



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

JUN -6 2023

Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Remediation Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Decommissioning Project Final Report for D-Area Coal Handling Houses and Associated Facilities (V-PCOR-D-00068, Revision 1, May 31, 2023) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document

The U. S. Department of Energy (DOE) is submitting the subject information for your review and approval. The Savannah River Site (SRS) submitted the Decommissioning Project Final Report (DPFR) for D-Area Coal Handling Houses and Associated Facilities (V-PCOR-D-00068, Revision 0, November 30, 2022) on December 14, 2022. The SRS received the South Carolina Department of Health and Environmental Control's (SCDHEC) and the U.S. Environmental Protection Agency's (EPA) comments on the Revision 0 DPFR on February 9, 2023 and March 3, 2023, respectively. The draft SRS' responses to the regulatory comments on the Revision 0 DPFR were emailed on April 20, 2023. SCDHEC and EPA replied on May 3, 2023 and May 19, 2023, respectively, that the draft responses to their comments were acceptable. The final comment responses were incorporated into the Revision 1 DPFR.

Hard copies and compact disks are enclosed according to the agreed upon distribution. Please review the enclosed document with the goal of responding within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject facilities are greatly appreciated.

Ms. Susan Fulmer
Mr. Jon Richards

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Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Operable Unit Manager, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2023.06.06 09:05:03 -04'00'

Brian T. Hennessey
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-23-011

Enclosures:

1. Decommissioning Project Final Report for D-Area Coal Handling Houses and Associated Facilities (V-PCOR-D-00068, Revision 1, May 31, 2023)
2. SRS Response to South Carolina Department of Health and Environmental Control (SCDHEC) Comment on the Decommissioning Project Final Report (DPFR): D-Area Coal Handling Houses and Associated Facilities, V-PCOR-D-00068, Revision 0, November 30, 2022
3. SRS Responses to Environmental Protection Agency (EPA) Comments on the Department of Energy, Savannah River Site (DOE-SRS) Facility Decommissioning Project Final Report (DPFR) for D-Area Coal Handling Houses and Associated Facilities, dated 11/30/2022

cc w/o encl:

J. Blalock, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. Stewart, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

D. Lloyd, EPA-Atlanta
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
M. McRae, Tech Law, Inc.

SRS Response to South Carolina Department of Health and Environmental Control (SCDHEC)
Comment on the Decommissioning Project Final Report (DPFR): D-Area Coal Handling Houses
and Associated Facilities, V-PCOR-D-00068, Revision 0, November 30, 2022

Comments Received on 02/09/2023

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SCDHEC COMMENT

1. According to the Facility Decommissioning Evaluation for the D-Area Coal Handling Houses and Associated Facilities, Bldgs. 484-21D, -22D, -23D and Conveyors 1, 2 & 4 contained non-friable Asbestos Containing Material requiring removal. For clarity and programmatic consistency, Section 2.01, Facility Description, of the DPFR should confirm that asbestos abatements were performed at these buildings and conveyors.

Response: Agree

Section 2.01 will be revised to state: “All asbestos containing material (ACM) was removed by certified asbestos abatement personnel in accordance with all local, state, and federal asbestos abatement regulations prior to decommissioning activities.”

Responsible Party: Ira (Alex) Davis (803-522-0481), Ira.Davis@srs.gov

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COMMENTS ON THE DEPARTMENT OF ENERGY, SAVANNAH RIVER SITE (DOE-
SRS) FACILITY DECOMMISSIONING PROJECT FINAL REPORT (DPFR) FOR D-
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11/30/2022**

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EPA GENERAL COMMENTS

1. According to the Facility Decommissioning Evaluation (FDE) (Reference 8.01) of the DPFR, Conveyor #3 is to be decommissioned and removed only up to the first concrete support column, and the remainder of Conveyor #3 decommissioning will be included with the 484-D Powerhouse at the time of D-Area Operable Unit (OU) final remediation or sooner. However, the DPFR does not include this information to clarify when/how the remainder of Conveyor #3 will be decommissioned. In addition, Appendix A (Before and After Photos of the Facility/Structure) Figure A-21 (484-21D [Looking Southwest] Before Decommissioning), does not identify the section of Conveyor #3 that was removed. Please revise the DPFR to clarify when and how Conveyor #3 will be decommissioned and identify the section of Conveyor #3 that was removed in Figure A-21.

Response: Agree with Clarification

Section 1.0 of the Revision 0 DPFR states (with editorial changes): “...Conveyor #3 was decommissioned from 484-21D to the 484-D Powerhouse. The demolition of Conveyor #3 was approved as expanded scope by U.S. Department of Energy Savannah River Site Operations (DOE-SR) in ‘Decommissioning of D-Area Coal Handling Houses and Associated Facilities’ (Reference 8.14).”

