looking Northeast

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Figure 6C: 710-16D Opposite Side Of Wall From Storage 8 Spill Looking Northwest

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- b. Figure 4: please include legend for this figure to ensure clarity and understanding of the depicted structures/different colors depicted in the figure. Please label all structures or alternatively label and provide a legend in the overall FDE project figure requested in #3) above.

Response: Clarification.

The various colors held no particular significance. The 710-16D FDE will be revised to convert Figure 4 to black and white, with only yellow used to highlight the 710-16D facility footprint. See Attachment 2 for an overall aerial photo with all structures labelled for this and previously approved FDEs, as requested in General Comment 2.

- c. Please include the November 25, 2019 asbestos survey in this FDE which identified small amount of asbestos containing materials (ACM).

Response: Agree.

A pdf file of Asbestos Inspection Report of Building 710-16D, Q-APG-D-00019, is being provided with these comment responses. No change to the document is proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

10) Building 484-5D, D-Area Powerhouse Storage Building, Rev. 0, Dated April 27, 2020

- a. Figure 3: Please include a legend to ensure clarity and understanding of the depicted structures and the different associated colors depicted in the figure. Please label all

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structures or alternatively label and provide a legend in the overall FDE project figure requested in #3 above.

Response: Clarification.

The various colors held no particular significance. The 484-5D FDE will be revised to convert Figure 3 to black and white, with only yellow used to highlight the 484-5D facility footprint. See Attachment 2 for an overall aerial photo with all structures labelled for this and previously approved FDEs, as requested in General Comment 2.

- b. Please include the November 04, 2019 asbestos survey in this FDE which identified small amount of asbestos containing material (ACM).

Response: Agree.

A pdf file of Asbestos Inspection Report of Building 484-5D, Q-APG-D-00007, is being provided with these comment responses. No change to the document is proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

11) Building 484-9D, D-Area Valve House, Rev. 0, Dated May 20, 2020

- a) For the purposes of clarity, please provide further explanation for isolation of all fire water (inclusive of the fire hydrant), steam, instrument air and electrical versus air-gapped. It is unclear if the above services are no longer usable and in a safe state prior to and following demolition.

**Final SRS Responses to EPA Comments on the
FACILITY DECOMMISSIONING EVALUATIONS FOR:
Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020;
Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020;
Building 483-3D, Electrical Control Building Rev 0, Dated April 28, 2020;
Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev 0,
Dated May 11, 2020
Building 710-16D, Storage Building, Rev 0, Dated April 27, 2020
Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020
Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020**

D-Area Operable Unit

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

Comments Received July 13, 2020

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Response: Clarification

All D-Area Site utility lines have been shut-off and isolated (i.e., cut, plugged, and no longer operable as is a typical practice based on our D&D procedures and protocols). Each D-Area building was electrically isolated during completion of the deactivation project scope. Power was globally disconnected in D-Area as follows: 1) Main electrical feeders were air-gapped; 2) Power lines were disconnected and air-gapped; 3) Main power to the Powerhouse and all ancillary buildings was globally disconnected (the exceptions being only feeds to the 681-3G Pump House, Primary Domestic Water Well 905-3D, Back-up Domestic Water Well 905-136D, Domestic Water Production Facilities 483-7D, Elevated Domestic Water Storage Tank 905-5D, and D-Area Replacement Telecommunications Building 702-D); 4) All power busses were removed; 5) All transformers were de-energized; 6) Most D-Area transformers were removed; and 7) Breakers were racked out and removed.

Prior to demolition, each facility must have been rendered and verified to be “Cold & Dark” as is a typical practice based on our D&D procedures and protocols. No change to the document is proposed.

- b) Please include the January 9, 2020 Asbestos survey in this FDE.

Response: Agree.

A pdf file of Asbestos Inspection Report of Building 484-9D, Q-APG-D-00027, is being provided with these comment responses. No change to the document is proposed.

**Final SRS Responses to EPA Comments on the
FACILITY DECOMMISSIONING EVALUATIONS FOR:**

Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020;
Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020;
Building 483-3D, Electrical Control Building Rev 0, Dated April 28, 2020;
**Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev 0,
Dated May 11, 2020**
Building 710-16D, Storage Building, Rev 0, Dated April 27, 2020
Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020
Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020

D-Area Operable Unit

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

Comments Received July 13, 2020

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- c) Page 7 of 13, bottom of the page: The highlighted sentence in the paragraph below is an incomplete sentence; please amend and complete this sentence to convey further information as originally intended.

