



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

October 31, 2022

**ENVIRONMENTAL COMPLIANCE &**

**OCT 31 2022**

Mr. Brian T. Hennessey  
SRS Remedial Project Manager  
Infrastructure and Area Completion Division  
U.S. Department of Energy  
Savannah River Operations Office  
P.O. Box A  
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**AREA COMPLETION PROJECTS**

**EPA Comments STATEMENT OF BASIS/PROPOSED PLAN FOR THE EARLY CONSTRUCTION AND OPERATIONAL DISPOSAL SITE N-1 (NBN), CENTRAL SHOPS SCRAP LUMBER PILE (631-2G), AND BUILDING 690-N, PROCESS HEAT EXCHANGER REPAIR FACILITY (AKA FORD BUILDING) OPERABLE UNIT (U) SEMS NUMBER: 93, SRNS-RP-2022-00202, REVISION 0, JULY 2022, SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA**

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the reports on the SOB/PP for the ECODS N-1, 631-2G, 690-N, Rev.0, dated July 2022. Attached are our comments and attached table for the legal comments.

If you have any questions or if you require additional information, please contact me at (404) 562-8648.

Sincerely,  
JON RICHARDS  
Jon Richards  
FFA Remedial Project Manager  
Superfund & Emergency Management  
Division

Digitally signed by JON RICHARDS  
Date: 2022.10.31 08:46:53 -0400

cc: C.L. Bergren, SRNS-ACP Susan Fulmer, SCDHEC

## GENERAL COMMENTS

1. The SB/PP does not discuss the lateral and vertical extent of the contamination present in site media at each subunit as noted in Section 3.3.3 (Site Characteristics) of EPA's *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (EPA 540-R-98-031), dated July 1999 (the EPA Decision Guidance). The following issues for each subunit should be addressed:
  - a. **Early Construction and Operational Disposal Site (ECODS) N-1 Subunit:** Section III (Operable Unit Background) of the SB/PP states that during the 2020 characterization, two of three sampled locations at the ECODS N-1 subunit encountered asbestos; however, the locations where the asbestos was found are not shown on Figure 3 (ECODS N-1 Subunit 2001, 2019, and 2020 Sample Locations). The extent of the asbestos at this subunit is unclear, and therefore the area and depth at the site to which the remedy should be applied is unclear.
  - b. **Central Shops Scrap Lumber Pile (631-2G) (CSSLP) Subunit:** The results of the soil, sediment, and surface water samples collected during the 2020 characterization are not discussed; however, it appears that hotspots based on arsenic concentrations are identified on Figure 8 (CSSLP Subunit Alternative B-4 [Hotspot Removal] and Disposal). The text should clarify how these hotspots were characterized as it appears additional delineation is needed at the edges of the subunit (i.e., at the southern, western, and northern edges where hotspots are identified and not clearly defined).
  - c. **Building 690-N, Process Heat Exchanger Repair Facility (Ford Building) Subunit:** Soil and concrete sampling is discussed for the Ford Building; however, it is unclear if the constituents of concern (COCs) on the concrete slab and in site soil have been delineated. For example, Figure 7 (Ford Building Subunit Cobalt-60 Data [0-1 ft]) indicates that the only sample collected on the south side of the former building detected cobalt-60, but the lateral and vertical extent of this contamination is unclear. Further, none of the figures show the locations of the concrete samples.

The SB/PP should discuss and show on site figures the lateral and vertical extent of contaminated media to support the discussion of alternatives and selection of the preferred remedies. *Revise the SB/PP to include a description of the extent of the contaminated areas in each subunit.*

2. The description of the remedial alternatives in Section VII (Summary of the Remedial Alternatives) does not discuss the common elements of the alternatives for each subunit, so that the distinguishing features can be highlighted in the alternative-specific discussions (e.g., if a disposal facility is needed, the expected outcomes for compatibility with future land use, timeframe for completion, etc.) as noted in Section 3.3.7 (Summary of Remedial Alternatives) of the EPA Decision Guidance. Also, this overview of the remedial alternatives for each subunit should identify the preferred alternative at the beginning of the discussion. Further, the SB/PP does not provide figures for each proposed alternative to show the difference in the extent of the potential actions (e.g., different land use control [LUC] boundaries) under each alternative. Currently, only a figure for the hotspot removal at the CSSLP is provided (see Figure 8, CSSLP Subunit Alternative B-4 [Hotspot Removal] and Disposal). *Revise Section VII to include discussions of the common elements of each alternative by subunit and to identify the preferred alternative at the beginning of this discussion. Please also provide figures showing the extent of the proposed remedial alternatives.*

