



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

ARF-023606

FEB 28 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 Site Remedial 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:** Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) F-Area Material Storage Building (235-F) (SRNS-RP-2021-00001, Revision 1, February 2022) (Clean Copy and Redline), Savannah River Site Responses to Regulatory Comments on the Revision 0 Document, and the Draft Action Memorandum

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy is submitting the subject Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for your concurrence. The South Carolina Department of Health and Environmental Control's (SCDHEC) and U. S. Environmental Protection Agency's (EPA) comments on the Revision 0 RSER/EE/CA were received on October 25, 2021 and November 8, 2021, respectively. Draft Savannah River Site (SRS) responses to the comments were submitted electronically to EPA and SCDHEC on November 18, 2021. Additional comments from EPA's Office of Regional Counsel (ORC) Region 4 were received on January 13, 2022. Draft responses to the additional EPA ORC comments were submitted electronically on January 26, 2022. The final SRS responses to all EPA and SCDHEC comments, which are included with this submittal, have been incorporated into the Revision 1 RSER/EE/CA.

This submittal also includes a draft Action Memorandum for the Non-Time Critical Removal Action for the F-Area Material Storage Building (235-F) for your review and comment. Please review and provide your comments and/or concurrence within thirty (30) days of receipt.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,

**Brian T. Hennessey** Digitally signed by Brian T. Hennessey  
Date: 2022.02.23 13:08:22 -05'00'

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

IACD-22-130

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Ms. Susan Fulmer  
Mr. Jon Richards

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Enclosures:

1. Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) F-Area Material Storage Building (235-F) (SRNS-RP-2021-00001, Revision 1, February 2022) (Clean Copy and Redline)
2. SRS Responses to SCDHEC and EPA Comments on the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) F-Area Material Storage Building (235-F) (SRNS-RP-2021-00001, Revision 0, August 2021)
3. Draft Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for F-Area Material Storage Building (235-F)

cc w/o encl:

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

cc w/encl:

M. McRae, TechLaw, Inc.



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Mr. Jon Richards  
Savannah River Site Remedial 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: Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the F-Area Material Storage Building (235-F)**

Pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan [40 CFR Section 300.415 and the Savannah River Site (SRS) Federal Facility Agreement (FFA) (Appendix K.1: D&D Facilities to be Decommissioned), the United States Department of Energy (USDOE) prepared a Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for the F-Area Material Storage Building (235-F) (SRNS-RP-2021-00001, Revision 1, February 2022). The USDOE, United States Environmental Protection Agency (USEPA), and South Carolina Department of Health and Environmental Control (SCDHEC) reached agreement in 2019 that a Non-Time Critical (NTC) removal action under the Comprehensive Environmental Response, Compensation, and Liability Act is an appropriate regulatory mechanism to decommission Building 235-F. The regulatory review of the Revision 0 RSER/EE/CA occurred from September 2021 to January 2022.

The SRS received comments from the SCDHEC and USEPA on October 25, 2021 and November 8, 2021, respectively. SRS received additional comments from the USEPA on January 13, 2022. SRS responses to the USEPA and SCDHEC comments were incorporated into the Revision 1 RSER/EE/CA, and the document was made available for public review and comment from **March xx, 2022 to April xx, 2022**. Comments received on the Revision 1 RSER/EE/CA during the public comment period are addressed in the enclosed Responsiveness Summary. A notice to the public will be made via an Environmental Bulletin within two (2) weeks of issuance of the Action Memorandum and Responsiveness Summary. This Action Memorandum, the RSER/EE/CA, and the Environmental Bulletin will be made part of the SRS Administrative Record File/Information Repository File (ARF/IRF).

Building 235-F is a windowless, two-story, reinforced-concrete structure located in F Area near the center of SRS. The building is approximately 68 meters (222 feet) long, 33 meters (109 feet) wide, and 8.5 meters (28 feet) high. Building 235-F was constructed in the 1950s as part of the original SRS project and used for a variety of missions, primarily processing, storage, and distribution of radioactive materials in support of SRS and the USDOE complex. Building 235-F and support facilities are currently in a reduced surveillance and maintenance state and are undergoing deactivation activities and preparations for decommissioning. Building 235-F is designated a Hazard Category 2 non-reactor nuclear facility according to DOE STD-1027-92 due to the radiological contamination within the building, consisting primarily of neptunium-237 in the Actinide Billet Line and plutonium-238 in the Plutonium Fuel Form Facility, Old Metallurgical Laboratory, and the Plutonium Experimental Facility.

Two additional structures exterior to Building 235-F are also included in the scope of this NTC removal action. They include an abandoned capped stack (293-F) located on the east side of the building and an underground storage tank connected by a pipe trench on the north side of the building. The underground storage tank previously contained radionuclide contamination (plutonium and tritium) and hazardous waste constituents (cadmium and chromium). The tank was emptied in 1991 by pumping out the liquid and sludge and cleaned by scraping and mopping the walls and bottom of the tank and flushing the tank. The tank inlet pipe has been capped.

A human health risk assessment and fate and transport modeling were conducted for contamination that will remain in the building following deactivation. Potential exposure to residual radiological contamination exceeds the hypothetical future industrial worker risk threshold of one excess cancer in an exposed population of one million (risk greater than  $1E-06$ ) and principal threat source material levels that exceed the risk threshold of one excess cancer in an exposed population of one thousand (risk greater than  $1E-03$ ). In addition, residual radiological contamination has the potential to leach to groundwater at levels that would exceed maximum contaminant levels in groundwater. Therefore, the objectives of the NTC removal action are to protect human health and the environment as follows:

- Prevent exposure of the hypothetical future industrial worker to radiological contaminants present in Building 235-F that exceed  $1E-06$  risk thresholds (including principal threat source material); and
- Prevent the migration of radionuclide contamination from Building 235-F to groundwater at concentrations that exceed maximum contaminant levels to the extent practicable.

Four removal action alternatives were evaluated in the RSER/EE/CA including a no action alternative (representing the Building 235-F deactivated state), two in-situ decommissioning alternatives, and a complete building removal alternative. Based on the evaluation in this RSER/EE/CA, the lead agency's preferred NTC removal action alternative for Building 235-F is Alternative A-2, In-situ Decommissioning of First and Second Level Process Areas/Engineered Roof. This alternative involves the grouting of the first and second level process areas, the installation of an engineered roof (sloped concrete reinforced roof slab with integral crystalline waterproofing) designed to last 1,000 years, grouting/capping of the underground storage tank, and permanent sealing of the abandoned capped stack

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Mr. Robert Pope

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(293-F). Some non-process areas will also be grouted either because they contain contaminated equipment or ventilation ducts, or to eliminate void spaces directly above or below process areas that will be grouted. Alternative A-2 does not preclude grouting other locations exterior to the process areas if deemed necessary for engineering practicability by the detailed design.

Alternative A-2 meets the effectiveness criteria by grouting of the process areas and sealing the doors and penetrations along the exterior walls of Building 235-F to prevent exposure to radioactive and hazardous contamination contained within the building. Entombing the contamination within the building and grouting the underground storage tank will prevent release of contamination. Constructing a sloped reinforced concrete roof on Building 235-F will prevent rainwater infiltration and delay contaminant transport to groundwater. Administratively, this alternative provides the most flexibility in implementation because it is possible to grout one area at a time should a phased approach to implementing the NTC removal action be needed due to funding or resource limitations.

Upon conclusion of the NTC removal action, a completion report (e.g., Removal Action Report) that summarizes the work and describes the end-state condition of Building 235-F will be prepared and submitted to USEPA and SCDHEC to document the completion of the removal action, and placed in the SRS ARF/IRF. Questions from you or your staff may be directed to me at (803) 952-6371 or Brian Hennessey, SRS FFA Program Manager, at (803) 952-8365.

Sincerely,

Jimmy McMillian, Assistant Manager  
Infrastructure and Environmental Stewardship  
U. S. Department of Energy  
Savannah River Operations Office

IACD-22-xxx

Ms. Susan Fulmer  
Mr. Robert Pope

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Enclosure:

Responsiveness Summary for the Non-Time Critical Removal Action for the for the F-Area Material Storage Building (235-F) (SRNS-RP-2022-xxxx), Revision 0, April 2022)

cc w/o encl:

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

cc w/encl:

M. McRae, TechLaw, Inc.

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## Specific Comments

1. Section 2.2, Previous Action, page 8. The last sentence of the first full paragraph on this page regarding core sampling from the abandoned capped stack states: “The radioactivity of the waste material was less than 400 picocuries/gram (pCi/g) and PCB contamination was not detected.” Please explain the relevance of this value. Is it some type of benchmark?

### Response: Clarification.

The reference to 400 pCi/g was intended to represent the highest detected value of radioactivity of the waste material removed from the abandoned stack during the stack height reduction project for waste management purposes. For clarity, the text in Section 2.2 Previous Action, third paragraph, will be revised as follows:

**“The radioactivity of the waste material was less than measured between 200-400 picocuries/gram (pCi/g) and was characterized as low-level waste (LLW) for disposal in the SRS E-Area Low-Level Waste Facility (LLWF). No PCB contamination was not detected.”**

**Responsible Party: Will Jolin, (803) 952-6122, [william.jolin@srs.gov](mailto:william.jolin@srs.gov)**

2. Section 2.5, Nature and Extent of Contamination, page 10. The second paragraph on page 10 states an inspection identified 9,643 m<sup>2</sup> of asbestos transite-containing material; however, there is no intent to remove this material unless it is determined to be friable or is disturbed by deactivation activities. Does the cost analysis on Tables D-2, D-3, and D-4 account for this possible asbestos abatement? Please verify.

### Response: Clarification.

The cost estimates for Alternatives A-2 through A-4 (Tables D-2 through D-4) include asbestos sampling and field inspection costs that are associated with the penetrations required for bore holes between floors for grout placement, removal of ductwork, and to create an opening in the side of the building to allow for equipment access. The cost for asbestos abatement for Alternatives A-2 and A-3 will be minimal with respect to filling the interior rooms with grout. Asbestos containing material on the roof of Building 235-F was estimated to be 20 m<sup>2</sup> (SRNS 2020). The cost for asbestos abatement for the roof is insignificant with respect to the estimate for demolition and removal of the roof structures (approximately \$3M) and is therefore not specifically detailed in the cost estimate tables.

The cost estimate for Alternative A-4 also includes specific costs for asbestos sampling and field inspection; however, asbestos abatement during demolition is not specifically detailed in

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the cost estimate. The rough order of magnitude (ROM) estimate for Alternative A-4 was developed from scaling portions of previous estimates for similar SRS demolition activities. While not specifically detailed in the cost estimates, the requirement for qualified asbestos workers and permitting were recognized as discussed in Section 5.3.4. No change to Tables D-2 through D-4 are proposed.

**Responsible Party: Monique Rabin, (803) 952-6695, monique.rabin@srs.gov**

3. Section 2.7, Contamination Migration Risk to Groundwater, page 13-15. According to Appendix B, two other scenarios were also evaluated - Grout First Level Scenario and Grout First and Second Level Scenario. These scenarios should also be noted in this section.

**Response: Agree.**

The two other modeling scenarios, Grout First Building Level Scenario and Grout First and Second Level Scenario were not discussed in Section 2.7 because these scenarios were not carried forward as proposed NTC removal action alternatives as explained in further detail in Appendix B. For completeness of the report, the text in Section 2.7, third paragraph, will be revised to identify all four modeling scenarios as follows:

**“The 1-D GoldSim F&T model was used to evaluate four scenarios: a No Action Scenario, to represent the Building 235-F deactivated state, Grout First Building Level Scenario, Grout First and Second Level Scenario, and Grout First and Second Levels with Engineered Roof Scenario. As discussed in further detail in Appendix B, the second and third modeling scenarios, which do not include an engineered roof, were not considered in the NTC removal action evaluation. The model also evaluated a scenario to grout the first and second level process areas to No Action Scenario represents the Building 235-F deactivated state, and the Grout First and Second Levels with Engineered Roof Scenario supports the in-situ decommissioning (ISD) removal action alternatives. The following conditions were assumed for each these two modeling scenarios.**

- **No Action Scenario - Represents Building 235-F deactivated state (i.e., baseline conditions). The F&T model assumes the existing roof collapses at 150 years with no modifications to prevent ponding of rainwater. This modeling scenario supports the No Action removal action alternative presented in Section 4.0.**
- **Grout First and Second Levels with Engineered Roof Scenario – First and second building level process areas are grouted. An engineered roof is placed over Building 235-F. The engineered roof is assumed to last over 1,000 years. This modeling scenario supports the two ISD removal action alternatives presented in Section 4.0.”**

Comments on:

Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis  
for the F-Area Material Storage Building (235-F) (U),  
(SRNS-RP-2021-00001, Revision 0, August 2021) received August 27, 2021

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**Responsible Party: Will Jolin, (803) 952-6122, william.jolin@srs.gov**

4. Table D-1, Building 235-F Cost Analysis, Alternative A-1 No Action, page D-3. Please itemize and/or explain the annual costs associated with Alternative A-1 No Action.