The fire panel and control room (Figures 4 & 7) contains the Panalarm® fire control panels, pull stations, system annunciator panels, battery backups, switches and relays, and other fire control devices necessary for the system, all of which are now isolated, but not “air-gapped” to render the facility “cold and dark.” A single ceiling-mounted incandescent light in the control room, which has also been electrically isolated, provided lighting in the alarm panel and control room. There is a leak in the ceiling of the fire panel and control room.

JKB 5-20-20

Response: Clarification.

The highlighted sentence will be rewritten to be more precise.

The 5th paragraph of the FDE’s Facility Description section will be revised as follows:

“~~The fire panel and control room~~ Alarm Panel and Control Room (Figures 4 & 7) contains the Panalarm® fire control panels, pull stations, system annunciator panels, battery backups, switches and relays, and other fire control devices necessary for the system, all of which are now isolated, but not “air-gapped” to render the facility “cold and dark.” A single ceiling-mounted incandescent light ~~in the control room,~~ which has also been electrically isolated, provided lighting ~~in for the alarm panel and control room~~ Alarm Panel and Control Room. There is a leak in the ceiling of the ~~fire panel and control room~~ Alarm Panel and Control Room.”

**Final SRS Responses to EPA Comments on the
FACILITY DECOMMISSIONING EVALUATIONS FOR:**

Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020;
Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020;
Building 483-3D, Electrical Control Building Rev 0, Dated April 28, 2020;
**Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev 0,
Dated May 11, 2020**
Building 710-16D, Storage Building, Rev 0, Dated April 27, 2020
Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020
Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020

D-Area Operable Unit

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

Comments Received July 13, 2020

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Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 12) Building 717-3D, D-Area Welding Shop, Rev. 0, Dated April 27, 2020
- a) Please provide response to EPA General Comment #4 for this FDE.

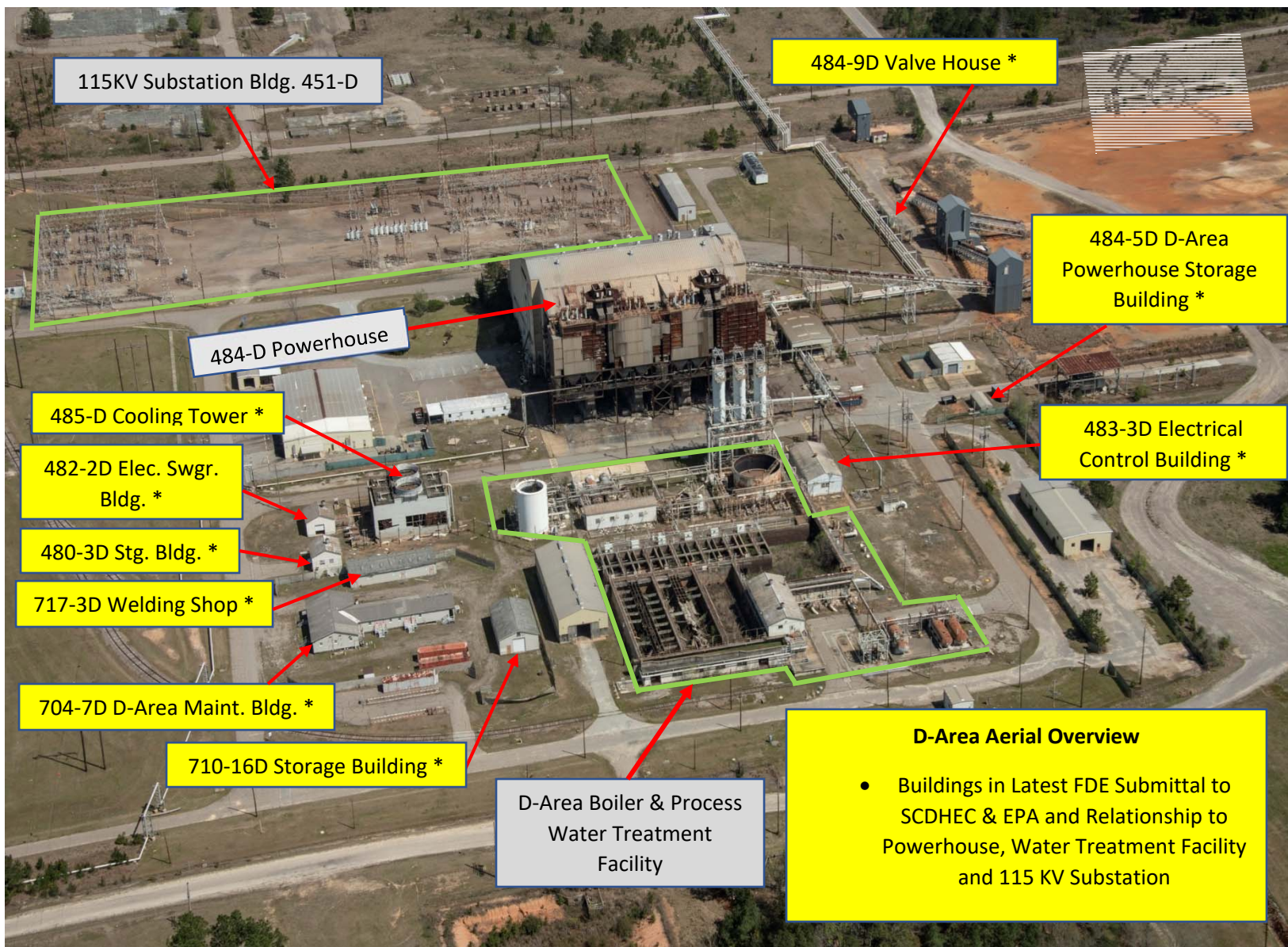
Response: Clarification.

