



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

JUL - 5 2023

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: Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-01284, Revision 1 Redline, June 2023) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 93

In accordance with the terms of the Federal Facility Agreement, the U.S. Department of Energy (DOE) is submitting the subject information for your review and approval. The South Carolina Department of Health and Environmental Control (SCDHEC) and U.S. Environmental Protection Agency (EPA) provided comments on the Revision 0 document on April 20, 2023, and May 16, 2023, respectively. This submittal includes the Savannah River Site's responses to the SCDHEC's and EPA's comments on the Revision 0 report and the incorporation of the responses into the Revision 1 Redline document.

Please review the enclosures and provide your approval within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject operable unit are greatly appreciated.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Brian T. Hennessey".

Brian T. Hennessey
SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division

RDDD-23-015

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

1. Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-01284, Revision 1 Redline, June 2023) SEMS Number: 93
2. SRS Responses to SCDHEC Comments on Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-01284, Revision 0, March 2023) SEMS Number: 93
3. SRS Responses to EPA Comments on Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2022-01284, Revision 0, March 2023) SEMS Number: 93

cc w/o encl:

J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. R. Stewart, 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

cc w/encl:

M. McRae, TechLaw, Inc.

**SRS Responses to the
Environmental Protection Agency Comments on the Record of Decision
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Highlight references below are to *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and other Remedy Selection Decision Documents* (July 1999)

Comments

1. Description of Selected Remedy, p. v of x: The second paragraph implies that hazardous substances will reach UU/UE levels in some certain amount of time, however Section XI clarifies that asbestos and PCBs “do not degrade over time” and therefore LUCs will be needed for longer than 30 years. Recommend revising this paragraph to more accurately reflect LUC duration, e.g. “LUCs for the ECODS N-1 subunit and Ford Building subunit will be in effect for an indefinite period beyond 30 years due to the nature of the hazardous substances present, and include the following:...”

Response: Clarification.

The text “until concentrations of hazardous substances are at levels that allow for unrestricted use” replaced the former language “for an indefinite period of time” in ROD documents based on 2007 comments received from EPA HQ legal on SRS LUCIP documents. This language was incorporated into the SRS ROD template and has been used consistently in ROD documents. No change to the Declaration section is proposed.

SRS does agree to provide more detail in Section XI, Detailed Description of the Selected Remedy, to explain that the duration of LUCs at the ECODS N-1 and Ford Building subunits will likely be in effect for an indefinite period due to the nature of the hazardous substances present. Please see the response to EPA comment #8.

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

2. Section I, p. 1 of 88: Recommend adding support agency information to this section. For example, revise the beginning of the last paragraph to read: “USDOE entered into a Federal Facility Agreement (FFA) (FFA 1993) with the United States Environmental Protection Agency (USEPA) and South Carolina Department of Health and Environmental Control (SCDHEC) to ensure that the environmental impacts associated with past and present activities at the site are thoroughly investigated and that appropriate corrective/remedial action is taken as necessary to protect the public health and welfare and the environment. The FFA for SRS lists the *Early Construction and Operational Disposal Site N-1 (NBN)....*”

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Response: Agree.

The third complete paragraph of Section I will be revised to state, “USDOE entered into a Federal Facility Agreement (FFA) (FFA 1993) with the United States Environmental Protection Agency (USEPA) and South Carolina Department of Health and Environmental Control (SCDHEC) to ensure that the environmental impacts associated with past and present activities at the site are thoroughly investigated and that appropriate corrective/remedial action is taken as necessary to protect the public health and welfare and the environment. The Federal Facility Agreement (FFA) (FFA 1993) for SRS lists the *Early Construction and Operational...*”

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

3. Section V, p. 9 of 88: Recommend adding a sentence at the end of the first paragraph under *Conceptual Site Model* to direct the reader to Figure 9.

Response: Clarification.

The CSM depicted in Figure 9 represents the CSM following implementation of the selected remedy and is appropriately referenced in Section XI, the Selected Remedy. Reference to Figure 9 in Section V, prior to the discussion of the selected remedy is premature. For this reason, no change to the text is proposed.

4. Section V, p. 10 of 88, first full paragraph. Recommend revising first two sentences to more clearly identify the OU subunits, and also add reference to Figures 2 and 3, e.g.: “The OU consists of three subunits: ECODS N-1, CSSLP and Ford Building. See Figures 2 and 3 for the location of the subunits within the SRS. These subunits represent geographically distinct locations within the OU....”

Response: Agree.

The fourth paragraph of the Conceptual Site Model subsection of Section V will be revised to state, “The OU consists of three subunits: ECODS N-1, CSSLP, and the Ford Building—OU consists of three subunits. Figures 2 and 3 depict the location of the subunits within the SRS. These subunits represent geographically distinct locations...”

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5. Section VII, p. 23 of 88: Recommend using language from Highlight 6-12 to clearly state basis for taking action at the conclusion of the Summary of Risks section.

Response: Agree.

The Conclusion subsection of Section VII will be revised to state, “As determined in the combined RFI/RI/BRA/CMS/FS report (SRNS 2022a), unacceptable risks were identified under the future resident and future industrial worker scenarios for the CSSLP subunit for arsenic contamination in soil and sediment, and the Ford Building subunit for Co-60 in soil. In addition, asbestos is present within the ECODS N-1 subunit that may potentially pose a threat to human health if disturbance of subsurface soils occurs. The response action selected in this ROD is necessary to protect the public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment.”

