Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

JUL 01 2024

Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U) (SRNS-RP-2024-00015, Revision 1, June 2024) (Redline Pages) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 71

In accordance with the terms of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is submitting the subject document for your review. The *Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U)* (SRNS-RP-2024-00015, Revision 0, February 2024) was submitted to the South Carolina Department of Environmental Services (SCDES) and U.S. Environmental Protection Agency (EPA) for review on March 12, 2024. The EPA's comments were received on April 23, 2024. The SCDES approved the Revision 0 report on May 1, 2024. The draft responses to the regulatory comments were submitted for review via email on June 4, 2024. The EPA and SCDES approved the draft responses on June 4, 2024, and June 13, 2024, respectively. The final responses were incorporated into the Revision 1 document. Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the EPA and the SCDES have given on the subject operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-7805.

Sincerely,

AVERY HAMMETT

Digitally signed by AVERY HAMMETT
Date: 2024.07.01 08:50:03 -04'00'

Avery G. Hammett
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-24-143

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Enclosure:

1. Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U) (SRNS-RP-2024-00015, Revision 1, June 2024) (Redline Pages) SEMS Number: 71
2. SRS Response to the U.S. Environmental Protection Agency's Comments on the Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U) (SRNS-RP-2024-00015, Revision 0, February 2024) SEMS Number: 71

cc w/o encl:
J. Blalock, SCDES-Columbia
S. French, SCDES-Columbia
M. Reece, SCDES-Columbia
G. K. Taylor, SCDES-Columbia
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H. L. Herlong, SCDES-Aiken Environmental Affairs Office

cc w/ encl:
M. McRae, TechLaw, Inc

SRS Responses to United States Environmental Protection Agency Comments on the Post-Construction Report/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, February 2024 Savannah River Site, South Carolina

Comments received April 23, 2024.

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.*

Response: Agree.

Table 1, Chronology of Events, in Section 1.4 will be revised to include all the missing events listed above as follows, where changes are shown in bold text:

Table 1. Chronology of Events

Description of Activity	Start Date
ROD (SRNS 2018a) signed	June 20, 2018
Subcontract Award	November 19, 2018
LUCIP approved	**November 28, 2018**
RA start/land clearing	January 17, 2019
Mobilization of office trailers/equipment	February 6, 2019
Improve existing road and install construction entrance	February 18, 2019
SARA – Clear and grub for sediment control features	February 18, 2019
SARA – Install perimeter sediment controls	February 18, 2019
SARA – Additional ash found outside the limits of ash	February 24, 2019

SRS Responses to United States Environmental Protection Agency Comments on the Post-Construction Report/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, February 2024 Savannah River Site, South Carolina

Comments received April 23, 2024.

Description of Activity	Start Date
Haul ash and root balls to landfill	February 26, 2019
NARA – Clear and grub for sediment control features	February 27, 2019
SARA – Install flow dissipater	March 7, 2019
NARA – Install initial sediment trap outlet structure	March 7, 2019
NARA – Install stormwater channel and perimeter berms	March 6, 2019 (berms) April 9, 2019 (channel)
SARA – Clear and grub zone 1	March 28, 2019
SARA – Excavate zone 1 ash, stockpile	April 15. 2019
SARA – Confirmation Sampling (S-08 and S-09)	May 1, 2019 and May 15, 2019
SARA – Stabilization (Zone 1)	Jun 6, 2019
NARA – Clear and grub ash excavation areas	May 7, 2019
NARA – Excavate & Stockpile Ash	May 17, 2019
Core Team Meeting held to discuss SARA changed conditions	June 18, 2019
A de-scope letter was issued to the subcontractor to eliminate the excavation of ash in Zones 2-4 of the SARA	June 24, 2019
NARA – Confirmation Sampling (N-01, N-02 & N-04)	June 27, 2019
NARA – Confirmation Sampling (N-06 & N-07)	July 25, 2019
NARA – Confirmation Sampling (N-03 & N-05)	August 1, 2019 (additional dates for sampling within grid N-05 include August 20, September 4, and September 25)
NARA – Stabilization	August 7, 2019
SARA – As-Built survey	September 5, 2019
Core team meeting held to discuss the end state of the completed portion of the RA and to discuss the path forward for disposition of the ash in the remaining zones	September 17, 2019
NARA – As-Built survey	November 1, 2019
SRNS Final Acceptance Inspection	**November 7, 2019**
Install access control warning signs (wetland area)	January 7, 2020
LUC Boundary Survey	June 2, 2020
EPA approval of PCR Revision 1	October 26, 2020
SCDHEC approval of PCR Revision 1.	November 19, 2020
Addendum to the Revision 1 LUCIP approved	**July 31, 2023**
ESD issued.	August 10, 2023

SRS Responses to United States Environmental Protection Agency Comments on the Post-Construction Report/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, February 2024 Savannah River Site, South Carolina

Comments received April 23, 2024.

Description of Activity	Start Date
USEPA and SCDHEC final inspection for acceptance of WADB closure	**October 8, 2023**
Reposition access warning signs (SARA)	October 17, 2023
Final field acceptance inspection of the LUC area	**October 18, 2023**
Final inspection walkdown for the ESD portion	**October 18, 2023**
Expanded LUC Boundary Survey	November 6, 2023

Responsible Party: Eric Schiefer, eric.schiefer@srs.gov, 803-952-6273

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 Monday, November 11, 2019…"; however, Table 1, Chronology of Events, shows that the Savannah River Nuclear Solutions (SRNS) Final Acceptance Inspection was conducted on Thursday, November 7, 2019. *Please verify the date that the final acceptance inspection was performed and revise Section 5.1 or Table 1, as necessary.*

   Response: Agree.

   The final acceptance inspection was conducted on November 7, 2019. Table 1 will be corrected as shown in the response to General Comment #1. The text in the second paragraph of Section 5.1, Verification of Remedial Action Completion, Page 11 will be revised as follows:

   > "A final acceptance inspection of the ash remediation area specifically addressed in the NARA and Zone 1 of the SARA, not including the activities for the ESD, was held on November ~~11~~7, 2019, and SRNS approved the site conditions."

Responsible Party: Eric Schiefer, eric.schiefer@srs.gov, 803-952-6273