



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

July 22, 2021

ENVIRONMENTAL COMPLIANCE &

JUL 22 2021

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
Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

EPA Comments of the DECOMMISSIONING PROJECT FINAL REPORT BUILDING 690-N, PROCESS HEAT EXCHANGER REPAIR FACILITY, V-PCOR-N-00025, R0, MAY 18, 2021, SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the reports on the DPFs for the 690B Process Heat Exchangers Repair Facility. Attached are our comments.

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

Sincerely,

JON
RICHARDS

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RICHARDS
Date: 2021.07.22
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Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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

GENERAL COMMENT:

1. The age of the water table elevations used as the physical parameter input for contaminant migration screening is unclear, and it is uncertain how this may impact the results of the contaminant migration analysis. For example, Appendix B – Contaminant Migration Analysis, Table B-2, Physical Parameters Used for Screening, Page 46 of 52, indicates the depth to water of 45 feet and horizontal gradient of 0.005 feet/foot (ft/ft) was estimated from the potentiometric surface. Additionally, in Section B-2.1, Background, Page 27 of 52, the text states, “A potentiometric map of the water table aquifer was generated in July 1996 for Central Shops using synchronous water table elevations in monitoring wells screened in the water table aquifer. The map indicates that the unconfined groundwater in the vicinity of the Ford Building (690-N) flows from northeast to southwest (Figure B-1)....” However, a review of the figure legend on Figure B-1 (Ford Building Location and N-Area Potentiometric Surface), Page 42 of 52, indicates the water table data depicted on the figure is dated 2003. It is noted utilizing older water table elevations, rather than the most recently available water table elevations, as the input for contaminant migration screening may not be applicable since it is not representative of the most current groundwater elevations, particularly if water table elevations have significantly changed. *Please revise the Decommissioning Project Final Report Building 690-N, Process Heat Exchanger Repair Facility, V-PCOR-N-00025, Rev. 0, dated May 18, 2021 (the Report) to discuss the age of the water table elevations used as a physical parameter input in the contaminant migration analysis, and explain why it is appropriate for use in the model.*

SPECIFIC COMMENTS:

1. **Section 6.02.01, Human Health Risk Assessment, Page 14 of 52:** It unclear if the “Human Health Risk Screening Evaluation for the 690-N Ford Building (U),” SDD-2019-00030, Rev. 0, April 11, 2019 (Reference 8.03) was approved by the regulatory agencies [i.e., United States Environmental Protection Agency (USEPA) and South Carolina Department of Health and Environmental Control (SCDHEC)] since conclusions of the Human Health Risk Assessment (HHRA) were based on the older 2014 characterization data and regional screening level/preliminary remedial goals (RSL/PRGs). It is noted the text states, “Although the RSL and Preliminary Remediation Goal (PRG) values have been updated since the 2014 characterization, there are no significant changes in the screening thresholds that would change the preliminary conclusions of this evaluation (Reference 8.03).” *Please revise the Report to state whether the Reference 8.03 was approved by the regulatory agencies.*

2. **Section 6.03, Post Decommissioning Requirements, Page 15 of 52:** It is unclear whether the surveillance and maintenance (S&M) inspections of the cap slab activities will be conducted as a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) land use control (LUC) remedial activity once 690-N is added to Appendix C.4 of the Federal Facility Agreement (FFA). For example, the text states, “S&M inspections will be performed at regular (i.e., 12 month) intervals to identify any breaches (i.e., cracks) which would impair the integrity of the cap. To ensure facility remnants are addressed, Building 690-N will be added to Appendix C.4 of the FFA and is a subunit of the ECODS N-1, Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (Ford Building) OU.” *Please revise Report to state whether S&M inspections will be conducted as a LUC remedial activity under CERCLA once 690-N is added to Appendix C.4 of the FFA.*