



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

September 28, 2022

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

SEP 28 2022

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 Building 454-D, D Area Diesel Fuel Tank, Revision 0, July 14, 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

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, BUILDING 454-D
D-AREA DIESEL FUEL TANK, REVISION 0
JULY 2022**

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

EPA COMMENTS:

1. The Decommissioning Project Final Report (DPFR), Building 454-D, D-Area Storage Diesel Fuel Tank (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated February 2021 (the D&D Protocol). For example, the text in Section 1.0 (Introduction) of the D&D Protocol states “The DPFR describes the decommissioning project activities and accomplishments, final facility status, cost, and performance information.” It is noted the DPFR report included the project activities and the final facility status; however, the cost or performance information by Community Reuse Organization (CRO) and CTI and Associates Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) was not provided. Please revise the DPFR to include/reference the cost and performance information as stated in the D&D Protocol.
2. The DPFR indicates in Section 1.0 (Summary) that all interfacing utilities were isolated, disconnected, and plugged, and the resulting holes were grouted; however, photographs depicting the plugged and grouted holes are not provided in Appendix A (Before and After Photos of the Facility/Structure). In addition, photographs depicting a view of the slab condition of Building 454-D before and after decommissioning were not included in the DPFR. Please revise the DPFR to include photographs of the plugged and grouted holes and a view of the Building 454-D slab condition before and after decommissioning.
3. **Section 1.0, Summary, Page 6 of 16, and Section 6.02, Risk Assessment Summary, Page 10 of 16:** The text in the second paragraph indicates the building slab was only observed before, and not after, structure demolition for evidence of contamination, which is inconsistent with the text in Section 6.02 (Risk Assessment). For example, the last sentence in Section 6.02 states, “Since there was no evidence of contamination on the slabs either before or after structure demolition, no final verification survey was required.” Please revise the text in Section 1.0 to state, “Since there was no evidence of contamination on the slabs either before or after structure demolition, no final verification survey was required.”
4. **Section 5.01, Salvage and Reuse, Pages 8 & 9 of 16:** The text indicates that 30 cubic yards of scrap metal from the 454-D and 454-1D were transferred to 741-N, Salvage and Reclamation Building, for recycling; however, according to Table 1 (Waste Generation), recycled metals were disposed to the 741-N Salvage Yard. For clarification, please revise the text to address this discrepancy.
5. **Section 6.02, Risk Assessment Summary, Page 9 of 16:** The text states, “A review of the existing characterization data, process/building history, sample data and walk downs of the facility prior to decommissioning supported the determination that Building 454-D and its ancillary structures met

the criteria of a Clean Building, Simple Model as described in Manual 1C, Procedure 501;” however, Section 3.0 (Decommissioning Model Approval) states that there was no regulator walk down of the facility due to COVID-19 travel restrictions. As such, it is unclear which stakeholders participated in walk down evaluations. Please revise Section 6.02 to summarize the stakeholders that participated in the walk down assessments that took place prior to decommissioning Building 454-D.