UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

November 8, 2021

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

EPA Comments on the 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

Dear Mr. Hennessey,

EPA has reviewed this R0 for this RSER/EECA for the 235-F. We appreciated the helpful scoping meeting on this facility. Our comments are attached.

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: 2021.11.08 09:42:54 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund Division

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

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.

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.*

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.*

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.*

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.*

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.*

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

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.*

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 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.*