



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

JUN 13 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 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: Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U) (SRMC-CWDA-2023-00006, Redline Revision 1, June 2023) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 23

In accordance with the terms of the Federal Facility Agreement, the U.S. Department of Energy (DOE) is submitting the subject document for regulatory review and approval. The DOE submitted the Revision 0 document on February 27, 2023. The U. S. Environmental Protection Agency's (EPA) comments on the Revision 0 document were received on April 14, 2023. The South Carolina Department of Health and Environmental Control's (SCDHEC) approval of the Revision 0 document was received on April 27, 2023. This submittal includes the Savannah River Site's responses to the EPA's comments on the Revision 0 document and the incorporation of the responses into the Revision 1 Redline document.

Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject operable unit are greatly appreciated.

Ms. Susan Fulmer
Mr. Jon Richards

JUN 13 2023

2

Questions from you or your staff may be directed to me at (803) 952-8365, or Mr. Joel Maul at (803) 208-7424.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2023.06.13 12:28:14 -04'00'

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

WDPD-23-37

Enclosures:

1. Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U) (SRMC-CWDA-2023-00006, Redline Revision 1, June 2023) SEMS Number: 23
2. SRS Responses to the U.S. Environmental Protection Agency Comments on the Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U) (SRMC-CWDA-2023-00006, Revision 0, January 2023) SEMS Number: 23

cc w/o encl:

J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
R. G. Stewart, 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
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office

cc w/encl:

H. H. Cathcart, SCDHEC – Columbia
J. Dawson, EPA - Atlanta
M. McRae, TechLaw, Inc.

Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U), (SRMC-CWDA-2023-00006, Revision 0, January 2023) SEMS Number: 23 – Comment Response

UNITED STATES DEPARTMENT OF ENERGY SAVANNAH RIVER SITE		SRMC-CWDA-2023-00053, Revision 0	
Document No./Title: Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U), (SRMC-CWDA-2023-00006, Revision 0), SEMS Number: 23		Rev.: 0	Doc. Date: January 2023
Commenter(s): U. S. Environmental Protection Agency		Contact: Celia I. Aponte	
No.	Comments	Comment Resolution	
EPA 1	Page 1 of 11, in the first sentence of the first paragraph, add the site location (Aiken County, South Carolina), as recommended by the EPA guidance document OSWER 9200.1-23P <i>Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents</i> , EPA 540-R-98-031, July 1999, ESD Checklist Highlight 7-2 Sample Outline and Checklist for ESDs and ROD Amendments [ROD ESD Guidance]. For example "...which functions as the lead agency for remedial activities at Savannah River Site (SRS), located near Aiken County, South Carolina, with concurrence by...."	<p>The site location has been added, as requested:</p> <p>“This Explanation of Significant Difference (ESD) is being issued by the United States Department of Energy (USDOE), which functions as the lead agency for <u>remedial activities at Savannah River Site (SRS), located near Aiken County, South Carolina</u>, with concurrence by the United States Environmental Protection Agency (USEPA) and the South Carolina Department of Health and Environmental Control (SCDHEC).”</p> <p>Responsible Party: Celia Aponte, (803) 557-9550, celia.aponte@srs.gov</p>	
EPA 2	Page 1 of 11, at the end of the first paragraph, include the date of IROD signature, as recommended by the ROD ESD Guidance.	<p>Section I, Introduction, has been modified as follows to include the date of the signed Interim Record of Decision:</p> <p>“The purpose of this ESD is to announce the incorporation of F-Area Diversion Box (FDB)-5 and FDB-6 (Buildings 241- 33F and 241-32F, respectively) at the F-Area Tank Farm (FTF) into the interim response action selected in the <i>Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20</i> (SRR-CWDA-2012-00111), <u>which was issued on April 30, 2013.</u>”</p> <p>Responsible Party: Celia Aponte, (803) 557-9550, celia.aponte@srs.gov</p>	

**Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U), (SRMC-CWDA-2023-00006, Revision 0, January 2023) SEMS Number: 23 –
Comment Response**

UNITED STATES DEPARTMENT OF ENERGY SAVANNAH RIVER SITE		SRMC-CWDA-2023-00053, Revision 0	
Document No./Title: Explanation of Significant Difference (ESD) for Incorporating F-Area Diversion Boxes 5 and 6 into the Revision 1 Interim Record of Decision Remedial Alternative Selection for the F-Area Tank Farm, Waste Tanks 17 and 20 (U), (SRMC-CWDA-2023-00006, Revision 0), SEMS Number: 23		Rev.: 0	Doc. Date: January 2023
Commenter(s): U. S. Environmental Protection Agency		Contact: Celia I. Aponte	
No.	Comments	Comment Resolution	
EPA 3	Page 2 of 14, at the end of first paragraph, it is recommended that a sentence be added to describe the history of prior related ESDs. For example, “An ESD was previously issued to modify the IROD to apply the selected remedy to FTF Waste Tanks 18 and 19 (SRR-CWDA-2013-00007) and to Tanks 5 and 6 (SRR-CWDA-2014-00008).”	<p>Section I last paragraph was modified to include the history of previous IROD related ESDs as follows:</p> <p><u>“ESDs were previously issued to modify the IROD to apply the selected remedy to FTF Waste Tanks 18 and 19 (SRR-CWDA-2013-00007) and to Waste Tanks 5 and 6 (SRR-CWDA-2014-00008).”</u></p> <p>The Waste Tanks 18 & 19 and Waste Tanks 5 & 6 ESDs were also added to Section VII (References).</p> <p>Responsible Party: Celia Aponte, (803) 557-9550, celia.aponte@srs.gov</p>	