

Shelia Mcfalls

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Wednesday, May 19, 2021 12:49 PM
To: Shelia Mcfalls; Fulmer, Susan
Cc: pope.robert (epa.gov); Cathcahe (dhec.sc.gov); Chris Bergren; Robert Shirley; Amy Meyer; Thelesia Oliver; Jeffcj Ward; Ross Fanning; J Ross; Dena Brett; Steven Conner; Bette Ross
Subject: RE: Request for Concurrence on the Administrative Path Forward for Location of a Former Heating Oil Tank near Building 710-A, Maintenance Training Facility and Warehouse

EPA appreciates the explanation and information provided in light of our comment on the FDE report. We accept and concur with the information and the 3 bullets as provided below for this former Heating Oil Tank. And documenting in the Admin record will suffice, thanks

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From: Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>
Sent: Wednesday, May 19, 2021 12:30 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>
Cc: Pope, Robert <Pope.Robert@epa.gov>; Cathcahe@dhec.sc.gov; chris.bergren@srs.gov; Robert.Shirley@srs.gov; Amy.Meyer@srs.gov; thelesia.oliver@srs.gov; jeffcj.ward@srs.gov; ross.fanning@srs.gov; j.ross@srs.gov; dena.brett@srs.gov; Steven.Conner@srs.gov; bette.ross@srs.gov
Subject: Request for Concurrence on the Administrative Path Forward for Location of a Former Heating Oil Tank near Building 710-A, Maintenance Training Facility and Warehouse

SRNS-J2000-2021-00404

Jon and Susan,

The Savannah River National Laboratory (SRNL) has submitted a Site Use permit to place several storage containers and mini-mobiles on the Building 710-A facility remnant slab. Building 710-A, Maintenance Training Facility and Warehouse, was decommissioned as a Simple Model facility in 2005, is listed in the Federal Facility Agreement (FFA) Appendix K.2, D&D Facilities (or Remnants) that Require No Further Evaluation, and is suitable for industrial reuse of the building slab as requested by SRNL. Environmental Compliance and Area Completion Projects (EC&ACP) personnel performed a walk down of the building slab on April 29, 2021 in consideration of the request.

A separate issue concerns the disposition of an area near Building 710-A that was the location of a former residential heating oil tank. The Facility Decommissioning Evaluation (FDE) (G-FDE-A-00038, Revision 1, dated 11/17/2004) for Building 710-A includes a floor plan that depicts an area just off the northwest corner of Building 710-A as the former location of a residential heating oil tank removed in the early 1990s (see attachment). The FDE states that according to the recollection of the rigger supervisor who oversaw the project's field activities,

the heating oil tank was removed intact without incident; however, the FDE notes that written documentation of the tank removal project was not available. The FDE selected the Simple Model as being appropriate because there was no evidence that the building processed radioactive or hazardous material and there was no evidence (walkdown/inspection and review of Site Item Reportability and Issues Management (SIRIM) database and FFA) that there had been a spill or release from the building.

In 2005, the South Carolina Department of Health and Environmental Control (SCDHEC) and U. S. Environmental Protection Agency (EPA) concurred with the use of the Simple Model (ARF-011990, dated January 7, 2005 and ARF-012160, dated February 16, 2005, respectively). In their respective letters, EPA and SCDHEC provided comments on the FDE. EPA submitted a comment to request that the area where the residential heating oil tank was located be referred to the Area Operable Unit (OU) Record of Decision (ROD) process so that soil sampling is conducted to determine whether heating oil from the tank impacted the surrounding soils. In the response to the EPA's comment, Savannah River Site (SRS) agreed to refer the tank area to the Area OU ROD process and to specifically address the response in the Decommissioning Project Final Report (DPFR) (FCP-05-168, dated July 28, 2005). Due to an administrative oversight, the heating oil tank area was not added to the Area ROD process (Appendices C.4/C.5 of the FFA) and the DPFR (V-PCOR-A-00030, Revision 0, March 28, 2005) does not include language referring the area in question to the Area OU ROD process. The DPFR was approved by EPA and SCDHEC on June 21, 2005 (ARF-013571) and July 25, 2006 (ARF-013736), respectively.

This oversight was discovered when EC&ACP reviewed the project documentation in response to SRNL's request to reuse the remnant slab. SRS has been unable to locate any records to document that the location of the former heating oil tank was addressed in accordance with our comment response. However, SRS does not believe sampling for the presence of heating oil in the soils at the former tank location is necessary or warranted since heating oil is not a hazardous substance under the Comprehensive Environmental Response, Compensation and Liability Act petroleum exclusion.

SRS proposes to place this correspondence and your concurrence in the Administrative Record File to document that:

- Building 710-A was properly decommissioned using the Simple Model;
- No further investigation of potential impact from the former adjacent heating oil tank is required; and
- No addition to the A-Area Operable Unit (Appendix C) for further assessment is required.

Please review the information contained in this email and reply by May 27, 2021 if the proposed path forward is acceptable.

Please contact me if you have any questions, comments, or concerns.

Thanks

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