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

April 12, 2022

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

EPA comments : THE RCRA FACILITY INVESTIGATION/REMEDIAL INVESTIGATION WORK PLAN FOR THE EARLY CONSTRUCTION AND OPERATIONAL DISPOSAL SITE L-3 (NBN), L-AREA RUBBLE PIT (131-1L), AND L-AREA RUBBLE PIT (131-4L) OPERABLE UNIT (U) SEMS NUMBER: 91 SRNS-RP-2021-05602, REVISION 0 FEBRUARY 2022

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed this RI/FS WP for L Area ECODs L-3, L ARPs 131-1L & 4L. Attached are our comments on this R0.

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

Sincerely,

JON RICHARDS

Digitally signed by JON RICHARDS
Date: 2022.04.12 08:45:05 -04'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management Division

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

GENERAL COMMENTS

1. It is uncertain whether the number of proposed soil samples to be collected around the boundary of the LRP 131-4L subunit is adequate to define the nature and extent of contamination. For example, according to Figure 25 (Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-4L Subunit), of the 12 perimeter subunit boundary soil samples proposed, only two sample locations (i.e., LAP4L-009 and LAP4L-010) are proposed along the 100 feet (ft) long southwestern side of the subunit. *Please revise the Work Plan to justify why this should be enough along the southwestern and northwestern sides of the subunit to ensure the extent of contamination is adequately defined.*

2. It appears the Environmental Protection Agency (EPA) May 2021 regional screening levels (RSLs) were utilized for screening purposes at the Early Construction and Operational Disposal Site (ECODS) L-3 and LRP 131-4L subunits, rather than the more recent November 2021 RSLs. *Please revise the Work Plan to indicate the most recent EPA RSLs will be utilized to support the remedial investigations and risk assessments.*

3. According to the Work Plan, visual inspections will be performed to determine the presence of both asbestos and/or asbestos containing material during drilling operations at the LRP 131-1L and LRP 131-4L subunits; however, it is unclear how the presence of asbestos only would be determined visually. As such, it appears more likely that visual inspection would be performed to determine the presence of asbestos containing materials. *Please revise the Work Plan to clarify the visual inspections for asbestos and clarify if the visual inspections would be performed to determine the presence of asbestos containing material.*

SPECIFIC COMMENTS

1. **Section 1.2.2, LRP-131-1L Subunit, Page 3 of 100:** The period of operation is not reported for the L-Area Rubble Pit (LRP)-131-1L subunit. *Please revise the text to include the period of operation.*

2. **Section 1.2.2, LRP-131-1L Subunit, Page 3 of 100, and Section 3.1.2.2, LRP 131-1L Subunit, Page 24 of 100:** The statement in each section that no previous characterization has been performed at the LRP 131-1L subunit requires further clarification. For example, Section 1.0 (Introduction) states there is no subunit-specific characterization data for the LRP 131-1L subunit; however, a soil-gas prescreen was performed. Additionally, Section 2.1.2 (LRP 131-1L, Page 10 of 100) indicates a soil-gas survey is the only previous investigation performed at the LRP 131-1L subunit. *Please revise the text in these sections to indicate that although no subunit-specific characterization data is available, a soil-gas survey was performed at the LRP 131-1L subunit.*

3. **Section 1.4.1, ECODS L-3 Subunit, Page 4 of 100:** The ECODS L-3 subunit area dimensions provided in the text for the two trenches are not consistent with the dimensions presented on Figure 3 (ECODS L-3 Subunit Boundaries and Site Evaluation Sampling Locations, Page 52 of 100). For example, the text indicates the two trenches located end to are approximately 60 ft wide by 100 ft long. However, based on the scale presented on the figure, the dimension of the two trenches is less than 60 ft wide and greater than 100 ft long. *Please revise the text to address the discrepancy in the dimensions for the two trenches presented between the text and figures.*

4. **Section 1.4.1, ECODS L-3 Subunit, Page 4 of 100:** This section does not discuss the subunit used to dispose of material potentially containing asbestos. According to Section 2.3 (Operable Unit Strategy, ECODS L-3 Subunit, Page 15 of 100), it is assumed that asbestos containing material is potentially present in the subunit. *Please revise Section 1.4.1 to state the ECODS L-3 subunit was used to dispose of material potentially containing asbestos.*

5. **Section 1.4.1, ECODS L-3 Subunit, Page 5 of 100:** The depth of the water table in ft below the ground surface (bgs) is not presented in this section. Consistent with the depths of the water table

noted for LRP 131-1L and LRP 131-4L subunits of 15 ft and 25 ft in Sections 1.4.2 and 1.4.3, respectively, *please revise the text in this section to state the depth of the water table in ft bgs encountered at the ECODS L-3 subunit.*

6. **Section 1.4.2, LRP 131-1L Subunit, Page 6 of 100:** Section 1.4.2 indicates that asphalt debris and an obvious depression were observed on the ground surface within the subunit during a site visit on December 7, 2021; however, the location of these observations discussed in the text is not depicted on a site map (e.g., Figure 24, Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-1L Subunit). As such, the location of the asphalt debris and ground surface depression relative to the subunit boundaries and proposed sample locations is unclear. *Please revise the Work Plan to address this issue.*

7. **Section 1.4.3, LRP 131-4L Subunit, Page 7 of 100, and Section 2.1.3, LRP 131-1L Subunit, Page 11 of 100:** It is unclear whether the northwestern side of the subunit outside of the orange ball markers was identified as the area of land disturbance, as stated in these sections. For example, based on Figure 25 (Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-4L Subunit), the subunit boundary was expanded towards the northeast. As such, it appears the northeastern side of the subunit boundary was expanded to a total length of 120 ft. *Please revise the text to address the discrepancy so the location of the land disturbance area is clearly documented.*

8. **Section 1.4.3, LRP 131-4L Subunit, Page 7 of 100, and Section 3.1.5.3, LRP 131-4L Subunit, Page 26 of 100:** The dimensions discussed in these sections for the subunit boundary of 120 ft by 100 ft expanded to include the land disturbance area identified during the 1994 site evaluation are not consistent with the dimensions presented on the site figure. For example, according to Figure 12 (LRP 131-4L Subunit Boundaries and Topography), the subunit boundary appears to be 100 ft by 100 ft and square shaped and does not include the land disturbance area. *Please revise the Work Plan to address this discrepancy.*

9. **Section 1.4.3, LRP 131-4L Subunit, Page 7 of 100:** The location of the blacktop and asphalt debris observed on the ground surface and discussed in the text is not depicted on a site map (e.g., Figure 25, Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-4L Subunit). As such, the location of the blacktop and asphalt debris relative to the subunit boundaries and proposed sample locations is unclear. *Please revise the Work Plan to address this issue.*

10. **Section 7.2, Equipment and Decontamination Procedures, Page 38 of 100, and Section 7.7, Investigation Derived Waste, Page 42 of 100:** It is unclear whether the investigation derived waste (IDW) management plan will be incorporated or attached to the Work Plan to ensure proper implementation during the remedial investigation. For example, Section 7.2 states, "Decontamination of field sampling equipment will be done in accordance to the 3Q1 Manual Procedure 9016, Section 5.4. The Disposal of IDW will follow the job-specific waste management plan." In addition, Section 7.7 states, "IDW will be managed according to the site-specific IDW management plan developed for the project." *Please revise the Work Plan to ensure proper implementation of the IDW management plan during the remedial investigation.*