



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

April 23, 2024

ENVIRONMENTAL COMPLIANCE &

Ms. Avery Hammett, SRS Remedial Project Manager
 Remediation and Deactivation & Decommissioning Division
 U.S. Department of Energy
 Savannah River Operations Office
 P.O. Box A
 Aiken, South Carolina 29802

APR 23 2024

AREA COMPLETION PROJECTS

**EPA Comments on the TECHNICAL REVIEW OF THE POST-
 CONSTRUCTION/CORRECTIVE MEASURES IMPLEMENTATION
 REPORT/REMEDIAL ACTION COMPLETION REPORT FOR THE WETLAND
 AREA AT DUNBARTON BAY IN SUPPORT OF STEEL CREEK INTEGRATOR
 OPERABLE UNIT (U), SEMS NUMBER: 71, SRNS-RP-2024-00015, REVISION 0,
 DATED FEBRUARY 2024 SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA**

Dear Ms. Hammett,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Post-Construction/Corrective Measures Implementation Report/Remedial Action Completion Report for the Wetland Area at Dunbarton Bay, Steel Creek IOU, March 12, 2023. EPA comments are attached.

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

Sincerely,

**JON
 RICHARDS**

Digitally signed
 by JON RICHARDS
 Date: 2024.04.23
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Jon Richards
 FFA Remedial Project Manager
 Superfund & Emergency Management
 Division

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

GENERAL COMMENT

1. There are a few events listed in the text that are missing from Table 1, Chronology of Events. First, the text in Section 1.4, Chronology of Events, states, “A Land Use Control Implementation Plan (LUCIP) (SRNS 2018c) was approved in 2018 for the installation of warning signs at ingress points to the Dunbarton Bay and buffer area” and “An Addendum to the Revision 1 LUCIP was approved on July 31, 2023, that documents the expanded LUC [Land Use Control] boundary”. Second, the text in Section 5.1, Verification of Remedial Action Completion, and Section 5.2, Final Inspection for Acceptance of WADB [Wetland Area at Dunbarton Bay] Closure, indicates that a final field acceptance inspection of the LUC area, attended by United States Department of Energy (USDOE), United States Environmental Protection Agency (USEPA), and South Carolina Department of Health and Environmental Control (SCDHEC), occurred on October 18, 2023. Third, the text in Section 5.2 discusses the final inspection for acceptance of WADB closure with regulators on October 8, 2023. Lastly, the text in Section 5.2, Final Inspection for Acceptance of WADB Closure, indicates that a final inspection walkdown for the Explanation of Significant Differences (ESD) portion was performed on October 18, 2023. However, none of these events are included in Table 1. *Please revise Table 1 to include all the missing events listed above.*

SPECIFIC COMMENT

1. **Section 5.1, Verification of Remedial Action Completion, Page 11:** The text states that, “A final acceptance inspection of the ash remediation area specifically addressed in the NARA [North Ash Remediation Area] and Zone 1 of the SARA [South Ash Remediation Area], not including the activities for the ESD, was held on November 11, 2019...”; however, Table 1, Chronology of Events, shows that the Savannah River Nuclear Solutions (SRNS) Final Acceptance Inspection was conducted on November 7, 2019. *Please verify the date that the final acceptance inspection was performed and revise Section 5.1 or Table 1, as necessary.*