



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

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
P.O. Box A
Aiken, South Carolina 29802



RE: EPA Comments: Corrective Measures Implementation/Remedial Action Implementation Plan for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U), SEMS Number: 71 (SRNS-RP-2018-00481, Revision 0, June 2018)

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Implementation/Remedial Action Implementation Plan for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit. Attached are our comments:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Richards".

Jon Richards, Acting FFA
Remedial Project Manager
Superfund Division

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

I. GENERAL COMMENTS

1. Section 2.1 (Design Strategy) of the Corrective Measures Implementation/Remedial Action Implementation Plan for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (OU), SEMS Number: 71, SRNS-RP-2018-00481, Revision 0, Savannah River Site, Aiken, South Carolina, dated June 2018 (CMI/RAIP) states, "A Stormwater Pollution Prevention Plan (SWPPP) has been prepared in accordance with the requirements of South Carolina Standards for Stormwater Management and Sediment Reduction, Regulation 72-300 through 72-316 and National Pollutant Discharge Elimination System (NPDES) General Permit number SCR100000 to be implemented during construction activities, and establishment of permitting activities associated with the project;" however, a formal reference to the Stormwater Pollution Prevention Plan (SWPPP) is not included in Section 6.0 (References). Revise the CMI/RAIP to include a formal reference to the SWPPP.
2. Section 4.2 (Construction Activities) of the CMI/RAIP lists eleven general construction activities to be executed by the subcontractor per the design drawings, procurement specification, and the SWPPP. While the list is not exhaustive, several general construction activities are not included. Specifically,
 - a. Section 4.4 (Waste Disposal and Transport) states, "Excavated ash will be loaded into haul vehicles and transported to an approved containment facility located off-SRS property via site and public roads in accordance with the accepted traffic safety plan;" however, Section 4.2 does not discuss the inclusion of an accepted traffic safety plan or traffic control plan.
 - b. Section 4.7 (Health and Safety Plan) states, "Dust suppression requirements related to 40 CFR [Code of Federal Registry] 50.6 and South Carolina Regulation 61-62.6;" however, Section 4.2 does not discuss the inclusion of a dust control plan.
 - c. Based on the Final RCRA Corrective Action Plan, OSWER Directive 9902.3-2A, dated May 1994 (CMI Guidance), a draft Operation and Maintenance (O&M) Plan should be submitted simultaneously with the draft plans and specifications, yet Section 4.2 does not include an O&M Plan.

Revise Section 4.2 to include a more comprehensive list of general construction activities to be executed by the subcontractor per the design drawings, procurement specification, and the SWPPP.

3. Figure 5 (Post-ROD Schedule) does not provide sufficient detail. Based on the CMI Guidance, the project schedule must specify all significant steps in the process and when all corrective measure implementation (CMI) deliverables (e.g., O&M Plan, Corrective Measure Work Plan, design documents) are to be submitted. Revise Figure 5 to include all significant steps in the process and identify when all CMI deliverables are to be submitted.
4. The CMI Guidance indicates that the CMI/RAIP should specify performance requirements for the overall corrective measure and for each major component; however, specific performance requirements are not provided for the each major component. Revise the

CMI/RAIP to specify performance requirements for the overall corrective measure and for each major component.

II. SPECIFIC COMMENT

1. **Table 2, Applicable or Relevant and Appropriate Requirements, Page 26 of 32:**

The presence of wetlands is listed as a to-be considered (TBC) criterion in Table 2; however, it is unclear why this is considered a TBC as the protection of wetlands is typically identified as an Applicable criterion (40 CFR Part 6, Appendix A). Revise Table 2 to clarify why the presence of wetlands is identified as a TBC criterion.