As stated in the response to EPA General Comment #4:

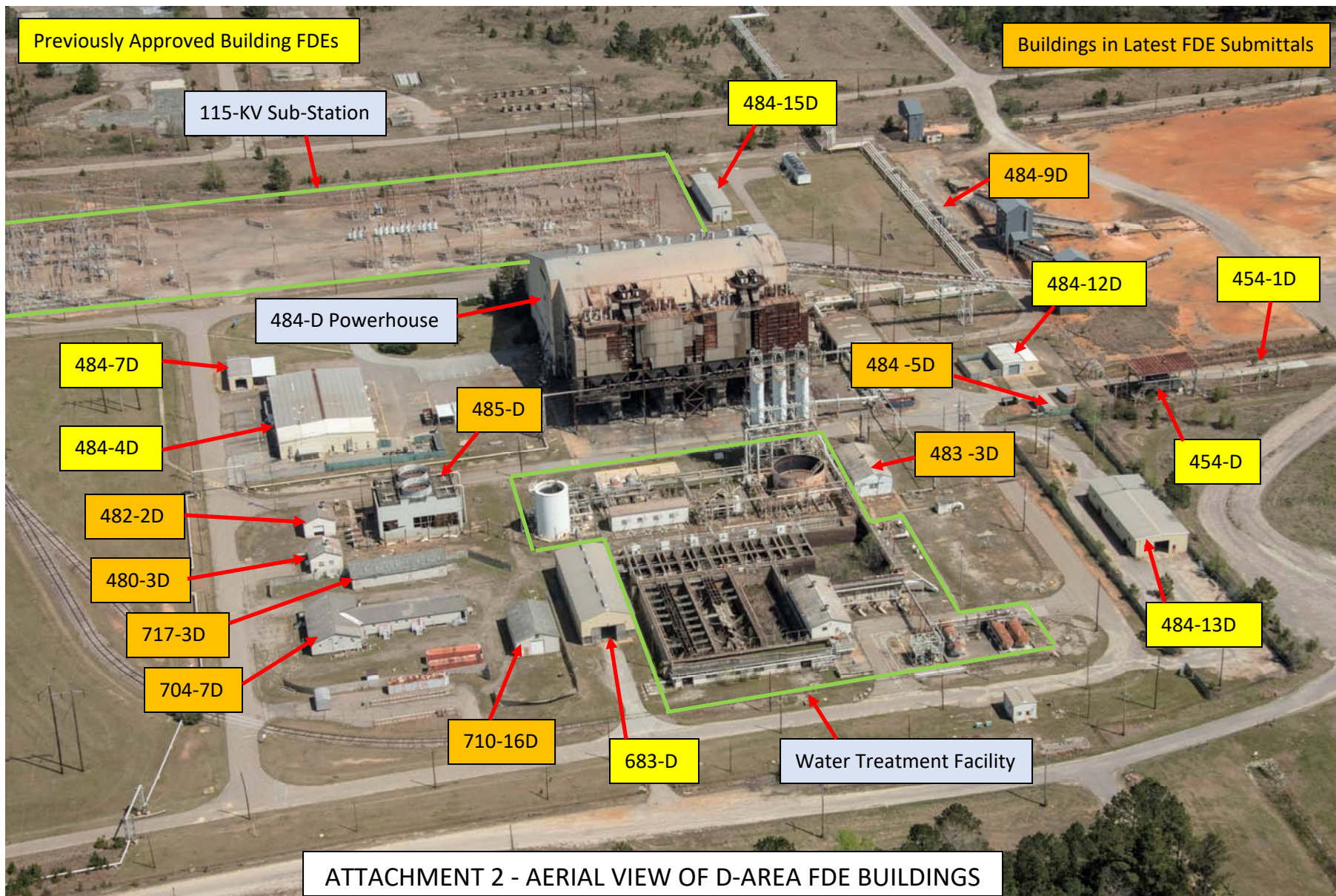
Each building was electrically isolated during completion of the deactivation project scope. Power was globally disconnected in D-Area as follows: 1) Main electrical feeders were air-gapped; 2) Power lines were disconnected and air-gapped; 3) Main power to the Powerhouse and all ancillary buildings was globally disconnected (the exceptions being only feeds to the 681-3G Pump House, Primary Domestic Water Well 905-3D, Back-up Domestic Water Well 905-136D, Domestic Water Production Facilities 483-7D, Elevated Domestic Water Storage Tank 905-5D, and D-Area Replacement Telecommunications Building 702-D); 4) All power busses were removed; 5) All transformers were de-energized; 6) Most D-Area transformers were removed; and 7) Breakers were racked out and removed.

