

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

April 6, 2020

Mr. Brian T. Hennessey  
SRS Remedial Project Manager  
Infrastructure and Area Completion Division  
U.S. Department of Energy  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

**ENVIRONMENTAL COMPLIANCE &**

APR - 6 2020

**AREA COMPLETION PROJECTS**

**EPA comments: RFI/RI Work Plan 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), SEMS Number: 93, SRNS-RP-2020-00041, Revision 0, February 2020**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed RFI/RI Work Plan for these N Areas, dated Feb, 2020, and we have the following attached comments:

If you have any questions or require additional information, please contact me at (404) 562-8648.

Sincerely,

JON  
RICHARDS

Digitally signed by JON  
RICHARDS  
Date: 2020.04.06  
09:27:08 -04'00'

Jon Richards  
FFA Remedial Project Manager  
Superfund & Emergency Management  
Division

cc: C.L. Bergren, SRNS-ACP  
Susan Fulmer, SCDHEC

## I. GENERAL COMMENTS

1. The text in the last paragraph in the Executive Summary, Page ES-7 of ES-10 indicates a Sampling and Analysis Plan (SAP) is included in this Work Plan for the additional data needs to accomplish the remedial investigation (RI) objectives. The text further indicates the data obtained under this Work Plan will be integrated with data from previous investigations to support the Baseline Risk Assessment, contaminant fate and transport analysis, and remedial alternative selection process for the Early Construction and Operational Disposal Site (ECODS) N-1 (NBN), Central Shops Scrap Lumber Pile (CSSLP) (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (OU). It is noted that the SAP for Pre-Work Plan Characterization presented in Appendix A of this RFI/RI Work Plan indicates groundwater samples were collected at select locations at the ECODS N-1, CSSLP and Ford Building subunits to evaluate and support contaminant migration evaluation conclusions. However, the RFI/RI Work Plan does not address or discuss the SAP pre-characterization groundwater sample results relative to evaluation of contaminant migration. As such, it is not clear how the SAP pre-characterization groundwater sampling results will be integrated into the RFI/RI Work Plan to support the contaminant migration evaluation conclusions. *Revise the RFI/RI Work Plan to address this issue to ensure no impacts and no problems warranting action with respect to groundwater have previously been identified, and as support for the SAP design, to demonstrate that the resulting data will meet the project objective to provide a comprehensive evaluation of contaminant migration.*
2. The text in Section 1.3 Land Use, Page 4 of 90 states, “Land use controls (LUCs) will be part of any remedial action, as appropriate, to ensure prevention of unrestricted use (e.g., residential)”. However, the text in Section 1.4.3 Ford Building (690-N), Page 8 of 90 indicates following deactivation and decommissioning (D&D) of the Ford Building (690-N), an engineered concrete cap will be installed over the existing concrete slab area extending out 0.305-m (1-ft) from the building edge and the post-decommissioning facility remnants (including the building slab) will be closed as part of the ECODS N-1, CSSLP, and Ford Building OU. As such, it appears that LUCs will also be required to maintain the integrity of the engineered concrete cap at the Ford Building (690-N) to ensure long-term protectiveness of the remedy. *Revise the text in Section 1.3 of the RFI/RI Work Plan to address this issue.*

## II. SPECIFIC COMMENT

### 3. Section 1.4.1 ECODS N-1 (NBN), Page 5 of 90:

The last two sentences state, “The deep subsurface contained a relatively thick [~6.1-m (20-ft)] impermeable clay layer. Soil boring reports from the 2019 characterization effort at this subunit are attached in Appendix B.” Similar text is also found in Section 1.4.3 ECODS N-1 (NBN) third paragraph, Page 9 of 90 asserting the deep subsurface contained a relatively thick impermeable clay layer. However, based on review of Appendix B Soil Boring Reports, a deep thick clay layer was not described in any of the soil boring installation reports. As such, the assertion a deep relatively thick impermeable clay layer exists in the subsurface could not be substantiated. *Revise the text of the RFI/RI Work Plan as appropriate to address this issue*