



December 13, 2017

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: Removal Site Evaluation Report / Engineering Evaluation / Cost Analysis for Trichloroethylene Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (U), CERCLIS Number: 81 (SRNS-RP-2017-00372, Revision 0, October 2017) received October 31, 2017.

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:
Removal Site Evaluation Report / Engineering Evaluation / Cost Analysis for Trichloroethylene
Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (U),
CERCLIS Number: 81 (SRNS-RP-2017-00372, Revision 0, October 2017) received October 31, 2017.

Page 1 of 2

General Comments

1. It is stated in the Scoping Summary for the P-Area Groundwater Operable Unit (ERD-EN-2013-0009, May 2017) that "additional characterization is needed at the elbow portion of the cVOC plume to better define the impact to Steel Creek and extent of groundwater contamination in the distal area." The Department request that this additional characterization be completed prior to the submittal of the RSER/EE/CA for public comment. Although this characterization is mentioned in the RSER/EE/CA, it is imperative that it be completed before the public comment period and submittal of the Action Memorandum so that the appropriate remedial action can be selected. Please revise the implementation schedule to accommodate this characterization.
2. Section 5.5 Comparison of Removal Action Alternatives, Page 25. In Section 5.5, Comparison of Removal Action Alternatives, the PRB's are considered the most favorable alternative from the standpoint of implementability and are also rated the highest by effectiveness score. However, from the previous Section 5.4, Cost, Alternative 3 has an estimated cost of \$9.09M, while Alternatives 2A and 2B have a combined estimated cost of \$10.64M. Due to the effectiveness scores derived in Section 5.5, Comparison of Removal Action Alternatives, the Department suggests that Alternatives 2A and 2B both be considered in order to deplete the concentrations of TCE in both the areas above the neck Area from the source area and in the distal area where a significant mass of TCE contaminates groundwater and leaches into the surface water of Steel Creek.

Specific Comments

1. Section 2.5, Nature and Extent of Contamination, Groundwater Contamination Summary, page 8. In the first paragraph, it is stated that, "The source area represents the majority of the groundwater contamination and is centered north of the P-RBC within the P Area facility area." However, Figure 16, Cross Section A-A' of TCE Groundwater Plumes from East of P Area West towards Steel Creek (page 49), as drawn, appears to contradict this statement. If known, please provide volume estimates of the groundwater contamination in the neck and distal areas of the plume.
2. Section 5.2, Identification of Applicable or Relevant and Appropriate Requirements (ARARs), second paragraph, page 18 of 58. Please complete the definition of 'applicable requirements' as defined in 40 CFR § 300.5 by adding the second sentence of the definition. The second sentence of the definition states, "Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be applicable."
3. Section 5.4 Cost, page 24, second paragraph. Please include the number of injection wells and monitoring wells, and the time period for multiple injections for Alternative 3A in the cost discussion.

South Carolina Department of Health and Environmental Control Comments on:
Removal Site Evaluation Report / Engineering Evaluation / Cost Analysis for Trichloroethylene
Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (U),
CERCLIS Number: 81 (SRNS-RP-2017-00372, Revision 0, October 2017) received October 31, 2017.

Page 2 of 2

-
4. Section 6.0, Preferred Removal Action Alternative, page 26. The middle of the first paragraph of this section states that Alternative 2A will ultimately allow surface water concentrations in Steel Creek to achieve the MCL once the remnant plumes have attenuated. If possible, please provide a time estimate for how long this may take.