**Response: Agree.**

**The annual cost for Alternative A-1 includes continued operation of the E5 fan exhaust ventilation system and operation and maintenance of the Sand Filter Fan House (292-2F) and associated air compressors as discussed in Section 5.3.1. Additionally, the annual cost includes program costs associated with maintaining a Hazard Category 2 nonreactor nuclear facility, e.g., nuclear safety program, fire protection, radiological control, etc. The existing facility cost is about \$7M per year. The estimated annual cost for these activities was based on the projected facility costs post-deactivation. A revised Table D-1 is included with these comment responses that expands the description of the annual costs for Alternative A-1 as follows:**

**“Surveillance and Maintenance of Deactivated 235-F (which also includes operation of the E5 fan exhaust system, the Sand Filter House [292-2F], associated air compressors, and nuclear facility program costs).”**

**In addition, text in Sections 2.1 and 2.2 that refers to Building 235-F as a Hazard Category 2 nonreactor facility” will be revised to use the correct term “Hazard Category 2 nonreactor nuclear facility”. Text in Section 5.3.1 that refers to Building 235-F as a “hazard category 2 nuclear facility” will be revised to use the correct term “~~h~~Hazard eCategory 2 nonreactor nuclear facility” for consistency.**

**Responsible Party: Monique Rabin, (803) 952-6695, monique.rabin@srs.gov**

SRS Responses to South Carolina Department of Health and Environmental Control  
Comments on:  
Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis  
for the F-Area Material Storage Building (235-F) (U),  
(SRNS-RP-2021-00001, Revision 0, August 2021) received August 27, 2021  
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**Table D-1. Building 235-F Cost Analysis, Alternative A-1 No Action**

<u>Item</u>	<u>Quantity</u>	<u>Units</u>	<u>Unit Cost</u>	<u>Total Cost</u>
<b>Direct Capital Costs</b>				
None	0	ea	\$0	\$0
<b>Total Direct Capital Cost</b>		(sum of * items)		<b>\$0</b>
<b>Indirect Capital Costs</b>				
N/A				
<b>Total Indirect Capital Cost</b>				<b>\$0</b>
<b>Total Estimated Capital Cost</b>				<b>\$0</b>
<b>Direct O&amp;M Costs</b>				
<b>Annual Costs (during implementation)</b>	-0.3%	discount rate for costs > 30 years duration <sup>1</sup>		
	1			
Surveillance and Maintenance of Deactivated 235-F		yr	\$3,500,000	\$3,500,000
Subtotal - Annual Costs				\$3,500,000
<b>Present Worth Annual Costs (-0.3% Discount Rate)</b>				<b>\$3,510,532</b>
<b>Annual Costs</b>		150 years S&M		
Surveillance and Maintenance of Deactivated 235-F <u>(which also includes operation of the E5 fan exhaust system, the Sand Filter House [292-2F], associated air compressors, and nuclear facility program costs)</u>	1	ea	\$3,500,000	\$3,500,000
Subtotal - Annual Costs				\$3,500,000
<b>Present Worth Annual Costs (-0.3% Discount Rate)</b>				<b>\$666,267,626</b>
<b>Total Present Worth Direct O&amp;M Cost</b>				<b>\$669,778,158</b>
<b>Indirect O&amp;M Costs</b>				
Project/Admin Management		0% of direct O&M		\$0
Health & Safety		0% of direct O&M		\$0
Overhead		30% of direct O&M		\$200,933,447
Contingency		15% of direct O&M		\$100,466,724
<b>Total Estimated Present Worth Indirect O&amp;M Cost</b>				<b>\$301,400,171</b>
<b>Total Estimated Present Worth O&amp;M Cost</b>				<b>\$971,178,329</b>
<b>TOTAL ESTIMATED COST</b>				<b>\$971,178,329</b>

1. Interest rate from OMB Circular No A-94 (November 2020)

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## GENERAL COMMENT

1. EPA notes that the EE/CA proposes a removal action for facilities within the F Area Operable Unit. While the EE/CA included the evaluation of groundwater and probable contaminant migration modeling from the remnants of the building, EPA is not concurring on a decision regarding groundwater or the need for groundwater remediation for the F Area Operable Unit under this removal action. The removal action is limited to actions regarding the 235-F building and possible associated facilities. Decisions regarding the F Area Operable Unit and the groundwater underlying and emanating from the F Area Operable Unit will be made in the future.

**Response: Agree.**

**As stated in Section 2.3. Land Use, groundwater is not part of the NTC removal action scope for Building 235-F. The groundwater in F Area is currently monitored by the SRS General Separations Area Western Groundwater Operable Unit monitoring network. Decisions regarding the F Area Operable Unit and underlying groundwater will be made in the future. No change to the document is proposed.**

**Responsible Party: Dena Brett, (803) 952-6031, dena.brett@srs.gov**

## SPECIFIC COMMENTS

1. Section 1.0 Introduction, Page 1 of 70: The text in the second paragraph did not reference the previous Scoping Summary for the F-Area Material Storage Building (235-F) (Removal Site Evaluation/Engineering Evaluation/Cost Analysis – Removal Alternative Comparative Analysis Scoping) SRNS-RP-2020-00444, Final, April 2021 (Scoping Summary). The Scoping Summary supports and reflects the outcome of scoping meetings and includes a tabulated record of key Core Team agreements. The text should include reference to the Scoping Summary to acknowledge the discussion and considerations by the Core Team. *Please revise this section and Section 8.0 (References) of the RSER/EE/CA to include reference citation to the Scoping Summary.*

**Response: Agree.**

**Section 1.0, Introduction, second paragraph will be revised to include the reference to the April 2021 scoping summary at the beginning of the paragraph as follows:**

**“The USDOE, USEPA, and SCDHEC held scoping meetings in October 2019 and April 2021 and reached agreement on the criteria for evaluation of human health risk and contaminant**

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**migration for Building 235-F, the NTC removal alternatives for evaluation, and the comparative analysis of the removal alternatives (SRNS 2021a). This Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) identifies the objectives of the NTC removal action....”**

**Section 8.0 References will be revised to include the reference to the April 2021 Scoping Summary that documents the Core Team agreements for the project as follows:**

**“SRNS, 2021a. Scoping Summary for the F-Area Material Storage Building (235-F) (Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis – Removal Alternative Comparative Analysis Scoping), SRNS-RP-2020-00444, Final, April 2021, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC”**

**Responsible Party: Dena Brett, (803) 952-6031, dena.brett@srs.gov**

2. Section 2.5 Nature and Extent of Contamination, Page 11 of 70: It is uncertain if residual silver remains in the sewer line from the former photographic dark room. This uncertainty impacts the problems warranting action and will be resolved by sampling of the sewer line during deactivation. The RSER/EE/CA (fifth bullet) describes the potential for silver to be present in the sewer line but does not provide details on what actions will be taken if the silver results indicate an exceedance of applicable regulatory criteria. *Please revise the text to discuss whether actions will be taken during the non-time critical removal action alternative if silver is detected in the sewer line at concentrations exceeding applicable regulatory criteria.*

**Response: Clarification.**

**The drain and trap in the former photographic dark room (Room 111) was sampled in August 2021 and analyzed for silver. The maximum result of 180 mg/kg is well below the industrial worker USEPA Regional Screening Level of 5,800 mg/kg. The former photographic dark room is in Zone 10 which will not be grouted under the preferred Alternative A-2, but the room will be contained within the sealed Building 235-F with sloped reinforced concrete roof. The drain from the photographic dark room is connected to the sanitary sewer. Building 235-F will be isolated from the sanitary sewer system during deactivation by sealing all floor connections and grouting the manhole nearest to the building.**

**In Section 2.5, 5<sup>th</sup> bullet, the last sentence will be replaced with the following:**

**“Residual silver or other photographic chemicals may be present in the sewer line or associated trap, which will be sampled during deactivation. The drain and trap in the former dark room were sampled in August 2021. Residual silver was present in the drain and trap**

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**with a maximum concentration of 180 mg/kg, well below the industrial worker USEPA Regional Screening Level of 5,800 mg/kg. Building 235-F will be isolated from the sanitary sewer system during deactivation by sealing all floor connections and grouting the manhole nearest to the building.**

**Responsible Party: Monique Rabin, (803) 952-6695, monique.rabin@srs.gov**

3. Section 4.2 Alternative A-2, ISD of First and Second Level Process Areas/Engineered Roof, Activity Description, Page 20 of 70: The text in the last paragraph states, “A preconceptual design was developed for Alternative A-2 and Alternative A-3 to support the removal alternative evaluation.” However, a reference to the preconceptual design report was not cited in the RSER/EE/CA. *Please revise this section and Section 8.0 (References) to include a reference citation to the preconceptual design report.*

**Response: Agree.**

**The RSER/EE/CA will be revised in Section 4.2 and Section 5.3.2, to include the reference to the preconceptual design report as follows:**

***Section 4.2, ISD of First and Second Level Process Areas/Engineered Roof, Activity Description***

**(eighth paragraph) “A preconceptual design was developed for Alternative A-2 and Alternative A-3 to support the removal alternative evaluation (SRNS 2021b).”**

***Section 5.3.2 Alternative A-2, ISD of first and Second Level Process Areas/Engineered Roof***

**(first paragraph) “A preconceptual design of the grouting process includes drilling cores through the concrete ceiling (second level floor and Building 235-F roof) above the areas to be grouted (SRNS 2021b).”**

**(third paragraph) “The preconceptual design also indicates that removal of the concrete duct work on the Building 235-F roof will be required to construct a concrete reinforced roof with a sufficient slope to prevent rainwater ponding (SRNS 2021b).”**

***Section 5.3.3 Alternative A-3, ISD of Entire Building/Engineered Roof***

**(first paragraph) “A preconceptual ~~structural~~ design of this alternative indicated that very little formwork will be required to implement this alternative if nearly simultaneous lifts were poured throughout each level (SRNS 2021b).”**

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***Section 5.4 Cost***

(second paragraph) “The cost estimates were developed based on a generic description and preconceptual design (SRNS 2021b) of activities for each alternative with limited engineering data.”

Section 8.0 References will be revised to include the reference to the preconceptual design report for the project as follows:

**“SRNS, 2021b. *Pre-conceptual Design Estimate for Building 235-F In-Situ Decommissioning Alternatives*, T-ESR-F-00033, Revision 0, January 2021, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC”**

**Responsible Party: Monique Rabin, (803) 952-6695, [monique.rabin@srs.gov](mailto:monique.rabin@srs.gov)**

4. Section 5.1.1 Alternative A-1, No Action, Page 25 of 70: The text in the second paragraph stating the fate and transport (F&T) modeling of the migration of Building 235-F contaminants was performed for each of the removal action alternatives is incorrect. As discussed in Appendix B (Fate and Transport Analysis for Building 235-F) the F&T modeling scenarios included the No Action scenario. However the three in-situ decommissioning (ISD) F&T modeling scenarios performed were not the same removal action alternatives (i.e., A-2, A-3 and A-4) identified in the RSER/EE/CA. *Please revise the text in this section to note that the three ISD F&T modeling alternative scenarios discussed in Appendix B are not the same as presented in the RSER/EE/CA.*

**Response: Clarification.**

**Please see the response to SCDHEC Specific Comment #3 and the proposed revised text to Section 2.7 Contaminant Migration Risk to Groundwater to explain the relationship between the modeling scenarios and the NTC removal action alternatives. The 1-D GoldSim F&T model discussed in Appendix B evaluated four scenarios: No Action, Grout First Building Level, Grout First and Second Levels, and Grout First and Second Levels with Engineered Roof. The first modeling scenario supports the No Action removal alternative, and the last modeling scenario supports the two ISD removal action alternatives. As discussed in Appendix B, Section B.5, the second and third modeling scenarios were not included as removal action alternatives due to implementability constraints (existing roof collapse timing and the need to move contaminated equipment). Because the text in Section 5.1.1 is specific for Alternative A-1 No Action, the second paragraph will be revised as follows:**

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**“F&T modeling of the migration of Building 235-F contaminants, as discussed in Appendix B, was performed for each of the No Action scenario ~~removal action alternatives~~. The No Action scenario was found to be ineffective....”**

**Responsible Party: Will Jolin, (803) 952-6122, william.jolin@srs.gov**

5. Section 5.3.2 Alternative A-2, ISD of Entire Building/Engineered Roof, Page 37 of 70; Section 5.3.3 Alternative A-3, ISD of First and Second Level Process Areas/Engineered Roof, Pages 37-38 of 70; and, Table 3 Comparative Analysis of the NTC Removal Action Alternative for Building 235-F, Page 69 of 70: It is unclear how completion of the implementation in phases of the removal action alternatives A-2 and A-3 stretched over multiple years will impact the cost estimates. The text in these sections and in Table 3 under “implementability”, indicates the funding resources could be stretched over multiple years, allowing implementation in phases. However, it is unclear whether implementation in phases over multiple years will increase the current cost estimates prepared for the removal action alternatives A-2 and A-3. *Please revise the RSER/EE/CA to provide additional text discussing how the estimated costs for implementation of alternatives A-2 and A-3 will be impacted if the removal action alternative is implemented in phases over multiple years.*

