



# **Environmental Compliance and Area Completion Projects Regulatory Document Handbook**

**SRNS-RP-2022-00330**

**Revision 0**

**June 2023, updated December 2025**

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and  
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Aiken, South Carolina**

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LIST OF APPENDICES

Appendix A Record of Modifications to the EC&ACP Regulatory Document Handbook

Appendix B Five Phases of Project Scoping

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*“It is the lead agency’s current judgement that the preferred alternative identified in this SB/PP, or one of the other active measures considered in the SB/PP, is necessary to protect public health or welfare or the environment from ~~Aactual~~ or threatened releases of hazardous substances from this waste unit, if not addressed by the Preferred Alternative, may present a current or potential threat to public health, welfare, or into the environment.”*

## VI. REMEDIAL ACTION OBJECTIVES

This section briefly describes the remedial action objectives (RAOs) for the OU and how they mitigate site risks (e.g., prevent contamination from reaching the groundwater by treating the contaminated soils, etc.). The assumed future land use (i.e., industrial, unrestricted, etc.) is identified with a description of how the RAOs support that future land use. The RAOs are listed in bullet form and by subunit if appropriate.

### Preliminary Remedial Goals<sup>1</sup>

This section presents and describes the basis for the preliminary remedial goals (PRGs) (e.g., PRG of 5 ppm for trichloroethylene is based on the federal MCL for drinking water). A table that presents the range of PRGs for the receptor(s) and media of concern is provided. A discussion of ecological receptors and PRGs is included if appropriate.

### Applicable or Relevant and Appropriate Requirements (ARARs)

This section provides a description of the three categories of Applicable or Relevant and Appropriate Requirements (ARARs) (action-specific, location-specific, and chemical-specific) and references the table that identifies the ARARs for the preferred remedial alternative.

## VII. SUMMARY OF REMEDIAL ALTERNATIVES

This section provides a brief narrative description of the remedial alternatives evaluated including remedy components and distinguishing features unique to each alternative. A minimum of three alternatives are evaluated unless the USEPA and SCDHEC agree to a unit-specific exception. For example, if a No Action Alternative and a Land Use Control Alternative are under consideration,

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<sup>1</sup> Preliminary remedial goals were formerly known as remedial goal options in earlier SRS regulatory documentation.

a third alternative that reduces the toxicity, mobility, or volume of the hazardous substances, pollutants, or contaminants must also be included.

Examples of remedy components for the narrative discussion may include the following:

- Treatment technologies employed and how they will reduce the intrinsic threat posed by the contamination
- Engineered controls including temporary storage and permanent on-site containment
- Land use controls (LUCs) that will restrict access and limit future activities that might result in increased exposure to contamination. The LUCs should be descriptive and specific for the remedy. LUCs may include engineering controls such as warning signs or fencing and institutional controls (e.g., deed restrictions, excavation permit restrictions, etc.).

Distinguishing features will vary based on remedy specifications. Examples of distinguishing features for the narrative discussion may include the following:

- RAOs to be achieved by the alternative (e.g., return surface water to recreational use)
- Estimated quantities of material to be addressed by major components
- Implementation requirements (e.g., the need for an off-site disposal facility)
- Reasonably anticipated future land use and whether or not appropriate contamination levels will be achieved by the alternative
- A summary level narrative of ARARs evaluated for each alternative, with emphasis on key ARARs that differ from those that must be attained by other alternatives. No ARARs are required for LUC only remedies. Any proposed ARAR waivers and any RCRA treatability or no migration variances will be discussed.
- Use of presumptive remedies or innovative technologies
- Estimated time to construct and implement the remedy until RAOs are met. Time savings if schedule was accelerated (i.e., previous removal actions, etc.) are discussed.
- Expected outcomes (e.g., RAOs that the alternative will attain)

## PROTOCOL

### Core Team Protocol for Reuse of Federal Facility Agreement Decommissioned Excess Facilities

#### 1.0 INTRODUCTION

The Savannah River Site (SRS) is a thriving site within the United States Department of Energy (USDOE) Complex. In addition to ongoing long term National Nuclear Security Administration (NNSA) missions conducted at the Savannah River Tritium Enterprise facilities in H Area, SRS was selected for important NNSA missions in F and K Areas. In fact, SRS has transitioned from an Environmental Management (EM) Site to a NNSA Site. EM missions such as Area Completion will continue until those missions are completed.

