



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

DEC 12 2019

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 Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Acting 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: Savannah River Site's Responses to the Regulatory Comments on the Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -5A) Operable Unit - January through December 2018 (U) (SRNS-RP-2019-00074, Revision 0, May 2019) SEMS Number: 28

In accordance with the terms of the Federal Facility Agreement, the U.S. Department of Energy (DOE) is submitting the subject comment responses for your review and approval. The South Carolina Department of Health and Environmental Control (SCDHEC) and the U.S. Environmental Protection Agency (EPA) provided comments on September 19, 2019 and September 25, 2019 respectively. This performance evaluation report (PER) will not be revised; however, all comment responses will be included in the next scheduled PER, as applicable. Please review these responses and provide your approval within thirty (30) days from receipt. The time and effort that the SCDHEC and the EPA have given on the subject operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian T. Hennessey".

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

DEC 12 2019

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

1. SRS Responses to the South Carolina Department of Health & Environmental Control Comments on the Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -5A) Operable Unit - January through December 2018 (SRNS-RP-2019-00074, Revision 0, May 2019) SEMS Number: 28
2. SRS Responses to the U. S. Environmental Protection Agency's Comments on the Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -5A) Operable Unit - January through December 2018 (SRNS-RP-2019-00074, Revision 0, May 2019) SEMS Number: 28

cc w/o encl:

D. Scaturo, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
T. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. N. O'Quinn, SCDHEC - Aiken Environmental Affairs Office
B. Cameron, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/ encl:

J. Tufts, EPA-Atlanta
M. McRae, TechLaw, Inc.

**SRS Responses to
U.S. Environmental Protection Agency Comments on the
Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -A) and
Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -
5A) Operable Unit, January through December 2018 (U)
SRNS-RP-2019-00074, Revision 0, May 2019, SEMS Number: 28
Savannah River Site, Aiken, South Carolina
Comments received September 25, 2019**

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SPECIFIC COMMENTS

1. In Section 4.2, MCB Subunit Conclusion, Page 11 of 44, of the Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -5A) Operable Unit, January through December 2018 (U), SEMS Number: 28, SRNS-RP-2019-00074, Revision 0, May 2019 (PER) the text states, “MCSV-07 and/or MCSV-17 will be converted back to BaroBalls™ if three consecutive quarterly results are less than detection limits.” However, Section 4.3, Overall Recommendations includes the recommendation that A-Area Burning/Rubble Pits (ABRP) and Miscellaneous Chemical Basin/Metals Burning Pit (MCB) passive soil vapor extraction (PSVE) monitoring frequency be decreased to annually. Revise the PER to clarify the recommended monitoring frequency for MCSV-07 and MCSV-17 and criteria for conversion back to BaroBalls™.

Response: Agree.

SRS proposed that the ABRP and MCB PSVE monitoring be decreased to an annual frequency in Section 4.3 Overall Recommendations. However, SCDHEC was not in agreement and commented that the transition to annual monitoring was premature (see SCDHEC General Comment #1). The recommendation to proceed to annual sampling will be delayed until there is Core Team agreement that either soil samples and/or sufficient vapor samples show a trend to reduce sampling and reporting frequencies. Quarterly sampling will continue and the conversion of MCSV-07 and MCSV-17 from MicroBlowers™ back to BaroBalls will be based on three consecutive quarterly results that are less than detection limits. No change to the 2018 PER is proposed.

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

SRS Responses to
South Carolina Department of Health and Environmental Control Comments on:
Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and
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GENERAL COMMENTS

1. The Department believes that the proposals to change the ABRP and MCB sampling frequency from quarterly to annually and the reporting from annually in the PER to every 5 years in the Five-Year Remedy Review Report are both premature at this time. The full transition from ASVE to PSVE was only recently completed in 2018; therefore, it is requested that quarterly sampling and annual reporting in the PER should continue for at least another year. Alternatively, confirmation soil sampling to verify attainment of RGs for TCE and PCE may be performed in accordance with Section 4.3, and the results may be taken into consideration for a reduced sampling frequency if RGs have not been met yet.

Response: Agree.

Quarterly sampling and annual performance reviews will continue as currently performed. Confirmation soil sampling is scheduled to occur within the next few years and the results will be reported in the PER. The soil sampling results will be discussed with the Core Team in order to reach agreement on the remedial path forward including future sampling and performance reporting frequencies. No change to the 2018 PER is proposed.

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

SPECIFIC COMMENTS

1. Section 2.0, Remedial Actions, page 3. The first bullet of the ABRP Subunits RA section states: "The PSVE meets the remedial action objective (RAO) to prevent migration of TCE contamination in soil to groundwater at a concentration above the MCL of 5 µg/L." However, the paragraph preceding Section 2.0 discussing MAAZ wells near the ABRP source states in the last sentence: "...TCE exceeds the MCL in only two wells." Please provide some discussion as to how the RAO to prevent migration of TCE contamination to groundwater above the MCL is being met, given that two of the wells indicate TCE concentrations above MCL, and include more information about the two referenced MAAZ wells (locations, TCE concentrations, data trends, etc.).

Response: Agree

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The two MAAZ (water table aquifer) wells which exceed the MCL exhibit decreasing trends and are expected to be below the MCL in the near future. Text that states that the PSVE meets the RAO to prevent migration of TCE contamination will not be included in future PER reports until the groundwater concentrations in all eight wells are below the MCL. Further discussion as appropriate will be added to the RA discussion in the next PER similar to the following:

“TCE is below the groundwater MCL in six MAAZ wells. The two MAAZ wells which exceed the MCL exhibit decreasing trends and are expected to be below the MCL in the near future.”

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