



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

August 1, 2023

ENVIRONMENTAL COMPLIANCE &

AUG - 1 2023

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

AREA COMPLETION PROJECTS

EPA Conditional Approval for the Draft Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) SEMS Number: 93 SRNS-RP-2022-01284 June 2023, SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

Dear Mr. Hennessey:

N-1
also
8/1/23
The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the draft ROD R1 for ~~N-2~~ ECODS, CSSLP, and Ford building. The attached table has the accepted changes for this conditional approval letter.

If you have any questions or if you require additional information, please contact me at (404) 562-8648.

Sincerely,
Richards, Jon
Digitally signed by
Richards, Jon
Date: 2023.08.01 10:52:54
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Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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

Table 8 (ARARs for the Selected Remedial Alternative for the CSSLP Subunit)

Action	Requirements	Prerequisite	Citation
Managing fugitive dust emissions from land disturbing activities	Emissions of fugitive particulate matter shall be controlled in such a manner and to the degree that it does not create an undesirable level of air pollution.	Activities that will generate fugitive particulate matter (Statewide) – applicable	SCDHEC R. 61-62.6 Section III(a)- <i>Control of Fugitive Particulate Matter Statewide</i>
Waste Treatment and Disposal — (e.g., excavated contaminated soils/sediments, debris)			
Disposal of solid waste	Shall ultimately dispose of solid waste at facilities and/or sites permitted or registered by the Department for processing or disposal of that waste stream.	Generation of solid waste intended for off-site disposal – relevant and appropriate	SCDHEC R. 61-107.5(D)(3)
	Must determine whether the waste is identified in subpart C of 40 <i>CFR</i> Part 261 by using prescribed testing methods or applying generator knowledge based on information regarding material or processes used.	Generation of solid waste that is not listed in subpart D of 40 <i>CFR</i> Part 261 and not excluded under 40 <i>CFR</i> 261.4 – applicable	40 <i>CFR</i> 262.11(c) SCDHEC R. 61-79 262.11(c)
Waste Characterization – Primary Wastes (e.g., excavated contaminated soil and sediment) and Secondary Wastes (e.g., contaminated equipment, PPE)			
Characterization of <i>solid waste</i> (all primary and secondary wastes) and listed hazardous waste determination	Must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. A hazardous waste determination is made using the following steps: (a) Must be made at the point of waste generation, before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the RCRA classification of the waste may change (b) Must determine whether the waste is excluded from regulation under 40 <i>CFR</i> § 261.4 (c) Must use the knowledge of the waste to determine whether waste meets any of the listing descriptions under subpart D of 40 <i>CFR</i> Part 261. Acceptable knowledge that may be used in making an accurate determination as to whether the waste is listed may include waste origin, composition, the process producing the waste, feedstock, and other reliable and relevant information	Generation of solid waste as defined in 40 <i>CFR</i> § 261.2 – applicable	40 <i>CFR</i> § 262.11(a), (b) and (c)
Determination of characteristic hazardous waste	The person then must also determine whether the waste exhibits one or more hazardous characteristics as identified in subpart C of 40 <i>CFR</i> part 261 by following the procedures in paragraph (d)(1) or (2) of this section, or a combination of both.	Generation of solid waste which is not excluded under 40 <i>CFR</i> § 261.4(a) – applicable	40 <i>CFR</i> § 262.11(d)
Determination of characteristic hazardous waste through knowledge	The person must apply knowledge of the hazard characteristic of the waste in light of the materials or the processes used to generate the waste. Acceptable knowledge may include process knowledge (e.g., information about chemical feedstocks and other inputs to the production process); knowledge of products, by-products, and intermediates produced by the manufacturing process; chemical or physical characterization of wastes; information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste; testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents. A test other than a test method set forth in subpart C of 40 <i>CFR</i> part 261, or an equivalent test method approved by the		40 <i>CFR</i> § 262.11(d)(1)

