



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

July 8, 2022

**ENVIRONMENTAL COMPLIANCE &**

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

**JUL - 8 2022**

**AREA COMPLETION PROJECTS**

**EPA Review of the Monitored Natural Recovery Effectiveness Plan for the Lower Three Runs Integrator Operable Unit - Upper Subunit (U), SEMS Number: 35, SRNS-RP-2022-00085, Revision 0, March 2022**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has received and reviewed the Monitored Natural Recovery Effectiveness Plan for the Lower Three Runs Integrator Operable Unit - Upper Subunit (U), SEMS Number: 35, SRNS-RP-2022-00085, Revision 0, March 2022, Savannah River Site, Aiken, South Carolina. EPA's comments are enclosed. EPA looks forward to continuing to work with DOE and SCDHEC to implement the remedy for the Lower Three Runs Integrator Operable Unit (OU 35). If you have any questions or require additional information, please contact me at (404) 562-8506.

Sincerely,

**ROBERT POPE** Digitally signed by ROBERT POPE  
Date: 2022.07.08 13:05:33 -04'00'

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

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

**EPA REVIEW OF THE  
MONITORED NATURAL RECOVERY EFFECTIVENESS PLAN FOR THE LOWER  
THREE RUNS INTEGRATOR OPERABLE UNIT - UPPER SUBUNIT (U)  
SEMS NUMBER: 35  
SRNS-RP-2022-00085, REVISION 0  
MARCH 2022**

**SAVANNAH RIVER SITE  
AIKEN, SOUTH CAROLINA**

**GENERAL COMMENTS**

1. EPA requests that the MNREP clearly state that initial sampling for all media will be conducted concurrently with the RA Start scheduled in 2023 to set a post-ROD baseline for current contamination levels as much of the data used in the RI and decision documents is dated.
2. EPA requests that the MNREP clearly state that aerial surveys will also commence with the RA Start in 2023 in order to set a post-ROD baseline.
3. It is unclear if ongoing sediment deposition will be monitored and evaluated as a naturally occurring process to reduce the bioavailability or toxicity of contaminants in sediment/soil as part of the MNR remedy. EPA requests that SRS conduct an evaluation of ongoing sediment deposition to further support the MNR remedy. The text in Section 1.1 (Purpose and Scope, Page 2 of 22) states, “MNR is a remedy that uses ongoing, naturally occurring processes to reduce the bioavailability or toxicity of contaminants in sediment/soil (e.g., radiological decay and ongoing deposition);” however, the Effectiveness Plan does not discuss the monitoring and evaluation of ongoing deposition. Please revise the Effectiveness Plan to discuss if monitoring ongoing sediment deposition will be performed as part of the MNR remedy for LTR IOU Upper Subunit with results reported in the five-year remedy reviews.
4. Sampling periodicity for fish is unclear in the MNREP. EPA requests that fish sampling be conducted annually in order to report trends in the 5-year review report.
5. Likewise, sampling periodicity for soil/sediment is unclear in the MNREP. EPA requests that sampling periodicity be clearly stated, such as: annual, every 3 years, or every 5 years. Sampling must be conducted at least often enough for trend analysis reporting purposes in the 5-year review reports.