



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

February 13, 2023

ENVIRONMENTAL COMPLIANCE &

Mr. Brian T. Hennessey
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

FEB 13 2023

AREA COMPLETION PROJECTS

EPA Comments on the Explanation of Significant Difference for the Record of Decision R1 Remedial Alternative Selection FOR THE WETLAND AREA AT DUNBARTONAY IN SUPPORT OF STEEL CREEK INTEGRATOR OPERABLE UNIT (U) SEMS NUMBER: 71, SRNS-RP-2022-00982, REVISION 0, Jan 2023

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the R0 for this ESD for OU71, dated Jan 11, 2023.

Our attorney comments are attached.

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

Sincerely,

Richards, Jon
Digitally signed by
Richards, Jon
Date: 2023.02.13
13:33:07 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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

General Comments

1. Recommend adding additional information to clarify/further explain the change from excavation to expanded LUCs. For example, are perched water conditions in SARA persistent or seasonal? Are perched water conditions present in the entire SARA? Are perched water conditions present in the additional ash area? Regarding the planned disposal volume at the waste receiving facility – why not partially excavate drier areas of SARA and additional ash (if existing) and fill waste receiving facility to capacity? Regarding cost increases -- is the \$5.8 million estimate from the ESD an additional amount beyond the range of the \$11,535,146 cost estimate in the ROD? What was the cost to complete the remedy in NARA? The \$5.8 million cost to complete excavation by itself does not justify a change, it should be clear that this exceeds the ROD estimate, and by what amount.
2. The “ESD Checklist” referenced below is Highlight 7-2 in *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*.

Specific Comments

1. Page 3 – Update SEMD signature name.
2. Page 9, first paragraph, first sentence – Per ESD Checklist, include site location in the introduction. Recommended edit: “...the lead agency for remedial activities at the Savannah River Site, near Aiken, South Carolina, with concurrence by....”
3. Page 9, first paragraph, last sentence – Per ESD Checklist, Include date of ROD signature. Recommended edit: “...as selected in the Record of Decision, dated XXXXX, land use controls....”
4. Page 9, section I – Per ESD Checklist, include summary of circumstances that led to the need for an ESD. For example, add sentence at the end of this section to state that the change is the result of the discovery of additional ash and saturated ground conditions, and the additional cost to complete excavation and disposal.
5. Page 11, first paragraph under *Previous Action* – Recommend adding more detail regarding total volume of soil excavated. The document states the ROD included excavation and disposal of 16,820 m³ of contaminated soil. How much of that total was removed from NARA? How much, if any, was excavated from SARA before excavation was suspended? How much contaminated soil of the original 16,820 m³ is remaining in this area? Also, the area of additional ash is stated; if known, add the volume of additional ash that would have to be excavated from this area.

EPA/ORC Comments- prepared by Damian Yemma, Attorney, Feb 10, 2023
ESD for WADB In Support of Steel Creek Integrator Operable Unit (U)
SEMS Number: 71 (SRNS-RP-2022-00982)
SRS Rev. 0, January 2023

6. Page 11, first paragraph under *Selected Remedial Action* – Capitalize “Dunbarton bay” to “Dunbarton Bay.”
7. Page 12, first paragraph under Section IV – The document states that excavation in SARA was “suspended” and expanded LUCs are “in lieu of” excavation. Recommend using more specific language. If accurate, state explicitly that no further excavation will occur in the SARA and newly discovered ash area.
8. Page 12, last paragraph under Section IV – The document states the estimated costs for expanded LUCs vs. continued excavation and offsite disposal but does not explain how these values were calculated. Recommend adding additional detail for cost estimates, and a supporting reference.
9. Pages 12-13, Section V – Per ESD Checklist, this section should state specifically that the modified remedy satisfies CERCLA §121. Recommend adding a sentence in this section stating, e.g. “The modified remedy remains protective of human health and the environment and satisfies CERCLA §121, 42 United States Code §9621.”
10. Page 12, second paragraph under Section V – The statement that an ESD generally does not reopen ARAR considerations is too broad. This statement should be revised to relate to this specific project. Recommended replacing this paragraph with: “This ESD expands the LUC area previously described in the ROD, but does not otherwise change an active remedy component; therefore reconsideration of Applicable or Relevant and Appropriate Requirements (ARARs) is not required in this case.”