**Response: Clarification.**

**As described in Section 5.3, the cost estimate for the complete implementation of the preferred Alternative A-2 are representative of 2021 dollars. The ability to implement preferred Alternative A-2 in phases was discussed to emphasize that partial funding of the removal action could result in a reduction of short-term risks by entombing the process enclosures that contain the greatest amount of radiological contamination. The cost estimates in this RSER/EE/CA are provided for comparative purposes of the removal alternatives evaluated. Any cost increases or cost savings for a phased implementation cannot be accurately evaluated until a detailed design and implementation schedule is available following the design phase. No change to the document is recommended.**

**Responsible Party: Monique Rabin, (803) 952-6695, monique.rabin@srs.gov**

6. Appendix B, Fate and Transport Analysis for Building 235-F, Section B.3.1.1 Infiltration Rates, Page B-6 of B-32: The text under the fourth scenario (i.e. “Grout Entire 235-F with Engineered Roof Scenario”) to grout the entire Building 235-F with engineered roof is not consistent with the fourth scenario presented in Section B.2 Alternatives, Page B-4 of B-32: The fourth scenario presented in Section B.2 at the top of Page B-4 of B-32 indicates the first and second level process areas will be grouted. However, the text in Section B.3.1.1 indicates the entire Building 235-F will be grouted. *Please revise the text to address this discrepancy in whether the entire*

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*Building 235-F will be grouted under the fourth scenario or that only the first and second level process areas will be grouted.*

**Response: Agree.**

**The fourth scenario in Section B.3.1.1 will be revised to “Grout ~~Entire 235-F~~ First and Second Levels with Engineered Roof Scenario” for consistency with Section B.2 and the discussion of the 1-D nature of the model. For the fourth modeling scenario, both the first and second levels are assumed to be grouted even if no radiological holdup is present in the corresponding area above or below. This modeling scenario supports the two ISD removal action alternatives due to the 1-D nature of the model. In addition, the third scenario in Section B.3.1.1 will be revised to “Grout ~~Entire 235-F~~ First and Second Level Scenario” for consistency with Section B.2.**

**Responsible Party: Will Jolin, (803) 952-6122, [william.jolin@srs.gov](mailto:william.jolin@srs.gov)**

7. Appendix B, Fate and Transport Analysis for Building 235-F, Section B.3.2.2 Elemental Lead, Page B-9 of B-32: The statement that the modeled lead inventory was 26,447 kilograms (kg) or 58,184 pounds (lbs) is not accurate. The lead inventory of 26,447 kg converts to 58,371.79 lbs. Also, the estimated lead inventory documented in the Characterization Report (SRNS 2020) of 17,244 kg converts to 38,016.51 lbs and not 37,937 lbs as indicated in the text. *Please revise the text as appropriate to provide the correct conversion value in pounds of the modeled lead inventory and the estimated lead inventory documented in the Characterization Report.*

**Response: Clarification.**

**The estimated lead inventory in kilograms was converted to pounds using the conversion factor 2.2 lbs/kg. By applying the conversion factor using four decimal places (2.2046 lbs/kg) and rounding to the whole number, the lead inventory of 26,447 kg converts to 58,305 lbs and 17,244 kg converts to 38,016 lbs. In response to the comment, the text in Appendix B.3.2.2 Elemental Lead will be revised as follows:**

**“The modeled lead inventory was 26,447 kilograms (kg) (~~58,184~~ 58,305 pounds [lbs]). This inventory conservatively bounds the estimated 17,244 kgs (~~37,937~~ 38,016 lbs) of lead documented in the Characterization Report (SRNS 2020).”**

**Responsible Party: Will Jolin, (803) 952-6122, [william.jolin@srs.gov](mailto:william.jolin@srs.gov)**

8. Appendix B, Fate and Transport Analysis for Building 235-F, Section B.3.2.3 Polychlorinated biphenyls (PCBs), Page B-9 of B-32: It is unclear why the unit of measurement presented for the estimated total PCBs inventory is in grams (i.e., 2,375 grams) and not in kilograms as was

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presented for the modeled lead inventory. *Please revise the text to present the estimated total PCBs inventory in kilograms for consistency with reported modeled lead inventory.*

**Response: Agree.**

**For consistency, the PCB inventory in Section B.3.2.3 will be reported in kgs (2.38 kgs) as follows:**

**“The estimated total PCBs inventory is ~~2,375 g~~ 2.38 kgs (5.25 lbs) in paint (SRNS 2020).”**

**Responsible Party: Will Jolin, (803) 952-6122, [william.jolin@srs.gov](mailto:william.jolin@srs.gov)**

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## COMMENTS

1. Executive Summary, p. ES-2. The text states that “a risk evaluation for polychlorinated biphenyls and lead, based on maximum detected concentrations in building paint, was conducted to demonstrate the negligible risk contribution from these hazardous inventories when compared to the primary radiological risk drivers.” Please specify the types of PCB bulk product or PCB remediation waste present.

### **Response: Clarification.**

**PCB painted surfaces and manufactured PCB containing products (gaskets, caulk, etc.) that will remain within the facility following deactivation activities are identified as PCB bulk product. There is no PCB remediation waste or PCB-containing articles (transformers, capacitors, ballasts) that are within the scope of the removal action. The facility did not house PCB-containing transformers or capacitors, and there are no documented releases of PCBs within the facility. All ballasts, regardless of the type (non-PCB or PCB-containing) will be removed during deactivation (i.e., prior to the removal action), and no ballasts will remain within the facility. It also should be noted that none of the waste characterization completed to date has identified any of the PCB bulk product waste as radioactive.**

**For clarification to the removal action scope that supports the Executive Summary, the description of the hazardous materials in the building in Section 2.5 Nature and Extent of Contamination will be revised to better define the facility conditions as follows:**

**“Other hazardous materials in the building may include the following:**

- **Mercury in lamps, switches, batteries, thermostats, etc. These features will be removed if accessible during deactivation.**
- **Used-Residual oils in locations throughout Building 235-F. During inventory assessments it has been determined that all transformers and capacitors are dry and void of dielectric fluid of the dry type and did not contain oil reservoirs or PCBs. Hydraulic oil in the main reservoirs for the hot and cold presses have been drained aside from and any oil remaining in the small lines to the presses and the hydraulic cylinders will be drained during deactivation. The hydraulic oils have no history of PCBs. The accessible used oil will be drained from the chillers (Room 209) and air compressors (Room 152) during deactivation.**
- **Chiller/cooling water contain chemicals that inhibit biological activity (i.e., sodium nitrate), prevent freezing (i.e., ethylene glycol) and/or inhibit corrosion within the**

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pipng and equipment. The cooling water will be drained and recovered as wastewater.

- PCBs may be present in the materials of construction such as paint, joint compounds, insulation, capacitors, hydraulic oil, and light ballasts. Accessible PCB ballasts will be removed during deactivation. All ballasts, regardless of the type (non-PCB or PCB-containing) will be removed during deactivation and no known ballasts will remain within the facility. PCBs in paint on the first and second levels, assuming two surface coats of paint applied, was conservatively estimated at 2.38 kg (7.44 lbs). Paint samples were taken with the highest concentration of PCBs of 3,900 mg/kg (SRNS 2020). PCBs in building components, paint, etc., will remain in place and be addressed by the NTC removal action alternative.”

**Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov**

2. Executive Summary, p. ES-2, ES-3. The text identifies the following removal action objectives for Building 235-F: (1) Prevent exposure of the hypothetical future industrial worker to radiological contaminants present in Building 235-F that exceed 1E-06 risk thresholds (including principal threat source material); and (2) Prevent the migration of radionuclide contamination from Building 235-F to groundwater at concentrations that exceed maximum contaminant levels at the 360-meter (1,181-foot) point of assessment in less than 10,000 years to the extent practicable. Per EPA groundwater policy and the NCP, EPA would expect a point of compliance for attaining MCLs beginning at the boundary of the waste management area and throughout the plume if determined to be a source to groundwater contamination. The RAO should does not need the information used in the modeling to be included and should be simplified. Please revise the RAO language to be consistent with EPA policy/guidance. [See, "Summary of Key Existing EPA CERCLA Policies for Groundwater Restoration," OSWER Directive 9283.1-33, June 26, 2009].

**Response: Agree.**

**The contaminant migration RAO in the Executive Summary will be revised to remove the modeling information as follows:**

**“Prevent the migration of radionuclide contamination from Building 235-F to groundwater at concentrations that exceed maximum contaminant levels at the 360-meter (1,181-foot) point of assessment in less than 10,000 years to the extent practicable.”**

**Responsible Party: Dena Brett, (803) 952-6031, dena.brett@srs.gov**

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3. Site Description and Background, p. 4. The text states “the Sand Filter Fan House (292-2F), Sand Filter (294-2F), and the Exhaust Stack (291-2F) have not been assayed. However, the Sand Filter (294-2F) has been surveyed per the SRS Radiological Controls Program. Based on historical operations, the radiological inventories in all three buildings are significantly less than the estimate of radiological holdup (i.e., residual radiological contamination) within Building 235-F. Other buildings located within the Building 235-F perimeter fence that are designated for eventual deactivation and decommissioning in accordance with FFA Appendix K.1: D&D Facilities to be Decommissioned are shown in Figure 5.” Please clarify whether these three (294-2F, 291-2F, 292-2F) present an unacceptable risk to human health and the environment and whether they are designated for eventual deactivation/decommissioning per FFA App. K.1. The text states "other buildings" but does not state plan for these three structures.

**Response: Agree.**

**As stated in the RSER/EE/CA, these three buildings are not part of the NTC removal action scope and will remain in operation during decommissioning. The Sand Filter Fan House (292-2F) and Sand Filter (294-2F) are located in the FFA Appendix K.1: *D&D Facilities to be Decommissioned* as per the SRS Deactivation and Decommissioning criteria used at the time to target large capital facilities based on a capital value threshold for inclusion or exclusion in FFA Appendix K.1. The Exhaust Stack (291-2F) was identified as an ancillary facility and therefore, not listed independently in the FFA Appendix K.1. According to a 2007 waste identification form evaluation for the three buildings, the Exhaust Stack (291-2F) is downstream of the sand filter and is expected to be managed as sanitary waste. All three facilities will be evaluated and dispositioned at a future date. For clarity, the text in Section 2.1 Site Description and Background, third paragraph, will be revised as follows:**

**“The Sand Filter Fan House (292-2F), Sand Filter (294-2F), and the Exhaust Stack (291-2F) have not been assayed. However, the Sand Filter (294-2F) has been surveyed per the SRS Radiological Controls Program. Based on historical operations, the radiological inventories in all three buildings are assumed to be significantly less than the estimate of radiological holdup (i.e., residual radiological contamination) within Building 235-F. The Sand Filter Fan House (292-2F) and Sand Filter (294-2F) have been dispositioned to FFA Appendix K.1: *D&D Facilities to be Decommissioned*. The Exhaust Stack (291-2F) is identified as an ancillary structure and will be evaluated with the Sand Filter Fan House (292-2F) and Sand Filter (294-2F). Other buildings located within the Building 235-F perimeter fence that are designated for eventual deactivation and decommissioning in accordance with FFA Appendix K.1: *D&D Facilities to be Decommissioned* are shown in Figure 5.”**

**Responsible Party: Dena Brett, (803) 952-6031, dena.brett@srs.gov**

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4. Nature and Extent, p. 10. The text states that “inspection identified 9,643 m<sup>2</sup> (103,791 ft<sup>2</sup>) of asbestos transite-containing material (ACM) in the building [and] there is no intent to remove ACM during deactivation unless it is determined to be friable or is disturbed by deactivation activities.” EPA ORC has provided additional applicable or relevant and appropriate requirements (ARARs) for ACM to be added to Appendix C- Potential ARARs and TBC Criteria for Building 235-F. These requirements need to be complied with for any ACM removal as part of the NTCRA. See attached Asbestos ARARs table. If the NTCRA will address any ACM removal these ARARs are needed in the EE/CA.

