



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

NOV 30 2017

Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Acting Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) Aiken, South Carolina (SRNS-RP-2016-00609, Redline Revision 1.1, November 2017) (Redline Pages) and Savannah River Site's Responses to the Regulatory Comments on the Revision 1 Document

The U.S. Department of Energy is submitting the subject information for your review. The Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems Revision 1 Redline Pages and supporting documentation were submitted to the South Carolina Department of Health and Environmental Control (SCDHEC) and U.S. Environmental Protection Agency (EPA) on August 29, 2017. The SCDHEC's conditional approval and EPA's comments were received on October 12, 2017 and October 19, 2017, respectively. This submittal includes the Savannah River Site's responses to the regulatory comments on the Revision 1 report and the incorporation of the responses into the Revision 1.1 redline pages.

Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject report are greatly appreciated.

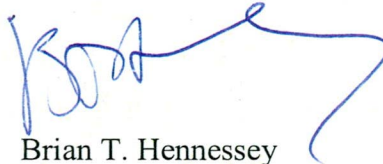
Ms. Susan B. Fulmer
Mr. Jon Richards

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Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,



Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

IACD-18-109

Enclosures:

1. Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) Aiken, South Carolina (SRNS-RP-2016-00609, Redline Revision 1.1, November 2017) (Redline Pages)
2. SRS Responses to South Carolina Department of Health and Environmental Control's Comments on Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) Aiken, South Carolina (SRNS-RP-2016-00609, Revision 1, August 2017 (Redline Pages))
3. SRS Responses to U.S. Environmental Protection Agency's Comments on Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) Aiken, South Carolina (SRNS-RP-2016-00609, Revision 1, August 2017 (Redline Pages))

cc w/o encl:

G. K. Taylor, SCDHEC – Columbia
D. Scaturro, SCDHEC - Columbia
S. French, SCDHEC - Columbia
M. D. Wilson, SCDHEC - Columbia
T. Fuss, SCDHEC – Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

D. Lloyd, EPA-Atlanta
J. Tufts, EPA-Atlanta
M. McRae, TechLaw, Inc.

**SRS Responses to South Carolina Department of Health and Environmental Control
Comments on:
Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units
with Engineered Cover Systems (U), Aiken, South Carolina
(SRNS-RP-2016-00609, Revision 1, August 2017 (Redline Pages)) received August 30, 2017**

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Conditional Approval Comment

1. Section II, Site Chronology, page 4. The date of the signing of the Consent Decree should be May 26, 1988. Please correct.

Response: Agree. The date will be corrected. The date will also be corrected in the Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Geosynthetic or Stabilization/Solidification Cover Systems (SRNS-RP-2016-00610).

Responsible Party: Sadika O'Quinn, (803)952-6697, sadika.oquinn@srs.gov

**SRS Responses to United States Environmental Protection Agency Comments on:
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GENERAL COMMENT:

1. The selected remedy included LUCs and/or specific LUC objectives for each of the following OUs: D-Area Burning/Rubble Pits (431-D and 431-1D), F-Area HWMF (904-41G, 904-42G, 904-43G), Ford Building Seepage Basin (904-91G), H-Area HWMF (904-44G, 904-45G, 904-46G, 904-56G), M-Area HWMF (904-51G, 904-112G), Metallurgical Laboratory HWMF (904-110G), and the Mixed Waste Management Facility (643-28E). However, the FYR appendix for each of these OUs does not discuss whether a unit-specific Land Use Control Implementation Plan (LUCIP), or other appropriate unit-specific post-ROD document, containing the federal facility LUC checklist items (*including the checklist statement regarding required CERCLA 120(h) deed notices/restrictions) has been prepared for each of the OUs. Please indicate in the remedy technical assessment section whether a unit-specific LUCIP governing the specific details of LUC implementation, maintenance, monitoring and enforcement has been prepared. If not, please indicate when a LUCIP, or other appropriate unit-specific post-ROD LUC implementation document, will be prepared for each of these OUs. If a unit-specific LUCIP has not been prepared, the FYR should include this requirement in the recommendations section.

* See, e.g., LUC Checklist items, including Property transfer language regarding deed restrictions: "Each transfer of fee title from the United States will include a CERCLA 120(h)(3) covenant which will have a description of the residual contamination on the property and the environmental use restrictions, expressly prohibiting activities inconsistent with the performance measure goals and objectives.