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

6. Principal Threat Wastes section not included. Recommend adding new section between current sections X (Comparative Analysis) and XI (Selected Remedy) to restate summary of findings from Discussion of Principal Threat Source Material in Section VII, p. 22.

Response: Clarification.

A discussion of PTSM and the associated risk, reduction through treatment, etc., is included in Section X (Comparative Analysis) and Section XI (Selected Remedy) of SRS ROD documents if present. For this reason, a stand-alone section for PTSM following the comparative analysis is not needed. The format of the ROD is consistent with the EPA’s guidance to preparing ROD documents (EPA 1999) and the SRS ROD document format. No change to the document is proposed.

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

7. Section XI, p. 38 of 88: replace the word “selective” with “selected” to read, “For the ECODS N-1 subunit, *Alternative A-2, Land Use Controls* is the selected remedy....”

Response: Agree.

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The text will be revised as indicated.

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

8. Section XI, p. 38 (last paragraph) and p. 42 (first full paragraph): Recommend revising language to more clearly state undetermined duration of LUCs, e.g. “LUCs are maintained until the concentration of hazardous substances in the media is at such levels to allow for unrestricted use and exposure. For the purposes of making a cost estimate only, the duration of LUCs at this subunit was estimated to be 30 years. However, the actual duration is undetermined and will likely be longer as asbestos [or PCBs for p. 42] does not degrade over time.”

Response: Agree.

The third paragraph of Section XI, Detailed Description of the Selected Remedy, ECODS N-1, will be revised as follows:

"LUCs will be maintained until the concentration of hazardous substances in the media is at such levels to allow for unrestricted use and exposure. The timeframe for LUCs is assumed for 30 years of duration as a basis for the cost estimate. However, the actual time requirement duration is undetermined and will likely be longer, as asbestos does not degrade over time."

The last paragraph of the Ford Building subsection of Section XI will be revised to state,

"Long-term effectiveness is achieved under this alternative as long as LUCs are maintained until the concentration of hazardous substances in the media is at such levels to allow for unrestricted use and exposure. For the purposes of making a cost estimate only, the timeframe duration for LUCs at this subunit is assumed was estimated to be 30 years of duration as a basis for a cost estimate. However, the actual time requirement is undetermined and will likely be longer, as PCBs do not degrade significantly over time. A LUCIP will be prepared by the USDOE..."

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

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9. Section XI, p. 39 of 88, delete the word “of” at the end of the first line under *CSSLP Subunit*, to read, “...*Excavation (Hot Spot Removal) and Disposal* is the selected alternative....”

Response: Agree.

The typographical error will be corrected as noted.

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

10. Section XI, p. 45 of 88, *Estimated Outcomes of Selected Remedy* paragraphs - recommend consistency in use of italics for selected alternatives; Alternative A-2 and C-2 are not italicized while Alternative B-4 is italicized.

Response: Agree.

The titles of the alternatives will be italicized.

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

11. Section XII, p. 47 of 88, in last paragraph, add justification for not satisfying statutory preference for treatment.

Response: Agree with Clarification.

As documented in the Corrective Measures Study/Feasibility Study (SRNS-RP-2021-00548, April 2022), a preference to employ a treatment technology for the ECODS N-1, CSSLP, and Ford Building OU was not necessary due to the nature of the problems warranting action and contaminants present.

To address this comment, the third paragraph of the Statutory Determinations subsection of the Declaration will be revised to state, “The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action (unless justified by a waiver), and is cost-effective. The statutory preference for treatment as a principal element of the remedy is not applicable as no principal threat source material refined constituents of concern were identified at the OU. ~~The remedy in this OU does not satisfy the statutory preference for treatment as a principal element of the remedy~~”

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~~because it does not employ treatment to reduce the toxicity, mobility, or volume of the contaminated media.~~

Also, the third paragraph of Section XII will be revised to state, “The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action (unless justified by a waiver), and is cost-effective. The statutory preference for treatment as a principal element of the remedy is not applicable as no PTSM RCOCs were identified at the OU.” ~~The remedy in this OU does not satisfy the statutory preference for treatment as a principal element of the remedy because it does not employ treatment to reduce the toxicity, mobility, or volume of the contaminated media.~~

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov

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Specific Comments

1. Section V. Operable Unit Characteristics, CSSLP and Ford Building Subunits, page 14. For the sake of consistency with the approved SB/PP and throughout Section V, at the end of the second paragraph for the Upland Area discussion, please add the following sentence: "Arsenic was identified as a problem warranting action in surface soil for residential and industrial worker receptor scenarios." Also, for the Ford Building Subunit, add the following to the end of the first sentence: "for the residential and industrial worker scenarios."

Response: Agree with clarification.

The first paragraph of Section V, Media Assessment Results, CSSLP Subunit subsection will be revised to state, “Sample location CSSLP-31 (Figure 5) had the highest detected concentration. Arsenic was identified as a problem warranting action in surface soil for residential and industrial worker receptor scenarios.”

For the Surface Water Impoundment Area, arsenic was detected...”

In the Ford Building subsection that follows, the text in the first paragraph will be revised to state, “Before an engineered concrete cover system was installed in 2021, PCBs (Aroclor 1254 and 1260) and Cs-137(+D) were identified at the Ford Building remnant concrete slab as problems warranting action (SRNS 2019b). In surface soil, Co-60 was identified as a problem warranting action for the future residential and future-industrial worker scenarios.”

Responsible Party: Susan Blas, (803) 952-6904, susan.blas@srs.gov