Section 4.0 of the Revision 0 DPFR states: “...Conveyor #3 was decommissioned from 484-21D to the 484-D Powerhouse. A small section of Conveyor #3 remains attached to the Powerhouse since its complete removal would have compromised the 484-D Powerhouse wall.”

The DPFR does not include information on when and how the remaining small section of Conveyor #3 will be decommissioned because that information is currently unknown. However, text will be added to Section 4.0 as follows: “...484-D Powerhouse wall. This small section will be decommissioned with the 484-D Powerhouse at the time of D-Area Operable Unit final remediation or sooner.”

Figure A-23 will be added to the Revision 1 DPFR to show the remaining section of Conveyor #3. The figure is included with the comment responses.

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EPA SPECIFIC COMMENTS

- 1. Section 1.0, Summary, Page 7 of 30; Section 4.0, Decommissioning Activities Completed, Page 11 of 30; and Section 6.01, Final Facility Condition and Remaining Hazards, Page 13 of 30:** The text indicates that the leading door from Conveyor #3 to the 484-D Powerhouse was barricaded on the exterior and interior to prevent unsafe access; however, it is unclear how the door was barricaded as this information is not included in the text or depicted on a figure. Please revise the DPFR to describe how the leading door from Conveyor #3 was barricaded to provide protectiveness and prevent unsafe access.

Response: Agree with Clarification

The barricading of the leading door from Conveyor #3 to the 484-D Powerhouse is unrelated to the end state of the coal handling structures that were decommissioned. The door was barricaded as a maintenance activity related to the safety of the 484-D Powerhouse until it can be decommissioned.

Text in Sections 1.0, 4.0, and 6.01 will be revised as follows: “...The door leading from Conveyor #3 to the 484-D Powerhouse was barricaded on the exterior and interior by steel bars bolted to the door frame as a maintenance activity to prevent unsafe access. Electrical junction...”.

Responsible Party: Ira (Alex) Davis (803-522-0481), Ira.Davis@srs.gov

- 2. Section 1.0, Summary, Page 6 of 30; Section 4.0, Decommissioning Activities Completed, Page 10 of 30; and Section 6.01, Final Facility Condition and Remaining Hazards, Page 13 of 30:** The text states that the tunnels for both Conveyor #1 and Conveyor #4 were refilled with riprap, excavated dirt and additional fill material, and graded; however, there are no photos documenting the decommissioning refilling and grading activities. Please revise the DPFR to consider adding photos documenting the refilling of tunnels with riprap, excavated dirt and additional fill, and the grading processes at Conveyors #1 and #4.

Response: Agree

Because it is not always safe or feasible to do so, photos documenting the in-process D&R are not generally taken for inclusion in the DPFR as the report focuses on the end state condition. However, in-process photos of Conveyor #1 tunnel are available and will be added to the Revision 1 DPFR (Appendix B, In-Process Photos of Conveyor Tunnels) to

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document the refilling and grading process for the conveyor. The same refilling and grading process applies to Conveyor #4.

Text will be added to Sections 1.0, 4.0, and 6.01 that states, **“See Appendix B for in-process photos of excavation and filling of Conveyor #1 and tunnels. The same refilling and grading process was used for Conveyor #4 tunnels.”**

Responsible Party: Ira (Alex) Davis (803-522-0481), Ira.Davis@srs.gov

3. **Section 6.02, Risk Assessment Summary, Pages 13 of 11:** The DPFR states, “A review of the existing characterization data, process/building history, and sample data, along with walkdowns of the facilities conducted prior to decommissioning...;” however, Section 3.0 (Decommissioning Model Approval) notes that a walk down was not prescheduled with the South Carolina Department of Health and Environmental Control (SCDHEC) or the United States Environmental Protection Agency (EPA), and that a regulator walkdown of the facility did not occur due to COVID-19 travel restrictions. As such, it appears that USDOE was the only Core Team member that participated in the walkdown of the facilities. Please revise the text to clarify that USDOE was the only Core Team member that participated in the walkdown assessments prior to decommissioning of the Coal Handling Houses and Associated Facilities.

Response: Agree

Section 3.0 will be revised as follows: “...COVID-19 travel restrictions. Of the three Core Team members, only DOE-SR participated in a walkdown of the facility.”

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Figure A-23: Conveyor #3 After Decommissioning

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Figure B-1: Conveyor #1 Tunnel during Excavation/Fill

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Figure B-2: Conveyor #1 Tunnel during Excavation/Fill