3. The SB/PP should explain additional technical terms and acronyms that may be unfamiliar to the public (i.e., in addition to the terms in the glossary). For example, Section V (Summary of Site Risks) should explain the exposure point concentration (EPC) and  $1 \times 10^{-6}$  risk level that was used to identify COCs. In addition, the Savannah River Site background concentration included in the remedial action objectives should be explained. Also, it is recommended that each term or acronym that is included in the glossary be highlighted when first used, so readers know that these terms are defined in the glossary. *Revise the SB/PP to include definitions for these technical terms and consider highlighting the first use of all terms defined in the glossary.*

## SPECIFIC COMMENTS

1. **Section I, Introduction and Background, Page 1 to 2 of 46:** The SB/PP should include a reference to the National Contingency Plan (NCP) §300.430(f)(2) as specified in Section 3.3.1 (Introduction) of the EPA Decision Guidance. *Revise the text to include this reference.*
2. **Section II, Community Participation, Page 3 of 46:** The text indicates hard copies of the SB/PP are available at two locations, the Reese Library and the Asa H. Gordon Library; however, the text does not state that the Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study (RFI/RI/BRA/CMS/FS) (SRNS 2022) is also available for public review. Consistent with the EPA Decision Guidance, the lead agency is charged with making the relevant documents, such as the Proposed Plan and the RI/FS Report, available to the public at the time the newspaper notification is made (see Section 2.6.2, Public Comment Period). The EPA Decision Guidance also states the lead agency must ensure that any information that forms the basis for selecting the response action is included as part of the Administrative Record file and is available to the public during the public comment period. As such, it is recommended that the SB/PP text state that the RFI/RI/BRA/CMS/FS and that the *Decommissioning Project Final Report Building 690-N, Process Heat Exchanger Repair Facility* (SRNS 2020) that documents the Deactivation and Decommissioning completion phase of the Ford Building (690-N) is also made available for public review. *Revise the SB/PP to include this information.*
3. **Section II, Community Participation, Page 3 of 46:** The text states that a public meeting to discuss the SB/PP will be held only if significant interest is expressed, but this meeting must be held if requested by any single member of the public. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 113(k)(2)(B)(iii) and 117(a)(2); and the NCP at 40 CFR §300.430(f)(3)(i)(D) require “[t]he lead agency, after preparation of the proposed plan and review by the support agency, shall...[p]rovide the opportunity for a public meeting to be held during the public comment period at or near the site at issue...” They also require the agency to take a “transcript of the public meeting” and “make such transcript available to the public. *Revise the SB/PP to indicate that the public meeting for the SB/PP will be held if requested and ensure that the date of the public meeting is included if planned.*
4. **Section V, Summary of Site Risks, Page 11 of 46:** The depth of surface soil that was found to exceed risk at the CSSLP Subunit is “0 to 0.3 [0 to 1 ft].” *Revise the units of these depths to include “meters” for the 0 to 0.3 depth level to be consistent with other reported depths.*
5. **Section V, Summary of Site Risks, Page 11 of 46:** The first bullet point for the Ford Building Subunit states that concentrations of polychlorinated biphenyls (PCBs) and Cesium-137 at the Ford Building exceeded the  $1 \times 10^{-6}$  resident and industrial risk levels, but the calculated risk levels are not specified. *Revise the text to include the calculated residential and industrial risk levels for the PCBs and Cesium-137 at the Ford Building.*

