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ENVIRONMENTAL COMPLIANCE &
MAY 18 2020
AREA COMPLETION PROJECTS

May 13, 2020

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: RFI/RI Work Plan for the Early Construction and Operational Disposal Site N-1(NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U), SEMS Number: 93 (SRNS-RP-2020-00041, Revision 0, February 2020) received February 13, 2020.

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:
RFI/RI Work Plan for the Early Construction and Operational Disposal Site N-1(NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U), SEMS Number: 93
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General Comments

1. The individual subunit evaluation conclusions discussed in Section 2.2 indicate that there are potential contaminant migration (CM) concerns with hexavalent chromium and/or metals in general at each subunit; however, these concerns do not appear to be consistently included in applicable sections of the Work Plan that discuss rationale, data needs, etc. The Work Plan should be revised to consistently include CM analysis where applicable, specifically but not limited to, Sections 3, 4, 5 and Tables 1 through 5.

Specific Comments

1. Section 2.2.2, CSSLP (631-2G), page 17. The last sentence of the first paragraph of this section states that none of the 2019 soil samples at Central Shops Scrap Lumber Pile (CSSLP) exceeded the nonvolatile beta trigger limit for additional analyses/speciation; yet, the PTSM screening data from Appendix D shows a few beta-emitting radionuclides that were specifically analyzed for. Additionally, it is unclear why the results of the nonvolatile beta testing are discussed while the gross alpha results are omitted. Please clarify.

2. Section 3.1.2.1, ECODS N-1, page 28. Please include a statement in the first bullet of this section that addresses the potential of hexavalent chromium to impact groundwater as a CMCOC based on information provided in Section 2.2.1 and similar to the language provided for CSSLP in Section 3.1.2.2. See General Comment 1.

3. Section 3.1.2.2, CSSLP (631-2G), pages 29-30. The last bullet of this section discusses the data gap for background concentrations for sediment and surface water samples and states background samples will be collected at a Carolina Bay that is said to have "little or no impact from SRS operations." After observing the potentiometric map on Figure 2, page 58, it appears that the location of the Unnamed Carolina Bay is down gradient of SRS operations. Please explain how samples can be taken from the Unnamed Carolina Bay in Figure 2 and avoid influence from the subunits included in this work plan and other Central Shops activities.

4. Section 3.1.2.3, Ford Building (690-N), page 30. Please include a statement that addresses the potential of metals to impact groundwater based on information provided in Section 2.2.3 and similar to the language provided for CSSLP in Section 3.1.2.2. See General Comment 1.

5. Section 4.4.2, CSSLP (631-2G), page 38. The second and third paragraphs of this section regarding surface sediment and surface water characterization strategies do not mention CM and PTSM screening as are mentioned for soils; yet, Tables 3 and 4 list these as data needs for these two media. See General Comment 1.

6. Section 5.2, CSSLP (631-2G), page 40. The second paragraph of this section states that six locations inside the subunit and three locations outside of the subunit boundary will be sampled. The following sentence then states that four soil intervals will be sampled, implying that this will be done at each location which would result in a total of 36

samples; however, only 30 are proposed at the beginning of the paragraph. It appears from information in Section 3.1.3.2 and Figure 11 that two of these locations will be sampled only at the surface interval (0- to 1-ft), which would result in a total of 30 samples. Please clarify this information in this section.

7. Tables 1, 2 and 5, Data Quality Objectives for the ECODS N-1 for Soil Media, Central Shops Scrap Lumber Pile for Soil Media, and Ford Building for Soil Media, pages 69, 70 and 73. These three tables do not include CM or PTSM screening as data needs; yet, these are discussed for these media in Section 4.4. Please revise and see General Comment 1.

8. Appendix D, Preliminary PTSM Screening For Ford Building 690-N (Soil – All Depths), page D-17. The second paragraph of Section 2.2.3 states that ten soil samples were selected for gamma spectroscopy analyses due to the maximum nonvolatile beta result of 48.0 pCi/g and the possible presence of Cs-137 in soils based on previous concrete sample data. These results are not included in Appendix D; please include.