



December 19, 2018

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: Periodic Report 6 for the Steel Creek Integrator Operable Unit (U), SEMS Number: 71 (SRNS-RP-2018-00809, Revision 0, September 2018) received September 28, 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:
Periodic Report 6 for the Steel Creek Integrator Operable Unit (U), SEMS Number: 71
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General Comments

1. All operable units having a potential impact on groundwater and/or surface water should be included on the Conceptual Site Model (CSM), regardless if a Record of Decision has been signed, until remedial goals have been met. Therefore, G-Area Unit ID #509 and 462, listed on Table 1-1, Status of Potential IOU Contamination Sources, should be included on the Figure 1-5, SC IOU Conceptual Site Model under the Sources of Potential Contamination column. The G-Area Unit ID #509 and 462 include L Lake, L-Area Reactor Discharge Canal and P-Area Discharge Canal that could continue to have impacts on groundwater and surface water.
2. It is unclear as to what portion(s) of Meyers Branch is unimpacted or undisturbed by SRS operations and selected for background location. This declaration is mentioned in several sections of the document; however, the document also states contaminant exceedances in sediment, surface water and fish in the Meyers Branch subunit. Furthermore, it appears that the Dunbarton Rail Road Yard is a possible source of contamination that feeds into the Meyers Branch subunit. Please clarify and identify what portion of Meyers Branch is suitable for background sampling.
3. Throughout the document, the terms "max ratio" and "mean ratio" are used interchangeably with "max HQ" and "mean HQ". Please change the term "ratio" to "HQ" for consistency with the scoping summary and other periodic reports for IOUs. For consistency reasons, this comment should be applied to all future periodic reports.

Specific Comments

1. Executive Summary Ecological Benchmarks Screening and Results, Sediment, first sentence, page ES-4. Please correct the last portion of this sentence from "mean detected levels **less** than background" to "**above** background."
2. Table 1-1 Status of Potential IOU Contamination Sources, page 1-23. The L-Area Unit ID 560 should be highlighted.
3. Figure 1-5, SC IOU Conceptual Site Model, page 1-17. Please identify OU 143 as P-Area Groundwater OU and OU 487 as L-Area Southern Groundwater in the legend.
4. Section 2.1, HH Benchmark Screening and Results, SW, page 2-5, second paragraph. Please include the anticipated start date of April 30, 2019 for the non-time critical removal action for the PAGW OU.