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

June 21, 2021

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

EPA Comments on the Draft Record of Decision for the Lower Three Runs Integrator Operable Unit (IOU) (U), SEMS Number 35, [SRNS-RP-2020-00542], Revision 0, March 2021, Savannah River Site, Aiken, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has received and reviewed the Draft Record of Decision for the Lower Three Runs Integrator Operable Unit (IOU) (U), SEMS Number 35, [SRNS-RP-2020-00542], Revision 0, March 2021, Savannah River Site, Aiken, South Carolina. EPA's comments are below. Please develop responses to these comments. EPA looks forward to finalizing the document with DOE and SCDHEC. If you have any questions or require additional information, please contact me at (404) 562-8506.

Sincerely,

ROBERT POPE Digitally signed by ROBERT POPE
Date: 2021.06.21 16:06:45 -04'00'

Robert H. Pope, GS-14
Senior Remedial Project Manager
Superfund and Emergency
Management Division

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

EPA REVIEW OF THE
RECORD OF DECISION FOR THE LOWER THREE RUNS INTEGRATOR OPERABLE UNIT (IOU) (U), SEMS NUMBER 35, [SRNS-RP-2020-00542], REVISION 0, MARCH 2021, SAVANNAH RIVER SITE, AIKEN, SOUTH CAROLINA

EPA COMMENT

Please refer to the Lower Three Runs stream as "waters of the state" for the state of South Carolina in addition to defining it as a blackwater stream in the text.

Office of Regional Counsel Comments

1. Declaration Pg.*v*. Revise last sentence to include underlined text: *"The remedy for EA1 also satisfies the statutory preference for treatment as a principal element of the remedy (i.e., reduce the toxicity, mobility, or volume of materials comprising principal threats through treatment)."*

2. Pg.18, Media Assessment Results. It would be helpful to the reader to include in the introduction of this section the source of screening criteria used for each media assessed and refer reader to appropriate table identifying the numeric screening criteria used.

3. Pg.18, Media Assessment Results. For each exposure area (EA) identify whether any surface water screening criteria were exceeded. This information is missing from the media assessment summary in this section for some of the EAs. In addition, identify source of the screening criteria, e.g., AWQC, MCL.

4. Pg.19, Media Assessment Results, 2nd Para., surface water assessment, states: *"Surface water was determined to not be a media of concern and did not pose an unacceptable risk."* Please add the following language from the proposed plan 'summary of contaminant fate and transport' as revised per EPAR4 ORC's previous comments on the proposed plan: *"Surface water monitoring was conducted as part of the RI and several metals including mercury exceeded SCDHEC ambient water quality criteria. Also, certain radionuclides such as Cs-137 exceeded screening levels including SDWA MCLs in some samples. However, based on the conceptual site model of Cs-137 high affinity for soil/sediments and low solubility in water, it was determined that Cs-137 contamination is predominantly located in soil/sediments, as is mercury; therefore, surface water is not being directly addressed with the proposed remedial action."*

5. Pg.40, Conclusion. States: *"Surface water was determined to not be a media of concern and did not pose an unacceptable risk to human or ecological receptors."* As in previous comment #4, add clarifying language in this risk discussion section explaining why observed surface water exceedances were determined to not present a risk.

6. Pg.41, Remedial Action Objectives. The following RAO should be modified to include the underlined risks thresholds. For example, *"Protect the recreational fisherman from exposure to Cs-137 and Hg in fish tissue <u>that exceed risks of 1E-06 and HQ of 1, respectively.</u> The primary route of exposure is the ingestion of fish pathway."*