



Department of Energy
Savannah River Operations Office
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JUL 03 2024

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Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
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: RCRA Facility Investigation / Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2024-00312, Revision 1 Redline, July 2024) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 63

In accordance with the terms of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is submitting the subject document for your review The *RCRA Facility Investigation / Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U)* (SRNS-RP-2024-00312, Revision 0, April 2024) was submitted to the South Carolina Department of Environmental Services (SCDES) and U.S. Environmental Protection Agency (EPA) for review on April 4, 2024. The EPA's and SCDES' comments were received on May 31, 2024, and June 3, 2024, respectively. The Savannah River Site's responses were incorporated into the enclosed Revision 1 Redline document. Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the SCDES and the EPA have provided on this operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-7805, or the DOE Operable Unit Project Manager, Karen Adams, at (803) 952-7871.

Sincerely,

**AVERY
HAMMETT**

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HAMMETT
Date: 2024.07.02 11:08:47
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Avery G. Hammett
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-24-144

JUL 03 2024

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

1. RCRA Facility Investigation / Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2024-00312, Revision 1 Redline, July 2024) SEMS Number: 63
2. SRS Responses to the U.S. Environmental Protection Agency's Comments on the RCRA Facility Investigation / Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2024-00312, Revision 0, April 2024) SEMS Number: 63
3. SRS Responses to the South Carolina Department of Environmental Services' Comments on the RCRA Facility Investigation / Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2024-00312, Revision 0, April 2024) SEMS Number: 63

cc w/o encl:

J. Blalock, SCDES-Columbia
S. French, SCDES-Columbia
M. Reece, SCDES-Columbia
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B. Cameron, SCDES - Aiken Environmental Affairs Office
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B. Martin, EPA-Atlanta
M. McRae, TechLaw, Inc.

SRS Responses to the US Environmental Protection Agency's Comments on the RCRA Facility Investigation/Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U), (SRNS-RP-2024-00312, Revision 0, April 2024),

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GENERAL COMMENTS

1. Section 5.0, Sampling Design and Rationale of the RFI/RIWP states that the implementation of the Sampling and Analysis Plan (SAP) to obtain decision-quality data for each subunit is documented in the remaining sections of this sampling and analysis plan; however, several elements that are typical of the information presented in a SAP per EPA guidance *Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP)*, *Optimized UFP-QAPP Worksheets*, dated March 2012 are missing from the RFI/RIWP. Examples of missing elements include, but are not limited to, the following:
 - a. Procedures for collecting split samples
 - b. Identification of key project personnel and contact information, including the analytical laboratory
 - c. Field and laboratory quality control (QC) performance or acceptance criteria
 - d. Project action limits that will be used to evaluate the data
 - e. Calculations for evaluating accuracy and precision
 - f. Standard operating procedures

Revise the RFI/RIWP to include sufficient information required to perform the tasks outlined in the RFI/RIWP and to ensure data collected is of sufficient quality to meet the data quality objectives (DQOs) per EPA guidance.

Response: Clarification

The Core Team (i.e., USDOE, SCDES, USEPA) has previously agreed to cite the appropriate reference documents in lieu of repeating the same information in each Work Plan, sampling plan, etc. In an effort to meet all applicable requirements, a Quality Assurance Project Plan previously approved by the Core Team that integrates all technical and quality aspects of environmental data collection and management is used. All elements of the USEPA guidance on DQOs are instituted within the procedures and operational guidelines for investigative, characterization Work Plans. The following references which are cited within sections 5.0 through 9.0 of the DAG OU RFI/RI Work Plan Addendum include the elements noted in the comment.

- **WSRC-RP-96-234, Revision 1, *Savannah River Site RCRA Facility Investigation/Remedial Investigation Work Plan Safety, Health, and Emergency Response Plan, Quality Assurance/Quality Control, and Data Management Requirements* (WSRC 1996)**
- **SRS Procedure Manual 1Q, *Quality Assurance Manual (U)* (SRS 2019a)**
- **SRS Procedure Manual 3Q1, Section 9000, *Hydrogeological Data Collection Procedures and Specifications (U)* (SRS 2019b)**
- ***SRNS Area Completion Projects Programmatic Quality Assurance Project Plan for Environmental Data Collection and Management* (SRNS 2012)**

SRS Responses to the US Environmental Protection Agency's Comments on the RCRA Facility Investigation/Remedial Investigation Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U), (SRNS-RP-2024-00312, Revision 0, April 2024),

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The exception of key project personnel and analytical laboratory information not specifically called out in each Work Plan provides flexibility for the sampling to be conducted either by SRS employees and laboratories or by contracted samplers and laboratories. In this case, SRS employees will collect the PFAS and groundwater samples, and the VOC soil samples will be collected by Northwind, an environmental subcontractor. All samples will be sent to a certified off-site laboratory to conduct the analyses.