**Response: Agree with clarification.**

**ARARs specific to the removal of asbestos are applicable to reduce the risk of exposure resulting from the activities of the removal action. For the scope of the Building 235-F removal action, the potential for asbestos-related ARARs, as they apply to exposure, will only be applicable to Alternative A-4, Complete Building 235-F Removal/Soil Cover, as described in the RSER/EE/CA. If Alternative A-4 were the preferred alternative, all abatement would be completed prior to commencing the demolition of the building and would adhere to all ARARs associated with the asbestos abatement. For the ISD removal action Alternatives A-2 and A-3, exposure for renovation related ARARs will be identified as Relevant and Appropriate. The grouting of the building will not disturb the asbestos. However, any removal of the duct work/systems to facilitate the grouting will be considered as a renovation per 40 CFR 61.141. Please refer to last column of the attached additional ARAR tables for the SRS response to the applicability of additional ARARs to the Building 235-F removal action scope. The RSER/EE/CA Table C-1 will be revised to include additional ARARs as provided by the SRS response.**

**Responsible Party: Joe Burch, (803) 952-6660, [joseph.burch@srs.gov](mailto:joseph.burch@srs.gov)**

5. Nature and Extent, p. 11. The text states: “PCBs may be present in paint, joint compounds, insulation, capacitors, hydraulic oil, and light ballasts. Accessible PCB ballasts will be removed during deactivation. PCBs in paint on the first and second levels, assuming two surface coats of paint applied, was conservatively estimated at 2.38 kg (7.44 lbs). Paint samples were taken with the highest concentration of PCBs of 3,900 mg/kg (SRNS 2020). PCBs in building components, paint, etc., will remain in place and be addressed by the NTC removal action alternative.” Any liquids such as hydraulic fluid, items/articles containing PCBs that might leach such as light ballasts containing PCBs should be removed from the buildings prior to grouting and disposed of in compliance with identified TSCA ARARs. Removal of these PCB fluids and other items/articles can support the risk-based disposal wherein mostly PCB bulk product waste (i.e., painted surfaces) remain in the buildings that are grouted. EPA ORC has provided additional ARARs for PCB articles, bulk wastes, capacitors, hydraulic fluids, etc., to be removed and disposed, PCB risk-based disposal regulations, and deed notice

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requirements to be added to Appendix C- Potential ARARs and TBC Criteria for Building 235-F. See attached PCB ARARs table. Additionally, the preferred alternative A-2, ISD of First and Second Process Areas/Engineered Roof, will leave PCB 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 risk-based disposal of PCB bulk product waste under 40 CFR 761.62(c) is also an ARAR and similar information must be provided. The appropriate information required in an application can be provided in CERCLA documents (e.g. EE/CA and Action Memo) that is reviewed and approved by EPA. However, since EPA does not jointly select the NTCRA, a separate approval from the Director of SEMD would be issued provided that the EE/CA and Action Memo contain information that supports the protectiveness finding under these TSCA risk-based disposal provisions as well as demonstrates the removal action is protective of human health the environment under CERCLA.

**Response: Agree with clarification.**

**Please see the response to EPA Comment 1. Section 2.5 Nature and Extent of Contamination will be revised to better define the facility conditions and clarify the extent of PCBs in context to the removal action. PCB-specific ARARs for the selected removal action only pertain to citations specific to bulk product waste. The scope of this action does not involve any PCB articles, PCB-contaminated articles (i.e., transformers, capacitors, ballasts) or any PCB remediation waste. The facility did not house PCB or PCB contaminated transformers or capacitors, and there are no releases of PCBs within the facility. All ballasts, regardless of the type (non-PCB or PCB-containing) will be removed during deactivation and no known ballasts will remain within the facility. Only the non-disturbed PCB painted surfaces and manufactured products containing PCB (i.e., gaskets, caulk, etc.) will remain within the facility upon completion of the removal action. The residual risk resulting from the remaining PCB bulk product is at an acceptable level as documented in the RSER/EE/CA. Hence, only PCB bulk product waste under 40 CFR 761.62(c) will be included as an ARAR within the attached ARAR table.**

**SRS understands that a separate approval will be obtained from the EPA Director, SEMD that the RSER/EE/CA and Action Memo contain information that supports the requirements of CERCLA and 40 CFR 761.62(c), Risk-based disposal approval, demonstrating that the removal action does not pose an unreasonable risk or injury to health or the environment.**

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**Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov**

6. Removal Action Objectives, p. 17. The second RAO states: “Prevent the migration of radionuclide contamination from Building 235-F to groundwater at concentrations that exceed MCLs at the 360-m (1,181-ft) POA in less than 10,000 years to the extent practicable.” See previous comments. Per EPA groundwater policy and the NCP, EPA would expect a point of compliance for attaining MCLs beginning at the boundary of the waste management and throughout the plume if determined to be a source to groundwater contamination. The RAO should does not need the information used in the modeling to be included and should be simplified. Please revise the RAO language to be consistent with EPA policy/guidance. [See, "Summary of Key Existing EPA CERCLA Policies for Groundwater Restoration," OSWER Directive 9283.1-33, June 26, 2009].

**Response: Agree.**

**The second RAO in Section 3.2 will be revised to remove the modeling information as follows:**

**“Prevent the migration of radionuclide contamination from Building 235-F to groundwater at concentrations that exceed MCLs ~~at the 360-m (1,181-ft) POA in less than 10,000 years to the extent practicable.~~”**

**Responsible Party: Dena Brett, (803) 952-6031, dena.brett@srs.gov**

7. Preferred Alternative, p. 42. The EE/CA contains the following regarding presence of PCBs in the building: “PCBs may be present in paint, joint compounds, insulation, capacitors, hydraulic oil, and light ballasts. Accessible PCB ballasts will be removed during deactivation. PCBs in paint on the first and second levels, assuming two surface coats of paint applied, was conservatively estimated at 2.38 kg (7.44 lbs). Paint samples were taken with the highest concentration of PCBs of 3,900 mg/kg (SRNS 2020). PCBs in building components, paint, etc., will remain in place and be addressed by the NTC removal action alternative.” Any liquids such as hydraulic fluid, items/articles containing PCBs that might leach such as light ballasts containing PCBs should be removed from the buildings prior to grouting and disposed of in compliance with identified TSCA ARARs. Removal of these PCB fluids and other items/articles can support the risk-based disposal wherein mostly PCB bulk product waste (i.e., painted surfaces) remain in the grouted building. See comment #5 above. The preferred alternative A-2, ISD of First and Second Process Areas/Engineered Roof, will leave PCB 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*

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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 risk-based disposal of PCB bulk product waste under 40 CFR 761.62(c) is also an ARAR and similar information must be provided. The appropriate information required in an application can be provided in CERCLA documents (e.g. EE/CA and Action Memo) that is reviewed and approved by EPA. However, since EPA does not jointly select the NTCRA, a separate approval from the Director of SEMD would be issued provided that the EE/CA and Action Memo contain information that supports the protectiveness finding under these TSCA risk-based disposal provisions as well as demonstrates the removal action is protective of human health the environment under CERCLA.

**Response: Agree. Please refer to the response to EPA Comment 5.**

**Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov**

8. 5.2 Identification of Applicable or Relevant and Appropriate Requirements, p. 31. EPA ORC has provided additional applicable or relevant and appropriate requirements (ARARs) for hazardous debris disposal, universal waste storage and disposal, ACM and for PCB articles, capacitors, hydraulic fluids, etc., to be removed and disposed, and PCB risk-based disposal regulations to be added to Appendix C- Potential ARARs and TBC Criteria for Building 235-F. See attached RCRA Hazardous Debris, Asbestos, and PCB ARARs tables prepared by ORC. The narrative in 5.2 should provide a short summary of the identified ARARs. For example: “Potential Action-specific ARARs include RCRA waste characterization, storage, treatment and disposal requirements; Asbestos abatement and disposal requirements; and TSCA standards for PCB waste at 40 C.F.R. § 761 et. seq. and in particular those at § 761.61 for the cleanup, capping, storing, and disposing of PCB remediation waste. Also, DOE must include a summary of how the actions undertaken as part of the NTCRA along with any relevant exposure information demonstrate that PCB bulk product and PCB remediation wastes that remain in the grouted building does not *pose an unreasonable risk of injury to [sic] human health or the environment* as required by 40 CFR 761.61(c) and 761.62(c). As indicated in the preamble to the PCB Disposal Amendments Final Rule, EPA expects that CERCLA cleanups would comply with the substantive requirements of one (or all), of three options (self-implementing, performance- based and risk-based) provided in § 761.61 upon completion of the cleanups. See 63 Fed. Reg. 35,384, 35,407 (June 29, 1998).”

**Response: Agree with clarification.**

**Please refer to last column of the attached additional ARAR tables for the SRS response to the applicability of additional ARARs to the Building 235-F removal action scope. The**

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**RSER/EE/CA Table C-1 will be revised to include additional ARARs as provided by the SRS response.**

**The fourth paragraph in Section 5.2 Identification of Applicable or Relevant and Appropriate Requirements will be revised as follows:**

**“ARARs are identified for the Building 235-F NTC removal action in Appendix C. This RSER/EE/CA does not propose to waive any ARARs. Potential Action-Specific ARARs include Resource Conservation and Recovery Act (RCRA) waste characterization, storage, treatment and disposal requirements; asbestos abatement and disposal requirements; and Toxic Substances Control Act (TSCA) standards for PCB bulk product waste. The actions undertaken as part of the NTC removal action along with any relevant exposure information demonstrate that PCB bulk product materials that remain in the grouted building do not pose an unreasonable risk or injury to health or the environment as required by 40 CFR 761.62(c). The final NTC removal action (decommissioning) end state for Building 235-F will be documented as the CERCLA remedial action end state (i.e., requiring no further response action for protection of human health and the environment) in the FAOU ROD. Completion activities are identified in the FFA, a legally binding and enforceable tri-party agreement between USDOE and the two regulatory agencies, USEPA and SCDHEC.”**

**Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov**

9. General Comment: The EE/CA describes waste removal such as certain PCB waste, RCRA universal waste, and asbestos waste. Assuming these wastes are also radioactive wastes, and thus mixed waste, these radionuclides are typically identified as transuranics not LLW. Please provide DOE’s explanation on how DOE is considering these mixed wastes (whether left in place or removed) as not transuranic waste for clarification in the document.

**Response: Clarification.**

**No transuranic waste (TRU waste) is being generated by the selected ISD removal action. The definition of TRU waste is determined by the concentration of the transuranic alpha emitting isotopes in the waste stream. The concentration must be greater than 100 nCi/gram of waste. The mere presence of an alpha emitting transuranic isotope does not render waste as TRU waste. Also, the definition of “mixed” waste only applies to radioactively contaminated RCRA hazardous waste. Neither radioactively contaminated PCB nor radioactively contaminated asbestos waste would be considered a mixed waste.**

**As documented in the RSER/EE/CA, the potential for any measurable quantities of waste generation would only be possible during the execution of Alternative A-4, Complete Building 235-F Removal/Soil Cover. Because of the dense material of the waste stream (i.e.,**

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concrete, demolition debris, etc.) under this removal action alternative, the concentration of the alpha emitting transuranic isotopes that would be necessary to render a TRU waste designation is unlikely outside the process areas; however, all radioactive waste that leaves the site for final burial will be required to meet the waste acceptance criteria of the receiving facility. The DOE Order that governs TRU waste disposal is listed as an ARAR (To-Be-Considered) in Table C-1 of the RSER/EE/CA.

The last paragraph in Section 4.4, Alternative A-4, Complete Building 235-F Removal/Soil Cover, Activity Description, will be revised as follows:

**“Removal of the process enclosures and contaminated equipment, as well as demolition of the structure, will result in significant costs associated with the potential for TRU waste, TRU mixed waste, LLW, and LLW mixed waste disposal. It is only within discrete process areas that may contain transuranic isotope holdup/concentrations that would exceed the 100 nanocuries/g threshold and result in a TRU and/or TRU mixed waste determination upon disposal. ~~In addition to radiological holdup, All~~ radiologically contaminated equipment/ventilation ducts, etc., will be characterized (to include hazardous waste determination), packaged, and transported off-site to a ~~TRU waste disposal facility. Hazardous material and low-level radionuclide material will be removed and transported to~~ the appropriate disposal facility. The majority of the building rubble will ~~is expected to~~ be disposed of as LLW.”**

Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov

Attachments:

Table – Additional Asbestos ARARs

Table – Additional PCB ARARs

Table – Additional RCRA Hazardous Debris and Universal Waste ARARs

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**EPA ORC Comment: Add the following Asbestos ARARs to “Appendix C -Potential ARARs and TBC Criteria for Building 235-F”**

Action	Requirements	Prerequisite	Citation(s)	SRS Response
<i>General Standards—Asbestos Demolition, Collection, Packaging and Disposal</i>				
Activities potentially causing asbestos emissions	Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging and transporting of any asbestos-containing material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (a)(1) through (4) of this section.	Owner or operator of any source covered under the provisions of § 61.145 <i>Standard for demolition and renovation</i> – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b>	40 CFR § 61.150(a)	<i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
Emission control methods	<p>Adequately wet asbestos-containing waste material as follows:</p> <ul style="list-style-type: none"> <li>• Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and</li> <li>• Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by § 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and</li> <li>• After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and</li> <li>• Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(4) or 1926.1101(k)(8). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.</li> <li>• For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.</li> </ul>	Owner or operator of any source covered under the provisions of § 61.145 <i>Standard for demolition and renovation</i> – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b>	40 CFR § 61.150(a)(1)(i) – (v)	<i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i>

