



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 25, 2019

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



RE: EPA 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, January through December 2018 (U), (SRNS-RP-2019-00074, Revision 0, May 2019), SEMS Number: 28, Savannah River Site, Aiken, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed 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, January through December 2018 (U), (SRNS-RP-2019-00074, Revision 0, May 2019), SEMS Number: 28. EPA comments are attached.

If you have any questions or require additional information, please contact me at (404) 562-8513.

Sincerely,

JENNIFER
TUFTS

Digitally signed by
JENNIFER TUFTS

Date: 2019.09.25
13:57:42 -04'00'

Jennifer Tufts
Remedial Project Manager
Superfund Division

cc: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDHEC

EPA 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, January through December 2018 (U), (SRNS-RP-2019-00074, Revision 0, May 2019), SEMS Number: 28, Savannah River Site, Aiken, South Carolina

SPECIFIC COMMENTS

1. In Section 4.2, MCB Subunit Conclusion, Page 11 of 44, of 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 2018 (U), SEMS Number: 28, SRNS-RP-2019-00074, Revision 0, May 2019 (PER) the text states, "MCSV-07 and/or MCSV-17 will be converted back to BaroBalls™ if three consecutive quarterly results are less than detection limits." However, Section 4.3, Overall Recommendations includes the recommendation that A-Area Burning/Rubble Pits (ABRP) and Miscellaneous Chemical Basin/Metals Burning Pit (MCB) passive soil vapor extraction (PSVE) monitoring frequency be decreased to annually. Revise the PER to clarify the recommended monitoring frequency for MCSV-07 and MCSV-17 and criteria for conversion back to BaroBalls™.