



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

ARF-023012

DEC - 8 2020

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 2019 (U) (SRNS-RP-2020-00220, Revision 0, May 2020) 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 U.S. Environmental Protection Agency (EPA) provided comments on June 19, 2020 and the South Carolina Department of Health and Environmental Control (SCDHEC) approved the report on September 14, 2020. 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, **Brian T.**

**Hennessey**

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

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Brian T. Hennessey  
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DEC - 8 2020

Ms. Susan Fulmer  
Mr. Jon Richards

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Enclosure:

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 2019 (SRNS-RP-2020-00220, Revision 0, May 2020) SEMS Number: 28

cc w/o encl:

J. Blalock, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. Reece, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
T. R. Fuss, SCDHEC – Aiken Environmental Affairs Office  
G. 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,  
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SRNS-RP-2020-00220, Revision 0 May 2020, SEMS Number: 28  
Savannah River Site, Aiken, South Carolina  
Comments received June 19, 2020**

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1. **Section 1.2 MCB/MBP Subunits, Page 1 of 44:** The first sentence states “The MCB (731-4A) (Figure 2) is believed to have been a disposal site for solvents and oils based on the type of contamination in the vadose zone and groundwater beneath the area.” However, the text in this section does not discuss the nature of contamination in the vadose zone beneath the Metals Burning Pit (MBP) (731-5A). Additionally, Figure 2. ABRP/MCB/MBP OU Subunits at Savannah River Site, Page 17 of 44, depicts the location of not only the MCB (731-4A) but also the MBP (731-5A) waste unit boundaries. It is noted Table 1. ABRP/MCB/MBP OU Subunit Remedial Actions and Regulatory Decision Documents, Page 23 of 44, indicates the remedial action consisting of excavation and off-SRS disposal of elevated levels of aluminum in MBP surface soils from Subunit 731-5A is complete. As such, *revise 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 2019 (U), SEMS Number: 28, SRNS-RP-2020-00220, Revision 0, May 2020 (PER) to address this issue to ensure the nature of contamination and location of MBP (731-5A) relative to MCB (731-4A) is clearly understood and documented.*

**Response: Clarification. PER Section 1.0 specifically addresses the remedial actions (RAs) conducted at the ABRP Trench (vadose zone soil) Subunit and the 731-4A MCB Vadose Zone Subunit. Therefore, the Metals Burning Pit (MBP) was not included in Section 1.0. Figure 2 and Table 1 provide references to MBP for the purposes of PER Section 2.0.**

**Section 1.2 text will be revised in the next PER submittal to delete MBP in the section title similar to the following:**

**“1.2 MCB Subunits”**

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

2. **Section 2.2.2 Historical Information, Page 6 of 44:** This section does not discuss the soil removal activity that was conducted at the MCB (731-4A). Figure 4. Miscellaneous Chemical Basin SVE [Soil Vapor Extraction] Wells, Page 21 of 44, identifies an area of soil removal area at the MCB (731-4A) defined by dashed-lines as noted in the figure legend. *Revise the PER to address this issue to ensure the all the historical cleanup activities conducted at the MCB (731-4A) is clearly understood and documented.*

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**Response: Clarification.** PER Section 2.2 MCB Vadose Zone Subunit specifically provides the historical information of the remedial actions (RAs) conducted at the 731-4A MCB Vadose Zone Subunit. Therefore, 731-4A MCB Surface Soil Subunit was not included in Section 1.0. Along with all other subunits, 731-4A MCB Surface Soil Subunit historical cleanup activities or RAs is addressed by Table 1.

No text revisions are needed.

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

3. **Table 3. ABRP Well Construction Details, Page 25 of 44:** The screen length for wells AHT-16 and AHT-17 is not listed in the table. According to the depth in feet below the ground surface of the top and bottom of the respective well screens listed in the table, the screen lengths are 40-feet and 25-feet, respectively for AHT-16 and AHT-17. *Revise the table to address this issue.*

**Response: Agree.** The screen lengths are 40-feet and 25-feet, respectively for AHT-16 and AHT-17.

**Table 3 data will be revised in the next PER submittal to provide the new screen lengths similar to the following:**

Well ID	East Coordinate (UTM)	North Coordinate (UTM)	Ground Surface	Screen Top	Screen Bottom	Screen Length
			(ft asl)	(ft bgs)		(ft)
<i>Installed for Final RA in 2008</i>						
AHT-7A	431,024.385	3,686,483.710	357.04	82.2	102.2	20
AHT-7B	431,020.836	3,686,484.858	357.43	45.7	70.7	25
AHT-8A	431,021.492	3,686,499.696	357.42	82.8	102.8	20
AHT-8B	431,018.533	3,686,498.220	357.69	45.4	70.4	25
AHT-9A	431,022.143	3,686,512.833	357.29	82.6	102.6	20
AHT-9B	431,019.003	3,686,511.452	357.52	46.0	71.0	25
AHT-10A	431,033.003	3,686,510.600	355.79	81.0	121.0	40
AHT10B	431,029.389	3,686,510.231	356.16	30.4	70.4	40
AHT-11A	431,036.050	3,686,499.890	355.39	80.4	120.4	40
AHT-11B	431,032.284	3,686,499.523	356.04	30.6	70.6	40
AHT-12A	431,036.846	3,686,486.939	355.81	80.4	120.4	40

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AHT-12B	431,033.168	3,686,486.297	356.06	30.4	70.4	40
AHT-13	431,061.061	3,686,504.415	340.63	79.9	109.9	30
AHT-14	431,065.313	3,686,509.809	340.19	80.1	115.1	35
AHT-15	431,078.882	3,686,510.377	338.72	74.7	119.7	45
AHT-16	431,090.604	3,686,514.312	337.64	80.0	120.0	<b>40</b>
AHT-17	431,111.851	3,686,517.379	335.95	95.0	120.0	<b>25</b>

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

4. **Table 5. ABRP PSVE BaroBalls™ Well Exhaust Gas TCE Results, Pages 29 & 30 of 44:**  
The table references #7 as a Well History Note. However, according to the “Well History Notes” located at the end of the table, note #7 was not shown. Accordingly, Well History Notes included only #1 through #6. *Revise the table to address this issue.*

**Response: Agree. The historical notes 5 and 6 should be referenced instead of historical notes 6 and 7.**

**Table 5 text will be revised in the next PER submittal to provide references to notes 5 and 6 similar to the following:**

**Table 5. ABRP PSVE BaroBalls™ Well Exhaust Gas TCE Results**

Collection Date	Station ID – TCE Soil-Gas Concentration (ppmV)						
	AHT-06	ARV-1D1	ARV-2D2	ARV-3D3	AHT007A	AHT009A	AHT009B
Well History Notes	2	1	1, 3	1	<u>5, 6</u>	<u>5, 6</u>	<u>5, 6</u>

Collection Date	Station ID – TCE Soil-Gas Concentration (ppmV)						
	AHT010A	AHT010B	AHT012A	AHT012B	AHT015	AHT016	AHT017
Well History Notes	<u>5, 6</u>	<u>5, 6</u>	<u>5, 6</u>	<u>5, 6</u>	<u>5, 6</u>	<u>5, 6</u>	<u>5, 6</u>

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