	Administrator under 40 CFR 260.21, may be used as part of a person's knowledge to determine whether a solid waste exhibits a characteristic of hazardous waste. However, such tests do not, by themselves, provide definitive results. Persons testing their waste must obtain a representative sample of the waste for the testing, as defined at 40 CFR 260.10.		
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Table 9 (ARARs for the Selected Remedial Alternative for the Ford Building Subunit)

Action	Requirements	Prerequisite	Citation
<i>Waste treatment and disposal — (e.g., excavated contaminated soils/sediments, debris)</i>			
Disposal of PCB bulk product waste at 690-N	<p>EPA will issue a written decision on each application for a risk-based sampling, disposal, or storage method for PCB bulk product wastes. EPA will approve such an application if it finds that the method will not pose an unreasonable risk of injury to health or the environment.</p> <p>NOTE: Appropriate information required in an application can be provided in a CERCLA document (e.g., Engineering Evaluation/Cost Analysis, Action Memo, FS, PP, or ROD) that is approved or issued by EPA.</p>	<p>Sampling, storage and/or disposal of PCB bulk product waste (as defined in 40 CFR 761.3) – applicable</p>	<p>40 CFR Part 761, Section 62, Paragraph (c)</p>
<i>Waste Generation and Management</i>			
Management of PCB waste (e.g., contaminated PPE, equipment, wastewater)	Any person storing or disposing of PCB waste must do so in accordance with 40 CFR 761, Subpart D.	<p>Generation of waste containing PCBs at concentrations \geq 50 ppm – applicable</p>	<p>40 CFR 761.50(a), specifically 40 CFR 761.50(b)(4)</p>
	PCB bulk product waste shall be disposed of in accordance with paragraph (a), (b), or (c) of 40 CFR 761.62. Under some of these provisions, it may not be necessary to determine the PCB concentration or leaching characteristics of the PCB bulk product waste..	<p>Generation of PCB bulk product waste as defined in 40 CFR 761.3 – applicable</p>	<p>40 CFR 761.62</p>
<i>Disposal with PCB Bulk Product Waste Left in Place</i>			
Risk-based sampling, storage and/or disposal of PCB bulk product waste	<p>May sample or dispose of bulk product waste in a manner other than prescribed in 40 CFR 761.62(a) or (b), or store bulk product waste in a manner other than prescribed in 40 CFR 761.65, if receive approval in writing from EPA Regional Administrator and EPA finds that the method will not pose an unreasonable risk of injury to human health or the environment. Each application must contain information indicating that, based on technical, environmental or waste specific characteristics or considerations, the proposed sampling, disposal or storage methods will not pose an unreasonable risk of injury to human health or the environment.</p> <p>NOTE: Appropriate information required in an application can be provided in a CERCLA document (e.g. FS, PP, or ROD) that is approved or issued by EPA.</p>	<p>Sampling, storage and/or disposal of PCB bulk product waste (as defined in 40 CFR 761.3) – relevant and appropriate</p>	<p>40 CFR 761.62(c)</p>

<p>Cap with risk-based disposal of PCB bulk product waste</p>	<p>A cap means, when referring to on-site cleanup and disposal of PCB remediation waste, a uniform placement of concrete, asphalt, or similar material of minimum thickness spread over the area where remediation waste was removed or left in place in order to prevent or minimize human exposure, infiltration of water, and erosion.</p> <ul style="list-style-type: none"> • A concrete or asphalt cap shall have a minimum thickness of 15 cm (6 inches). • A cap must be of sufficient strength to maintain its effectiveness and integrity during the use of the cap surface which is exposed to the environment. • A cap shall not be contaminated at a level ≥ 1 ppm PCB per Aroclor TM (or equivalent) or per congener. • Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap. 	<p>Cap requirements for the self-implementing on-site cleanup and disposal of PCB remediation waste – relevant and appropriate</p>	<p>40 CFR 761.61(a)(7)</p>
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