



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

July 12, 2020

Mr. Brian Hennessey, 730-B  
SRS Remedial Project Manager  
Savannah River Operations Office  
Area Completion Projects  
Post Office Box A  
Aiken, South Carolina 29802



Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the DOE-SRS Facility Decommissioning Evaluations (FDEs) for:

- 1) Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020;
- 2) Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020;
- 3) Building 483-3D, Electrical Control Building Rev 0, Dated April 28, 2020;
- 4) Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev 0, Dated May 11, 2020
- 5) Building 710-16D, Storage Building, Rev 0, Dated April 27, 2020
- 6) Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020
- 7) Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020
- 8) Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020

EPA conditionally concurs on the simple model for all 8 FDEs noted above, pending DOE-SRS responses to EPA comments. Should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely, for

**ROBERT POPE** Digitally signed by ROBERT POPE  
Date: 2020.07.24 08:52:41 -04'00'

Diedre Lloyd  
Remedial Project Manager  
Restoration & Sustainability Branch  
Superfund Emergency & Management Division

cc: Angelia Holmes, DOE-SRS, Brian Hennessey, DOE-SRS, Phil Prater, DOE-SRS, Karen Adams, DOE-SRS, Chris Bergren, SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

## EPA COMMENTS on the

### FACILITY DECOMMISSIONING EVALUATIONS FOR:

**Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020;**  
**Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020;**  
**Building 483-3D, Electrical Control Building Rev 0, Dated April 28, 2020;**  
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**Building 710-16D, Storage Building, Rev 0, Dated April 27, 2020**  
**Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020**  
**Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020**  
**Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020**

### D-Area Operable Unit

### SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

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#### EPA GENERAL COMMENTS:

- 1) Please notify the D Area core team member (Diedre Lloyd) via email or phone if, during decommissioning of a Simple Model facility, some condition is identified that may contradict the Simple Model assumptions.
- 2) Please provide one figure that depicts the relationship between the 8 buildings and their ancillary structures. This figure should also include all previously approved FDEs buildings and ancillary structures.
- 3) Please inform EPA/SCDHEC upon property disposition to the SRS Community Reuse Organization (SRS CRO) from all DAOU FDEs via letter.
  - a. Please included a brief, estimated timeline and items (property disposition) in the letter.
- 4) Please provide further detail that explains how the electrical services have been isolated/properly abandoned prior to facility decommissioning activities for all FDEs. Each of the FDEs mentions that electrical items will be isolated and not air gapped.

#### EPA SPECIFIC COMMENTS:

- 5) **Building 480-3D, Maintenance Field Office and Shop, Rev. 0, Dated April 28, 2020**
  - a. **Summary of Existing Characterization Section:** Please include the November 11, 2019 asbestos survey in this FDE which identified ~2,560 square feet of asbestos containing materials (ACM) along with 31 square feet of presumed asbestos containing materials (PACM).
  - b. **Process History Section:** This FDE identifies 2 drains/hubs/clean-outs that were not plugged and grouted in the process history in the former Lime Storage Room (1 hub and 1 floor drain) and in the former chlorine Cylinder Tank Room (one clean-out and 1 floor drain). The FDE indicates that these remain in good working order.
    - i. The current status of the 2 above identified drains/hubs/clean outs remains unclear. Specifically, do the drains/hubs/clean-outs remain unplugged/ungrouted?
    - ii. If the 2 above drains/hubs/clean-outs remain in operating status – please provide additional detail/clarity how operating status will be maintained during demolition and future operations.

