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

November 13, 2023

Ms. Avery Hammett
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

Technical Review of the CORRECTIVE MEASURES IMPLEMENTATION PLAN/REMEDIAL ACTION IMPLEMENTATION PLAN FOR THE EARLY CONSTRUCTION AND OPERATIONAL DISPOSAL SITE N-1 (NBN), CENTRAL SHOPS SCRAP LUMBER PILE (631-2G), AND BUILDING 690-N, PROCESS HEAT EXCHANGER REPAIR FACILITY (AKA FORD BUILDING) OPERABLE UNIT (U) AUGUST 2023 SAVANNAH RIVER SITE AIKEN, SC

Dear Ms. Hammett:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the draft CMIP/RAIP for N-2 ECODS, CSSLP, and Ford building, dated August 2023. Our comments are attached.

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

Sincerely,

JON RICHARDS Digitally signed by JON RICHARDS Date: 2023.11.13 13:59:54 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management Division

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

GENERAL COMMENT

1. It is unclear whether the sampling described in Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, dated August 2023 (the SAP) will support the remedy objectives of unlimited use/unrestricted exposure (UU/UE) for Central Shops Scrap Lumber Pile (CSSLP). The CMIP/RAIP states, "The selected remedy for CSSLP subunit is excavation (hot spot removal) and disposal of contaminated media, which supports unrestricted land use and will not require LUCs [land use controls], annual site inspections, or five-year remedy reviews. This remedy will eliminate exposure of contaminated media to human receptors. This remedy includes excavating contaminated media exceeding the arsenic cleanup level (8.2 mg/kg [milligrams per kilogram]) down to 1 ft [foot] below ground surface (bgs), disposing of the contaminated media off-site, and backfilling with clean soil to grade;" however, it is unclear whether the sampling proposed in the SAP supports these objectives. The proposed sampling in the SAP is based on hotspot areas defined from historical sampling results and there is no discussion of step-outs beyond the boundary of the proposed limit of excavation (LOE), should contamination at the proposed transect locations exceed the cleanup level. Also, according to Figure B4, Pre-Excavation Sampling Locations to Refine the LOE, the extent of contamination to the south and west of the excavation boundary areas shown on the figure are not defined and it is unclear whether step-out sampling will be required. Additionally, is it unclear if confirmation sampling will be required post-excavation to ensure the ROD remedy objectives were met where the excavation boundaries are not defined. *Please revise the SAP to clarify whether step-out locations will occur past the proposed LOE, if required, and whether post-excavation confirmation sampling will occur to ensure no contaminants are left in place above UU/UE levels.*

SPECIFIC COMMENTS

1. **Section 2.1.1, Design Strategy for LUCS, Page 9:** The text indicates proposed warning sign placement can be viewed in the Land Use Control Implementation Plan (LUCIP); however, it is noted that Figures 4 (ECODS N-1 Approximate Area of Land Use Control Boundary) and Figure 6 (Ford Building Approximate Area of Land Use Control Boundary) also contain this information and should also be referenced. *Please revise the text to also indicate that the placement of warning signs is presented in Figures 4 and 6.*

2. **Section 2.5, Design Criteria, Pages 12 and 13:** It is unclear whether any re-vegetation efforts will be conducted if it is determined a Storm Water Pollution Prevention Plan (SWPPP) is not required. The text indicates re-vegetation will occur, as necessary, if a SWPPP is developed; however, it is unclear whether any revegetation will be conducted if a SWPPP is not required. *Please revise the text to clarify whether revegetation activities will occur if the SWPPP is not required.*

3. **Section 3, Permitting Requirements, Page 13:** It is unclear whether there are any permitting requirements pertaining to the pre-excavation sampling. The text states, "A SRS [Savannah River Site] Site Use/Site Clearance Permit will be required for the placement of signage at the ECODS N-1 and Ford Building subunits and for excavation and disposal of

contaminated soil and sediment at the CSSLP subunit;" however, the text does not clarify whether permits are required for the pre-excavation activities. *Please revise the text to clarify whether a permit is required for pre-excavation activities.*

4. **Section 4.4, Waste Disposal and Transport, Page 15:** The text indicates Waste Lock 770, or similar approved SRS drying agent may be used to remove free water prior to disposal; however, the text does not clarify whether Waste Lock 770 was previously successfully applied at SRS. Also, a safety data sheet (SDS) for Waste Lock should be provided for review to verify it meets performance standards and to use in the qualification of an alternative if needed. *Please revise the CMIP/RAIP to include examples of other areas at SRS where soils with free water were successfully treated with Waste Lock 770 prior to disposal and provide a SDS for the Waste Lock.*

5. **Figure 2, Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site, PDF Page 30 and Appendix B, Figure B1, Location of N Area Within SRS, PDF Page 72:** The figures should clarify that watershed boundaries are depicted. The figures appear to be depicting various watershed boundaries at SRS; however, no explanation is provided in the title, legend, or as informational text. *Please revise the figures to indicate that watershed boundaries are depicted.*

6. **Figure 8, Post-ROD Schedule, PDF Page 36:** The Post-ROD schedule includes the Issuance of the Record of Decision, planned for December 12, 2023; however, it appears the ROD was issued in 2022. *Please revise the figure to address this discrepancy.*

7. **Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, PDF Page 75:** It is unclear why the SAP does not use consistent units of measurement. For example, previous sampling results are presented on Figures B3 and B4 in micrograms per kilogram (ug/kg); however, the remainder of the SAP uses milligrams per kilogram (mg/kg). *For clarity, please revise the SAP to use consistent units of measurement.*

8. **Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, Section 6.2, Investigative-Derived Waste, Page B-19:** The text does not sufficiently discuss investigative-derived waste (IDW), including types of IDW generation and management. Although it is noted an IDW management plan will be prepared for this project, the text at a minimum should discuss the expected IDW generation and proposed management procedures. *Please revise the text to include this information.*

9. **Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, Figure B4, Pre-Excavation Sampling Locations to Refine the LOE, PDF Page 75:** The figure should include the arsenic result for each historical soil location that provides the basis for the proposed sampling locations. Additionally, the figure should label each proposed sample location with the sample identification and the legend should be revised accordingly for accuracy. *Please revise the figure to include the requested changes.*