



Department of Energy
Savannah River Operations Office
P.O. Box A
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APR 18 2019

Ms. Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Acting Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Response to the Regulatory Comment on the Post-Construction Report Addendum for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit (U) (SRNS-RP-2018-00942, Revision 0, October 2018) SEMS Number: 30

The U. S. Department of Energy (DOE) is submitting the subject comment response for your review. The South Carolina Department of Health and Environmental Control (SCDHEC) provided a comment on January 17, 2019 and the U. S. Environmental Protection Agency (EPA) provided approval on February 25, 2019. No revision to the document was necessary due to the comment response. Please review the response and provide your approval thirty (30) days from receipt.

The effort and time that the EPA and the SCDHEC have given on the subject operable unit are greatly appreciated. Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Federal Project Director, Karen Adams, at (803) 952-7871.

Sincerely,

A handwritten signature in blue ink, appearing to read "BTH", with a long horizontal stroke extending to the right.

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosure:

SRS Response to SCDHEC Comment on the Post-Construction Report Addendum for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit (U) (SRNS-RP-2018-00942, Revision 0, October 2018) SEMS Number: 30

cc w/o encl:

D. Scaturo, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. Cameron, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

J. Tufts, EPA-Atlanta
M. McRae, TechLaw, Inc.

SPECIFIC COMMENT

1. **Section 7.5, Corrective Measures Implementation Report (CMIR)/Remedial Action Completion Report (RACR), Page 11**

The first sentence of this section states: “Data from sampling and process and performance monitoring will be used to establish guidelines for shutdown criteria of the PSVE system. Shutdown of the system will be based on soil samples collected from cone penetrometer testing borings at the trenches area. The PSVE system will be shut down when soil sample results for TCE and PCE are below the RGs established in the ROD.” While this section is clear that the PSVE system will remain in operation until soil samples confirm that RGs for TCE and PCE are achieved, it is not so clear as to what factors will be involved in deciding when to obtain these confirmation soil samples. This section should be revised to be more specific in this regard and should also state that the Department and EPA will be notified in advance when this decision is made. Also, any confirmation sampling should be done in accordance with an approved Sampling and Analysis Plan.

Response: Clarification. ARP soil sampling was conducted in July 2018 in accordance with the previously approved *Sampling and Analysis Plan for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit (U)* (SRNS-RP-2015-00007, Revision 1, May 2015). Per the Sampling and Analysis Plan, the new data would be used to refine the contaminant migration modeling assumptions and re-evaluate the COC potential to migrate to groundwater. Using the July 2018 data, an updated Contaminant Migration Model has been created. Based upon the results of the updated model, SRNS will propose in the August 2019 PER that the RGs can be updated pending Core Team approval. Should a revised RG be accepted, the Core Team will agree on the appropriate administrative pathway.

The updated Contaminant Migration Model will be submitted concurrently with the August 2019 PER. Once submitted, a follow-up discussion on the proposal will be scheduled with the Core Team.

The passive SVE system will continue to operate as currently configured until there is Core Team agreement on the path forward.

No change to the current document is proposed.

Responsible Party: Jim Kubar, 803-952-6525, james.kubar@srs.gov
