



ENVIRONMENTAL COMPLIANCE &

June 28, 2022

JUN 28 2022

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

AREA COMPLETION PROJECTS

Re: Remedial Action Implementation Plan for the Lower Three Runs Integrator Operable Unit
Upper Subunit (U), SEMS Number: 35 (SRNS-RP-2022-00011, Revision 0, March 2022)
received March 30, 2022.

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

Digitally signed by Susan B.
Fulmer
Date: 2022.06.27 15:57:18 -04'00'

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:
Remedial Action Implementation Plan for the Lower Three Runs Integrator Operable Unit
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Specific Comments

1. Section 1.3, Nature and Extent of Contamination, page 6; RAIP, Appendix A, page A-4. These sections of the document state that no "PTSM RCOCs" were identified for the IOU, although locations in EA1, EA3, and EA5 had Cs-137 levels above the PTSM threshold. Please clarify what the phrase "PTSM RCOCs" refers to in this context.
2. Section 2.1.3 Design Strategy for Maintain Water in Ponds, page 13, first paragraph. Please add a sentence that explains that the level of water in EA9 Pond C is controlled by the water level in EA 6 PAR Pond. Section 1.5.3 Maintain Water in Ponds, page 10, does an excellent job of describing how the water level is maintained Pond C, but a sentence should be added to other areas.
3. Appendix A Fact Sheet, Remedial Action, page A-5, last paragraph. Please add a sentence that explains that the water level in Pond C is controlled by the water level in PAR Pond. The first paragraph in this section explains the 'Maintain Water' in the three ponds and could be confusing to the public.