In both cases, all elements of the DQO process are within the procedures followed by SRS employees and the laboratory contractors. No change to the document is proposed.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

2. The proposed sample locations at the 715-D Gasoline Station Area appear insufficient to determine whether tetrachloroethylene (PCE) contamination has been successfully remediated in soil to levels below the threshold limit of 20 micrograms per kilogram ($\mu\text{g}/\text{Kg}$). As such, is it unclear whether the objectives listed in Section 3.1, Objectives will be achieved. Specifically, there are only three intervals proposed for sampling and analysis for volatile organic compounds (VOCs) in each of the five proposed borings. According to Table 5, Proposed DSVE VOC Soil Samples, the 5-6 foot interval below ground surface will not be sampled. Additionally, it is unclear why the borings are not located near the soil vapor extraction (SVE) units where PCE and trichloroethylene (TCE) concentrations were historically the highest (e.g., DSVE 006 and DSVE 008 and DSVE 009). According to Figure 12, Proposed 715-D Gasoline Station Area Sample Locations, soil boring DBR-016 is proposed near DSVE-008; however, a soil boring is not proposed near DSVE-006 or DSVE-009. Thus, it unclear how it will be determined whether PCE contamination has been successfully remediated. Please revise the RFI/RIWP to propose soil sampling from the 5-6 foot interval and to propose additional soil borings near DSVE-006 and DSVE-009.

Response: Agree

SRS agrees to collect VOC soil samples in the 5-6 ft sections at borings DBR-012, DBR-015, and DBR-016. Additionally, SRS will conduct VOC soil sampling at borings adjacent to the SVE units DSVE-006 (DBR-017) and SVE unit DSVE-009 (DBR-018). Both borings will include sample intervals of 1-2 ft, 3-4 ft, 5-6 ft, and 8-10 ft bgs. About 4 ft will be added to these intervals to account for the SVE soil cover thickness, and sampling will begin at the original ground surface. See revised Figure 12 for the proposed locations. These two additional borings will also include PFAS soil sampling. Additional duplicate and split samples will be included. Text within section 5.2, VOC Soil Samples will be updated as follows:

“... below ~~CM threshold limit~~ cleanup level of 20 $\mu\text{g}/\text{kg}$. ~~Three (3)~~ Five (5) boring locations at the SVE unit area where either previous soil samples were above CM cleanup levels remedial goals or where SVE units previously had elevated VOC vapor concentrations will be investigated at ~~the same~~ multiple depth intervals to determine current VOC contaminant levels (Figure 12 and Table 5). All VOC samples...”

Tables 1, 4, 5, and Figure 12 (see attached) will be updated to reflect the additional sample

interval and two additional borings (DBR-017 and DBR-018).

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

3. The RI/RIWP should present a figure that reflects the current footprint of all known Per- and Polyfluoroalkyl Substances (PFAS) including Perfluorooctanesulfonic acid (PFOS) and Perfluorononanoic acid (PFNA) based on recently published maximum contaminant levels (MCLs). Please revise the RFI/RIWP to reflect the current plume footprint based on recently published PFAS MCLs (i.e., 4 nanograms per liter (ng/L) for PFOS and 10 ng/L for PFNA).

Response: Clarification

SRS provided Figure 3, *D-Area PFAS Plume (4Q2022)* and Figure 15, *D-Area Groundwater Plumes (2022)*, which displays the PFAS PFNA and PFOS plume footprints based on the current USEPA RSLs at that time (April 2024: PFNA – 59 ng/L and PFOS – 40 ng/L). The new MCLs were not released until May 2024 after the report was submitted in April 2024. The next D-Area Groundwater OU report will include figures that display the PFNA and PFOS plumes based on the recently published MCLs (i.e., 4 nanograms per liter [ng/L] for PFOS and 10 ng/L for PFNA). Please note the new PFAS MCLs do not impact the Work Plan Addendum sampling plan which focuses on the source areas and not the distal fringes of the plume.

