



Department of Energy
Savannah River Operations Office
P.O. Box A
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AUG 11 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 Remediation Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Responses to the Regulatory Comments on the Decommissioning Project Final Report Building 690-N, Process Heat Exchanger Repair Facility (V-PCOR-N-00025, Revision 0, May 18, 2021)

The U. S. Department of Energy (DOE) is submitting the subject comment responses for your review. On May 24, 2021, the DOE submitted the Decommissioning Project Final Report (DPFR) (V-PCOR-N-00025, Revision 0, May 18, 2021) for U. S. Environmental Protection Agency (EPA) and South Carolina Department of Health and Environmental Control (SCDHEC) review. The EPA provided comments and the SCDHEC approved the DPFR on July 22, 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.

Sincerely,

Brian T. Hennessey

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Hennessey
Date: 2021.08.10 16:15:42 -04'00'

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

IACD-21-155

Ms. Susan Fulmer
Mr. Jon Richards

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AUG 11 2021

Enclosure:

SRS Responses to the EPA Comments on the Decommissioning Project Final Report (DPFR) for Building 690-N, Process Heat Exchanger Repair Facility (V-PCOR-N-00025, Revision 0, May 18, 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
B. Cameron, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office

**SRS Responses to EPA Comments on the
Decommissioning Project Final Report (DPFR) for Building 690-N, Process Heat
Exchanger Repair Facility, (V-PCOR-N-00025, Rev. 0, May 18, 2021),
Savannah River Site, Aiken, South Carolina**

Comments Received July 22, 2021

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GENERAL COMMENTS

1. The age of the water table elevations used as the physical parameter input for contaminant migration screening is unclear, and it is uncertain how this may impact the results of the contaminant migration analysis. For example, Appendix B – Contaminant Migration Analysis, Table B-2, Physical Parameters Used for Screening, Page 46 of 52, indicates the depth to water of 45 feet and horizontal gradient of 0.005 feet/foot (ft/ft) was estimated from the potentiometric surface. Additionally, in Section B-2.1, Background, Page 27 of 52, the text states, “A potentiometric map of the water table aquifer was generated in July 1996 for Central Shops using synchronous water table elevations in monitoring wells screened in the water table aquifer. The map indicates that the unconfined groundwater in the vicinity of the Ford Building (690-N) flows from northeast to southwest (Figure B-1)....” However, a review of the figure legend on Figure B-1 (Ford Building Location and N-Area Potentiometric Surface), Page 42 of 52, indicates the water table data depicted on the figure is dated 2003. It is noted utilizing older water table elevations, rather than the most recently available water table elevations, as the input for contaminant migration screening may not be applicable since it is not representative of the most current groundwater elevations, particularly if water table elevations have significantly changed. *Please revise the Decommissioning Project Final Report Building 690-N, Process Heat Exchanger Repair Facility, V-PCOR-N-00025, Rev. 0, dated May 18, 2021 (the Report) to discuss the age of the water table elevations used as a physical parameter input in the contaminant migration analysis, and explain why it is appropriate for use in the model.*

Response: Clarification.

The text in Section B-2.1 incorrectly states that the potentiometric map was generated from 1996 water elevations. The regional potentiometric map was generated from 2003 water elevations that were also used in the contaminant migration model. Water levels determined from 2019 direct push sampling events were approximately 255 feet mean sea level just south of the Ford Building (690-N), consistent with levels measured for the 2003 potentiometric map.

The effect of using older water table elevations within the contaminant migration models for this facility has minimal impact on the modeling results. The depth to water would need to be drastically different (i.e., 5 feet below the slab or less) for contaminants to fail Tier II analysis due to the immobile nature of the contaminants investigated and the influence of the larger mixing zone. Further, conservatism is provided within the model by not including the concrete slab placed on top of the Ford Building (690-N) remnant slab when determining infiltration rates and the directly proportional transport time to the aquifer. The effect of practical changes to the water table elevation on model results and conclusions would be well within this level of conservatism. No change to the document is proposed.

**SRS Responses to EPA Comments on the
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Responsible Party: William Jolin, (803) 953-6122, william.jolin@srs.gov

SPECIFIC COMMENTS

- 1. Section 6.02.01, Human Health Risk Assessment, Page 14 of 52:** It unclear if the “Human Health Risk Screening Evaluation for the 690-N Ford Building (U),” SDD-2019-00030, Rev. 0, April 11, 2019 (Reference 8.03) was approved by the regulatory agencies [i.e., United States Environmental Protection Agency (USEPA) and South Carolina Department of Health and Environmental Control (SCDHEC)] since conclusions of the Human Health Risk Assessment (HHRA) were based on the older 2014 characterization data and regional screening level/preliminary remedial goals (RSL/PRGs). It is noted the text states, “Although the RSL and Preliminary Remediation Goal (PRG) values have been updated since the 2014 characterization, there are no significant changes in the screening thresholds that would change the preliminary conclusions of this evaluation (Reference 8.03).” *Please revise the Report to state whether the Reference 8.03 was approved by the regulatory agencies*

Response: Clarification.

The EPA approved the HH Risk Screening Evaluation on June 4, 2019 (SRNS-OS-2019-00169 [ARF-022193]). The SCDHEC approved the HH Risk Screening Evaluation on June 21, 2019 (SRNS-OS-2019-00183 [ARF-022235]). As the approvals are available in the administrative record, no change to the document is proposed.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

- 2. Section 6.03, Post Decommissioning Requirements, Page 15 of 52:** It is unclear whether the surveillance and maintenance (S&M) inspections of the cap slab activities will be conducted as a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) land use control (LUC) remedial activity once 690-N is added to Appendix C.4 of the Federal Facility Agreement (FFA). For example, the text states, “S&M inspections will be performed at regular (i.e., 12 month) intervals to identify any breaches (i.e., cracks) which would impair the integrity of the cap. To ensure facility remnants are addressed, Building 690-N will be added to Appendix C.4 of the FFA and is a subunit of the ECODS N-1, Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (Ford Building) OU.” *Please revise Report to state whether S&M inspections will be conducted as a LUC remedial activity under CERCLA once 690-N is added to Appendix C.4 of the FFA.*

Response: Clarification.

**SRS Responses to EPA Comments on the
Decommissioning Project Final Report (DPFR) for Building 690-N, Process Heat
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The S&M inspections described in Section 6.03 of the DPFR will be conducted annually under the Post-Decommissioning Action Plan for Building 690-N (see Section 1.0 of the DPFR) until a final CERCLA remedial decision is determined for the facility remnants. The RFI/RI Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit is currently in the development phase (FFA submittal date: October 28, 2021). The Record of Decision for the operable unit is scheduled to be issued in December 2023. Inspections of the facility remnants (as appropriate) under CERCLA will be documented in an operable unit-specific land use control implementation plan (LUCIP). Once the LUCIP is approved and implemented, inspections will no longer be conducted under the Post-Decommissioning Action Plan. No change to the document is proposed.

Responsible Party: Steven Conner, (803) 952-8842, steven.conner@srs.gov