



SRNS-OS-2024-00192

June 3, 2024

ENVIRONMENTAL COMPLIANCE &

JUN - 3 2024

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

AREA COMPLETION PROJECTS

Re: RCRA Facility Investigation/Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources), SEMS Number: 63 (SRNS-RP-2024-00312, Revision 0, April 2024) received April 5, 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/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 Digitally signed by Susan B. Fulmer
Date: 2024.06.03 10:29:44 -04'00'

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:
RCRA Facility Investigation/Remedial Investigation Work Plan Addendum for the
D-Area Groundwater Operable Unit (D-Area Upgradient Sources), SEMS Number: 63
(SRNS-RP-2024-00312, Revision 0, April 2024) received April 5, 2024.**

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Specific Comments

1. Section 3.1 Objectives, page 12. This work plan addendum presents the characterization investigation designed to determine the nature and vertical extent of PFAS contamination in concrete, vadose zone soils, and Upper Three Runs Aquifer (UTRA) soils. The purpose of this investigation is to understand the contamination migration potential and reduce uncertainties associated with the contamination migration risk to groundwater from PFAS. Why is identifying the horizontal extent of PFAS in the two suspected source areas, the 411-1D Fire-Fighting Training Area and the former 715-D Gasoline Station, not included in this sampling objective? Specifically, why does the objective on page 12 state "Collect PFAS source area sampling of concrete, vadose zone soils, and saturated soils of the UTRA to help evaluate CM risks and provide vertical source area characterization of PFAS constituents"? Please clarify why the horizontal and vertical characterization of PFAS constituents are not included in the report.
2. Figure 14, Conceptual Site Model, page 67. Concrete should be included as a secondary source, as it is mentioned in Section 4.1.1.3 Secondary Sources of Contamination and is included in the sampling strategy for PFAS at DAG OU.