



Department of Energy
Savannah River Operations Office
P.O. Box A
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NOV 17 2022

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 Remediation 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: Savannah River Site's Responses to the Regulatory Comments on the Decommissioning Project Final Report for Building 454-D, D-Area Diesel Fuel Tank (V-PCOR-D-00048, Revision 0, July 14, 2022)

The U. S. Department of Energy (DOE) is submitting the subject comment responses for your review and approval. The Savannah River Site submitted the Decommissioning Project Final Report (DPFR) for Building 454-D, D-Area Diesel Fuel Tank (V-PCOR-D-00048, Revision 0, July 14, 2022) on July 20, 2022. The South Carolina Department of Health and Environmental Control (SCDHEC) approved and the U. S. Environmental Protection Agency (EPA) provided comments on the DPFR on September 19, 2022 and September 28, 2022, respectively. The comment responses, once approved, are part of the DPFR for Building 454-D, D-Area Diesel Fuel Tank by incorporation and the document is thereby approved.

Please review the responses with the goal of responding within thirty days (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject facility are greatly appreciated.

Ms. Susan Fulmer
Mr. Jon Richards

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Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

Brian T. Hennessey

Digitally signed by Brian T.
Hennessey
Date: 2022.11.17 09:38:44 -05'00'

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

IACD-23-110

Enclosure:

SRS Responses to EPA Comments on the Decommissioning Project Final Report, Building 454-D, D-Area Diesel Fuel Tank (V-PCOR-D-00048, Revision 0, July 14, 2022)

cc w/o encl:

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

cc w/encl:

D. Lloyd, EPA-Atlanta
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office

**SRS RESPONSES TO
EPA COMMENTS ON THE
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EPA COMMENTS

1. The Decommissioning Project Final Report (DPFR), Building 454-D, D-Area Storage Diesel Fuel Tank (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated February 2021 (the D&D Protocol). For example, the text in Section 1.0 (Introduction) of the D&D Protocol states “The DPFR describes the decommissioning project activities and accomplishments, final facility status, cost, and performance information.” It is noted the DPFR report included the project activities and the final facility status; however, the cost or performance information by Community Reuse Organization (CRO) and CTI and Associates Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) was not provided. Please revise the DPFR to include/reference the cost and performance information as stated in the D&D Protocol.

Response: Clarification

Based on Savannah River Site (SRS) responses to previous U.S. Environmental Protection Agency (EPA) comments on various D-Area Decommissioning Project Final Reports (DPFRs) (IACD-22-131, dated February 24, 2022), SRS revised and submitted the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 1 Redline, August 2022) for EPA and South Carolina Department of Health and Environmental Control (SCDHEC) review on August 12, 2022. The Revision 1 Redline protocol was approved by SCDHEC and EPA on September 7, 2022 (SRNS-OS-2022-00284) and September 28, 2022 (SRNS-OS-2022-306), respectively. The final Revision 1 protocol was submitted to EPA and SCDHEC on October 6, 2022. This revision of the protocol clarified that cost and performance data is not included in Simple Model and Integrated Sampling Model DPFRs. Buildings 454-D and 454-1D were decommissioned as Simple Model facilities; therefore, cost and performance data is not included in the DPFR. No change to the document is proposed.

Responsible Party: Brianna Zawacki, (803) 952-6533, Brianna.Zawacki@srs.gov

2. The DPFR indicates in Section 1.0 (Summary) that all interfacing utilities were isolated, disconnected, and plugged, and the resulting holes were grouted; however, photographs depicting the plugged and grouted holes are not provided in Appendix A (Before and After Photos of the Facility/Structure). In addition, photographs depicting a view of the slab condition of Building 454-D before and after decommissioning were not included in the

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DPFR. Please revise the DPFR to include photographs of the plugged and grouted holes and a view of the Building 454-D slab condition before and after decommissioning.

Response: Clarification.

Figures 1 to 12 below provide photos of the 454-D and 454-1D slabs and sumps before and after decommissioning. The concrete slabs were verified to be free of equipment, structure, rubble, waste, and debris. All interfacing utilities were isolated, disconnected, and plugged. Resulting holes were plugged and grouted. The 454-D and 454-1D sumps were filled with gravel. The 454-D containment dike walls were breached in the northwest corner to prevent rainwater accumulation. There are no holes present in the slabs that would provide access to the environmental media beneath them. These decommissioning activities and the end-state condition of the concrete slabs and sumps are described in Sections 1.0, 4.0, and 6.0 of the DPFR. Future reports will include photos that clearly show the condition of the facilities before and after decommissioning. No change to the document is proposed.

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Figure 1. Building 454-D Slab (Looking Northwest) Before

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Figure 2. Building 454-D Slab (Looking Northwest) After Partial Decommissioning by CRO

Containment dike wall
breached to prevent
rainwater accumulation.



