



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

July 24, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian Hennessey, 730-B
SRS Remedial Project Manager
Area Completion Projects
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802



Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has received and is reviewing the Focused Corrective Measures Study/Feasibility Study Letter in Support of the D-Area Operable Unit, SEMS #63, dated April 17, 2019.

EPA can not approve the abovementioned Letter in support of the D-Area Operable Unit until the comments below have been addressed. If you have any questions, please contact me at (404) 229 -9500.

Sincerely,

A handwritten signature in black ink, appearing to read "Diedre Lloyd".

Diedre Lloyd
Remedial Project Manager
Restoration and Sustainability Branch
Region 4, Superfund Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

cc: Angelia Holmes, DOE-SRS, C. L. Bergren, SRNS-ACP (Signed Original), Karen Adams, DOE-SRS, C.L. Bergren SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

**Focused Corrective Measures Study/Feasibility Study Letter
in Support of the D-Area Operable Unit**

SEMS No. 63

Savannah River Site, Aiken, SC

EPA COMMENTS:

- 1) For each of the EE/CAs referenced in the text please clarify that the EE/CAs not only identified the objectives of the removal action for the particular subunit and described the evaluated alternatives, but also identified the Applicable or Relevant and Appropriate Requirements (ARARs) for each alternative presented.
 - a. Please also add a statement that the selected removal action complied with all ARARs identified in the particular Action Memo issued for the subunit and summarize the key ARARs that were complied with during implementation of removal actions.
- 2) Please clarify whether LUC implementation will be carried out under a new or existing Land Use Control Implementation Plan (LUCIP) that will, e.g., identify the specific LUC objectives, implementation, monitoring, inspection requirements, etc., as part of the preferred alternative.
- 3) Sect. 3.0 (Remedial Action Objectives). Please revise the first bulleted RAO for the 488-4D Ash Landfill to include the cancer and non-cancer risk thresholds, e.g. (see added underline text), “Maintain the engineered cover system to eliminate or control all routes of exposure to contaminants beneath the cover exceeding 1 E-06 risk to future industrial workers and exceeding a HQ>1 for ecological receptors.”
- 4) Page 21, Alternative 2. LUCs alone generally cannot meet all of the threshold and balancing criteria of a proposed alternative. Please revise the following sentence in the first paragraph to include the added underlined text: “LUCs in conjunction with the previously completed removal actions meet the threshold and balancing criteria requirements.”