



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

AUG 24 2021

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: Savannah River Site's Responses to the Regulatory Comments on the Facility Decommissioning Evaluation (FDE) for Plant 607-14D, Chemical Feed Facility (G-FDE-D-00053, Revision 0, February 23, 2021) Simple Model

The U. S. Department of Energy is submitting the subject comment responses for your review. The Savannah River Site (SRS) submitted the Facility Decommissioning Evaluation (FDE) for Plant 607-14D, Chemical Feed Facility (G-FDE-D-00053, Revision 0, February 23, 2021) on February 25, 2021 for South Carolina Department of Health and Environmental Control (SCDHEC) and U. S. Environmental Protection Agency's (EPA's) review. The SRS received the SCDHEC's comments on April 9, 2021 and EPA's approval on May 10, 2021. Please review the enclosure and provide your response within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject facility are greatly appreciated.

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

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
 Date: 2021.08.24 09:42:42 -04'00'

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

IACD-21-161

Ms. Susan Fulmer
Mr. Jon Richards

2

AUG 24 2021

Enclosure:

Savannah River Site's Responses to South Carolina Department of Health and Environmental Control's Comments on the Facility Decommissioning Evaluation (FDE) for Plant 607-14D, Chemical Feed Facility (G-FDE-D-00053, Revision 0, February 23, 2021)

cc w/o encl:

**J. Blalock, SCDHEC - Columbia
G. K. Taylor, SCDHEC - Columbia
S. French, SCDHEC - Columbia
M. Reece, SCDHEC - Columbia
T. R. Fuss, SCDHEC – Aiken Environmental Affairs Office
G. N. O'Quinn, SCDHEC – Aiken Environmental Affairs Office
B. Cameron, SCDHEC – Aiken Environmental Affairs Office
R. H. Pope, EPA - Atlanta**

cc w/encl:

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

SCDHEC COMMENTS

1) Process History, Pages 19-21

Page 20 states, "Some indication of Soda Ash spill points are evident in the interior of 607-14D." yet "N/A is provided as the response to "Evidence of spills?" in the Chemical Process table on page 21. Regardless of the definition of "chemical or radioactive processes" provided on page 19, the FDE should not contain this apparent discrepancy. Please correct.

Response: Clarification

Based on Savannah River Site's (SRS) long-standing definition of processes (i.e., no chemical, mechanical or electrical energy or interaction was performed to change the state of the input material or to produce a new output product), there were no processes declared in the facility. Therefore, the columns of the Chemical Process table are properly marked "N/A". SRS noted the observation of the Soda Ash (which is not part of any chemical process) spill points in the interior of 607-14D simply to be transparent with the Core Team.

No changes to the FDE are proposed.

Responsible Party: William B. Griffin (803-952-6430), William.Griffin@srs.gov

2) Part 2, Evaluation, Question#1, Page 23

If the chlorine-containing compound that was utilized in the Chemical Feed Facility (see page 19) was, or is, defined as hazardous by CERCLA, then there should be an "X" in the "Yes Column", not the "No Column", for Question 1. Please re-evaluate the response with regards to this compound.

Response: Agree with Clarification.

Chlorine and calcium hypochlorite are defined as hazardous by CERLCA and reportable quantities for each chemical are listed in 40 CFR 302.4, Table 302.4. Therefore, the response to Question 1 in Part 2, Evaluation, was changed from an "X" in the "No" Column to an "X" in the "Yes" column. Based on this change, all questions in Part 2, Evaluation, were reviewed and answered accordingly. The updated Part 2. Evaluation is included with these responses.

No changes to the FDE are proposed.

Savannah River Site Responses to South Carolina Department of Health and Environmental Control (SCDHEC) Comments on the Facility Decommissioning Evaluation (FDE): D-Area Chemical Feed Facility, Plant/Building 607-14D, G-FDE-D-00053, Revision 0, February 23, 2021, Cover Letter Dated February 23, 2021
Comments Received on 4/9/2021

Page 2 of 4

Responsible Party: William B. Griffin (803-952-6430), William.Griffin@srs.gov

3) Part 2, Evaluation, Question#2, Page 23

Question# 2 is marked "No" in response to whether or not there was a spill of stored packaged material in Building 607-14D. The justification provided states that no spill of radioactive or hazardous chemical material occurred; however, the posed question concerns any stored packaged materials. Please re-evaluate the response to Question# 2, and if necessary, continue the evaluation to completion.

Response: Clarification

Based on the response to comment #2, a response to Question #2 of the Evaluation is no longer applicable. Please refer to the updated Part 2. Evaluation that is included with the responses.

No changes to the FDE are proposed.

