



May 24, 2018

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: Sampling and Analysis Plan Addendum for the P-Area Groundwater Operable Unit (U),
CERCLIS Number: 81 (SRNS-RP-2018-00261, Revision 0, February 2018) received March 28,
2018.

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

Specific Comments

1. Section 2.1.2, Depth-Discrete Groundwater Samples, pages 7 and 8. The last sentence of page 7 indicates that the primary flow of contamination from monitoring well PRGW087 in the UAZ is to the west. However, the last sentence on page 8 states that flow direction of the PCE plume from this monitoring well is to the east towards an unnamed tributary to PAR Pond. Figures 13 and 19 indicate an eastward groundwater flow as well. Please correct this discrepancy.
2. Section 2.1.3, MicroCED, page 11. The first paragraph of this page states that seven detected constituents during the additional sampling for the MicroCED treatability study exceeded MCLs or RSLs; the rest of this paragraph and Table 5 list eight. Please correct.
3. Section 3.1.3, Identify Information Inputs, page 22. The second bullet under the Steel Creek discussion states that installation of a well near SC-02 may not be possible due to significant riprap in the general area. A contingency location for this well should be considered if this is the case.
4. Section 3.1.3, Identify Information Inputs, page 23. The last sentence of the first bullet under the Groundwater discussion states that four contingent locations are proposed and will only be sampled if the extent of the VOC groundwater plumes are not defined. The conditions for sampling these contingency locations should be more clearly defined in this section (i.e., what constitutes "defined" pertaining to the VOC plumes - no detections of VOCs above MCLs at upgradient sampling locations from the contingency locations?).
5. Section 4.1, Steel Creek Investigation, page 30, third paragraph. Four existing surface water locations (SC-02, -03, -04, and -07) will be sampled with the proposed new surface water locations. Figure 3 on page 46 includes SC-05 and SC-06 and appear to be outside the PAGW OU HCM; however, Figure 25, page 68, indicates that proposed water locations SC003D and SC003E also fall outside the PAGW OU HCM. Please clarify why SC-05 and SC-06 are not sufficient for sampling in determining the extent of VOC contamination in the distal area and impact to Steel Creek.
6. Figure 27, Proposed Steel Creek Surface Water Monitoring Locations, PAGW OU, page 70. Please include new location SC-08 on this figure, as indicated in the Surface Water discussion on page 23.
7. Table 6, CSIA Data Summary, page 86. The "Result Units" and concentration entries for 3 of the analytes listed on this table appear to be typos (0/00 and negative concentration values). Please correct.