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

August 15, 2018

ENVIRONMENTAL COMPLIANCE &
AUG 15 2018
AREA COMPLETION PROJECTS

Mr. Brian T. Hennessey, 730-B
SRS Remedial Project Manager
Area Completion Project
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

RE: EPA Comments on the Statement of Basis/Proposed Plan for the G-Area Oil Seepage Basin (GOSB) (761-13G) Operable Unit (OU) (U), SEMS Number: 93, SRNS-RP-2018-00460, Revision 0, dated June 2018, Savannah River Site, Aiken, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Statement of Basis/Proposed Plan for the G-Area Oil Seepage Basin (GOSB) (761-13G) Operable Unit (OU) (U), SEMS Number: 93, SRNS-RP-2018-00460, Revision 0, dated June 2018. EPA's comments on the Revision 0 document are attached.

If you have any questions or require additional information, please contact me at (404) 562-8513.

Sincerely,

JENNIFER TUFTS
Digitally signed by JENNIFER TUFTS
Date: 2018.08.15 15:52:21 -04'00'

Jennifer Tufts
Remedial Project Manager
Superfund Division

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

EPA Comments on the Statement of Basis/Proposed Plan for the G-Area Oil Seepage Basin (GOSB) (761-13G) Operable Unit (OU) (U), SEMS Number: 93, SRNS-RP-2018-00460, Revision 0, dated June 2018, Savannah River Site, Aiken, South Carolina

I. GENERAL COMMENTS

1. CERCLA places an emphasis on evaluating long-term effectiveness and related considerations for each of the alternative remedial actions including the potential threat to human health and the environment associated with, among other things, redisposal (e.g., in the present case, disposal on the land via spray irrigation of untreated wastewater). [*Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*, EPA/OSWER Directive 9355.3-01, October 1988, p. 6-3]. The analysis of each alternative with respect to overall protection of human health and the environment should provide a summary evaluation of how the alternative reduces the risk from potential exposure pathways through treatment, engineering, or institutional controls. This evaluation also examines whether alternatives pose any unacceptable short term *or* cross-media impacts. [*Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*, EPA/OSWER Directive 9355.3-01, October 1988, p. 6-6].

2. The selected ARARs in the Proposed Plan list SCDHEC Regulations for Land Application permits and contain conditions for specific categories of land application, which for the alternatives evaluated in this Proposed Plan is the regulation category of "irrigation of treated wastewater." The SC regulations for land application do not specify any numeric standards of control regarding the levels of COCs that may be present in the wastewater at the point of irrigation/disposal onto the land. Risk-based, protective levels for the COCs in the wastewater at the point of land application need to be established in accordance with EPA's acceptable risk range and included in the decision document to confirm that the remedy is protective of human health and the environment.

II. SPECIFIC COMMENTS

3. Page 14, Implementability Section, states that a "non-discharge permit for the land application of the basin water is needed." CERCLA does not require permit(s) for on-site actions; however, the substantive requirements contained in the state regulations for land application may be considered relevant and appropriate ARARs for the particular action.

4. Page 15, Preferred Alternative Section, last paragraph, states that "disturbance of the fill material and vegetative cover at the GOSB OU will be prevented by existing administrative site use procedures that prohibit unauthorized excavation at SRS." The sentence indicates that LUCs are a required as part of the remedy, however, LUCs are not required. EPA recommends deleting the sentence or reword to state, "disturbance of the fill material and vegetative cover at the GOSB OU will not occur as long as

administrative site use procedures that prohibit unauthorized excavation at SRS are in place."

5. Figure 5. The Key lists a symbol for "GOSB Interior, Sediment, 2009" data points but it appears these specific data points were not included on the figure itself.

6. Table 2. Potential ARARs for the Preferred Remedial Alternative. The preferred alternative includes Dewatering and Land Application/Irrigation of the basin water into the adjacent forest. The preferred alternative does not involve a point source discharge to surface water, however, Row 1 of Table 2 contains the following:

> S.C. R. 61-9 122.1(a)(1) regarding the coverage of Part 122 (the NPDES Program). Section 122.1(b) states that the "Scope" of the (1) The NPDES program requires permits for the discharge of "pollutants" from any "point source" into "waters of the State" and into "waters of the United States." The terms "pollutant," "point source," "waters of the State," and "waters of the United States" are defined in section 122.2. (2) The permit program established under this part also applies to owners or operators of any treatment works treating domestic sewage, whether or not the treatment works is otherwise required to obtain an NPDES permit, unless all requirements implementing section 405(d) of the CWA applicable to the treatment works treating domestic sewage are included in a permit issued under the appropriate provisions of subtitle C of the Solid Waste Disposal Act, Part C of the Safe Drinking Water Act, the Marine Protection, Research, and Sanctuaries Act of 1972, or the Clean Air Act, or under a Land Application or State permit issued by the Department under R.61-9.505, as adequate to assure compliance with section 405 of the CWA.

The above regulation is not applicable to the preferred alternative, and should be deleted from Table 2.