



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

July 25, 2022

ENVIRONMENTAL COMPLIANCE &

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

JUL 25 2022

AREA COMPLETION PROJECTS

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Energy, Savannah River Site Second Early Action Post Construction Report for the D Area Operable Unit, SEMS#63, Revision Draft, dated May 2022.

EPA can not approve this report until the comments below are addressed. If you have any questions, please contact me at (404) 229 -9500.

Sincerely,

A handwritten signature in cursive script that reads "Diedre Lloyd".

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

cc: Angelia Holmes, DOE-SRS, C. L. Bergren, SRNS-ACP (Signed Original), Karen Adams, DOE-SRS, C.L. Bergren SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

**EPA COMMENTS ON THE
SECOND EARLY ACTION POST CONSTRUCTION REPORT
FOR THE D AREA OPERABLE UNIT, SEMS #63
REVISION DRAFT**

MAY 2022

**SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA**

EPA COMMENTS:

- 1) **Section 5.1, Verification of Construction Completion, Page 10 of 22 and Section 7.0, Post Construction Activities, Pages 11-12 of 22:** The established frequency of periodic field inspections of the cover system, access roads, and warning signs and the criteria for performing maintenance of the cover system is unclear. For example, Section 5.1 indicates that scheduling for periodic field inspections of the cover system, access roads, and warning signs has been established; however, the scheduled frequency is not stated in Section 5.1. It is noted, Section 7.0 (Post Construction Activities) indicates that annual inspections will be performed for signs, access roads, cover system integrity as specified in the Second Early Action Land Use Control Implementation Plan (EALUCIP). Further, Section 7.0 indicates that maintenance of the cover system will be performed as necessary; however, it is unclear how post construction maintenance of the cover system will be triggered (e.g., as necessary based on issues identified during annual field inspection of the cover system). To ensure that the land use controls (LUC) elements for the D Area Operable Unit (DAOU) are being implemented, maintained, and monitored, please revise the text in Section 5.1 and 7.0, respectively, to state the frequency of periodic field inspections that will be conducted and clarify how maintenance of the cover system will be triggered.
- 2) **Table 3, Events/Dates, Page 21 of 22:** Table 3 shows that a Field Inspection Checklist activity was conducted on November 11, 2021; however, there is no record or attachment of the Field Inspection Checklist in the EAPCR. Please revise the EAPCR to include the Field Inspection Checklist prepared for the activity conducted on November 11, 2021 as an attachment.
- 3) **Table 4, Final Remedial Action Project Cost Comparison, Page 22 of 22:** Table 4 does not provide a breakdown of the indirect capital costs for comparative purposes. Also, Table 4 does not provide a breakdown of the Early Action Record of Decision estimated direct and indirect operations and maintenance costs for comparative purposes. Please revise Table 4 to provide the appropriate breakdown costs to ensure a comparative evaluation between estimated and incurred costs can be performed.