



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

March 1, 2019

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



RE: **EPA Comments: Investigation Derived Waste Management Plan, App. A, B, & C
(WSRC-RP-94-1227, Revision 9F, Dec 2018)**

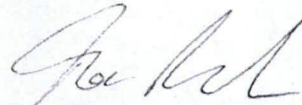
Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the IDW WMP. Below is our comment:

1. The Savannah River Site Investigation-Derived Waste Management Plan, Appendices A, B and C; WSRC-RP-94-1227, Redline Revision 9F, dated December 2018 (IDW Plan) Appendix B (Health-Based Levels for Radioactive Non-Aqueous IDW) on Page B23 of B24 includes site-specific background values for radionuclides that do not meet the EPA definition of 'background' constituents. For example, according to EPA document, *Risk Assessment Guidance for Superfund, Volume 1, Human Health Evaluation Manual (Part A)*. EPA/540/1-89/002, background is defined as constituents or locations that are not influenced by the releases from a site, and are usually described as naturally occurring or anthropogenic. The Appendix B table of radioactive elements includes background concentrations for Americium-241 [Am-241], Curium-244 [Cm-244], Cesium-137 [Cs-137], Plutonium-238 [Pu-238], Plutonium-239 [Pu-239], Strontium-90 [Sr-90], Thorium-232 [Th-232], and Uranium-234 [U-234], Uranium-235 [U-235], and Uranium-238 [U-238]. However only the uranium isotopes and Th-232 are found to occur naturally in soil, while Cs-137 and Sr-90 may be considered present due to anthropogenic sources, i.e., fallout from nuclear weapons testing. Therefore it is unclear why Am-241, Cm-244 and the plutonium isotopes are listed as having background concentrations. *Please provide a clarifying explanation in the IDW Plan regarding how background is defined for inclusion in the Appendix B table.*

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

Sincerely,



Jon Richards, Acting FFA
Remedial Project Manager
Superfund Division

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