Under the SRS Deactivation and Decommissioning (D&D) program, excess facilities to be decommissioned are located on the Federal Facility Agreement (FFA) *Appendix K.1, D&D Facilities to be Decommissioned*. Following decommissioning, these facilities (or remnants) are assigned to *Appendix C.4, D&D Facilities (or Remnants) that May Warrant Response Action* or *Appendix K.2, D&D Facilities (or Remnants) that Require No Further Evaluation* (FFA 1993). The footprint associated with excess facilities (or remnants) that have undergone decommissioning may have the potential to be repurposed to support new NNSA missions.

The *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* describes the process SRS uses to engage the Core Team (i.e., representatives from the USDOE, U.S. Environmental Protection Agency [USEPA], and South Carolina Department of Environmental Services [SCDES])<sup>1</sup> in managing excess facilities undergoing D&D (SRNS 2022). This *Core Team Protocol for Reuse of Federal Facility Agreement Decommissioned Excess Facilities* describes the process to engage the Core Team on decisions involving reuse/repurposing of excess D&D facilities (or remnants). The process will rely on existing documents, established approaches, and tools that are familiar to the Core Team to evaluate decommissioned facilities (or remnants) for reuse/repurposing.

USDOE<sup>2</sup> will coordinate with other SRS entities requesting to reuse a D&D facility (or remnant) to ensure that area closure milestones are not impeded.

<sup>1</sup> SCDES was known as the South Carolina Department of Health and Environmental Control prior to July 1, 2024.

<sup>2</sup> USDOE (Savannah River Operations Office)

## 2.0 DECOMMISSIONING MODELS AND DOCUMENTATION

The Facility Decommissioning Evaluation (FDE) is used to secure Core Team input on the appropriate decommissioning model. The three types of decommissioning models are the Simple Model, Integrated Sampling Model (ISM), and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Model. Core Team input and concurrence are sought on the FDE. The FDE, primary references, and regulatory feedback are placed in the SRS Administrative Record File (ARF).

- The Simple Model is designed for clean facilities where there have been no hazardous releases within the facility or the environment. Following decommissioning, the administrative disposition for Simple Model facilities is FFA *Appendix K.2, D&D Facilities (or Remnants) that Require No Further Evaluation*.
- The ISM is designed for low hazard chemical facilities and other industrial facilities<sup>3</sup> that may contain chemical and/or radiological contamination from former operation activities. Following decommissioning, the administrative disposition for ISM facilities is FFA *Appendix K.2, D&D Facilities (or Remnants) that Require No Further Evaluation* or *Appendix C.4, D&D Facilities (or Remnants) that May Warrant Response Action*.
- The CERCLA Model is used for nuclear facilities (Hazard Category 2 or 3), Radiological Facilities<sup>4</sup>, and high hazard chemical facilities to support a CERCLA action for a facility decommissioning project. For CERCLA Model facilities, the USDOE, USEPA, and SCDES reach concurrence on the CERCLA administrative path and documentation. Facilities (or remnants) decommissioned under the CERCLA Model are likely managed under regulatory approved land use controls that will impact their availability for reuse/repurposing.

The Decommissioning Project Final Report (DPFR) is used to communicate the details of the decommissioning project, the condition of the resultant D&D facility (or remnant) and proposes the administrative path for the D&D facility (or remnant) for Simple and ISM Model facilities. DPFRs for ISM decommissioning projects typically include the results of a final verification survey that documents the chemical or radiological condition of the resultant D&D facility (or remnant). Core Team input and concurrence are sought on the DPFR. The DPFR, primary references, and regulatory feedback are placed in the ARF.

## 3.0 PROCESS FOR EVALUATING D&D FACILITIES (OR REMNANTS) FOR REUSE/REPURPOSING

The process for evaluating D&D facilities (or remnants) located on FFA *Appendix K.2, D&D Facilities (or Remnants) that Require No Further Evaluation*, or *Appendix C.4, D&D*

<sup>3</sup> USDOE defines "Other Industrial Facility" as a facility with all radiological or chemical hazards below 40 CFR 302.4 thresholds (SRS 2020, USEPA 2004).

