



January 16, 2019

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Infrastructure and Area Completion Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802



Re: Post-Construction Report Addendum for the A-Area Miscellaneous Rubble Pile (731-6A)
Operable Unit (U), SEMS Number: 30 (SRNS-RP-2018-00942, Revision 0, October 2018)
received October 23, 2018.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/DHEC comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Travis Fuss, Aiken Environmental Affairs Office (via email)
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Health and Environmental Control Comments on:
Post-Construction Report Addendum for the A-Area Miscellaneous Rubble Pile (731-6A)
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Specific Comment

1. Section 7.5, Corrective Measures Implementation Report (CMIR)/Remedial Action Completion Report (RACR), page 11. The first sentence of this section states: "Data from sampling and process and performance monitoring will be used to establish guidelines for shutdown criteria of the PSVE system. Shutdown of the system will be based on soil samples collected from cone penetrometer testing borings at the trenches area. The PSVE system will be shut down when soil sample results for TCE and PCE are below the RGs established in the ROD." While this section is clear that the PSVE system will remain in operation until soil samples confirm that RGs for TCE and PCE are achieved, it is not so clear as to what factors will be involved in deciding when to obtain these confirmation soil samples. This section should be revised to be more specific in this regard, and should also state that the Department and EPA will be notified in advance when this decision is made. Also, any confirmation sampling should be done in accordance with an approved Sampling and Analysis Plan.