



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

September 28, 2022

ENVIRONMENTAL COMPLIANCE &

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

SEP 28 2022

AREA COMPLETION PROJECTS

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Removal Action Report (RAR) for the 484-17D Coal Storage Area, dated June 2022 for the Savannah River Site, Aiken, South Carolina.

EPA cannot approve the above mentioned report until the comments below have been addressed. As always, should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely,

Diedre Lloyd

Diedre Lloyd
Remedial Project Manager
DOD Section
Restoration & Sustainability Branch
Superfund Division

cc: Angelia Holmes, DOE-SRS, Brian Hennessey, DOE-SRS, Phil Prater, DOE-SRS, Karen Adams, DOE-SRS, Chris Bergren, SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC;

**EPA COMMENTS ON THE
REMOVAL ACTION REPORT FOR THE
484-17-D COAL STORAGE AREA**

SEMS #63, REVISION 0

DATED JUNE 2022

EPA COMMENTS:

1. The Removal Action Report for the 484-17D Coal Storage Area (U) (the RAR) indicates the representative soil samples collected after removal of coal confirmed no coal-related hazardous constituents remain at the northern 484-17D D-Area Coal Storage Area (DCSA) exceeding residential risk levels and/or SRS background. The text notes the coal fragments that remain below the topsoil and sod in the southern 484-17D DCSA represents a possible further source of acidity; however, it is unclear if the layer of coal will also pose a contaminant migration issue to groundwater. Please revise the RAR to address the issue of whether the remaining coal fragment layer will pose a contaminant migration issue to groundwater.
2. Please consider future limited soil sampling to monitor the long term efficacy of this removal action and determine if the above mentioned coal layer/fragments present further source.
3. **Table 8, Project Cost Comparison, Page 35 of 42:** Table 8 does not provide a breakdown of the indirect capital costs for comparative purposes. It would be beneficial to have costs separated into equipment and non-equipment categories. Please revise Table 8 in the RAR to provide the appropriate cost breakdowns to ensure a comparative evaluation between estimated and incurred costs can be performed.
4. **Figure 6. June 2018 and May 2022 Soil Sampling Locations within the 484-17D DCSA:** Please ensure that the figure legend outline color (purple) for the Coal Pile Storage Area (484-17D) matches the figure outline for referenced area (red in figure).