- c. Please include interior pictures of the building slab/interior along with additional views of the building exterior.
- 6) Building 704-7D, D-Area Maintenance Building, Rev 0, Dated April 27, 2020**
- a. Please indicate if sanitary sewer drains/hubs/clean-outs have been plugged/abandoned?
  - b. Has electrical service in all buildings and feeder boxes been abandoned in addition to being disconnected?
  - c. **Summary of Existing Characterization Section:** Please include the November 18, 2019 asbestos survey in this FDE which identified small amount of asbestos containing materials (ACM).
  - d. Please include interior pictures of the building slab/interior along with additional views of the building exterior, inclusive of fencing.
- 7) Building 483-3D, Electrical Control Building Rev 0, Dated April 28, 2020**
- a. Please provide additional information/clarity as to what below grade structure will remain intact and what equipment will be removed with respect to the N. Cable Trench area.
  - b. Please indicate if the 2 floor drains and 1 cleanout have been capped/plugged prior to decommissioning activities. If so, please state the activities. If not, please indicate this and provide a rationale to support this decision.
  - c. Please provide rationale for filling the remaining below grade structure with rock, gravel and soil instead of concrete?
  - d. **Facility Description Section:** Building construction of the siding and roof contains corrugation asbestos. Please include the November 25, 2019 asbestos survey for this structure.
  - e. **Figure 1 and Figure 2/associated Facility Description:**
    - i. The text in Facility Description indicates that the red dot/dash line in Figure 1 is the boundary for the FDE activity for Building 483-3D however, the Transformer AT2W that has been drained and disconnected is NOT included in this FDE but is inside the red dot/dash line boundary. Please provide clarity in the report text and a map legend that indicates the significance of all colors and symbols in each figure 1 and figure 2.
  - f. Please include the below requested information for each of the transformer locations (AT2W, AT1W and W4):
    - i. Please address the presence/absence of physical evidence/releases for each transformer location inclusive of photographic and descriptive evidence of the concrete pad/containment dike and sump, etc.
    - ii. Have any of the transformers contained PCBs?
    - iii. Has the ground surface below the gravel associated with AT1W been inspected? If so, please include this photo. If not, please explain, why not?
  - g. Please provide clarity as to the boundaries of the proposed activities and the items included/associated with this FDE, it isn't clear what activities/structures are and are not included, perhaps a table could be provided that would provide additional clarity and information.
  - h. Please include the November 25, 2019 asbestos survey in this FDE which identified several areas that tested positive for asbestos containing materials (ACM) and provide locations/descriptions of the areas that tested positive.
- 8) Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, Rev 0, Dated May 11, 2020**
- a. Were the underground lines/pipes that led from Building 480-3D to the cooling tower basin abandoned/capped? If so, please state their disposition in this FDE. If not, please explain the end state of the underground piping.

- b. Please include the November 30, 2019 and the January 13, 2020 asbestos surveys in this FDE which identified areas that tested positive for asbestos containing materials (ACM).

**9) Building 710-16D, Storage Building, Rev 0, Dated April 27, 2020**

- a. **Figure 2:** The picture indicates that the spill impacted the area of intersection of wall with concrete. Has the exterior section of concrete/dirt area on the outside of this intersection been inspected/evaluated? Please include a photograph of this area.
- b. Figure 4: please include legend for this figure to ensure clarity and understanding of the depicted structures/different colors. Please label all structures or alternatively label and provide a legend in the overall FDE project figure requested in #3) above.
- c. Please include the November 25, 2019 asbestos survey in this FDE which identified small amount of asbestos containing materials (ACM).

**10) Building 484-5D, D-Area Powerhouse Storage Building, Rev 0, Dated April 27, 2020**

- a. **Figure 3:** Please include a legend to ensure clarity and understanding of the depicted structures and the different associated colors depicted in the figure. Please label all structures or alternatively label and provide a legend in the overall FDE project figure requested in #3) above.
- b. Please include the November 04, 2019 asbestos survey in this FDE which identified small amount of asbestos containing materials (ACM).

**11) Building 484-9D, D-Area Valve House, Rev 0, Dated May 20, 2020**

- a. For the purposes of clarity, please provide further explanation for isolation of all fire water (inclusive of the fire hydrant), steam, instrument air and electrical versus air-gapped. It is unclear if the above services have been properly abandoned prior to demolition/decommissioning.
  - i. For instance: have the water services to the fire hydrant and fire water piping been plugged to ensure services are no longer usable and in a safe state prior to and following demolition.
- b. Please include the January 9, 2020 Asbestos survey in this FDE.
- c. **Page 7 of 13, bottom of the page:** The highlighted sentence in the paragraph below is an incomplete sentence; please amend and complete this sentence to convey further information as originally intended.

The fire panel and control room (Figures 4 & 7) contains the Panalarm® fire control panels, pull stations, system annunciator panels, battery backups, switches and relays, and other fire control devices necessary for the system, all of which are now isolated, but not "air-gapped" to render the facility "cold and dark." A single ceiling-mounted incandescent light in the control room, which has also been electrically isolated, provided lighting in the alarm panel and control room. There is a leak in the ceiling of the fire panel and control room.

JKB 5-20-20

**12) Building 717-3D, D-Area Welding Shop, Rev. 0 Dated April 27, 2020**

- a. Please provide response to EPA General Comment #4 for this FDE