Prior to demolition, each facility must have been rendered and verified to be “Cold & Dark” as is a typical practice based on our D&D procedures and protocols. No change to the document is proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov



Attachment 1



**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Specific Comments

- 1) The FDE does not address the intended purpose for the two process sewer lines in the Electrical Control Building/Switchgear house. Please address.

Response: Clarification.

Due to safety concerns, the two floor drains, draining to a process sewer line, were included in the building's design to remove any potentially intrusive water (i.e., leaking through the roof, at the windows, or at the rollup door) and prevent any accumulation on the floor of this electrical control building. No change to the document is proposed.

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

- 2) Though the FDE states that there are no documented spills for the facility, it does not address the presence or absence of any physical evidence of spills/releases at the former location of transformer AT1W. Please describe the appearance/condition of the concrete pad, gravel-filled containment dike and sump. Per the last paragraph on page 10, it appears that transformer AT1W may have been a PCB-containing transformer. Is this correct?

Response: Clarification.

Visual inspection shows no evidence of any spills/releases at the former location of transformer AT1W. The transformer's concrete foundation, gravel-filled containment dike area, and sump are all free from any staining or other indication of any spill(s). Reference Photos 1, 2, and 3 showing the subject areas to be free of any staining or other evidence of spill(s)/leakage. Transformer AT1W was not a PCB-containing transformer. Nothing in the last paragraph on page 10 suggests otherwise. Also, reference Figure 1 for supporting paperwork. No change to the document is proposed.

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Photo 1: Transformer AT1W Foundation and Gravel Containment Dike Area Looking Southwest

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Photo 2: Transformer AT1W Foundation and Gravel Containment Dike Area Looking Northwest

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
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Photo 3: Transformer AT1W Gravel Containment Dike Area Sump (With Expanded Metal Gravel Barrier Cage Removed) Looking Down Facing South

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Figure 1:



To: Timothy Bowman/SRNS/Srs@Srs, Julia West/SRNS/Srs@Srs,
Cc: Doris Kaney/SRNS/Srs@Srs, Malethia Brown/SRNS/Srs@Srs, Robert
Backer/SRNS/Srs@Srs, Andrew Albenesius/SRNS/Srs@Srs, Bonnie Yon/SRNS/Srs@Srs,
Bcc:
Subject: Fw: DAA201501690 - D-AREA - AFS-SRSCRO - TANKS, CYLINDERS, AND OIL FILLED
TRANSFORMERS
From: Carlos Lucha/SRNS/Srs - Tuesday 12/01/2015 02:49 PM

The 3 transformers included in DAA201501690 have no PCB's. From 11/17/2015 West email; left to right on the pictures below please note the following:

The first 2 photos of Transformers are 483-AT2W ,1W which were sampled and the analysis results are with sample Job 13003. The results show no PCB's and total metals were below limits for RCRA metals. No PCB type components in these transformers, such as oil filled bushings.