No change to the document is proposed.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

4. The location of proposed new Upper Three Runs Aquifer (UTRA) monitoring well DCB087C is shown on Figure 13, Proposed 484-17D DCSA Groundwater Monitoring Well Location; however, a figure showing the location of DCB087C relative to the Fire-Fighting Training Area (FFTA) and the 715-D Gasoline Station Area is not included. Please revise the RFI/RIWP to include a figure showing the location of proposed well DCB087C in relation to the FFTA and 715-D Gasoline Station Area.

Response: Agree

The Rev 1 RFI/RI Work Plan Addendum will include a revised Figure 13, *Proposed 484-17D DCSA Groundwater Monitoring Well Location* (see attached), showing proposed monitoring well location DCB087C relative to the FFTA and 715-D Gasoline Station Area.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

5. Figure 3, D-Area PFAS Plume (4Q2022) includes an inset map showing the location of the D-Area Groundwater (DAGW) Operable Unit (OU) within the Savannah River Site; however, it would be helpful if the RFI/RIWP included a larger scaled figure showing the relative location of the site within South Carolina. Please revise the RFI/RIWP to include a figure showing the location of the site within South Carolina.

Response: Agree

The Rev. 1 RFI/RI Work Plan Addendum will include an updated Figure 3, *D-Area PFAS Plume (4Q2022)*, showing an insert that includes the SRS in relation to South Carolina and Georgia.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

6. The discussion of DQOs in Section 4.1.2 through 4.1.8 is insufficiently detailed and should be expanded to provide additional information regarding the decision process and objectives based on EPA's *Guidance on Systematic Planning Using the Data Quality Objectives Process*, EPA QA/G-4 (the DQO Guidance), dated February 2006. Examples of insufficient detail include, but are not limited to:
- Section 4.1.5 (Define the Boundaries of the Study, PDF Page 29 of 100) does not discuss practical constraints that could interfere with sampling or temporal boundaries that describe the timeframe the study will represent and when samples should be collected.
 - Section 3.1.6 (Develop Decision Rules, PDF Page 38 of 122) does not provide decision statements (i.e., "if..., then..." statements) for how the project data will be used.
 - Section 3.1.7 (Specify the Limits on Decision Errors, PDF Page 39 of 100) does not define the screening levels that will be used for making each project decision.

Revise the RFI/RIWP to provide comprehensive DQOs in accordance with the DQO Guidance.

Response: Agree/Clarification. As discussed in the response to USEPA General Comment #1, the executed Work Plan will comply with USEPA guidance on DQOs. Specifically, the following explanations expand on each section and includes text that will be included into the following sections:

Section 4.1.5: "For groundwater, this WP addendum is using the guidance of monitoring stations that have been previously installed and established for years and provide a benchmark for the spatial boundaries of the individual contaminant plumes of concern. Groundwater monitoring will commence after the installation of the additional monitoring well and is expected in late 2024 with sampling at least annually. This data will provide trending information for the effectiveness of the DAG OU Treatability Study and removal action in the immediate vicinity. For soils, historical process knowledge, previous soils sampling, and known groundwater contamination has indicated that contaminants may be present above CM cleanup levels. The soil sampling proposed in this WP addendum will help determine the vertical and horizontal extent of contamination in these known source areas. It is not expected that any existing infrastructure will interfere with the proposed sampling locations."

Section 4.1.6: "No new groundwater constituents are expected to be found as a result of the new well installation. The purpose of the data to be collected is to supplement the existing groundwater monitoring network, and to provide trending information for the effectiveness of

the D-Area OU Treatability Study and removal action in the immediate vicinity. All data will be included in the RFI/RI/BRA to be submitted in December 2026.

Soil and concrete data will be used to determine current secondary source contaminant concentrations (PFAS and VOCs). The VOC data will be used to determine if VOC (specifically PCE) concentrations have been reduced to below the 20 µg/L CM cleanup level. If concentrations have not been reduced below this limit, then SVE operations (either with MicroBlowers™ or Baroballs) will continue to be conducted. If concentrations have been reduced to below the level, the SVE MicroBlower™ wells will be shut down and abandoned.

PFAS data is being collected from locations that are expected to be the most contaminated and sample results will be used in future CM calculations to determine if the soil and/or concrete are contaminated at levels that pose a continuing CM concern to groundwater. If so, an appropriate technical and administrative path forward will be discussed with the Core Team (i.e., USDOE, SCDES, USEPA).

