



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

May 16, 2023

ENVIRONMENTAL COMPLIANCE &

MAY 16 2023

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

AREA COMPLETION PROJECTS

ORC Comments on Savannah River Site Draft ROD for the ECODS N-1, CSSLP, and Ford Building OU (U) Rev.0 SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the draft ROD for N-1 ECODS, CSSLP, and Ford building. Our attorney comments are attached.

1 atm 5/16/2023

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

Sincerely,

Richards, Jon Digitally signed by Richards, Jon
Date: 2023.05.16 09:18:39 -0400

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
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FROM: Damian Yemma, Attorney Advisor, EPA R4/ORC
TO: Jon Richards, FFA Manager, EPA R4/SEMD
SUBJ: ORC Comments on Savannah River Site Draft ROD for the ECODS N-1, CSSLP, and Ford Building OU (U) Rev.0
DATE: May 12, 2023

Highlight references below are to *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and other Remedy Selection Decision Documents* (July 1999)

Comments

1. Description of Selected Remedy, p. v of x: The second paragraph implies that hazardous substances will reach UU/UE levels in some certain amount of time, however Section XI clarifies that asbestos and PCBs “do not degrade over time” and therefore LUCs will be needed for longer than 30 years. Recommend revising this paragraph to more accurately reflect LUC duration, e.g. “LUCs for the ECODS N-1 subunit and Ford Building subunit will be in effect for an indefinite period beyond 30 years due to the nature of the hazardous substances present, and include the following:...”
2. Section I, p. 1 of 88: Recommend adding support agency information to this section. For example, revise the beginning of the last paragraph to read: “USDOE entered into a Federal Facility Agreement (FFA) (FFA 1993) with the United States Environmental Protection Agency (USEPA) and South Carolina Department of Health and Environmental Control (SCDHEC) to ensure that the environmental impacts associated with past and present activities at the site are thoroughly investigated and that appropriate corrective/remedial action is taken as necessary to protect the public health and welfare and the environment. The FFA for SRS lists the *Early Construction and Operational Disposal Site N-1 (NBN)...*”
3. Section V, p. 9 of 88: Recommend adding a sentence at the end of the first paragraph under *Conceptual Site Model* to direct the reader to Figure 9.
4. Section V, p. 10 of 88, first full paragraph. Recommend revising first two sentences to more clearly identify the OU subunits, and also add reference to Figures 2 and 3, e.g.: “The OU consists of three subunits: ECODS N-1, CSSLP and Ford Building. See Figures 2 and 3 for the location of the subunits within the SRS. These subunits represent geographically distinct locations within the OU...”
5. Section VII, p. 23 of 88: Recommend using language from Highlight 6-12 to clearly state basis for taking action at the conclusion of the Summary of Risks section.

6. Principal Threat Wastes section not included. Recommend adding new section between current sections X (Comparative Analysis) and XI (Selected Remedy) to restate summary of findings from Discussion of Principal Threat Source Material in Section VII, p. 22.
7. Section XI, p. 38 of 88: replace the word “selective” with “selected” to read, “For the ECODS N-1 subunit, *Alternative A-2, Land Use Controls* is the selected remedy....”
8. Section XI, p. 38 (last paragraph) and p. 42 (first full paragraph): Recommend revising language to more clearly state undetermined duration of LUCs, e.g. “LUCs are maintained until the concentration of hazardous substances in the media is at such levels to allow for unrestricted use and exposure. For the purposes of making a cost estimate only, the duration of LUCs at this subunit was estimated to be 30 years. However, the actual duration is undetermined and will likely be longer as asbestos [or PCBs for p. 42] does not degrade over time.”
9. Section XI, p. 39 of 88, delete the word “of” at the end of the first line under **CSSLP Subunit**, to read, “...*Excavation (Hot Spot Removal) and Disposal* is the selected alternative....”
10. Section XI, p. 45 of 88, *Estimated Outcomes of Selected Remedy* paragraphs - recommend consistency in use of italics for selected alternatives; Alternative A-2 and C-2 are not italicized while Alternative B-4 is italicized.
11. Section XII, p. 47 of 88, in last paragraph, add justification for not satisfying statutory preference for treatment.