The last photo on the right is a dry transformer so no oil to sample, and has no PCB type component This is transformer **EN-D484-2000-60**. I have included these photos immediately below for reference. Please note the DAA may need editing to distinguish the transformers.



Former Transformer AT1W

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Former Transformer W4A

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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- 3) Please describe the appearance/condition of the concrete pad and surrounding soil at the former location of transformer W4A. Was transformer W4A a PCB-containing transformer?

Response: Clarification.

Visual inspection of the W4A transformer concrete pad and surrounding soil show them to be free of any oil stains or other indicators of any spill(s) or leakage (Reference Photo 4). This is as expected, since transformer W4A was a dry-type transformer containing no oil or PCBs. Also, reference Figure 2 for supporting paperwork. No change to the document is proposed.



Photo 4: Transformer W4A Concrete Pad Looking North

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Figure 2



To: Timothy Bowman/SRNS/Srs@Srs, Julia West/SRNS/Srs@Srs,
Cc: Doris Kaney/SRNS/Srs@Srs, Malethia Brown/SRNS/Srs@Srs, Robert
Backer/SRNS/Srs@Srs, Andrew Albenesius/SRNS/Srs@Srs, Bonnie Yon/SRNS/Srs@Srs,
Bcc:
Subject: Fw: DAA201501690 - D-AREA - AFS-SRSCRO - TANKS, CYLINDERS, AND OIL FILLED
TRANSFORMERS
From: Carlos Lucha/SRNS/Srs - Tuesday 12/01/2015 02:49 PM

The 3 transformers included in DAA201501690 have no PCB's. From 11/17/2015 West email; left to right on the pictures below please note the following:

The first 2 photos of Transformers are 483-AT2W ,1W which were sampled and the analysis results are with sample Job 13003. The results show no PCB's and total metals were below limits for RCRA metals. No PCB type components in these transformers, such as oil filled bushings.

The last photo on the right is a dry transformer so no oil to sample, and has no PCB type component This is transformer **EN-D484-2000-60**. I have included these photos immediately below for reference. Please note the DAA may need editing to distinguish the transformers.



Former Transformer AT1W

**SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Building 483-3D, Electrical Control Building,
G-FDE-D-00049, Revision 0, April 28, 2020, Cover letter dated May 28, 2020**

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Former Transformer W4A

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov

**Final SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Storage Building, 710-16D, G-FDE-D-00046,
Revision 0, April 27, 2020, Cover letter dated May 28, 2020**

Comments Received June 29, 2020

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General Comments

1. Part 2, Evaluation, states that the apparent spill in Storage 8 was contained within the facility but the statement is not substantiated. The photograph in Figure 3 appears to show that the spill contacted the internal facility wall and may have migrated downward and outside the facility. Please address this concern.

Response: Clarification.

Visual inspection of the concrete, exterior to the building wall, and soil in close proximity show no evidence that the apparent spill in Storage 8 migrated outside the facility. Reference Photos 1, 2, and 3 showing the area directly outside the wall from the apparent spill in Storage 8. Note there is no indication of any staining of the concrete or soil that would indicate the apparent spill ever migrated outside the building wall. No change to the document is proposed.



Photo 1 - 710-16D Opposite Side Of Wall From Storage 8 Spill Looking North

**Final SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Storage Building, 710-16D, G-FDE-D-00046,
Revision 0, April 27, 2020, Cover letter dated May 28, 2020**

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Photo 2 - 710-16D Opposite Side Of Wall From Storage 8 Spill Looking Northeast

**Final SRS Responses to SCDHEC Comments on the
Facility Decommissioning Evaluation (FDE): Storage Building, 710-16D, G-FDE-D-00046,
Revision 0, April 27, 2020, Cover letter dated May 28, 2020**

Comments Received June 29, 2020

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Photo 3 - 710-16D Opposite Side Of Wall From Storage 8 Spill Looking Northwest

Responsible Party: Ken Blankenship, (803) 952-8612, john.blankenship@srs.gov