Section 4.1.7: The second paragraph will be edited as follows: “All constituents will be analyzed at levels that allow comparison against established MCLs or RSLs or risk-based concentrations (RBCs). The analytical method chosen must be capable of achieving a Practical Quantitation Limit (PQL) below the established MCL, RSL, or RBC. The minimum detection limits that SRS will request from the laboratories for each analyte are provided in Tables 9 and 10. The project will use the results to determine COCs and support a remedial decision that can be agreed to by the USDOE, USEPA and SCDES.”

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

SPECIFIC COMMENTS

1. **Figure 14, Conceptual Site Model, PDF Page 75 of 100:** The text in Section 4.1.1.3, Secondary Sources of Contamination, states that concrete may be a secondary source of contamination; however, Figure 14 does not include this medium. Because the concrete in the FFTA and 715-D Gasoline Station is potentially contaminated with PFAS, please revise Figure 14 to include concrete as a secondary source of contamination.

Response: Agree

The Rev. 1 RFI/RI Work Plan Addendum will include an updated Figure 14, *Conceptual Site Model*, including concrete as a secondary source. The secondary source box will be updated as follows: Concrete/Soil (all depths)².

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

2. **Section 6.2, Field Analytical Sampling Quality Assurance/Quality Control, PDF Page 36 of 100 and Table 11, Minimum Field Quality Control/Quality Assurance Sampling Requirements, PDF Page 99 of 100:** There is an omission of information from Section 6.2 and Table 11 regarding the

frequency of collection of matrix spike/matrix spike duplicate (MS/MSD) Quality Assurance (QA) samples. For example, Section 6.1, Data Quality Levels for Analytical Results, states that MS/MSD samples are QA samples used to determine accuracy; however, MS/MSD frequency of sample collection information is not included in Section 6.2 and Table 11. Please revise Section 6.2 and Table 11 to include MS/MSD frequency information.

Response: Clarification

The matrix spike/matrix spike duplicate (MS/MSD) are laboratory Quality Assurance (QA) samples, not field QA/QC samples. The EPA methods (e.g., Method 1633) specify the frequency of MS/MSD QA/QC samples.

No change to the document is proposed.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

3. **Figure 1, D-Area 411-1D Fire-Fighting Training Area (FFTA), PDF Page 49 of 100:** Figure 5, D-Area FFTA 2022 Previous PFAS Soil Borings, identifies borings DBR-01 and DBR-02 as 2022 PFAS Soil Borings; however, they are not defined as such on Figure 1. Please revise Figure 1 to identify DBR-01 and DBR-02 as 2022 PFAS Soil Borings.

Response: Agree

The Rev. 1 RFI/RI Work Plan Addendum will include a revised Figure 1, D-Area 411-1D Fire-Fighting Training Area (FFTA) (see attached), that includes a legend showing DBR-01 and DBR-02 as 2022 PFAS Soil Borings.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

4. **Figure 2, D-Area 715-D Gasoline Station Area, PDF Page 51 of 100:** The symbol used to represent boring DCB063D and the red oval shape are not defined on the figure. Please revise Figure 2 to include definitions for the symbol representing boring DCB063D and the red oval shape.

Response: Agree

The red oval in Figure 2, D-Area 715-D Gasoline Station Area, is the area where the fuel fire was suspected to occur. The Rev 1 RFI/RI Work Plan Addendum will include an updated figure with a callout label, "Suspected Fire Location" for the red oval area and a legend for the symbol representing boring DCB063D.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

MINOR COMMENTS

1. **List of Abbreviations and Acronyms, Pages vi and viii:** There are several acronyms and abbreviations missing from the List of Abbreviations and Acronyms including ACP, bgs, DCSA,

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ERDMS, FFTA, HASP, IDW, PFNA, PQL, QAPP, RBC, RG, SVE, TCL, TO, and V&V. Furthermore, there are several instances throughout the text where an acronym or abbreviation is not defined upon first use including: $\mu\text{g/L}$, BRA, TCL, and RG. Please revise the List of Abbreviations and Acronyms to add these missing acronyms and abbreviations and revise the text to define all acronyms and abbreviations upon first use.

