



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

March 28, 2019

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 &**

MAR 29 2019

**AREA COMPLETION PROJECTS**

**EPA Comments for the Sixth Five-Year Remedy Review Report for SRS Operable Units with Native Soil Covers (U), [SRNS-RP-2018-00811], REV 0, DECEMBER 2018, & the Fact Sheet [ERD-EN-2018-0057] & Scoping Summary [ERD-EN-2018-0038] Savannah River Site, Aiken, South Carolina**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the R0 Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Native Soil Covers. EPA comments are attached.

The Fact Sheet and Scoping Summary we approve, with no comments.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Richards".

Jon Richards  
Acting FFA RPM  
Superfund Division

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

## I. COMMENTS

1. The general remedial action objectives (RAOs) at SRS are listed in the Response Action Summary subsection on Page 8 of 24. Land use controls (LUCs) have also been selected as part of the remedial action and are necessary to ensure protectiveness of the remedy. As such, it is recommended this section include a list of the general LUC objectives (e.g., prohibit residential use, prevent unauthorized access, prevent unauthorized intrusive activity) implemented at SRS. *Revise the Sixth Five-Year Review Remedy Report for Savannah River Site Operable Units with Native Soil Covers and/or Land Use Controls (U), SRNS-RP-2018-00811, Revision 0; dated December 2018 (Sixth Five-Year Review Remedy Report) to address this issue.*
2. The Sixth Five-Year Review Remedy Report Appendix B (Evaluation of Changes In Standards And Toxicity) states that an evaluation was performed for analytes that were identified as constituents of concern (COCs) for the SRS OUs discussed in Appendix C through Appendix M, to determine if there were any changes in standards or toxicity values that would call into question the protectiveness of the remedy for these OUs. However, Appendix B does not appear to indicate whether all detected contaminants (chemical and radiological) were screened against the updated standards, toxicity values, or PRGs for radionuclides to determine whether additional COCs or Refined COCs (RCOCs) may be identified for each OU. Please provide a response, and as appropriate, revisions to Appendix B to specify if all detected constituents at each of the OUs were screened against updated screening values, such as Regional Screening Limits (RSLs) and radionuclide PRGs to determine if any other COCs or RCOCs should be identified for the soil cover or Land Use Control (LUC) OUs. Additionally, for the radionuclides under consideration, *please specify if secular equilibrium was used in identifying the appropriate screening PRG values or not and if not, if daughter radionuclides for each parent radionuclide were considered in the tabulation of the PRG.*
3. Appendix D, Section VII. Technical Assessments states that a final list of COCs and remedial goals (RGs) have not been determined for the C-, K-, and L-Reactor Complexes, however changes to the Constituents of Concern (COCs) is not anticipated even though screening values listed in Appendix B have changed. Notably, changes have been made to the EPA's Radionuclide Preliminary Remediation Goal (PRG) calculator, but the Sixth Five-Year Review Remedy Report does not say if the newest PRG values will be used to identify COCs, and whether secular equilibrium daughter nuclides will be included in PRG calculations used to identify PRGs for the Reactor Complexes. *Please revise the Sixth Five-Year Review Remedy Report to address whether secular equilibrium (which includes all daughter nuclides but does not account for decay) will be selected for calculating radionuclide PRGs, and how COCs and RGs will be selected for radionuclides at the C-, K-, and L-Reactor Complexes.*