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

November 13, 2020

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 on the Proposed Plan for the Lower Three Runs Integrator Operable Unit (IOU) (U), SEMS Number 35, [SRNS-RP-2019-00058], Revision 1, September 2020, Savannah River Site, Aiken, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Proposed Plan for Lower Three Runs OU, Revision 1, September 2020. EPA's comments are enclosed. Please address all comments and revise the document.

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

Sincerely,

ROBERT POPE

Digitally signed by ROBERT POPE
Date: 2020.11.13 16:33:17 -05'00'

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

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

EPA REVIEW OF THE
PROPOSED PLAN FOR THE LOWER THREE RUNS INTEGRATOR OPERABLE UNIT (IOU) (U), SEMS NUMBER 35, [SRNS-RP-2019-00058], REVISION 1, SEPTEMBER 2020, SAVANNAH RIVER SITE, AIKEN, SOUTH CAROLINA

EPA COMMENTS

1. Section V. A brief summary statement should be added to this section where appropriate clarifying that surface water was not determined to be a media of concern and did not pose an unacceptable risk to the receptors evaluated.

2. Page 12, Section V, Summary of Ecological Risk Assessment. Please insert the following text: "Fish in certain areas of the LTR IOU are contaminated with mercury and Cs-137".

3. Page 12, Section V, Conclusion. Please insert the following text: "Surface water sampling was conducted as part of the RI and several metals including mercury exceeded SCDHEC ambient water quality criteria. Also, certain radionuclides such as Cs-137 exceeded screening levels including SDWA MCLs in some samples. However, based on the conceptual site model considerations of the high affinity of Cs-137 for soil/sediments and low solubility in water, it was determined that Cs-137 contamination is predominantly located in soil/sediments, as is mercury; therefore, surface water is not being directly addressed with the proposed remedial action. Instead, actions are proposed to address the sediment as the "source" of the contamination (excavation/dredging, reducing the chance of direct contact for humans and terrestrial ecological organisms by keeping the sediments covered by water, restricting access, posting signs, restricting fishing on DOE property, institutional controls)."

4. Page 13, Section VI, Remedial Goal Options. Please change the title and text to cross reference and reflect that the RGOs are better referred to as Preliminary Remediation Goals (PRGs) and consistent with the NCP and EPA guidance, revise this subsection to state: "the PRGs for the selected remedy are documented as final remediation levels or cleanup levels in the ROD." Please note in future documents that EPA requests usage of the PRG and cleanup levels terminology to be more consistent with current guidance and the NCP.

5. Page 24, Section X. As a sub section in this section or in a new section please add the following text: "**FIVE-YEAR REVIEW -** Because hazardous substances will remain at the site above levels that allow for unlimited exposure and unrestricted use, the DOE will review the remedial action no less than every 5 years per CERCLA Section 121(c) and the NCP at 40 CFR 300.430(f)(4)(ii) until the levels of COCs allow for unrestricted use and unlimited exposure of soil/sediment. If results of the 5-year reviews reveal that remedy integrity is compromised and protection of human health and the environment is insufficient, then additional remedial actions will be evaluated by the DOE, EPA and SDHEC."

6. Page 27, Section XII, ARARs. Please add the following language: "Reference 40 CFR 300.5 Definitions of 'Applicable requirements' and 'relevant and appropriate requirements'".