



Department of Energy
Savannah River Operations Office
P.O. Box A
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JUL 24 2019

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
Acting Savannah River Site Remedial 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: Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the D-Area Coal Storage Area (484-17D), SEMS Number: 63

Pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan [40 CFR Section 300.415(b)(2)(iv)] that states removal actions shall be considered when “*High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that might migrate.*”, the U.S. Department of Energy (DOE) prepared a Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for the D-Area Coal Storage Area (484-17D) (SRNS-RP-2018-00813, Revision 1, May 2019) SEMS Number: 63. The regulatory review of the Revision 0 RSER/EE/CA occurred from November 29, 2018 to March 4, 2019. The Savannah River Site (SRS) received comments from the South Carolina Department of Health and Environmental Control (SCDHEC) on January 25, 2019 and the U.S. Environmental Protection Agency (EPA) on March 4, 2019. The SRS’ responses to the EPA’s and SCDHEC’s comments were incorporated into the Revision 1 RSER/EE/CA, which was made available for public review and comment from June 13, 2019 to July 13, 2019. As documented in the enclosed Responsiveness Summary, no comments were received during the public comment period. The Action Memorandum and Responsiveness Summary will be made part of the Administrative Record. In addition, a notice will be filed in the Environmental Bulletin within two (2) weeks of submittal of the Action Memorandum and Responsiveness Summary to the Administrative Record File/Information Repository File

The D-Area Coal Storage Area (484-17D) is located within the D-Area Operable Unit (DAOU) at the SRS. DAOU is located within the southwest quadrant of SRS approximately 3,000-foot east of the nearest site boundary, the Savannah River. The DAOU contains surface units and source areas in D Area that potentially pose a threat to human health and the environment. The D-Area Coal Storage Area is approximately fifteen acres in size and supported the D-Area Powerhouse (484-D) as a temporary storage area for coal prior to use at 484-D. The D-Area Powerhouse was built in 1953 and shut down in 2012 after 59 years of operation. The facility burned approximately 160,000 tons of coal per year during this period.

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The justification to perform a removal action is to reduce the acidity in the upper portion of the vadose zone and subsequently reduce the amount of acidic leachate to groundwater. The removal action objective to protect human health and the environment is to increase the pH in the D-Area Coal Storage Area vadose zone soils to more natural conditions resulting in the minimization of future impacts to groundwater.

The preferred removal action for the D-Area Coal Storage Area is Alternative 2, Addition of Soil Neutralization Amendments, which meets the effectiveness, implementation, cost, and acceptance criteria. Alternative 2 will mix in soil neutralization amendments such as lime or calcium carbonate material to a targeted depth of 4 feet below ground surface across the entire 15 acres of the D-Area Coal Storage Area, including the 6 to 8 inches layer of coal fragments. The addition of soil neutralization amendments to raise the pH of the vadose zone soils will reduce the acidic leachate that contributes to low pH and metals plumes in groundwater. This alternative will employ treatment by the addition of soil amendments and meets the criteria to reduce toxicity by raising the pH of the leachate prior to discharge to groundwater. Through treatment of the vadose zone soils and reduction in acidic leachate, groundwater pH is expected to return to more natural background levels over time. Reducing the leaching of metals and returning the groundwater to an approximate pH of 5.5 (background condition) over time is more protective of human health and the environment as compared to no action.

Removal activities are scheduled to commence April 30, 2020. Upon conclusion of the removal action, a Removal Action Report that summarizes the work will be prepared and submitted to document the completion of the removal action.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,



Brian T. Hennessey
SRS Remedial Project Manager
Area Completion Project

IACD-19-174

Enclosure:

Responsiveness Summary for the Non-Time Critical Removal Action for the for the D-Area Ash Basin (488-1D) SEMS Number: 63

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D. Scaturo, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. O'Quinn, SCDHEC - Aiken Environmental Affairs Office
B. Cameron, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA

cc w/encl:

D. Lloyd, EPA-Atlanta
M. McRae, TechLaw, Inc.

Responsiveness Summary

The thirty (30) day public comment period for the *Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for the D-Area Coal Storage Area (484-17D) (SRNS-RP-2018-00813, Revision 1, May 2019)* began on June 13, 2019 and ended on July 13, 2019.

Public Comments

No comments were received from the public during the thirty (30) day public comment period.