SC DEPARTMENT of ENVIRONMENTAL SERVICES

Susan Fulmer, P.G.
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

October 29, 2024

ENVIRONMENTAL COMPLIANCE &

Ms. Avery G. Hammett, SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

OCT 29 2024

AREA COMPLETION PROJECTS

Re: Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for the Early Construction and Operational Disposal Site L-3 (East of L Area) (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U), SEMS Number: 91 (SRNS-RP-2023-01365, Revision 0, July 2024) received August 2, 2024.

Dear Ms. Hammett:

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/SCDES 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 Digitally signed by Susan B. Fulmer
Date: 2024.10.29 11:20:40 -04'00'

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Travis Fuss, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Environmental Services Comments on:

Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for the Early Construction and Operational Disposal Site L-3 (East of L Area) (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U),
SEMS Number: 91 (SRNS-RP-2023-01365, Revision 0, July 2024) received August 2, 2024.

Specific Comments

1. Section 3.8.1.2, ECODS L-3 Subunit Characterization and Data Summary, page 3-14. The second sentence of the last paragraph on this page states that sampling at the ECODS L-3 subunit was completed with a total of 90 samples collected. Later in Section 3.10, a total of 81 samples is listed for ECODS L-3, and Table A.2-3 shows 61 samples collected at all soil depths. Please revise the report to correct these discrepancies.

2. Section 3.8.3.2, LRP 131-4L Subunit Characterization and Data Summary, page 3-23. The first paragraph of this section states that sampling at the LRP 131-4L subunit consisted of 198 REG samples, of which seven were unable to be collected, leaving 191. Table A.4-3 lists a total of 192 samples. Please revised the report to correct this discrepancy.

3. Section 3.9.3, LRP 131-4L Subunit, page 3-29. The second sentence of this section states: "ACM is presumed to be present in unit soils, based on waste history at other ECODS..." This appears to be copied language from the discussion for ECODS L-3. As stated earlier in Section 3.8.3.3, presumed ACM was identified by an SRS asbestos inspector at LRP 131-4L. Please correct.

4. Section 4.1.1, ECODS L-3 Subunit, page 4-2. The second RAO listed for this subunit states: "Prevent exposure of a hypothetical resident to Aroclor 1254 and Aroclor 1260 in surface soils at levels exceeding 1.0E-06 risk and HQ of 1." The reference to "hypothetical" resident in this remedial action objective seems awkward. "Hypothetical" belongs more in the problems warranting action discussion as that discussion describes a scenario and not an objective. This RAO should omit the word "hypothetical" and be revised to state "Prevent exposure of a future resident...". This objective would also be consistent with the last RAO listed for LRP 131-4L subunit.

5. Table C-4, Human Health COPC Screening for LRP 131-1L Subunit Soil Media (0-0.3 m [0-1 ft]), page C-47. The maximum detection for manganese, 1.80E+2, is equal to the human health screening value and a value of "no" is given in the "Exceeds Human Health Screening Value?" column. The same maximum detection for manganese is listed for LRP 131-4L on page C-53, but a value of "yes" is given under the same column. The value on page C-47 should be changed to "yes" for the sake of consistency, and any applicable section should be revised accordingly.