Response: Agree with Clarification.

A Land Use Control Implementation Plan (LUCIP) has been approved for every operable unit (OU) except for the Resource Conservation and Recovery Act (RCRA)-permitted facilities (i.e., F-Area Hazardous Waste Management Facility [HWMF] [Appendix E], H-Area HWMF [Appendix G], M-Area HWMF [Appendix I], Metallurgical Laboratory HWMF [Appendix J], and Mixed Waste Management Facility [MWMF] [Appendix K]). For the RCRA-permitted facilities, the land use control requirements are discussed and approved as part of the closure/post-closure/permit application process and are governed by the RCRA Permit Renewal for the Savannah River Site (SRS). Therefore, LUCIPs are not required for these OUs.

For the other OUs (e.g., Central Shops Burning/Rubble Pits [CSBRP] [Appendix C], D-Area Burning/Rubble Pits [DBRP] [Appendix D], Ford Building Seepage Basin [FBSB] [Appendix F]), the LUCIP is included as part of another post-Record of Decision (ROD) document. These post-ROD documents may be referenced in the appendix; however, it

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may not be obvious that the LUCIP is included in the document.

No changes were needed for the K-Area Burning/Rubble Pit and K-Area Rubble Pile OU (Appendix H) and SRL Seepage Basins OU (Appendix L).

For consistency and clarity, Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as indicated below. In addition, the reference documents will be added to Section XII. Documents Reviewed if not previously included.

(a) CSBRP (Appendix C)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The Land Use Control Implementation Plan (LUCIP) for the CSBRP OU, located in Appendix F of the PCR, governs LUC implementation, maintenance, monitoring, reporting, and enforcement of LUCs (WSRC 2005). All LUC objectives are being met.”

(b) DBRP (Appendix D)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The Land Use Control Implementation Plan for the DBRP OU, located in Section 2.0 of the FRR, governs LUC implementation, maintenance, monitoring, reporting, and enforcement of LUCs (WSRC 1998). All LUC objectives are being met.”

(c) F-Area HWMF (Appendix E)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The LUC requirements are discussed and approved as part of the closure/post-closure/permit application process and are governed by the RCRA Permit Renewal for the SRS (SCDHEC 2014). Therefore, a Land Use Control Implementation Plan is not required for this OU.”

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(d) FBSB (Appendix F)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The Land Use Control Implementation Plan for the FBSB OU, located in Appendix A of the Post-Construction Report/Corrective Measures Implementation Report/Final Remediation Report, governs LUC implementation, maintenance, monitoring, reporting, and enforcement of LUCs (WSRC 2003). All LUC objectives are being met.”

In addition, the following reference will be added to Section XII. Documents Reviewed:

WSRC, 2003. *Post-Construction Report (PCR)/Corrective Measures Implementation Report (CMIR)/Final Remediation Report (FRR) for the Ford Building Seepage Basin (904-91G) Operable Unit (U)*, WSRC-RP-2003-4038, Revision 1, Westinghouse Savannah River Company, Savannah River Site, Aiken, SC

(e) H-Area HWMF (Appendix G)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The LUC requirements are discussed and approved as part of the closure/post-closure/permit application process and are governed by the RCRA Permit Renewal for the SRS (SCDHEC 2014). Therefore, a Land Use Control Implementation Plan is not required for this OU.”

(f) M-Area HWMF (Appendix I)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The LUC requirements are discussed and approved as part of the closure/post-closure/permit application process and are governed by the RCRA Permit Renewal for the SRS (SCDHEC 2014). Therefore, a Land Use Control Implementation Plan is not required for this OU.”

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(g) Metallurgical Laboratory HWMF (Appendix J)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The LUC requirements are discussed and approved as part of the closure/post-closure/permit application process and are governed by the RCRA Permit Renewal for the SRS (SCDHEC 2014). Therefore, a Land Use Control Implementation Plan is not required for this OU.”

(h) MWMF (Appendix K)

Section VII. Technical Assessment, *Is the Remedy Functioning as Intended by the Decision Document?* will be revised as follows:

“The LUC requirements are discussed and approved as part of the closure/post-closure/permit application process and are governed by the RCRA Permit Renewal for the SRS (SCDHEC 2014). Therefore, a Land Use Control Implementation Plan is not required for this OU.”

Responsible Party: Sadika O’Quinn, (803)952-6697, sadika.oquinn@srs.gov