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Emission control for processing	<p>Process asbestos-containing waste material into nonfriable forms as follows:</p> <ul style="list-style-type: none"> <li>(i) Form all asbestos-containing waste material into nonfriable pellets or other shapes;</li> <li>(ii) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use other method specified in § 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented, the outside air.</li> </ul>	Owner or operator of any source covered under the provisions of § 61.145 <i>Standard for demolition and renovation</i> – <b>applicable</b>	40 CFR § 61.150(a)(2)(i) and (ii)	<b>DO NOT RETAIN</b> – no asbestos processing will occur for any of the alternatives.
Emission control for asbestos-containing waste after demolition	<p>Adequately wet the asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site.</p> <p>Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.</p>	Facilities demolished where RACM (as defined in 40 CFR § 61.141), is not removed prior to demolition according to §61.145(c)(1)(i)-(iv) <u>or</u> for facilities demolished according to § 61.145(c)(9) – <b>applicable</b>	40 CFR § 61.150(a)(3)	<b>Agree - Applies to Alternative A-4 only.</b>
Disposal of asbestos-containing waste material	<p>All asbestos-containing waste material shall be deposited as soon as practicable by the waste generator at:</p> <ul style="list-style-type: none"> <li>• A waste disposal site operated in accordance with the provisions of § 61.154, or</li> <li>• An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of § 61.155.</li> <li>• The requirements of paragraph (b) of this section do not apply to Category I nonfriable ACM that is not RACM.</li> </ul>	Owner or operator of any source covered under the provisions of § 61.145 <i>Standard for demolition and renovation</i> – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b>	40 CFR § 61.150(b)(1)-(3)	<b>Agree - Applies to Alternatives A-2, A-3, and A-4.</b>

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Pre-transport of asbestos-containing waste material	<p>Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible.</p> <p>The markings must conform to the requirements of §§ 61.149(d)(1)(i), (ii), and (iii).</p>	<p>Owner or operator of any source covered under the provisions of § 61.145 <i>Standard for demolition and renovation</i> – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b></p>	<p>40 CFR § 61.150(c)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>
<b><i>Standards for Demolition and Renovation Activity</i></b>				
Inspection of facility for asbestos	<p>Prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM.</p> <p>The requirements of paragraphs (b) and (c) of § 61.145 apply to each owner or operator of a demolition or renovation activity, including the removal of RACM.</p> <p>NOTE: The <i>Notification requirements</i> of paragraph (b) of § 61.145 are considered “administrative” and therefore not identified as ARARs. However, some of the information included in the notice, for example a description of work to be performed and methods to be employed, work practices and engineering controls used to comply with the requirements of Subpart M, including asbestos removal and waste-handling emission control procedures should be included in the CERCLA decision document (e.g., ROD, Action Memorandum) and/or a subsequent Remedial Action or Removal Action Work Plan.</p>	<p>Demolition or renovation of a facility which may cause a disturbance of friable asbestos material and exceed the thresholds in 40 CFR 61.145(a)(1) – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b></p>	<p>40 CFR § 61.145(a)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
RACM Thresholds	<p>In a facility being demolished, all the requirements of paragraphs (b) and (c) of § 61.145 apply, except as provided in paragraph (a) of § 61.145, if the combined amount of RACM is</p> <ul style="list-style-type: none"> <li>(i) At least 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet) on other facility components, or</li> <li>(ii) At least 1 cubic meter (35 cubic feet) of facility components where the length or area could not be measured previously.</li> </ul> <p>NOTE: The <i>Notification requirements</i> of paragraph (b) of § 61.145 are considered “administrative” and therefore not identified as ARARs.</p>	Demolition of a facility which may cause a disturbance of friable asbestos material – <b>applicable</b>	40 CFR § 61.145(a)(1)	<i>Agree - Applies to Alternative A-4 only.</i>

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Procedures for asbestos emission control	<p>Remove all RACM from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.</p> <p>RACM need not be removed before demolition if:</p> <ul style="list-style-type: none"> <li>(i) It is Category I nonfriable ACM that is not in poor condition and is not friable.</li> <li>(ii) It is on a facility component that is encased in concrete or other similarly hard material and is adequately wet whenever exposed during demolition; or</li> <li>(iii) It was not accessible for testing and was, therefore, not discovered until after demolition began and, as a result of the demolition, the material cannot be safely removed. If not removed for safety reasons, the exposed RACM and any asbestos-contaminated debris must be treated as asbestos-containing waste material and adequately wet at all times until disposed of.</li> <li>(iv) They are Category II nonfriable ACM and the probability is low that the materials will become crumbled, pulverized, or reduced to powder during demolition.</li> </ul>	Demolition or renovation of a facility which may cause a disturbance of friable asbestos material and exceed the thresholds in 40 CFR 61.145(a)(1) – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b>	40 CFR § 61.145(c)(1)(i)-(iv)	<i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i>

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	<p>When a facility component that contains, is covered with, or is coated with RACM is being taken out of the facility as a unit or in sections:</p> <ul style="list-style-type: none"> <li>(i) Adequately wet all RACM exposed during cutting or disjoining operations; and</li> <li>(ii) Carefully lower each unit or section to the floor and to ground level, not dropping, throwing, sliding, or otherwise damaging or disturbing the RACM.</li> </ul>	<p>Demolition or renovation of a facility which may cause a disturbance of friable asbestos material and exceed the thresholds in 40 CFR 61.145(a)(1) – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b></p>	<p>40 CFR § 61.145(c)(2)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>
	<p>When RACM is stripped from a facility component while it remains in place in the facility, adequately wet the RACM during the stripping operation.</p>		<p>40 CFR § 61.145(c)(3)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>
	<p>Component shall be stripped <u>or</u> contained in leak-tight wrapping, except as described in § 61.145(c)(5). If stripped, either:</p> <ul style="list-style-type: none"> <li>(i) Adequately wet the RACM during stripping; or</li> <li>(ii) Use a local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material produced by the stripping. The system must exhibit no visible emissions to the outside air or be designed and operated in accordance with the requirements in § 61.152.</li> </ul>	<p>A facility component covered with, coated with RACM (as defined in 40 CFR § 61.141), taken out of the facility as a unit or in sections pursuant to 40 CFR § 61.145(c)(2) – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b></p>	<p>40 CFR § 61.145(c)(4)(i) and (ii)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>

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	<p>The RACM is not required to be stripped if the following requirements are met:</p> <ul style="list-style-type: none"> <li>(i) The component is removed, transported, stored, disposed of, or reused without disturbing or damaging the RACM.</li> <li>(ii) The component is encased in a leak-tight wrapping.</li> <li>(iii) The leak-tight wrapping is labeled according to § 61.149(d)(1)(i), (ii), and (iii) during all loading and unloading operations and during storage.</li> </ul>	<p>Large facility components such as reactor vessels, large tanks, and steam generators, but not beams containing RACM (as defined in 40 CFR § 61.141) – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b></p>	<p>40 CFR § 61.145(c)(5)(i)-(iii)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>
<p>Requirements for RACM (i.e., removed or stripped)</p>	<p>For all RACM, including material that has been removed or stripped:</p> <ul style="list-style-type: none"> <li>(i) Adequately wet the material and ensure that it remains wet until collected and contained or treated in preparation for disposal in accordance with § 61.150; and</li> <li>(ii) Carefully lower the material to the ground and floor, not dropping, throwing, sliding, or otherwise damaging or disturbing the material.</li> <li>(iii) Transport the material to the ground via leak-tight chutes or containers if it has been removed or stripped more than 50 feet above ground level and was not removed as units or in sections.</li> <li>(iv) RACM contained in leak-tight wrapping that has been removed in accordance with paragraphs (c)(4) and (c)(3)(i)(B)(3) of § 61.145 need not be wetted.</li> </ul>	<p>Generation of RACM (as defined in 40 CFR § 61.141), from demolition or renovation of a facility – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b></p>	<p>40 CFR § 61.145(c)(6)(i)-(iv)</p>	<p><i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i></p>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
Removal of RACM in freezing temperatures	<p>The owner or operator need not comply with paragraph § 61.145(c)(2)(i) and the wetting provisions of § 61.145(c)(3). Shall remove facility components containing, coated with, or covered with RACM as units or in sections to the maximum extent possible.</p> <p>NOTE: Under § 61.145(c)(7)(iii), must record the temperature in the area containing the facility components at the beginning, middle and end of each workday and keep daily temperature records available for inspection. Recordkeeping requirements are generally considered “administrative” and therefore not identified as ARARs.</p>	Removal of RACM (as defined in 40 CFR § 61.141), when the temperature at the point of wetting is below 0 °C (32 °F) – <b>applicable (for Alternative A-4), or relevant and appropriate (for Alternatives A-2, A-3)</b>	of § 61.145(c)(7)(i)-(ii)	<i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i>
<b><i>Institutional Controls</i></b>				
Warning signs for disposal site	Display warning signs at all entrances and at intervals of 100m (328 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited.	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – <b>relevant and appropriate</b>	40 CFR § 61.151(b)(1)	<i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i>
	<p>The warning signs must:</p> <ul style="list-style-type: none"> <li>(i) Be posted in such a manner and location that a person can easily read the legend; and</li> <li>(ii) Conform to the requirements for (20”x14”) upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and</li> <li>(iii) Display the legend as prescribed in § 61.151(b)(1)(iii) located in the lower panel with letter sizes and styles of visibility at least equal to those specified in § 61.151(b)(1)(iii).</li> </ul>	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – <b>relevant and appropriate</b>	40 CFR § 61.151(b)(1)(i)-(iii)	<i>Agree - Applies to Alternatives A-2, A-3, and A-4.</i>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
Fence for disposal site	Fence the perimeter of the site in a manner adequate to deter access by the general public.		40 CFR § 61.151(b)(2)	<b>DO NOT RETAIN - Perimeter fencing is part of the LUCAP for SRS and will be addressed with the Land Use Controls for FAOU as part of the final remedy.</b>
Deed notice for asbestos waste disposal site	<p>Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that:</p> <ul style="list-style-type: none"> <li>• The land has been used for disposal of asbestos-containing waste material; and</li> <li>• The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site required in § 61.154(f) have been filed with the Administrator; and</li> <li>• The site is subject to 40 CFR part 61, Subpart M.</li> </ul> <p>NOTE: Recordation of deed notice that informs potential purchaser on the waste disposal site is considered a substantive requirement for post-closure.</p>	Closure of an inactive disposal area that received asbestos-containing waste materials <b>relevant and appropriate</b>	40 CFR § 61.151(e)(1)-(3)	<b>DO NOT RETAIN - Addressed as part of the final remedy for FAOU, not as part of this removal action.</b>

ARAR = applicable or relevant and appropriate requirement  
 CFR = Code of Federal Regulations  
 RACM = regulated asbestos-containing material  
 Subpart M = National Emission Standard for Asbestos located at 40 CFR 61.140 *et seq.*

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**EPA ORC Comment: Add the following PCB ARARs to “Appendix C -Potential ARARs and TBC Criteria for Building 235-F”**

Action	Requirements	Prerequisite	Citation	SRS Response
<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.	Generation of waste containing PCBs at concentrations $\geq$ 50 ppm – <b>applicable</b>	40 CFR 761.50(a)	<b>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</b>
	Any person cleaning up and disposing of PCBs shall do so based on the concentration at which the PCBs are found.	Generation of PCB remediation waste as defined in 40 CFR 761.3 – <b>applicable</b>	40 CFR 761.61	<b>DO NOT RETAIN - Does not apply. No PCB remediation waste is part of this removal scope.</b>

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Action	Requirements	Prerequisite	Citation	SRS Response
Management of PCB Items	Must dispose of in accordance with 40 CFR 761.60(b) or decontaminate in accordance with 40 CFR 761.79.	Removal from use of a PCB Item containing intact, non-leaking PCB Article — <b>applicable</b>	40 CFR 761.50(b)(2)	<b>DO NOT RETAIN - Does not apply. PCB Items are not part of this removal scope.</b>
	Must dispose of as bulk product waste in accordance with 40 CFR 761.62(a) or (c).	Removal from use of a PCB Item where PCB Article is no longer intact and non-leaking — <b>applicable</b>	40 CFR 761.50(b)(2)	<b>DO NOT RETAIN - Does not apply. PCB Items are not part of this removal scope.</b>
Management of PCB/Radioactive waste	Any person storing such waste $\geq$ 50 ppm PCBs must do so taking into account both its PCB concentration and radioactive properties, except as provided in 40 CFR 761.65(a)(1), (b)(1)(ii) and (c)(6)(i).	Generation of PCB/ Radioactive waste for a disposal — <b>applicable</b>	40 CFR 761.50(b)(7)(i)	<b>DO NOT RETAIN - Does not apply. No PCB/ Radioactive waste is part of this removal scope.</b>

