



September 19, 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: 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) received May 23, 2019.

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:

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) received May 23, 2019.

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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.

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.).