<sup>4</sup> USDOE defines "Radiological Facility" as a facility below Hazard Category 3 Nuclear that still contains quantities of radioactive material at or above 40 CFR 302.4 reportable quantities (SRS 2020, USEPA 2004).

*Facilities (or Remnants) that May Warrant Response Actions*, is described below. A graphic representation of these steps is provided in Figure 1.

***FFA Appendix K.2, D&D Facilities (or Remnants) that Require No Further Evaluation***

Conditions that placed excess facilities (or remnants) on Appendix K.2 as allowed by the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS 2022) include the following:

- Decommissioned with the Simple Model and no information was discovered to warrant further evaluation;
- Decommissioned with the ISM and the Core Team agreed that the final verification survey confirmed the contaminant migration and human health risk results require no further evaluation (Example - FFA Path Forward for PAR Pond Buildings 651-6G, 681-7G, and 735-7G and Ancillary Facility Remnants [USDOE 2021]); or
- Relocated from FFA *Appendix C.4 D&D Facilities (or Remnants) that May Warrant Response Action* after further evaluation by the Core Team concluded that the potential or presumed condition is not evident through observation, field screening, and/or residual contaminant levels (Example – Transfer of Paint Shop Building [725-A] to Appendix K.2 [SRNS 2023b]).

Actions required for reuse/repurposing Appendix K.2 D&D facilities (or remnants), as shown in Figure 1, include the following:

- Savannah River Nuclear Solutions (SRNS) will provide written communication to USDOE documenting the new use. USDOE will propose to the Core Team written communication declaring the intention to reuse/repurpose an FFA Appendix K.2 D&D facility (or remnant) for a new use, allowing 45 days for feedback from USEPA and SCDES. If there are no objections from a Core Team member, the D&D facility (or remnant) will be made available for reuse/repurposing and remain on FFA Appendix K.2 with a footnote identifying the reuse/repurposing status. If the reuse/repurpose results in assignment of a new structure identification number, the footnote will be amended to include the structure identification number.

***FFA Appendix C.4, D&D Facilities (or Remnants) that May Warrant Response Action***

Conditions that placed facilities (or remnants) on Appendix C.4 include the following:

- Decommissioned with the ISM and final verification survey relied on human health risk and contaminant migration evaluations using the initial D&D program approach that differed from technical protocols applied in the FFA CERCLA remedial process (SRNS 2023a);

- Decommissioned with the ISM and final verification survey concluded that the human health risk was between 1E-04 to 1E-06 and did not support unrestricted land use (i.e., < 1E-06) in the FFA CERCLA program; or
- Decommissioned with the ISM based on regulatory comment on the FDE even though the decommissioning process supported use of the Simple Model because the D&D facility (or remnants) lacked the presence of radioactive or chemical contaminants.

Actions required for reuse/repurposing FFA Appendix C.4 D&D facilities (or remnants), as shown in Figure 1, include the following:

- For facilities (or remnants) on FFA Appendix C.4 under consideration for reuse/repurposing, a reevaluation of the human health risk and contaminant migration analysis will be performed on the DPFR final verification survey results applying the approved FFA CERCLA remedial process protocols (SRNS 2023a). A weight-of-evidence discussion (i.e., uncertainty evaluation) will be included as appropriate.<sup>5</sup>
- If the D&D remnants remain a viable candidate for reuse/repurpose after reevaluation of the DPFR human health risk and contaminant migration analysis and/or resolution of any outstanding DPFR comments from USEPA and SCDES, the results of the reevaluation will be provided to the Core Team by email and/or meeting as appropriate. The reevaluation will confirm the conditions that placed the facility (or remnant) on FFA Appendix C.4 are no longer present or appropriate. A recommendation will be made to transfer the facility (or remnant) to FFA Appendix K.2 in accordance with the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS 2022) that allows ISM DPFRs to assign facilities (or remnants) to FFA Appendix K.2 when appropriate.
- USDOE will submit a letter to the USEPA and SCDES requesting approval to transfer the FFA Appendix C.4 D&D facilities (or remnants) to FFA Appendix K.2. If approval is received, the facilities or remnants are eligible for reuse/repurpose.
- If USEPA and SCDES do not approve transfer of the FFA Appendix C.4 D&D facilities (or remnants) to FFA Appendix K.2, the facilities (or remnants) will remain on Appendix C.4 and not be available for reuse/repurpose unless USDOE is able to satisfactorily address specific issues identified by USEPA and SCDES that preclude regulatory acceptance of the reuse/repurpose.