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	<p>Any person disposing of such waste must do so taking into account both its PCB concentration and its radioactive properties.</p>		<p>40 CFR 761.50(b)(7)(ii)</p>	<p><b>DO NOT RETAIN - Does not apply. No PCB/ Radioactive waste is part of this removal scope.</b></p>
	<p>If, after taking into account only the PCB properties in the waste, the waste meets the requirements for disposal in a facility permitted, licensed, or registered by a state as a municipal or non-municipal non-hazardous waste landfill, e.g., PCB bulk product waste under 40 CFR 761.62(b)(1), then the person may dispose of such waste without regard to the PCBs, based on its radioactive properties alone in accordance with applicable requirements.</p>			<p><b>DO NOT RETAIN - Does not apply. No PCB/ Radioactive waste is part of this removal scope.</b></p>

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Action	Requirements	Prerequisite	Citation	SRS Response
<i>Storage</i>				
Temporary storage of PCB waste (e.g., PPE, rags) in a container(s)	Container(s) shall be marked as illustrated in 40 CFR 761.45(a).	Storage of PCBs and PCB Items at concentrations $\geq$ 50 ppm for disposal – <b>applicable</b>	40 CFR 761.40(a)(1)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
	Storage area must be properly marked as required by 40 CFR 761.40(a)(10).		40 CFR 761.65(c)(3)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
	<del>Any leaking PCB Items and their contents shall be transferred immediately to a properly marked non-leaking container(s).</del>		<del>40 CFR 761.65(e)(5)</del>	<i><b>DO NOT RETAIN - Does not apply. PCB Items are not part of this removal scope.</b></i>

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	Container(s) shall be in accordance with requirements set forth in DOT HMR at 49 CFR 171-180.		40 CFR 761.65(c)(6)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
Storage of PCB waste and/or PCB/radioactive waste in non-RCRA regulated unit	Storage facility must have or be: <ul style="list-style-type: none"> <li>• Adequate roof and walls to prevent rainwater from reaching stored PCBs and PCB items;</li> </ul>	Storage of PCBs and PCB Items at concentrations $\geq 50$ ppm for disposal – <b>applicable</b>	40 CFR 761.65(b)(1)  40 CFR 761.65(b)(1)(i)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
	<ul style="list-style-type: none"> <li>• Adequate floor that has continuous curbing with a minimum 6-inch high curb. Floor and curb must provide a containment volume equal to at least two times the internal volume of the largest PCB article or container or 25% of the internal volume of all articles or containers stored there, whichever is greater.</li> </ul> <p><i>Note: 6 inch minimum curbing not required for area storing PCB/radioactive waste;</i></p>	Storage of PCB/radioactive waste as defined in 40 CFR 761.3 – <b>applicable</b>	40 CFR 761.65(b)(1)(ii)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>

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	<ul style="list-style-type: none"> <li>• No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from curbed area;</li> </ul>		40 CFR 761.65(b)(1)(iii)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
	<ul style="list-style-type: none"> <li>• Floors and curbing constructed of Portland cement, concrete, or a continuous, smooth, non-porous surface that prevents or minimizes penetration of PCBs; and</li> </ul>		40 CFR 761.65(b)(1)(iv)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
	<ul style="list-style-type: none"> <li>• Not located at a site that is below the 100-year flood water elevation.</li> </ul>		40 CFR 761.65(b)(1)(v)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>

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Action	Requirements	Prerequisite	Citation	SRS Response
	Storage area must be properly marked as required by 40 CFR 761.40(a)(10).		40 CFR 761.65(c)(3)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
Storage of PCB waste and/or PCB/radioactive waste in a RCRA-regulated container storage area	Does not have to meet storage unit requirements in 40 CFR 761.65(b)(1) provided unit: <ul style="list-style-type: none"> <li>• is permitted by EPA under RCRA §3004, or</li> <li>• qualifies for interim status under RCRA §3005; or</li> <li>• is permitted by an authorized state under RCRA §3006 and,</li> <li>• PCB spills cleaned up in accordance with Subpart G of 40 CFR 761.</li> </ul>	Storage of PCBs and PCB Items designated for disposal – <b>applicable</b>	40 CFR 761.65(b)(2)(i)-(iv)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
Storage of PCB/radioactive waste in containers	For liquid wastes, containers must be nonleaking.  For non-liquid wastes, containers must be designed to prevent buildup of liquids if such containers are stored in an area meeting the containment requirements of 40 CFR 761.65(b)(1)(ii); and	Storage of PCB/radioactive waste in containers other than those meeting DOT HMR performance standards – <b>applicable</b>	40 CFR 761.65(c)(6)(i)(A)  40 CFR 761.65(c)(6)(i)(B)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>

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	<p>For both liquid and non-liquid wastes, containers must meet all regulations and requirements pertaining to nuclear criticality safety.</p>		<p>40 CFR 761.65(c)(6)(i)(C)</p>	<p><i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i></p>
<p>Storage of liquid PCBs in stationary containers (e.g., leachate in storage tank)</p>	<p>Storage containers can be larger than the containers specified in paragraph (c)(6) of 40 CFR 761.65 provided that:</p> <ul style="list-style-type: none"> <li>• The containers are designed, constructed, and operated in compliance OSHA standards, 29 CFR 1910.106 <i>Flammable and combustible liquids</i>. Before using these containers for storing PCBs, the design of the containers must be reviewed to determine the effect on the structural safety of the containers that will result from placing liquids with the specific gravity of PCBs into the containers.</li> <li>• Owner/operator shall prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan as described in part 112 of this title.</li> </ul> <p><i>NOTE:</i> Substantive requirements of an SPCC Plan will be contained in the CERCLA Work Plan.</p>	<p>Storage of liquid PCB in <i>stationary containers</i> other than those meeting DOT HMR performance standards at 49 CFR parts 171 through 180 – <b>applicable</b></p>	<p>40 CFR 761.65(c)(7)(i) and (ii)</p>	<p><i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i></p>

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<i>Treatment and Disposal</i>				
Disposal of PCB Capacitor(s)	<del>Shall comply with all requirements of 40 CFR 761.60 unless it is known from label or nameplate information, manufacturer's literature, or chemical analysis that the capacitor does not contain PCBs.</del>	<del>Generation of PCB Capacitors with <math>\geq</math> 500 ppm PCBs for disposal— <b>applicable</b></del>	40 CFR 761.60(b)(2)(i)	<b>DO NOT RETAIN - No known PCB capacitors within scope of removal action.</b>
	<del>Any person must assume that a capacitor manufactured prior to July 2, 1979, whose PCB concentration is not established, contains <math>\geq</math> 500 ppm PCBs. If the date of manufacture is unknown, any person must assume the capacitor contains <math>\geq</math> 500 ppm PCBs.</del>		40 CFR 761.2(a)(4)	<b>DO NOT RETAIN - No known PCB capacitors within scope of removal action.</b>
	<del>May dispose of in a municipal solid waste landfill unless that person is subject to requirements of 40 CFR 761.60(b)(2)(iv).</del>	<del>Generation of PCB Small Capacitors (as defined in 40 CFR 761.3) for disposal— <b>applicable</b></del>	40 CFR 761.60(b)(2)(ii)	<b>DO NOT RETAIN - No known PCB capacitors within scope of removal action.</b>

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	<p>Shall dispose of in accordance with either of the following:</p> <ul style="list-style-type: none"> <li>• <del>disposal in an incinerator that complies with 40 CFR 761.70; or</del></li> <li>• <del>until March 1, 1981, disposal in a chemical waste landfill that complies with 40 CFR 761.75.</del></li> </ul>	<p>PCB Large Capacitor which contains 500 ppm or greater PCBs <del>applicable</del></p>	<p>40 CFR 761.60(b)(2)(iii)</p>	<p><b>DO NOT RETAIN - No known PCB capacitors within scope of removal action.</b></p>
<p>Disposal of fluorescent light ballasts</p>	<p>Must be disposed of in a TSCA approved disposal facility, as bulk product waste under 40 CFR 761.62, or in accordance with the decontamination provisions of 40 CFR 761.79.</p>	<p>Generation of fluorescent light ballasts containing PCBs in the potting material for disposal <del>applicable</del></p>	<p>40 CFR 761.60(b)(6)(iii)</p>	<p><b>DO NOT RETAIN - No known PCB ballasts within scope of removal action.</b></p>
<p>Disposal of PCB Contaminated Articles</p>	<p>Must remove all free flowing liquid from the Article, disposing of the liquid in compliance with the requirements of 40 CFR 761.60(a)(2) or (a)(3); and</p>	<p>Generation of PCB Contaminated Articles (as defined in 40 CFR 761.3) for disposal <del>applicable</del></p>	<p>40 CFR 761.60(b)(6)(ii)</p>	<p><b>DO NOT RETAIN - No known PCB article with free liquid within scope of removal action.</b></p>

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Disposal of PCB Contaminated Articles <i>con't</i>	<p>Dispose by one of the following methods:</p> <ul style="list-style-type: none"> <li>• <del>in accordance with the decontamination provisions at 40 CFR 761.79;</del></li> <li>• <del>in a facility permitted, licensed, or registered by a State to manage municipal solid waste or non municipal non-hazardous waste;</del></li> <li>• <del>in an industrial furnace operating in compliance with 40 CFR 761.72; or</del></li> <li>• <del>in a disposal facility approved under this part.</del></li> </ul>	<p>Disposal of PCB Contaminated Articles with no free flowing liquid – <b>applicable</b></p>	<p><del>40 CFR 761.60(b)(6)(ii)</del></p> <p>40 CFR 761.60(b)(6)(ii)(A) – (D)</p>	<p><b>DO NOT RETAIN - No known PCB article with free liquid within scope of removal action.</b></p>
Disposal of PCB hydraulic machine	<p>Shall dispose of by one of the following methods:</p> <ul style="list-style-type: none"> <li>• <del>in accordance with the decontamination provisions at 40 CFR 761.79;</del></li> <li>• <del>in a facility permitted, licensed, or registered by a State to manage municipal solid waste or non municipal non-hazardous waste;</del></li> <li>• <del>in an industrial furnace operating in compliance with 40 CFR 761.72; or</del></li> <li>• <del>in a disposal facility approved under this part.</del></li> </ul>	<p>Generation of a PCB hydraulic machine containing PCBs <math>\geq</math> 50 ppm for disposal – <b>applicable</b></p>	<p><del>40 CFR 761.60(b)(3)(i)</del></p> <p>40 CFR 761.60(b)(3)(i)(A) – (D)</p>	<p><b>DO NOT RETAIN - No known PCB hydraulic machine within scope of removal action.</b></p>

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	<p>Must remove all free flowing liquid from the machine, and dispose of the liquid in accordance with the provisions of 40 CFR 761.60(a);</p>		<p>40 CFR 761.60(b)(3)(ii)</p>	<p><b>DO NOT RETAIN - No known PCB hydraulic machine within scope of removal action.</b></p>
	<p>If the PCB liquid contains <math>\geq</math> 1000 ppm PCB, then the hydraulic machine must be decontaminated in accordance with 40 CFR 761.79 or flushed prior to disposal with a solvent listed at 40 CFR 761.61(b)(1)(i)(B) which contains <math>&lt;</math> 50 ppm PCB.</p>			<p><b>DO NOT RETAIN - No known PCB hydraulic machine within scope of removal action.</b></p>
<p>Disposal of PCB Contaminated Electrical Equipment (except capacitors)</p>	<p>Shall dispose in accordance with 40 CFR 761.60(b)(6)(ii)(A).</p>	<p>Generation of PCB Contaminated Electrical Equipment (as defined in 40 CFR 761.3) for disposal—<b>applicable</b></p>	<p>40 CFR 761.60(b)(4)</p>	<p><b>DO NOT RETAIN - No known PCB electrical equipment within scope of removal action.</b></p>

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<p>Disposal of PCB Contaminated Electrical Equipment (except capacitors) <del>con't</del></p>	<p>Must remove all free flowing liquid from the electrical equipment and dispose of the removed liquid in accordance with 40 CFR 760.61(a).</p> <p>Dispose of by one of the following methods:</p> <ul style="list-style-type: none"> <li>• <del>in accordance with 761.79;</del></li> <li>• <del>in a facility permitted, licensed, or registered by a State to manage municipal solid waste or non-municipal non-hazardous waste subject to 40 CFR 257.5 thru 257.30, as applicable (excluding thermal treatment units);</del></li> <li>• <del>in a scrap metal recovery oven or smelter operated in compliance with 40 CFR 761.72, or</del></li> <li>• <del>in a disposal facility approved under this part.</del></li> </ul>	<p>Drained PCB Contaminated Electrical Equipment (including any residual liquids) <del>—</del> <b>applicable</b></p>	<p>40 CFR 761.60(b)(6)(ii)(A)</p>	<p><b>DO NOT RETAIN - No known PCB electrical equipment within scope of removal action.</b></p>
	<p>Shall dispose of in one of the following disposal facilities approved under this part;</p> <ul style="list-style-type: none"> <li>• <del>incinerator under 40 CFR 761.70;</del></li> <li>• <del>chemical waste landfill under 40 CFR 761.75;</del></li> <li>• <del>high efficiency boiler under 40 CFR 761.71; or</del></li> <li>• <del>scrap metal recovery oven or smelter under 40 CFR 761.72.</del></li> </ul>	<p>Disposal of Large Capacitors that contain <math>\geq 50</math> ppm but <math>&lt; \square 500</math> ppm PCBs <del>—</del> <b>applicable</b></p>	<p>40 CFR 761.60(b)(4)(ii)</p>	<p><b>DO NOT RETAIN - No known PCB electrical equipment within scope of removal action.</b></p>

