



August 30, 2018

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Infrastructure and Area Completion Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802



Re: Land Use Control Implementation Plan for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U), SEMS Number: 71 (SRNS-RP-2018-00479, Revision 0, June 2018) received June 6, 2018.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/DHEC comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Travis Fuss, Aiken Environmental Affairs Office (via email)
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Health and Environmental Control Comments on:

Land Use Control Implementation Plan for the Wetland Area at Dunbarton Bay
in Support of Steel Creek Integrator Operable Unit (U), SEMS Number: 71
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General Comments

1. The LUCIP states on page 5, third paragraph, that the Site Use Program is to prevent the onsite worker from exposure to waste left in place at the Wetland Area at Dunbarton Bay. Page 9, Section 4.7, states that the field inspections will occur once every 5 years due to the low levels of contaminants. In the ROD, page 13, Summary of Human Health Risk Assessment (HHRA), 4th paragraph, the site-specific onsite worker receptor scenario had exposure assumptions of "20 years, 150 days per year, and 8 hours a day. These parameters were based on input provided by SREL for a wetland researcher." HHRA for the onsite worker resulted in a risk of $9.9E-5$. Please provide the further justification as to why this inspection rate is adequate for this operable unit. Also, upon further review of the Fifth Five-Year Remedy Review for RODs at OUs with LUCs, it was noted that all operable units with LUCs which included sign inspections had an inspection frequency of at least annually (one had semiannually).

Specific Comments

1. Section 4.7, Field Inspection and Maintenance for Land Use Controls, page 10. For the sake of consistency with LUCIPs for other OUs, an additional sentence should be included at the end of the incomplete paragraph at the top of this page to address any necessary repairs that may need to be performed for items in Appendix B.