



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

December 21, 2017



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 Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2016 through April 2017 (U), CERCLIS Numbers: 30, SRNS-RP-2017-00217, Revision 0, July 2017, Savannah River Site NPL Site, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2016 through April 2017 (U), CERCLIS Numbers: 30, SRNS-RP-2017-00217, Revision 0, July 2017. EPA comments on the Revision 0 document are attached.

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

Sincerely,

**JENNIFER
TUFTS**

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JENNIFER TUFTS
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Jennifer Tufts
Remedial Project Manager
Superfund Division

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

**EPA Comments on the Performance Evaluation Report for the A-Area
Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2016 through April 2017
(U), CERCLIS Numbers: 30, SRNS-RP-2017-00217, Revision 0, July 2017,
Savannah River Site NPL Site, South Carolina**

SPECIFIC COMMENTS

1. Section 2.0, Remedial Actions, Page 3 of 12

The second to last paragraph of Section 2.0 states that “Annual Inspections are conducted at the ARP OU to verify that ICs [Institution Controls] are in place and to ensure that no deficiencies exist with the integrity of soil cover at the Trenches Area subunit.” The text further states the ARP OU inspection confirmed that ICs were in place. Although the Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2016 through April 2017 (U), CERCLIS Number: 30, SRNS-RP-2017-00215, Revision 0, July 2017 (2016 PER) states the evaluation of the ICs and soil cover are documented in the Five-Year Remedy Review Reports, the 2016 PER does not provide as an attachment a copy of the Field Inspection Checklist A-Area Miscellaneous Rubble Pile Operable Unit (731-6A) (U) (SRS, 2016). Revise the 2016 PER to provide a copy of the Field Inspection Checklist, so that the 2016 PER can serve as a stand-alone document.

2. Section 3.0, Conclusions/Recommendations, Page 8 of 12

Section 3.0 states the transition from active soil vapor extraction (ASVE) to passive soil vapor extraction (PSVE) at seven (7) SVE wells from the 782-3M SVE unit took place on March 14, 2017. The text also states additional characterization of the ash layer and vadose zone soils is proposed to take place from May-June 2018 in order to determine the actual migration potential of contaminants from the ash material to the groundwater. However, the 2016 PER does not discuss the potential outcome if the results of the additional characterization activities indicate that the concentration of volatile organic compounds (VOCs) remaining in the ash/soil is greater than the remedial goal (RG) of 656 micrograms per kilogram ($\mu\text{g}/\text{kg}$) tetrachloroethylene (PCE) and 87.7 $\mu\text{g}/\text{kg}$ trichloroethylene (TCE). As such, it is not clearly understood whether the transition from PSVE back to ASVE would be implemented. Revise the 2016 PER to provide information on the anticipated course of action and path forward should the results of the characterization of the ash/soil material yield VOC concentrations greater than respective RGs.