

**ENVIRONMENTAL COMPLIANCE &**

June 3, 2021

**JUN - 3 2021**

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: Record of Decision Remedial Alternative Selection for the Lower Three Runs Integrator Operable Unit (U), SEMS Number: 35 (SRNS-RP-2020-00542, Revision 0, March 2021) received April 8, 2021.

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:**  
Record of Decision Remedial Alternative Selection  
for the Lower Three Runs Integrator Operable Unit (U),  
SEMS Number: 35 (SRNS-RP-2020-00542, Revision 0, March 2021) received April 8, 2021.

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Specific Comments

1. Declaration for the Record of Decision, Statutory Determinations, page vi of viii, last paragraph. The second sentence states that an agreement by USDOE, USEPA and SCDHEC to use LUCAP occurred on March 30, 2000. Please confirm this date.
2. Section V, Operable Unit Characteristics, page 10. The third bullet on page 10 describes EA 3 as including Pond B and the overflow canal connecting Pond B to Pond C. Figure 9, which depicts EA 3, shows the overflow canal but does not include it in the boundary designating EA 3. Furthermore, the description for EA 3 on page 10 includes the following language: "The canal flow area (i.e., where contaminants most likely have been deposited)..." This statement would imply the need for previous sampling in this canal overflow area; however, based on review of previous documents and the sampling locations depicted on Figure 9 for EA 3, no sampling at the canal overflow area between Pond B and Pond C was ever conducted. Please clarify the description of EA 3 and whether there could be any potential issues at the canal overflow area between Pond B and Pond C.
3. Figures 8 through 15, pages 78-85.
  - a. What is the specific purpose of the callouts on these figures with regard to sample locations?
  - b. Figure 8 has the PTSM locations for EA 5, but the figure is meant to represent EA 2.
  - c. Figure 9 is missing the PTSM locations for EA3.
  - d. Figure 11 is missing the PTSM locations for EA5.
4. Table 13, page 129 of 130. Please correct the title of the table to Lower 'Three' Runs.