Figure 3. Building 454-D Slab (Looking North) After Final Decommissioning

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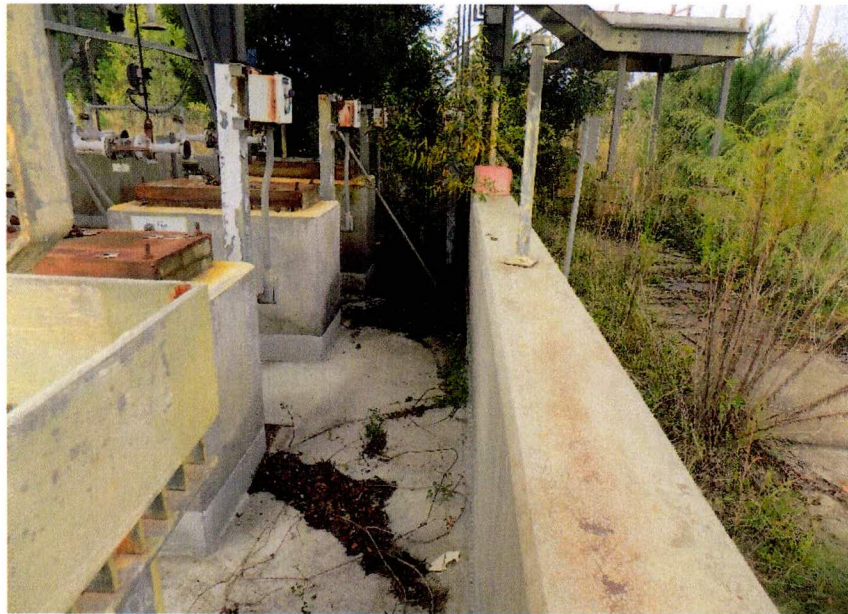


Figure 4. Building 454-D Slab and Sump (Looking West) Before



Figure 5. Building 454-D Slab and Sump (Looking West) After Partial Decommissioning by CRO

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Figure 6. Building 454-D Slab and Sump (Looking West) After Final Decommissioning

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Figure 7. Building 454-D Slab (Looking Northwest) After Partial Decommissioning by CRO



Figure 8. Building 454-D Slab (Looking North) After Final Decommissioning

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Figure 9. Building 454-D Slab (Looking South) After Final Decommissioning



Figure 10. Building 454-1D (Looking South) Before

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Figure 11. Building 454-1D (Looking South) After



Figure 12. Building 454-1D Sump Filled with Gravel (Looking West) After

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- 3. Section 1.0, Summary, Page 6 of 16, and Section 6.02, Risk Assessment Summary, Page 10 of 16:** The text in the second paragraph indicates the building slab was only observed before, and not after, structure demolition for evidence of contamination, which is inconsistent with the text in Section 6.02 (Risk Assessment). For example, the last sentence in Section 6.02 states, “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.” Please revise the text in Section 1.0 to state, “Since there was no evidence of contamination on the slabs either before or after structure demolition, no final verification survey was required.”

Response: Agree with Clarification.

The referenced sentence in Section 1.0 should have stated that there was no evidence of contamination on the slabs either before or after structure demolition and no final verification survey was required. In future reports, SRS will ensure that the text in Section 1.0 and Section 6.02 are consistent. No change to the document is proposed.

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- 4. Section 5.01, Salvage and Reuse, Pages 8 & 9 of 16:** The text indicates that 30 cubic yards of scrap metal from the 454-D and 454-1D were transferred to 741-N, Salvage and Reclamation Building, for recycling; however, according to Table 1 (Waste Generation), recycled metals were disposed to the 741-N Salvage Yard. For clarification, please revise the text to address this discrepancy.

Response: Clarification.

The 741-1N Salvage Yard is a sub-building to the main building, Building 741-N, Salvage Yard and Reclamation Building. Recycle/Scrap metal goes to the 741-1N Salvage Yard. For clarity, future reports will ensure that consistent building numbers are used throughout the document. No change to the document is proposed.

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- 5. Section 6.02, Risk Assessment Summary, Page 9 of 16:** The text states, “A review of the existing characterization data, process/building history, sample data and walk downs of the facility prior to decommissioning supported the determination that Building 454-D and its ancillary structures met the criteria of a Clean Building, Simple Model as described in Manual 1C, Procedure 501;” however, Section 3.0 (Decommissioning Model Approval) states that there was no regulator walk down of the facility due to

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COVID-19 travel restrictions. As such, it is unclear which stakeholders participated in walk down evaluations. Please revise Section 6.02 to identify the stakeholders that participated in the walk down assessments that took place prior to decommissioning Buildings 454-D.

Response: Clarification.

As stated in Section 3.0, numerous field walk downs were performed with SRS stakeholders involved in the D&D work such as Department of Energy, EC&ACP Engineering, Project Management, Safety, Industrial Hygiene, Environmental Compliance Authority, etc. A facility overview and walk down was not pre-scheduled with EPA and SCDHEC. However, the FDE submittal letters stated that EPA and SCDHEC could contact DOE if the regulatory agencies were interested in an overview and field visit. Neither EPA nor SCDHEC contacted DOE for an overview or field visit due to COVID-19 travel restrictions. No change to the document is proposed.

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