



June 18, 2020

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



Re: Proposed Plan for the Lower Three Runs Integrator Operable Unit (U), SEMS Number: 35 (SRNS-RP-2019-00058, Revision 0, April 2020) received April 23, 2020.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/DHEC comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Travis Fuss, Aiken Environmental Affairs Office (via email)
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Health and Environmental Control Comments on:

Proposed Plan for the Lower Three Runs Integrator Operable Unit (U),
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Page 1 of 1

Specific Comment

1. Section IX. Preferred Alternative, Alternative A-6 – Maintain Water in Ponds, page 22 of 44. The first paragraph states that Cs-137 concentrations will take approximately 50 years to decay below PTSM concentrations but fails to mention this applies only to EA3. EA6 and EA9 do not have locations above PTSM. Please restructure the paragraph so it is clear that only EA3 has two locations above PTSM levels. Furthermore, please add a sentence or two to explain why this alternative is protective of human health and the environment for EA3. This comment also applies to the Fact Sheet, last paragraph on page 4 of 6.