



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

July 8, 2022

ENVIRONMENTAL COMPLIANCE &

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

JUL - 8 2022

AREA COMPLETION PROJECTS

EPA Review of the Land Use Control Implementation Plan for the Lower Three Runs Integrator Operable Unit (Upper Subunit) (U), SEMS Number: 35, SRNS-RP-2022-00017, Revision 0, March 2022

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has received and reviewed the Land Use Control Implementation Plan for the Lower Three Runs Integrator Operable Unit (Upper Subunit) (U), SEMS Number: 35, SRNS-RP-2022-00017, Revision 0, March 2022, Savannah River Site, Aiken, South Carolina. EPA's comments are enclosed. EPA looks forward to continuing to work with DOE and SCDHEC to implement the remedy for the Lower Three Runs Integrator Operable Unit (OU 35). If you have any questions or require additional information, please contact me at (404) 562-8506.

Sincerely,

ROBERT POPE

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Robert H. Pope, GS-14
Senior Remedial Project Manager
Superfund and Emergency
Management Division

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

**EPA REVIEW OF THE
LAND USE CONTROL IMPLEMENTATION PLAN FOR THE LOWERE THREE
RUNS INTEGRATOR OPERABLE UNIT UPPER SUBUNIT (U)
SEMS NUMBER: 35
SRNS-RP-2022-00017, REVISION 0
MARCH 2022**

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

GENERAL COMMENT

1. It is unclear why additional land use controls (LUCs) (e.g., extra signage, fencing) are not implemented at exposure area EA3 since principal threat source material (PTSM) was identified in two locations in Pond B. For example, the text in Section 4.4 (Physical Access Controls, Page 10 of 24) describes the LUCs that will be applied to the two locations in EA5 (Joyce Branch) where PTSM has been identified; however, a discussion of why additional LUCs will not be applied at EA3 due to presence of PTSM is not presented. Also, according to Table 1 (Land Use Controls for the Lower Three Runs Integrator Operable Unit, Page 23 of 24), to address the PTSM locations in Joyce Branch and EA5, physical access controls (e.g., fences and gates) will be implemented at access points. A review of Figure 7 (Warning Signs and Gate Locations of Upper Subunit, Page 21 of 24) shows an access road leading to or near one of the two PTSM locations in Pond B; however, no sign or gate location is shown on the figure at this access point. Please revise the LUCIP to clarify if additional LUCs will be applied at EA3 to prevent exposure to PTSM sediment/soil, or provide an explanation why implementation of additional LUCs is not necessary to be protective at Pond B.

SPECIFIC COMMENTS

1. **Section 2.3, Remedial Action Selected, Page 5 of 24:** It is unclear whether there is a minimum surface water level elevation in feet relative to mean sea level that will be required for the selected remedy for EA3 (Pond B) and EA6 (PAR Pond) to maintain water levels in Pond B, PAR Pond, and Pond C. The text states water levels need to be maintained; however, a minimum water level elevation is not defined. Please revise the text to provide the minimum water level elevation in feet to relative mean sea level that needs to be maintained in Pond B and PAR Pond to ensure exposure is reduced and sediment/soil migration is mitigated. While this level is set in the early Par Pond IROD (through reference to a NEPA document), EPA requests it be clearly stated in the post-ROD documents for OU35 for clarity in monitoring and in future 5-year review documents.
2. **Section 4.7, Field Inspection and Maintenance for Land Use Controls, Page 11 of 24:** It is unclear whether the LTR IOU field inspections will be conducted such that evidence of trespassing can be observed to ensure no additional follow-on inspections will be necessary

outside of the five-year review frequency. For example, the text states the LTR IOU will be inspected per the Field Inspection Checklist in Appendix B (Field Inspection Checklist For Lower Three Runs IOU, Page B-3 of B-4) and completed every five years. However, the field inspection checklist form did not include an entry to verify that no evidence of trespassing (e.g., cans, bottles, fishing-line, -bobbers or -weights) was observed. EPA requests such an entry be added to the form. Please revise the LUCIP to address this issue to ensure that evidence of trespassing will be verified during the field inspections.