



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

March 23, 2022

ENVIRONMENTAL COMPLIANCE &

Mr. Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

MAR 23 2022

AREA COMPLETION PROJECTS

Dear Mr. Hennessey,

EPA has received and reviewed the Draft Action Memorandum for the Non-Time Critical Removal Action for the 235-F Building (dated February 2022). EPA's comments are below.

EPA looks forward to continuing to work with DOE and SCDHEC to implement the removal action for the 235-F building. If you have any questions or require additional information, please contact me at (404) 562-8506.

Sincerely,

ROBERT POPE Digitally signed by ROBERT POPE
Date: 2022.03.23 10:55:27 -04'00'

Robert H. Pope, GS-14
Senior Remedial Project Manager
Superfund and Emergency
Management Division

cc: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDHEC

EPA Comments on the Draft Action Memorandum for the Non-Time Critical Removal Action for the 235-F Building (dated February 2022)

General Comment

1. EPA Region 4's Office of Regional Counsel recommends DOE's draft Action Memorandum letter be revised or supplemented to include the substantive sections and content outlined in the model format in EPA's Superfund Removal Guidance for Preparing Action Memoranda, OSWER, Sept. 2009 (see e.g., Exhibit 4 "Basic Action Memorandum Outline").

Specific Comments

1. Page 2, para. 2. Per EPA's Superfund Removal Guidance for Preparing Action Memoranda, OSWER, Sept. 2009, the Action Memorandum section pertaining to release or threatened release into the environment of a hazardous substance, or pollutant or contaminant should list the hazardous substances as defined by section 101(14) of CERCLA, or pollutants or contaminants as defined by section 101(33) of CERCLA known to be present at the site. In addition to radiological contaminants, asbestos-containing material and PCBs are present in FAMS Building 235-F building materials, structures and/or fixtures as identified in the EE/CA. The Action Memo should identify these substances, quantity, location.
2. The Action Memo should summarize how the preferred alternative will address ACM and PCBs present in Bldg-235F.
3. The Action Memo should summarize the need for provision of LUCs, the LUC objectives and identify specific LUCs (e.g., maintenance of signs, fences, deed restrictions) necessary or appropriate for the removal action to remain protective.
4. Add the following language to the Action Memo regarding ARARs compliance: "Pursuant to 40 CFR 300.415(j), removal actions shall, to the extent practicable considering the exigencies of the situation, attain 'Applicable' or 'Relevant and Appropriate Requirements' (ARARs) as defined in 40 CFR 300.5. ARARs include any standard, requirement, criterion, or limitation under any Federal environmental law, such as Toxic Substances Control Act (TSCA) requirements pertaining to PCBs, Safe Drinking Water Act (SDWA) Maximum Contaminant Levels, Clean Air Act (CAA) NESHAPs pertaining to ACM, RCRA requirements pertaining to waste characterization, treatment and disposal, and any more stringent promulgated standard, requirement, criterion, or limitation under a State environmental or facility-siting law. The preferred removal alternative is expected to comply with the ARARs identified by DOE and EPA Region 4 in the EE/CA, Appendix C- Potential ARARs and TBC Criteria for Building 235-F."
5. The preferred alternative A-2, ISD of First and Second Process Areas/Engineered Roof, will leave PCB remediation waste (including bulk product waste) in place (i.e., in situ

disposal) and thus must meet the risk-based disposal regulation 40 CFR 761.61(c), which states “may sample, cleanup or dispose of PCB remediation waste in a manner other than prescribed in 40 CFR 761.61(a) or (b) or store remediation waste in a manner other than prescribed in 40 CFR 761.65 if application approved in writing by EPA Regional Administrator and EPA finds that the method will not pose an unreasonable risk of injury to [sic] human health or the environment. Each application must include information described in 40 CFR 761.61(a)(3).” The appropriate information required in an application can be provided in a CERCLA document (e.g. the EE/CA and Action Memo) that is reviewed by EPA. Refer to 40CFR 761.62(c) which covers risk-based disposal of bulk product waste. Please add a statement to the Action Memo regarding the information in the EE/CA that the PCBs in question are in sealants and paint and not in a mobile liquid form and that the sealants and paint will remain inside the building. Further, please state that the alternative will result in the building being partially filled with cement grout and sealed for in situ disposition keeping the PCBs from direct contact with any receptor and mitigating the risk of any leaching through multiple layers of concrete and through approximately 50 feet of soil to groundwater. In addition, please state that the entire F Area is an industrial area with multiple other facilities that under CERCLA future land use assumptions will remain industrial. Please add that the multiple other facilities and units are yet to be addressed which will require a final Remedial decision in the future and at that time, a full CERCLA Baseline Risk Assessment will be completed for the area.