6. **Section VIII, Evaluation of Alternatives, Compliance with ARARs, Page 18 of 46, and Table 8. Comparative Alternative Analysis for the ECODS N-1, CSSLP, and Ford Building OU, Page 45 of 46:** The discussion of the Compliance with ARARs [Applicable or Relevant and Appropriate Requirements] for the Ford Building states that chemical-specific ARARs apply to all three alternatives and that Alternatives C-2 and C-3 meet this requirement while Alternative C-1 does not. However, Table 8 lists “N/A” for Alternatives C-1 and C-2 in the Compliance with ARARs column. *Revise Section VIII and Table 8 to address this discrepancy in the reported compliance with ARARs for the Ford Building alternatives.*
7. **Section IX, Preferred Alternative, Pages 19 to 20 of 46:** The text states on page 20 that the preferred remedy for all subunits will leave hazardous substances in place that require land use restrictions indefinitely, but the description of the preferred alternative for the CSSLP subunit states that further action after completion of the remedial action is not required. *Revise Section IX to clarify if hazardous substances will be left in place at the CSSLP subunit such that land use restrictions will be necessary for the preferred remedy.*

### **Legal Comments**

1. Page 6 states: “Sediment and surface water data (unfiltered and filtered) were also collected from the CSSLP surface water impoundment area and analyzed for TAL metals, including Cr (VI).” *Please add a figure indicating location of the CSSLP surface water impoundment area, sampling locations, and sampling results. Summarize surface water data and whether above or below actionable levels.*
2. Page 6 states: “The process sewer pipeline and underground retention tank were removed in 1998.” Were these areas sampled? *Please clarify and indicate sampling results and whether above or below actionable levels.*
3. Page 13, first paragraph, last sentence. Delete sentence stating: “No ARARs were identified at the ECODS N-1 subunit.” *Add the attached ARARs table for ECODS N-1 Asbestos requirements pertaining to selected LUCs. Renumber ARARs tables accordingly and add the ECODS N-1 ARARs table to the list of tables in the SB/PP table of contents.*
4. Page 15. *Modify the following sentence as indicated by underlined text:* “Alternative B-4 would not require LUCs or five-year remedy reviews because removing the contaminated media would result in concentrations not exceeding the cleanup level levels acceptable for unrestricted use/unlimited exposure.”
5. Page 16. ECODS N-1 subunit. Compliance with ARARs. *Delete sentence stating:* “No ARARs exist for Alternative A-1 or A-2.” *Replace with:* “There are no ARARs for Alternative A-1. Alternative A-2 will comply with the Asbestos ARARs in Table [ ] that are relevant and appropriate to the selected LUCs, which include warning signs, fencing and deed notices for asbestos disposal sites.”

Attachments:

**Table [ ]: Potential ARARs for the Preferred Remedial Alternative for the ECODs N-1 Subunit:**

**Table [ ]. Potential ARARs for the Preferred Remedial Alternative for the ECODs N-1 Subunit**

Action	Requirements	Prerequisite	Citation(s)
<i>Institutional Controls / LUCs</i>			
Warning signs for disposal site	Display warning signs at all entrances and at intervals of 100m (328 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited.	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – <b>relevant and appropriate</b>	40 CFR § 61.151(b)(1)
	The warning signs must: <ul style="list-style-type: none"> <li>(i) Be posted in such a manner and location that a person can easily read the legend; and</li> <li>(ii) Conform to the requirements for (20"x14") upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and</li> <li>(iii) Display the legend as prescribed in § 61.151(b)(1)(iii) located in the lower panel with letter sizes and styles of visibility at least equal to those specified in § 61.151(b)(1)(iii).</li> </ul>	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – <b>relevant and appropriate</b>	40 CFR § 61.151(b)(1)(i)-(iii)
Fence for disposal site	Fence the perimeter of the site in a manner adequate to deter access by the general public.		40 CFR § 61.151(b)(2)
Deed notice for asbestos waste disposal site	Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that: <ul style="list-style-type: none"> <li>• The land has been used for disposal of asbestos-containing waste material; and</li> <li>• The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site required in § 61.154(f) have been filed with the Administrator; and</li> <li>• The site is subject to 40 CFR part 61, Subpart M.</li> </ul> NOTE: Recordation of deed notice that informs potential purchaser on the waste disposal site is considered a substantive requirement for post-closure.	Closure of an inactive disposal area that received asbestos containing waste materials – <b>relevant and appropriate</b>	40 CFR § 61.151(e)(1)-(3)

ARAR = applicable or relevant and appropriate requirement  
 CFR = Code of Federal Regulations