Responsible Party: William B. Griffin (803-952-6430), William.Griffin@srs.gov

Savannah River Site Responses to South Carolina Department of Health and Environmental Control (SCDHEC) Comments on the Facility Decommissioning Evaluation (FDE): D-Area Chemical Feed Facility, Plant/Building 607-14D, G-FDE-D-00053, Revision 0, February 23, 2021, Cover Letter Dated February 23, 2021
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Part 2. Evaluation

Clean Facilities				
	Question	Yes	No	Justification
1.	Has the facility ever contained or processed radioactive or hazardous material other than stored packaged material or materials of construction? <i>If yes, go to question 4.</i>	X		The facility has contained and used chlorine and calcium hypochlorite in the wastewater treatment process. Chlorine and calcium hypochlorite are hazardous per 40 CFR 302.4. Chlorine and calcium hypochlorite each have a reportable quantity of 10 pounds.
2.	If there was stored packaged material, has there ever been a spill? <i>If No or N/A, this is a Simple Model. Stop.</i>			N/A
3.	Was spill confined inside structure and cleaned to free release standard per Radiological Control Manual 5Q (for radiological) or continued occupancy per Industrial Hygiene Manual 4Q (for hazardous)? <i>If Yes, this is a Simple Model. Stop.</i>			N/A
Contaminated Facilities				
	Question	Yes	No	Justification
4.	Is the facility listed as a Resources Conservation and Recovery Act (RCRA)/CERCLA Unit in Appendix C of the SRS FFA? <i>If Yes, this is a CERCLA Model. Stop.</i>		X	The facility is not listed in Appendix C of the SRS FFA.
5.	Is the facility listed as a Site Evaluation Area in Appendix G of the SRS FFA? <i>If Yes, this is a CERCLA Model. Stop.</i>		X	The facility is not listed on Appendix G.1, Areas to be Investigated. Appendix G.2, Areas Determined to Require No Further Response Action, lists a Spill on 8/31/87 of <100 Gal of Bromocide Solution from 607-14D (NBN) as there were no impacts to the structure, human health, or the environment.
6.	Is there evidence that there has been a release of hazardous or radioactive materials outside the structure? <i>If Yes, this is a CERCLA Model. Stop.</i>		X	There is no evidence of a release of hazardous or radioactive materials outside the structure.
7.	Is there a substantial threat of a release of hazardous or radioactive materials outside the structure? <i>If Yes, this is a CERCLA Model. Stop.</i>		X	There is no substantial threat of a release of hazardous or radioactive materials outside the structure.
8.	Has the facility been assigned a hazard category as defined in Facility Safety Document Manual 11Q? <i>If No, stop and refer facility for evaluation to assign a hazard category, then proceed.</i>	X		The facility has been defined a hazard category of "Other Industrial" (i.e., operations involving hazardous materials routinely encountered in public or common industrial settings).

Savannah River Site Responses to South Carolina Department of Health and Environmental Control (SCDHEC) Comments on the Facility Decommissioning Evaluation (FDE): D-Area Chemical Feed Facility, Plant/Building 607-14D, G-FDE-D-00053, Revision 0, February 23, 2021, Cover Letter Dated February 23, 2021
 Comments Received on 4/9/2021

	Question	Yes	No	Justification
9.	Is the hazard category Nuclear (HC- 2 or 3), radiological, or high hazard chemical? <i>If Yes, this is a CERCLA Model. Stop.</i>		X	The hazard category is "Other Industrial".
10.	Has DOE-SR directed that the decommissioning be performed using the CERCLA Model? <i>If yes, this is a CERCLA Model. Stop.</i>		X	DOE-SR has not directed that the decommissioning be performed using the CERCLA Model.
11.	Does the complexity of the facility or the nature and extent of contamination warrant a higher than normal level of rigor and detail for decommissioning planning and evaluation? <i>If Yes, this is a CERCLA Model. Stop.</i>		X	Neither the complexity of the facility nor the nature and extent of contamination warrant a higher than normal level of rigor or detail for decommissioning planning and evaluation.
12.	Is the facility a formerly nuclear, radiological, or high-hazard chemical facility? <i>If Yes, this is an Integrated Sampling Model. Stop.</i>		X	The facility is "Other Industrial".
13.	Has EC&ACP's Regulatory Support Group determined that a final survey is not required for this facility? <i>If Yes, this is a Simple Model. If No, this is an Integrated Sampling Model. Stop</i>	X		EC&ACP has determined that the nature of the chemicals used, the history of the facility and current facility condition do not warrant a final survey. Building 607-14D and ancillary structures/appurtenances will be a Simple Model decommissioning.