#### 4.0 REFERENCES

FFA, 1993. *Federal Facility Agreement for the Savannah River Site*, Administrative Docket No. 89-05-FF (Effective Date: August 16, 1993)

SRNS, 2022. *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports*, SRNS-RP-2021-00120, Revision 1, August 2022

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<sup>5</sup> Further action may be required prior to Core Team approval (see Figure 1).

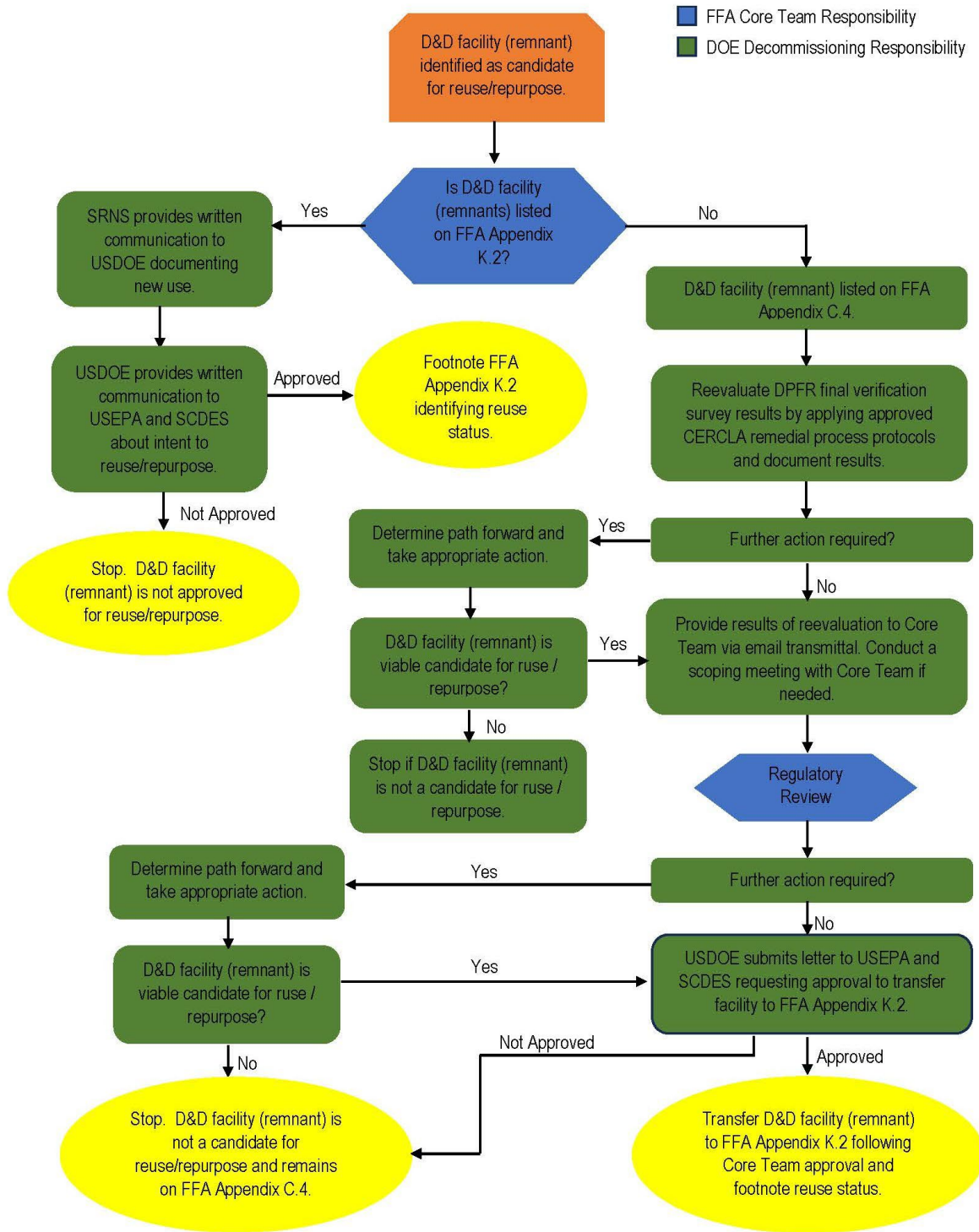
SRNS, 2023a. *Environmental Compliance and Area Completion Projects Regulatory Document Handbook*, SRNS-RP-2022-00330, Revision 0, June 2023