Response: Agree

The Rev 1 RFI/RI Work Plan Addendum will include an updated List of Abbreviations and Acronyms for all acronyms used within the text. Additionally, the text will be revised to define the first use of an acronym.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

2. **Section 4.2, Summary of DQO Evaluation, PDF Page 31 of 100:** The text states “The data needs developed under the DQO process are summarized in Tables 6 through 9”; however, these DQO processes are summarized in Tables 6 through 8. Please revise the sentence to reflect the tables that summarize DQO processes.

Response: Agree

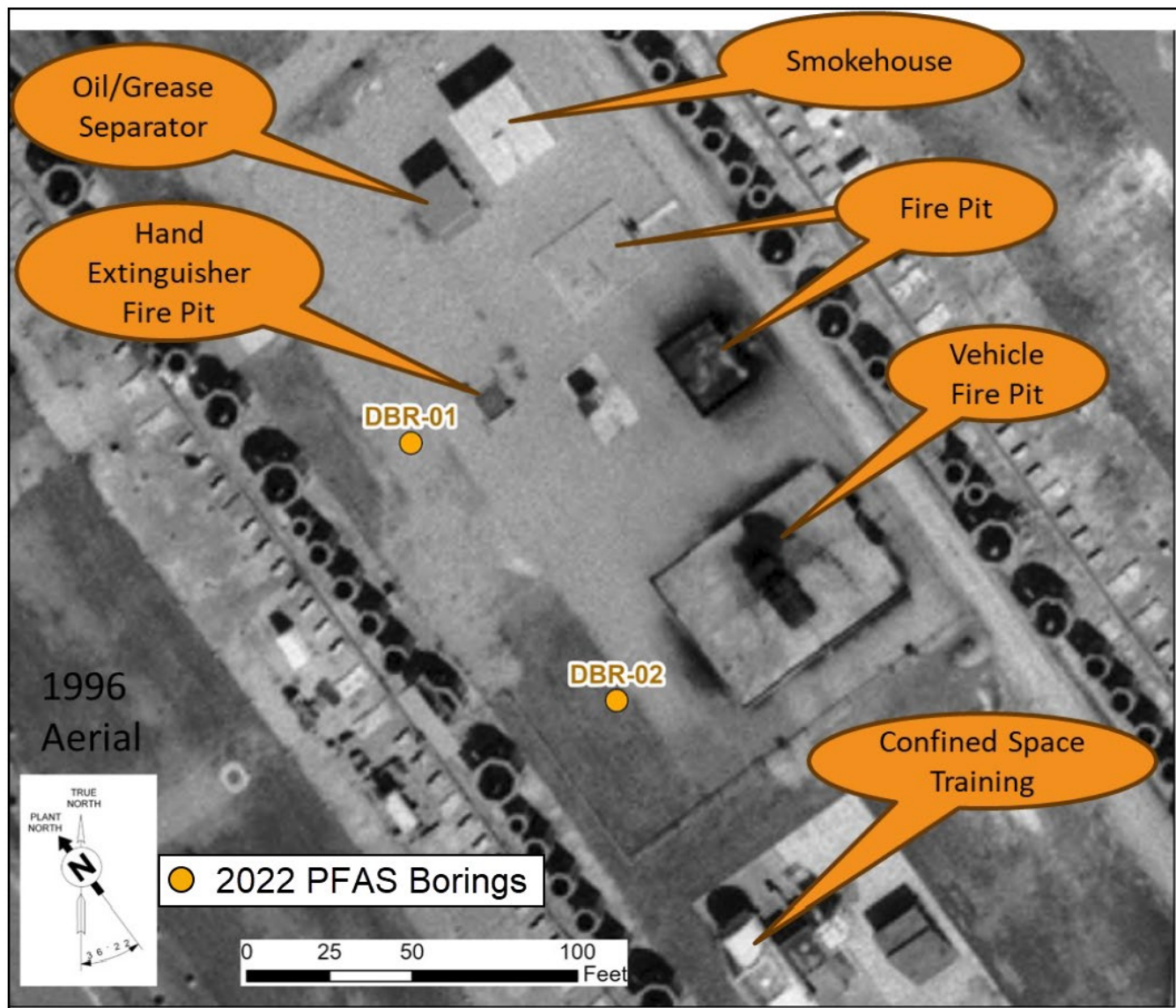
The DQO processes are summarized in Tables 6 through 8, not Tables 6 through 9. The Rev. 1 RFI/RI Work Plan Addendum will be updated to correctly list Tables 6 through 8.

