



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

August 12, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian T. Hennessey, 730-B
SRS Remedial Project Manager
Savannah River Operations Office
Area Completion Projects
Post Office Box A
Aiken, South Carolina 29802



Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Energy, Savannah River Site Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit, CERCLIS #63, Revision 0, February 2018.

EPA cannot provide approval for the above mentioned document until the comments below have been addressed. EPA would also like to reiterate the expectation that DOE-SRS will provide a data report on all D-Area Operable Unit Subunits along with a concise Feasibility Study followed by the resubmittal of the D-Area Proposed Plan with the understanding that associated D-Area Removal Report(s) will be submitted and finalized during the time period between the Proposed Plan and the Record of Decision (ROD).

If you have any questions, please contact me at (404) 229 -9500.

Sincerely,

A handwritten signature in black ink, appearing to read "Diedre Lloyd".

Diedre Lloyd
Remedial Project Manager
Restoration & Sustainability Branch
Superfund Division

**EPA COMMENTS ON THE
EARLY ACTION STATEMENT OF BASIS/PROPOSED PLAN FOR THE
D-AREA OPERABLE UNIT (U)
CERCLIS NUMBER 63**

**REVISION 0
DATED FEBRUARY 2018**

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

EPA COMMENTS:

1. The Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U), CERCLIS Number 63, indicates the preferred remedial alternative for 489-D Coal Pile Runoff Basin (CPRB) (Southern 75%) subunit is "No Action". The EASB/PP further indicates since there is no human health, ecological or contaminant migration constituents of concern (COCs) following the removal action and in its current state, this subunit supports unrestricted (residential) land use. The EASB/PP must clearly state the no action determination for the southern 75% portion of the 489-D CPRB does not include groundwater. The groundwater beneath the aforementioned unit is contaminated and must be addressed in the DAOU groundwater and that the existing LUCS will remain in place throughout the D Area.
2. The EA SB/PP states the preferred Alternative 2 (Land Use Controls) will be implemented for the 488-1D, 488-2D, and 488-4D subunits of the DAOU to limit access (e.g., land use and disturbance activities) in the area. Further, the text states that Engineering Controls (ECs) (i.e., warning signs) and Institutional Controls (ICs) (i.e., excavation permit restrictions and deed restrictions) will be used to restrict access to, or activities that can be performed at the impacted areas. However, the text does not specifically state groundwater use is limited to restrict exposure to contaminated groundwater. Revise the EASB/PP to address this issue to ensure the preferred remedy Alternative 2 will be protective of human health and the environment for the 488-1D, 488-2D, and 488-4D Subunits.
3. In Figure 3. Layout of the DAOU on Page 31 of 44 the location of the Bubble Tower Subunit and the Moderator Processing Subunit appear to be incorrect. For example, the Bubble Tower Subunit is located south of the Asbestos Pit and not to the east of the DAOU as depicted in the figure. Additionally, the Moderator Processing Subunit is located over 500-feet to the south of the currently shown location. Revise Figure 3 to address correct these apparent discrepancies.
4. A Focused Feasibility Study (FFS) must be prepared and referenced in the EA Proposed Plan, and subsequent EA ROD, in order to comply with the National Contingency Plan (NCP) requirements contained in 40 C.F.R. § 300.430(e).
5. Final Removal Action Reports for each of the subunits should be provided to the EPA for review prior to finalizing the Focused FS, EA Proposed Plan, and EA ROD. As previously discussed data summary reports must be provided prior to Focused FS and PP.

6. Page 6., last paragraph. The document currently states that the Removal Action (RA) Report for 488-1D Ash Basin and 489-D Coal Pile Runoff Basin is scheduled to be submitted in September 2019 and will document construction activities and as-built conditions. The RA Report should be provided to EPA for review prior to SRS submitting a Rev.1 EA Proposed Plan to EPA for review and comment. The RA Report should also contain a summary of confirmation sampling results and discussion of any remaining residual risks following completion of the removal action (to be referenced in the Focused FS and considered in developing RAOs and alternatives). Data summary reports must be provided prior to Focused FS finalized PP.
7. Page 8, first paragraph. Please explain why 488-2D ash basin soil sampling results were “indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use.” Risks presented by residual contaminants should be discussed in the Focused Feasibility Study. The document should clearly state that the remaining risks did not allow for UU/UE and therefore LUCS will be required.
8. Page 10, fifth paragraph. The document currently states that the Removal Action Report for 488-1D Ash Basin and 489-D Coal Pile Runoff Basin is scheduled to be submitted in September 2019 and will document construction activities and as-built conditions in the Southern 75% of the 489-D CPRB. The RA Report should be provided to EPA for review prior to SRS submitting a Rev.1 EA Proposed Plan to EPA for review and comment. The RA Report should also contain a summary of confirmation sampling results and discussion of any remaining residual risks following completion of the removal action (to be referenced in the Focused FS and considered in developing RAOs and alternatives). Data summary reports must be provided prior to Focused FS finalized PP.
9. Page 12, second paragraph. Please explain why the confirmation sampling results were “uncertain” for soils from the western end of the 488-1D Ash Basin and Inlet Basin and were “indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use.” Risks presented by residual contaminants should be discussed in the Focused Feasibility Study. Data summary reports must be provided prior to Focused FS finalized PP.
10. Page 13, first paragraph. Given the “indeterminate” sampling results in 488-1D Ash Basin, the EPA disagrees with the conclusion that “there are no human health, ecological or contaminant migration problems warranting action upon completion of the removal action” as stated at the beginning of this paragraph. The second paragraph reiterates that “constituents may remain in soil in the western end of the basin and the Inlet Basins that would pose a risk to human receptors....” If sampling results were “indeterminate” how can the conclusion be drawn that no migration risks are presented from the basin?
11. Page 13, fifth paragraph. Please explain why the confirmation sampling results were “uncertain” with regard to evaluation of hexavalent chromium in the 488-2D Ash Basin soils and were “indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use.” Risks presented by residual contaminants should be discussed in the Focused Feasibility Study. Data summary reports must be provided prior to Focused FS finalized PP.
12. Page 14, fourth paragraph. 488-2D Ash Basin Conclusion. Same as previous comment #6 regarding soil sampling uncertainty.