SRNS, 2023b. *Scoping Summary for the Automotive Repair Shop (716-A) and Paint Shop Building (725-A) Operable Unit (U), RI Work Plan Characterization*, SRNS-RP-2023-00820, October 2023 (Final)

SRS, 2020. *SRS Procedure Manual 11Q, Facility Safety Document, Procedure Appendix-B Glossary*, Savannah River Site, Aiken, SC.

USDOE, 2021. *Savannah River Site Responses to the Regulatory Comments on the Decommissioning Project Final Reports for Building 681-7G, Par Pond Pump House Equipment Building (V-PCOR-G-00023, Revision 0, September 12, 2011), Building 735-7G, PAR Pond Environmental Support Facility (V-PCOR-G-00022, Revision 0, September 12, 2011), and Federal Facility Agreement Path Forward for Buildings 651-6G, 681-7G, and 735-7G and Ancillary Facility Remnants (IACD-21-133, April 21, 2021)*

USEPA, 2004. 40 CFR 302.4, *Designation of Hazardous Substances*, Title 40, Code of Federal Regulations, Part 302, U.S. Environmental Protection Agency, Washington, DC, April 2004.



**Figure 1. D&D Facility (Remnant) Reuse/Repurposing Process**

**Table A-1. Record of Modification to the EC&ACP Regulatory Document Handbook**

Date	Format/ Protocol Number	Format/Protocol Name	Modification
6/2023	All	Entire Handbook	Former EC&ACP Regulatory Document Handbook (ERD-AG-003, Revision 17, June 2012) was updated and replaced with EC&ACP Regulatory Document Handbook (SRNS-RP-2022-00330, Revision 0, June 2023).
6/2023	D-1	Core Team Protocol For Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports, Revision 1	Protocol D-1, Revision 1, was a standalone protocol in the SRS ARF that was added to the EC&ACP Regulatory Document Handbook (SRNS-RP-2022-00330, Revision 0, June 2023).
<u>12/2025</u>	<u>Cover Page</u>	<u>Cover Page</u>	<u>Revised Cover Page to add “Updated December 2025” to reflect an update to the EC&amp;ACP Regulatory Document Handbook.</u>
<u>12/2025</u>	<u>D-2, F-6</u>	<u>Table of Contents</u>	<u>Added new Protocol D-2, Core Team Protocol for Reuse of Federal Facility Agreement Decommissioned Excess Facilities, Revision 0, to Module 10 – Decommissioning (D).</u>  <u>Updated Protocol F-6 to Revision 1.</u>
<u>12/2025</u>	<u>D-2</u>	<u>Core Team Protocol for Reuse of Federal Facility Agreement Decommissioned Excess Facilities, Revision 0</u>	<u>Added new protocol D-2 to the EC&amp;ACP Regulatory Document Handbook (SRNS-RP-2022-00330, Revision 0, June 2023, updated December 2025). Protocol D-2 was approved via email by SCDES and USEPA on 7/31/2025 and 8/11/2025, respectfully.</u>
<u>12/2025</u>	<u>F-6</u>	<u>Statement of Basis/Proposed Plan Format, Revision 1</u>	<u>Based on USEPA comments<sup>1</sup>, the standard statement that supports the need for taking action in the Conclusion section was revised to conform with the standard language in the USEPA guidance, <i>A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents</i>, OSWER Directive 9200.1-23P, July 1999.</u>

<sup>1</sup> USEPA Comments on the Statement of Basis/Proposed Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-00724, Revision 0, June 2025).

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