



July 30, 2020

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

ENVIRONMENTAL COMPLIANCE &

AUG - 5 2020

AREA COMPLETION PROJECTS

Re: Savannah River Site F-Area Tank Farm Deactivation Plan and Closure Strategy (SRR-CWDA-2020-00037, Revision 1, May 2020) received June 18, 2020.

Dear Mr. Hennessey:

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

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

Sincerely,

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

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

South Carolina Department of Health and Environmental Control Comments on:

Savannah River Site F-Area Tank Farm Deactivation Plan and Closure Strategy
(SRR-CWDA-2020-00037, Revision 1, May 2020) received June 18, 2020.

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General Comments

1. Please address whether any of the F-Area Tank Farm's structures/components are listed in the *Savannah River Site's Cold War Built Environment Cultural Resources Management Plan* (January 26, 2005) and are therefore considered historically significant. A reference for this document may need to be included in Section 8, References.
2. Some of the equipment/structures on the waste tank tops are not listed in the document as "FTF Ancillary Structures" or as "FFA Buildings/Structures to be Decommissioned" but are classified as "Other Equipment" (Sections 4.2.3, 4.3.3, 4.4.3 & 4.5.3). As a result, these may escape regulatory oversight since these structures might be addressed via D&R activities that are separate from the operational closure of ancillary structures, which require Closure Modules pursuant to the Consolidated General Closure Plan, and separate from the SRNS D&D Program that addresses the facilities listed on FFA Appendix K.1. Sections 5 and 6 of the document discuss how D&R of inactive process equipment and support structures may be conducted independently and thereby, reduce the duration of the Deactivation and Decommissioning phases. Please note that the Department will require a specific regulatory oversight mechanism for evaluating the equipment and structures designated as "Other Equipment".

Specific Comments

1. Section 2.3, Ancillary Structures, page 23 of 134. When a high-level waste tank has been removed from service, there is a partial closure of the FTF and HTF Construction Permit No. 17,424-IW. There is an attachment that lists both active and inactive equipment for these tank farms. Some equipment in Table 2.3-1 lists some ancillary equipment such as the Concentrate Transfer System and Valve Boxes that are not listed in the construction permit partial closure document. Does the partial closure document need to be updated to duplicate the list in Table 2.3-1? Please clarify.
2. Table 3.2-2, Spills Associated with the FTF OU, page 51 of 134. Please include the 1961 Tank 8 overflow to the Catch Tank on this table as an incident requiring investigation, as it appears that this incident is not included.
3. Table 3.2-3, Buildings/Structures to be Decommissioned which are Associated with the FTF OU, page 52 of 134. Only five of the six FTF Diversion Boxes are listed in this table; FDB3 does not appear to be included. Please include.
4. Section 4.2.2, Ancillary Structures, page 61 of 134. The ancillary structures listed in Table 4.2-2 are no longer in service and are available to be operationally closed. These structures could all be included in one closure module in accordance with the Consolidated General Closure Plan.