



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

June 04, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian Hennessey, 730-B
SRS Remedial Project Manager
Area Completion Projects
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

ENVIRONMENTAL COMPLIANCE &

JUN - 4 2019

AREA COMPLETION PROJECTS

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has received and has reviewed DOE-SRS Removal Action Report for the 488-1D Ash Basin and 489-1D Coal Pile Runoff Basin, dated January 2019.

EPA cannot approve the above mentioned document until the below comments have been addressed. If you have any questions or concerns, please contact me at (404) 229 -9500.

Sincerely,

A handwritten signature in black ink, appearing to read "Diedre Lloyd".

Diedre Lloyd
Remedial Project Manager
Restoration and Sustainability Branch
Region 4, Superfund Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

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**EPA'S COMMENTS ON THE
REMOVAL ACTION REPORT FOR THE
488-1D ASH BASIN AND 489-D COAL PILE RUNOFF BASIN
SEMS #63, REVISION 0**

DATED JANUARY 2019

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

EPA COMMENTS:

1. **Section 1.3.1 Removal Action Objectives 488-1D Ash Basin (Including inlet basins), Page 4 of 108**

The text cites the SRNS 2016b reference for the removal site evaluation report/engineering evaluation/cost analysis (RSER/EE/CA) for the D-Area Ash Basin (488-1D) discussion of removal action objectives (RAOs). However, it is unclear why the text does not cite the decision document USDOE 2016a reference *Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the D-Area Ash Basin 488-1D* for details regarding the RAOs. Revise the text in Section 1.3.1 to cite the decision document USDOE 2016a reference *Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the D-Area Ash Basin 488-1D*, for details regarding the RAOs.
2. **Section 1.3.1 Removal Action Objectives 488-1D Ash Basin (Including inlet basins), Page 4 of 108**

The text in the first sentence defines the D-Area Ash Basin (488-1D) RAOs abbreviation as remedial action objectives. However, the 488-1D cleanup action is being conducted under the CERCLA removal path and is consistent with the Action Memorandum. As such, revise the text to clearly indicate the RAOs abbreviation is defined as "removal action objectives."
3. **Section 1.4.1 Selected Removal Action 488-1D Ash Basin, Page 5 of 108**

The text cites the SRNS 2016b reference RSER/EE/CA for the D-Area Ash Basin (488-1D) for the discussion of the selected removal actions. However, it is unclear why the text does not cite the decision document USDOE 2016a reference *Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the D-Area Ash Basin 488-1D* for details regarding the selected removal action. Revise the text in Section 1.4.1 to cite the decision document USDOE 2016a reference *Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the D-Area Ash Basin 488-1D* for details regarding the selected removal actions.
4. **Section 2.3 Removal Action Activities, Page 10 of 108**

This section does not summarize the well abandonment and installation activities. Section 1.1 Purpose and Scope, states the abandonment and well installation project scope are included in the Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U), SEMS Number: 63, SRNS-RP-2018-01091, Revision 0, dated January 2019 (RAR). While it is noted the well installation and abandonment activities are discussed in Section 6.2 Well Modifications, these activities should also be summarized in this section. Revise the RAR to address this issue.

5. **Section 2.5.4 Area East of the 488-1D Ash Landfill – Backfilling, Page 20 of 108**
The first sentence states, “[U]pon receipt of acceptable results the area was regraded and backfilled with common fill and topsoil...” However, the text does not explain the meaning of “acceptable results.” Currently, the text in Sections 2.5.2 and 2.6.2 indicates acceptable sample results are “nonhazardous” as determined by laboratory analysis. Revise the RAR to address this issue.
6. **Section 2.6.4 489-D – CPRB Backfilling, Page 21 of 108**
The text states that following the removal of the coal fines and soil from the 489-D coal pile runoff basin (CPRB), the surface of the basin bottom was regraded and backfilled with common fill from the D-Area Borrow Area. However, the text does not indicate that acceptable sample results (i.e., nonhazardous) were received prior to regrading and backfilling the basin bottom. As such, it is not clear whether the current condition of the basin bottom achieves the RAOs established for the 489-D CPRB. Revise the RAR to address this issue.
7. **Section 4.3.2 488-1D Ash Basin (including inlet basins) and Area East of the 488-4D Ash Landfill, Pages 41-42 of 108**
The text states, “[T]he *Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins* (SRNS 2019) concluded that the residual concentrations of all analytes, except hexavalent chromium, met the pre-established cleanup levels for unrestricted land use.” However, the RAR does not clearly state that only the inlet basins met the unrestricted land use designation based on the confirmation sampling results. Revise the text in this section to address this issue.
8. **Section 8.0 Cost Projections, Page 49 of 108**
The text indicates the final total actual costs of the project were \$36,767,276. However, neither the text nor Table 14 - Project Cost Comparison, presents the actual cost breakdown for the Phase 2 removal action 488-1D project or the 489- D CPRB project. Estimated costs are presented in Table 14 for the 488-1D and 489-D CPRB removal projects and the costs for Phase 2 should also be included in text section and in Table 14 to provide the actual costs breakdown for the Phase 2 488-1D and 489-D CPRB removal action projects.