



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

November 13, 2023

ENVIRONMENTAL COMPLIANCE &

NOV 13 2023

Ms. Avery Hammett
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

AREA COMPLETION PROJECTS

Technical Review of the LAND USE CONTROL IMPLEMENTATION 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)AUGUST 2023 SAVANNAH RIVER SITE AIKEN, SC

Dear Ms. Hammett:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the draft LUCIP for N-2 ECODS, CSSLP, and Ford building. Our comments are attached.

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

Sincerely,

JON RICHARDS Digitally signed by JON RICHARDS
Date: 2023.11.13 13:58:10 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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

GENERAL COMMENTS

1. The LUCIP does not specify whether photographic evidence will be submitted along with the field inspection checklist. This evidence should be provided to support the condition of the warning signs in both subunits, the general condition of both subunits, and the condition of the concrete cover in the Ford (690-N) subunit. It is noted the annual inspection checklist presented in Appendix B (Field Inspection Checklist) provides verification that the LUCs are protective; however, no photographs are required to support the field observations. *Please revise the checklist and the text to consider the inclusion of photographic evidence during field inspections.*
2. There are acronyms and abbreviations used within the text that are not included in the Acronyms and Abbreviations list. For example, Federal Facilities Agreement (FAA) or milligrams per kilogram (mg/kg) are not included. *Please revise the Acronyms and Abbreviations list to include all acronyms used in the text.*

SPECIFIC COMMENTS

1. **Section 2.1, General Description and History of the ECODS N-1, CSSLP, and Ford Building OU, Page 2:** The text indicates that hazardous substances are currently present in the environment at Savannah River Site (SRS); however, the text should present a broader discussion of the specific media and hazardous substances present in the environment at SRS. *Please revise the text to clarify the specific media and hazardous substances that are known to be present within the operable unit (OU).*
2. **Section 2.1, General Description and History of the ECODS N-1, CSSLP, and Ford Building OU, Page 2:** The text indicates the site area consists of relatively flat terrain and references Figure 2 (Location of the ECODS N-1, CSSLP, and Ford Building OU (N Area)); however, Figure 2 includes water table elevation contours and not ground surface elevation contours. Additionally, it is noted that groundwater is not included as part of the OU, and therefore, it is unclear why water table elevation contours are presented in absence of surface elevation contours. *Please revise Figure 2 to include ground surface elevation contours.*
3. **Section 2.1.1, ECODS N-1 Subunit, Page 3:** It is unclear how it was determined that a portion of the ECODS N-1 pit may have been used as a burn pit. *Please revise the text to explain how this was determined (e.g., historical aerial photograph, document reference).*
4. **Section 4.7, Field Inspection and Maintenance for Land Use Controls, Page 13:** The text indicates that additional inspections may be required under unusual weather or any other condition warranting inspection; however, does not clarify what conditions may constitute an unusual weather event or warrant inspection. The text should clarify what specific conditions, e.g., “X” inches of rain within “X” hours or a hurricane, would require an additional inspection. The text should also specify the person with authority to determine whether additional inspections need be conducted. *Please revise the text to provide specific details on what an unusual weather event may be and state the deciding authority for additional inspections.*

5. **Figure 1, Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site, PDF Page 23:** The legend contains various entries denoted using colored polygons; however, it is unclear what each of these entries is representing as it is not described within the title of the figure, legend or in the text. The LUCIP indicates that Fourmile Branch and Pen Branch are watershed boundaries, but it is unclear whether all legend entries describe watershed boundaries. *Please revise the figure legend to clarify this information.*