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

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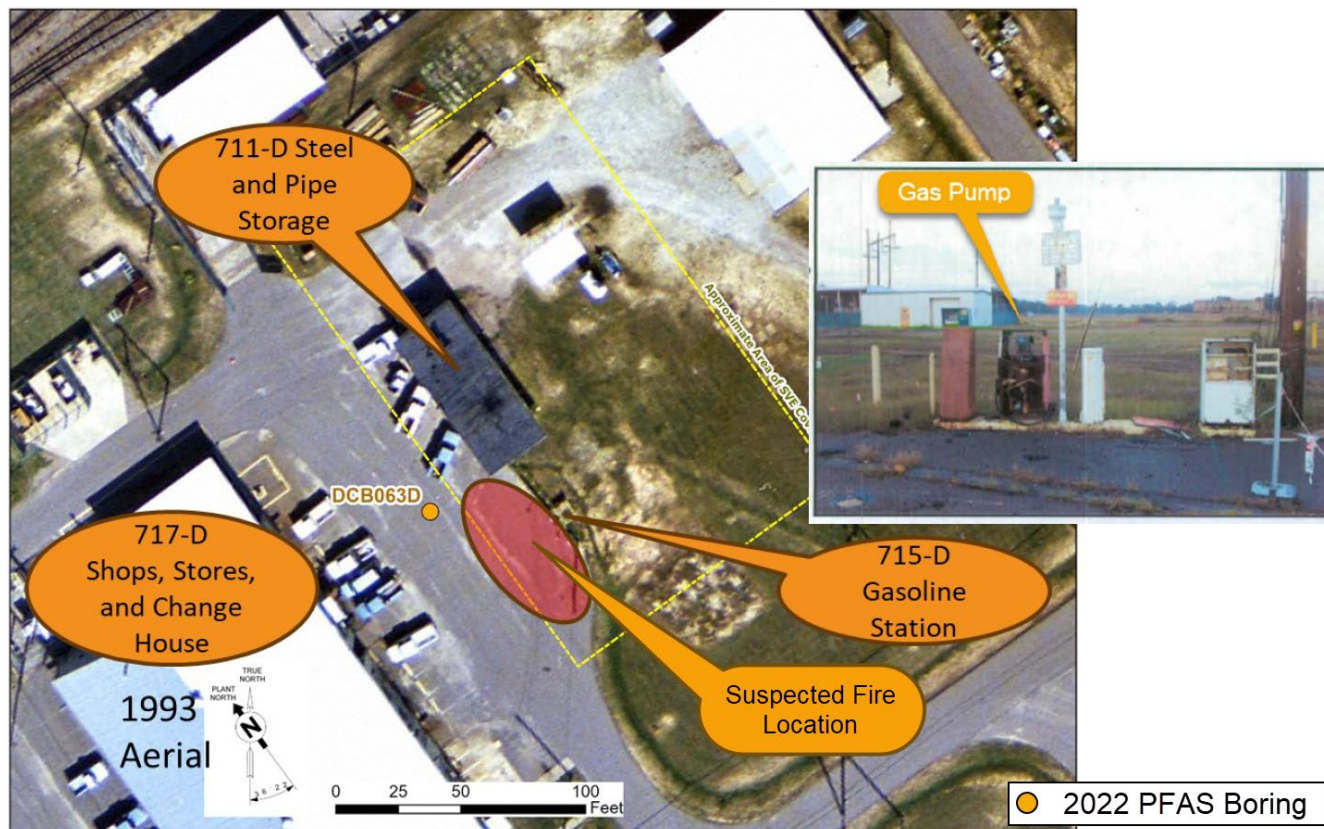


Revised Figure 1. D-Area 411-D Fire-Fighting Training Area (FFTA)

