



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

DEC 12 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 Responses to the Regulatory Comments on the RCRA Facility Investigation / Remedial Investigation (RFI/RI) Letter Work Plan in Support of the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) SEMS Number: 63

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the enclosed responses to the regulatory comments on the RCRA Facility Investigation / Remedial Investigation (RFI/RI) Letter Work Plan in Support of the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) for your review. The South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on October 30, 2019, and the U. S. Environmental Protection Agency (EPA) approved the letter work plan in their letter dated November 6, 2019. The letter work plan does not require revision as a result of these comment responses. Please review the responses and provide your approval within thirty (30) days of receipt.

The effort and time that the SCDHEC and the EPA 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, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

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

IACD-20-119

DEC 12 2019

Ms. Susan Fulmer  
Mr. Jon Richards

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Enclosure:

SRS Responses to South Carolina Department of Health and Environmental Control Comments on: RCRA Facility Investigation / Remedial Investigation (RFI/RI) Letter Work Plan in Support of the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) SEMS Number: 63

cc w/o encl:

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

cc w/encl:

D. Lloyd, EPA-Atlanta  
M. McRae, TechLaw, Inc.

**SRS Response to  
South Carolina Department of Health and Environmental Control Comments on:  
RCRA Facility Investigation / Remedial Investigation (RFI/RI) Letter Work Plan  
in Support of the D-Area Groundwater Operable Unit (D-Area Upgradient Sources),  
SEMS Number: 63 (IACD-19-185, dated October 1, 2019) received October 3, 2019.**

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General Comments

1. On August 29, 2019, the USDOE, USEPA and SCDHEC conducted a Core Team meeting to discuss the development of the RFI/RI Work Plan. During the meeting, the topic of adding PFAS analytes to the analyte list was discussed since there had been fire training exercises that used aqueous firefighting foam (AFFF) in the D-Area Operable Unit. The referenced document does not capture this discussion nor does it discuss the addition of the analytes to the analyte lists. Please revise the referenced document to include PFAS compounds in the discussion and add to Table 1.

**Response: Clarification.**

**As discussed during the August 29, 2019 Core Team meeting, PFAs will be included in the analyte list for existing wells located near the 715-D gas station and firefighting simulator building. The focus of the "Letter Work Plan" was to communicate the location and screening depths for 17 new plume monitoring wells to further characterize nature and extent of tritium, volatile organic compounds, and/or metals contamination. The new monitoring wells will be included in the overall monitoring plan for the D-Area Groundwater Operable Unit (DAG OU).**

**The analyte list (including PFAs where appropriate) and sampling locations for the DAG OU in support of the comprehensive Work Plan will be scoped in 2020. No change to the Letter Work Plan is proposed.**

**Responsible Party: Jim Kubar, (803) 952-6525, [james.kubar@srs.gov](mailto:james.kubar@srs.gov)**