



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

ARF-024769

ENVIRONMENTAL COMPLIANCE &

November 13, 2024

SRNS-OS-2024-00480

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

NOV 14 2024

AREA COMPLETION PROJECTS

EPA Comments on the POST-CONSTRUCTION REPORT FOR THE LOWER THREE RUNS INTEGRATOR OPERABLE UNIT UPPER SUBUNIT (U), SEMS NUMBER: 35, SRNS-RP-2023-00109, REVISION 0, AUGUST 2024, Savannah River Site

Dear Ms. Hammett,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the PCR for L3Runs OU 35, dated Sept 5, 2024. 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: 2024.11.13
10:23:21 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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

GENERAL COMMENT

1. The PCR provides insufficient documentation to support that the remedial action (RA) construction activities were completed in accordance with the approved Remedial Action Implementation Plan (RAIP, 2022). The examples include but are not limited to the following:
 - a. The PCR (see Section 6.1, Verification of Construction Completion) does not provide a discussion of how construction activities required for the RA have met the acceptance criteria established in the approved RAIP. If applicable, a summary of the results of the analytical sampling and testing should be discussed and the data either included in an appendix or text should be included to indicate that the records are being maintained at SRS.
 - b. The PCR does not mention a quality assurance/quality control (QA/QC) Plan for the topographical site survey, most notably coordinate locations of sample data points, removal areas and signage. In lieu of a previous location error mentioned in the RAIP (see Section 1.3 Nature and Extent of Contamination) it is important to verify location coordinates are accurate. The PCR should discuss the quality control documents used to perform aspects of the topographical site survey, including control points and datum used.
 - c. The PCR does not specifically address permits outlined in the RAIP (see Sec.3.0, Permitting Requirements) specifically the SRS Site Clearance Permit. Clarification stating this permit was secured as well as any other pertinent state/local/government permits required should be presented.
 - d. The PCR does not specifically address if a Storm Water Pollution Prevention Plan (SWPPP) was required for the work as discusses in the RAIP (see Section 2.1.2, Design Strategy for Excavation, Treatment, and Disposal of PTSM Sediment/Soil). Although the area of disturbance was likely less than 1 acre, and likely a SWPPP was not required, the PCR should verify as such.
 - e. The PCR does not include an overall site specific Quality Assurance Project Plan as specified in the RAIP (see Section 4.5, Quality Assurance Project Plan).

Please revise the PCR to include this information.

SPECIFIC COMMENT

1. **Section 3.3.1 , Pre-Mobilization and Mobilization Activities, Page 11 of 52:** The report states that Radiological Protection Department personnel surveyed all equipment prior to entering and leaving the site; however, no detail on the type of equipment or procedure used to conduct this survey was discussed. *Please revise the text to include more detail on the procedure used as well as documentation of the QA/QC plan for this survey.*