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Disposal of decontamination waste and residues	Such waste shall be disposed of at their existing PCB concentration unless otherwise specified in 40 CFR 761.79(g)(1-6).	Decontamination waste and residues— <b>applicable</b>	40 CFR 761.79(g)	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>
	Are regulated for disposal as PCB remediation waste.	Distillation bottoms or residues and filter media— <b>applicable</b>	40 CFR 761.79(g)(1)	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>
	Are regulated for disposal at their original concentration.	PCBs physically separated from regulated waste during decontamination, other than distillation bottoms and filter media— <b>applicable</b>	40 CFR 761.79(g)(2)	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>

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Disposal of decontamination waste and residues <i>cont</i>	Must be burned and marketed in accordance with used oil requirements in 40 CFR 761.20(e), or disposed of in accordance with 40 CFR 761.60(a) or (e), or decontaminated pursuant to the section.	Hydrocarbon solvent used or reused for decontamination that contains < 50 ppm PCBs — <b>applicable</b>	40 CFR 761.79(g)(3)	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>
	Shall be disposed of in an incinerator operating in compliance with 40 CFR 761.70, or decontaminated pursuant to this section.	Chlorinated solvent at any concentration PCBs used for decontamination — <b>applicable</b>	40 CFR 761.79(g)(4)	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>
	Shall be disposed of in accordance with 40 CFR 761.60(a), or decontaminated pursuant to this section.	Solvents $\geq$ 50 ppm PCBs [other than those described in 40 CFR 761.79(g)(3) and (g)(4)] — <b>applicable</b>	40 CFR 761.79(g)(5)	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>

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	<del>Shall be disposed of in accordance with provisions for wastes from cleanup of PCB remediation waste at 40 CFR 761.61(a)(5)(v).</del>	<del>Non liquid cleaning materials and PPE at any concentration PCBs, including non porous surfaces and other non liquid materials (e.g., rags, gloves, booties) resulting from decontamination</del> <b>applicable</b>	<del>40 CFR 761.79(g)(6)</del>	<b>DO NOT RETAIN - No known PCB decontamination waste within scope of removal action.</b>
Disposal of PCB contaminated porous surfaces <i>(self implementing option)</i>	<del>Shall be disposed on site or off site as bulk PCB remediation waste according to 40 CFR 761.61(a)(5)(i) or decontaminated for use according to 40 CFR 761.79(b)(4).</del>	<del>PCB remediation waste porous surfaces (as defined in 40 CFR 761.3)</del> <b>applicable</b>	<del>40 CFR 761.61(a)(5)(iii)</del>	<b>DO NOT RETAIN - No known PCB contaminated surfaces within scope of removal action.</b>
Disposal liquid PCB remediation waste <i>(self implementing option)</i>	<del>Shall either:</del> <ul style="list-style-type: none"> <li><del>• decontaminate the waste to the levels specified in 40 CFR 761.79(b)(1) or (2); or</del></li> <li><del>• dispose of the waste in accordance with 40 CFR 761.61(b) or a risk based approval under 40 CFR 761.61(e).</del></li> </ul>	<del>Liquid PCB remediation waste (as defined in 40 CFR 761.3)</del> <b>applicable</b>	<del>40 CFR 761.61(a)(5)(iv)</del>  <del>40 CFR 761.61(a)(5)(iv)(A) and (B)</del>	<b>DO NOT RETAIN - No known PCB liquid PCB remediation waste within scope of removal action.</b>

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<p>Disposal of PCB-contaminated non-porous surfaces on site  <i>(self-implementing option)</i></p>	<p>Shall be cleaned on-site or off-site to levels in 40 CFR 761.61(a)(4)(ii) using:</p> <ul style="list-style-type: none"> <li>• decontamination procedures under 40 CFR 761.79;</li> <li>• technologies approved under 40 CFR 761.60(e); or</li> <li>• risk-based procedures/technologies under 40 CFR 761.61(e).</li> </ul>	<p>PCB remediation waste non-porous surfaces (as defined in 40 CFR 761.3) — <b>applicable</b></p>	<p>40 CFR 761.61(a)(5)(ii)(A)(1) (3)</p>	<p><b>DO NOT RETAIN - No known PCB contaminated non-porous surfaces within scope of removal action.</b></p>
<p>Disposal of PCB-contaminated non-porous surfaces off site  <i>(self-implementing option)</i></p>	<p>Shall be disposed of in accordance with 40 CFR 761.61(a)(5)(i)(B)(3)(ii) [sic] 40 CFR 761.61(a)(5)(i)(B)(2)(ii).</p> <p>Metal surfaces may be thermally decontaminated in accordance with 40 CFR 761.79(e)(6)(i).</p>	<p>PCB remediation waste non-porous surfaces (as defined in 40 CFR 761.3) having surface concentrations &lt; 100 µg/cm<sup>2</sup> — <b>relevant and appropriate</b></p>	<p>40 CFR 761.61(a)(5)(ii)(B)(1)</p>	<p><b>DO NOT RETAIN - No known PCB contaminated non-porous surfaces within scope of removal action.</b></p>
	<p>Shall be disposed of in accordance with 40 CFR 761.61(a)(5)(i)(B)(3)(iii) [sic] 40 CFR 761.61(a)(5)(i)(B)(2)(iii).</p> <p>Metal surfaces may be thermally decontaminated in accordance with 40 CFR 761.79(e)(6)(ii).</p>	<p>PCB remediation waste non-porous surfaces having surface concentrations ≥ 100 µg/cm<sup>2</sup> — <b>relevant and appropriate</b></p>	<p>40 CFR 761.61(a)(5)(ii)(B)(2)</p>	<p><b>DO NOT RETAIN - No known PCB contaminated non-porous surfaces within scope of removal action.</b></p>

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<p>Disposal of PCB bulk product waste (e.g., building demolition debris) in solid waste landfill</p>	<p>May dispose of in a facility permitted, licensed, or registered by a State as a municipal solid waste or non-municipal non-hazardous waste landfill.</p> <p>Includes Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking; Galbestos; non-liquid building demolition debris; or non-liquid PCB bulk product waste from the shredding of automobiles or household appliances from which PCB small capacitors have been removed (shredder fluff).</p>	<p>PCB bulk product waste listed in 40 CFR 761.62(b)(1)(i) including non-liquid building debris – <b>applicable</b></p>	<p>40 CFR 761.62(b)(1)</p>	<p><i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i></p>
	<p>May dispose of in a facility permitted, licensed, or registered by a State as a municipal solid waste or non-municipal non-hazardous waste landfill.</p>	<p>Other PCB bulk product waste, sampled in accordance with the protocols set out in subpart R of this part, that leaches PCBs at &lt;10 µg/L of water measured using a procedure used to simulate leachate generation – <b>applicable</b></p>	<p>40 CFR 761.62(b)(1)(ii)</p>	<p><i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i></p>

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	May dispose of in a facility permitted, licensed, or registered by a State to manage as a municipal solid waste subject to 40 CFR 258 or non-municipal non-hazardous waste subject to 40 CFR 257.5 thru 257.30 if: <ul style="list-style-type: none"> <li>• the PCB bulk product waste is segregated from organic liquids disposed of in the landfill; and</li> <li>• leachate is collected from the landfill and monitored for PCBs.</li> </ul>	Other PCB bulk product waste not meeting conditions of 40 CFR 761.62(b)(1) (e.g., paper/felt gaskets contaminated by liquid PCBs) – <b>applicable</b>	40 CFR 761.62(b)(2)  40 CFR 761.62(b)(2)(i) and (ii)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
Disposal of PCB bulk product waste in an off-site solid waste landfill	Must provide written notice to the facility 15 days in advance of the first shipment from the same disposal waste stream.	Disposal of PCB bulk product waste regulated under 40 CFR 761.62(b)(1) at a facility without PCB approval – <b>applicable</b>	40 CFR 761.62(b)(4)(i)	<i>Agree - Applies to Alternative A-4 only due to bulk product waste generation.</i>
	The notice shall state that the PCB bulk product waste may include components containing PCBs at $\geq 50$ ppm based on analysis of the waste in the shipment or general knowledge of the waste stream (or similar material) which is known to contain PCBs at those levels, and the waste is known or presumed to leach $< 10$ $\mu\text{g/L}$ PCBs.			<i>Agree - Applies to Alternative A-4 only due to the potential for bulk product waste generation.</i>

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	Must provide written notice to the facility 15 days in advance of the first shipment from the same disposal waste stream and with each shipment thereafter.	Disposal of PCB bulk product waste regulated under 40 CFR 761.62(b)(2) at a facility without PCB approval – <b>applicable</b>	40 CFR 761.62(b)(4)(ii)	<i>Agree - Applies to Alternative A-4 only due to the potential for bulk product waste generation.</i>
	The notice shall state that the PCB bulk product waste may include components containing PCBs at $\geq 50$ ppm based on analysis of the waste in the shipment or general knowledge of the waste stream (or similar material) which is known to contain PCBs at those levels, and the waste is known or presumed to leach $< 10$ $\mu\text{g/L}$ PCBs.			<i>Agree - Applies to Alternative A-4 only due to the potential for bulk product waste generation.</i>

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<del>Performance-based disposal of PCB remediation waste</del>	<del>Shall dispose by one of the following methods:</del> <ul style="list-style-type: none"> <li><del>• in a high temperature incinerator approved under 40 CFR 761.70(b);</del></li> <li><del>• by an alternate disposal method approved under 40 CFR 761.60(e);</del></li> <li><del>• in a chemical waste landfill approved under 40 CFR 761.75;</del></li> <li><del>• in a facility with a coordinated approval issued under 40 CFR 761.77; or</del></li> <li><del>• through decontamination in accordance with 40 CFR 761.79.</del></li> </ul>	<del>Disposal of non-liquid PCB remediation waste (as defined in 40 CFR 761.3) —</del> <b>applicable</b>	<del>40 CFR 761.61(b)(2)</del>  <del>40 CFR 761.61(b)(2)(i)</del>   <del>40 CFR 761.61(b)(2)(ii)</del>	<b><i>DO NOT RETAIN - No remediation waste within scope of this removal action.</i></b>
	<del>Shall be disposed according to 40 CFR 761.60(a) or (e), or decontaminate in accordance with 40 CFR 761.79.</del>	<del>Disposal of liquid PCB remediation waste —</del> <b>applicable</b>	<del>40 CFR 761.61(b)(1)</del>	<b><i>DO NOT RETAIN - No remediation waste within scope of this removal action.</i></b>

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<del>Risk based cleanup, storage and/or disposal of PCB remediation waste</del>	<p>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 [or delegate] and EPA finds that the method will not pose an unreasonable risk of injury to [sic] human health or the environment.</p> <p>Each application must include the pertinent information described in 40 CFR 761.61(a)(3).</p> <p>NOTE: Appropriate information required in an application related to contamination can be provided in a CERCLA document (e.g. EE/CA, Action Memo, FS, PP, or ROD) that is reviewed/approved or issued by EPA.</p>	<del>Disposal of PCB remediation waste (as defined in 40 CFR 761.3)</del> <b>relevant and appropriate</b>	<del>40 CFR 761.61(e)</del>	<b><i>DO NOT RETAIN - No remediation waste within scope of this removal action.</i></b>
<del>Disposal of PCB cleanup wastes (e.g., PPE, rags, non-liquid cleaning materials) (self-implementing option)</del>	<p>Shall be disposed of either:</p> <ul style="list-style-type: none"> <li>• <del>in a facility permitted, licensed or registered by a State to manage municipal solid waste under 40 CFR 258 or non-municipal, non-hazardous waste subject to 40 CFR 257.5 thru 257.30; or</del></li> <li>• <del>in a RCRA Subtitle C landfill permitted by a State to accept PCB waste; or</del></li> <li>• <del>in an approved PCB disposal facility; or</del></li> <li>• <del>through decontamination under 40 CFR 761.79(b) or (e).</del></li> </ul>	<del>Generation of non-liquid PCBs at any concentration during and from the cleanup of PCB remediation waste</del> <b>relevant and appropriate</b>	<del>40 CFR 761.61(a)(5)(v)(A)(1)(4)</del>	<b><i>DO NOT RETAIN - No remediation waste due to spill cleanup within scope of this removal action.</i></b>

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Action	Requirements	Prerequisite	Citation	SRS Response
Disposal of PCB cleaning solvents, abrasives, and equipment <i>(self-implementing option)</i>	May be reused after decontamination in accordance with 40 CFR 761.79; or  For liquids, disposed in accordance with 40 CFR 761.60(a).	Generation of PCB wastes from the cleanup of PCB remediation waste — <b>relevant and appropriate</b>	40 CFR 761.61(a)(5)(v)(B)  40 CFR 761.60(b)(1)(i)(B)	<b>DO NOT RETAIN - No remediation waste due to spill cleanup within scope of this removal action.</b>
Disposal of PCB liquids (e.g., transformer fluid)	Must be disposed of in an incinerator which complies with 40 CFR 761.70, except:	PCB liquids at concentrations $\geq 50$ ppm — <b>applicable</b>	40 CFR 761.60(a)	<b>DO NOT RETAIN - No PCB transformers within scope of this removal action.</b>
	For mineral oil dielectric fluid, may be disposed in a high efficiency boiler according to 40 CFR 761.71(a).	PCB liquids at concentrations $\geq 50$ ppm and $< 500$ ppm — <b>applicable</b>	40 CFR 761.60(a)(1)	<b>DO NOT RETAIN - No PCB transformers within scope of this removal action.</b>

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	<p>For liquids other than mineral oil dielectric fluid, may be disposed in a high efficiency boiler according to 40 CFR 761.71(b).</p>		<p>40 CFR 761.60(a)(2)</p>	<p><b>DO NOT RETAIN - No PCB transformers within scope of this removal action.</b></p>
<p>Disposal of PCB contaminated precipitation, condensation, leachate, or load separation</p>	<p>May be disposed in a chemical waste landfill which complies with 40 CFR 761.75 if:</p> <ul style="list-style-type: none"> <li>• disposal does not violate 40 CFR 268.32(a) or 268.42(a)(1);</li> <li>• liquids do not exceed 500 ppm PCB and are not an ignitable waste as described in 40 CFR 761.75(b)(8)(iii).</li> </ul>	<p>PCB liquids at concentrations <math>\geq 50</math> ppm and <math>\leq 500</math> ppm from incidental sources and associated with PCB Articles or non liquid PCB wastes — <b>applicable</b></p>	<p>40 CFR 761.60(a)(3)</p> <p>40 CFR 761.60(a)(3)(i) and (ii)</p>	<p><b>DO NOT RETAIN - No PCB contaminated precipitation, condensation, leachate, or load separation within scope of this removal action.</b></p>

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Action	Requirements	Prerequisite	Citation	SRS Response
Disposal of PCB Transformers	<p>Shall be disposed of in either:</p> <ul style="list-style-type: none"> <li>• <del>an incinerator that complies with 40 CFR 761.70; or</del></li> <li>• <del>a chemical waste landfill approved under 40 CFR 761.75; provided all free flowing liquid and solvent (allowed to stand for 18 hrs to decontaminate transformer) is removed.</del></li> </ul>	<p>PCB Contaminated Electrical Equipment (including transformers that contain PCBs at concentrations of <math>\geq</math> 50 ppm and <math>\square\square</math> 500 ppm in the contaminating fluid) as defined in 40 CFR 761.3 – <b>applicable</b></p>	<p>40 CFR 761.60(b)(1)  40 CFR 761.60(b)(1)(i)(A)  40 CFR 761.60(b)(1)(i)(B)</p>	<p><b>DO NOT RETAIN - No PCB transformers within scope of this removal action.</b></p>
Performance-based disposal of PCB bulk product waste	<p>May dispose of by one of the following:</p> <ul style="list-style-type: none"> <li>• in an incinerator approved under 40 CFR 761.70;</li> <li>• in a chemical waste landfill approved under 40 CFR 761.75;</li> <li>• in a hazardous waste landfill permitted by EPA under §3004 of RCRA or by authorized state under §3006 of RCRA;</li> <li>• under alternate disposal approved under 40 CFR 761.60(e);</li> <li>• in accordance with decontamination provisions of 40 CFR 761.79; or</li> <li>• in accordance with thermal decontamination provisions of 40 CFR 761.79(c)(6) for metal surfaces in contact with PCBs.</li> </ul>	<p>Disposal of PCB bulk product waste as defined in 40 CFR 761.3 – <b>applicable</b></p>	<p>40 CFR 761.62(a) 40 CFR 761.62(a)(1)-(6)</p>	<p><b>Agree - Applies to Alternatives A-2, A-3, and A-4 due to the potential for bulk product waste generation.</b></p>

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Action	Requirements	Prerequisite	Citation	SRS Response
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.</p> <p>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. EE/CA, Action Memo, FS, PP, or ROD) that is approved or issued by EPA.</p>	Sampling, storage and/or disposal of PCB bulk product waste (as defined in 40 CFR 761.3) – <b>applicable</b>	40 CFR 761.62(c)	<b>Agree - Applies to Alternatives A-2, A-3, and A-4 due to the potential for bulk product waste generation.</b>
<b><i>Institutional Controls</i></b>				
<del>Deed restrictions for caps, fences and low occupancy areas (self implementing option)</del>	Must maintain the fence or cap, in perpetuity.	<del>Use of a cap or fence at PCB remediation waste cleanup site</del> – <b>relevant and appropriate</b>	40 CFR 761.61(a)(8)	<b>DO NOT RETAIN - Defer to final remedy.</b>

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Action	Requirements	Prerequisite	Citation	SRS Response
	<p><del>Within 60 days of completion of cleanup activity shall record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:</del></p> <ul style="list-style-type: none"> <li><del>• that land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in 40 CFR 761.3.</del></li> <li><del>• of existence of the fence or cap and the requirements to maintain the fence or cap.</del></li> <li><del>• the applicable cleanup levels left at the site, inside the fence, and/or under the cap.</del></li> </ul>	<p><del>Use of a cap or fence at low occupancy PCB remediation waste cleanup site</del> <b>relevant and appropriate</b></p>	<p><del>40 CFR 761.61(a)(8)(i)(A)(1)-(3)</del></p>	<p><b><i>DO NOT RETAIN - Defer to final remedy</i></b></p>
<b><i>Transportation</i></b>				
<p>Transportation of PCB wastes off-site</p>	<p>Must comply with the manifesting provisions at 40 CFR 761.207 through 218.</p>	<p>Relinquishment of control over PCB wastes by transporting, or offering for transport <b>-applicable</b></p>	<p>40 CFR 761.207(a)</p>	<p><b><i>Agree - Applies to Alternative A-4 only due to the potential for bulk product waste generation.</i></b></p>

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Action	Requirements	Prerequisite	Citation	SRS Response
Transportation of hazardous materials	Shall be subject to and must comply with all applicable provisions of the HMTA and DOT HMR at 49 CFR 171-180.	Any person who, under contract with an department or agency of the federal government, transports “in commerce,” or causes to be transported or shipped, a hazardous material – <b>applicable</b>	49 CFR 171.1(c)	<i>Agree - Applies to Alternative A-4 only due to the potential for bulk product waste generation.</i>

ARAR = applicable or relevant and appropriate requirement  
 CFR = Code of Federal Regulations  
 DOT = U.S. Department of Transportation  
 > = greater than  
 < = less than  
 ≥ = greater than or equal to  
 ≤ = less than or equal to  
 HMR = Hazardous Materials Regulations  
 HMTA = Hazardous Materials Transportation Act  
 PCB = polychlorinated biphenyl  
 PPE = personal protective equipment  
 RCRA = Resource Conservation and Recovery Act of 1976  
 TSCA = Toxic Substances Control Act of 1976

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**EPA ORC Comment: Add the following RCRA Hazardous Debris and Universal Waste ARARs to “Appendix C -Potential ARARs and TBC Criteria for Building 235-F”**

Action	Requirements	Prerequisite	Citation(s)	SRS Response
<i>Waste Treatment and Disposal</i>				
Disposal of RCRA-hazardous waste debris in a land-based unit (i.e., landfill)	Must be treated prior to land disposal as provided in 40 CFR 268.45(a)(1)-(5) unless EPA determines under 40 CFR 261.3(f)(2) that the debris no longer contaminated with hazardous waste <u>or</u> the debris is treated to the waste-specific treatment standard provided in 40 CFR 268.40 for the waste contaminating the debris.	Land disposal, as defined in 40 CFR 268.2, of restricted RCRA-hazardous debris - <b>applicable</b>	40 CFR 268.45(a)	<i>Agree - Applies to Alternative A-4 only. Hazardous waste debris will not be generated for any of the other alternatives.</i>
<del>Disposal of treated hazardous debris</del>	<del>Debris treated by one of the specified extraction or destruction technologies on Table 1 of 40 CFR 268.45 and which no longer exhibits a characteristic is not a hazardous waste and need not be managed in RCRA Subtitle C facility</del> Hazardous debris contaminated with listed waste that is treated by immobilization technology must be managed in a RCRA Subtitle C facility.	<del>Treated debris contaminated with RCRA-listed or characteristic waste - <b>applicable</b></del>	40 CFR 268.45(e)	<i><b>DO NOT RETAIN - Does not apply to any of the alternatives. No treatment is occurring as part of the action. All hazardous debris will be sent off site and managed per RCRA.</b></i>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
Disposal of <i>hazardous debris treatment residues</i>	Except as provided in 268.45(d)(2) and (d)(4), must be separated from debris by simple physical or mechanical means, and such residues are subject to the waste-specific treatment standards for the waste contaminating the debris	<del>Residue from treatment of hazardous debris –</del> <b>applicable</b>	40 CFR <del>268.45(d)(1)</del>	<b><i>DO NOT RETAIN - Does not apply to any of the alternatives. No treatment is occurring as part of the action. All hazardous debris will be sent off site and managed per RCRA.</i></b>
<b><i>Temporary Storage of Universal Waste</i></b>				
Temporary Storage of RCRA lamps (e.g., fluorescent, mercury vapor)	Must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.	Management of “universal waste lamp” as defined in 40 CFR 273.9 and 273.5 that are RCRA characteristic hazardous waste – <b>applicable</b>	40 CFR 273.13(d)(1) Waste management	<b><i>DO NOT RETAIN - Does not apply to any of the alternatives. All known universal waste will be removed during deactivation and will not be present as part of the removal action.</i></b>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
	Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.		40 CFR 273.13(d)(2) Waste management	<b>DO NOT RETAIN - Does not apply to any of the alternatives. All known universal waste will be removed during deactivation and will not be present as part of the removal action.</b>
	Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamp(s)", or "Waste Lamps", or "Used Lamps".		40 CFR 273.14(e) Labeling/markings	<b>DO NOT RETAIN - Does not apply to any of the alternatives. All known universal waste will be removed during deactivation and will not be present as part of the removal action.</b>

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Action	Requirements	Prerequisite	Citation(s)	SRS Response
<p>Temporary Storage of RCRA lamps (e.g., fluorescent, mercury vapor)</p>	<p>May accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of <del>paragraph (b)</del> of this section are met.</p> <p>NOTE: Under CERCLA § 121(e)(1) an on-site response action does not require a permit or compliance with administrative requirements. The limitations on accumulation of waste on-site for one year or greater are considered substantive requirements.</p>	<p>A small quantity handler of universal waste who accumulates universal waste – <b>applicable</b></p>	<p>40 CFR 273.15(a)</p>	<p><b>DO NOT RETAIN - Does not apply to any of the alternatives. All known universal waste will be removed during deactivation and will not be present as part of the removal action.</b></p>
	<p>May accumulate universal waste for longer than one year from the date the universal waste is generated, or received from another handler, if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal.</p> <p>NOTE: Under CERCLA § 121(e)(1) an on-site response action does not require a permit or compliance with administrative requirements. The limitations on accumulation of waste on-site for one year or greater are considered substantive requirements.</p>		<p>40 CFR 273.15(b) Accumulation time limits</p>	<p><b>DO NOT RETAIN - Does not apply to any of the alternatives. All known universal waste will be removed during deactivation and will not be present as part of the removal action.</b></p>

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Temporary Storage of RCRA lamps (e.g., fluorescent, mercury vapor)	<p>Must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:</p> <ul style="list-style-type: none"> <li>• <del>Mark or label the individual item with the date the lamp(s) became a waste;</del></li> <li>• <del>Mark or label the container or package with date wastes received;</del></li> <li>• <del>Maintaining an inventory system on site that identifies the date each universal waste became a waste or was received;</del></li> <li>• <del>Maintaining an inventory system on site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;</del></li> <li>• <del>Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or</del></li> <li>• <del>Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.</del></li> </ul>	<p>A small quantity handler of universal waste who accumulates universal waste – <b>applicable</b></p>	<p>40 CFR 273.15(e)(1)-(6)  <del>Accumulation time limits</del></p>	<p><b>DO NOT RETAIN - Does not apply to any of the alternatives. All known universal waste will be removed during deactivation and will not be present as part of the removal action.</b></p>

ARAR = applicable or relevant and appropriate requirement  
 CFR = Code of Federal Regulations  
 EPA = U.S. Environmental Protection Agency  
 RCRA = Resource Conservation and Recovery Act of 1976