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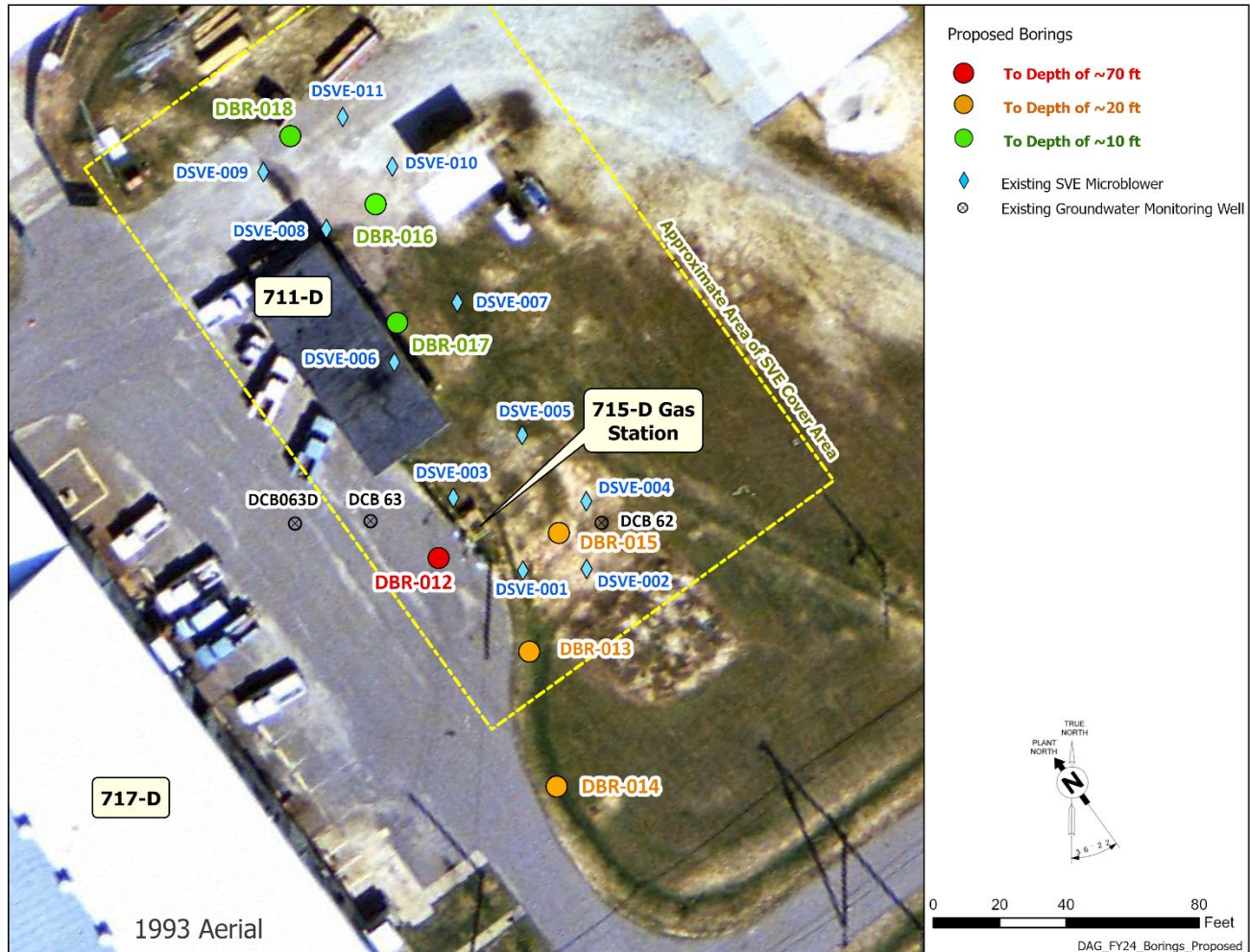


Revised Figure 2. D-Area 715-D Gasoline Station Area

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Revised Figure 12. Proposed 715-D Gasoline Station Area Sample Locations

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Revised Figure 13. Proposed 484-17D DCSA Groundwater Monitoring Well Location

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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.

Response: Agree

The text incorrectly states only vertical extent is being evaluated. Sample data collected across multiple fire pits, inside and outside of the pits, and at locations around and within surface runoff ditches below the suspected fuel fire area will also provide horizontal source area characterization of PFAS contaminants. The first bullet of section 3.1, *Objectives*, will be updated in the Rev. 1 RFI/RI Work Plan Addendum as follows:

- **"Collect PFAS source area sampling of concrete, vadose zone soils, and saturated soils of the UTRA to help evaluate CM risks and provide vertical and horizontal source area characterization of PFAS constituents;"**

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

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.

Response: Agree

The Rev. 1 RFI/RI Work Plan Addendum will include an updated Figure 14, *Conceptual Site Model*, including concrete as a secondary source. The secondary source box will be updated as follows: Concrete/Soil (all depths)².

Responsible Party: Ashley Shull, 803-952-7090, ashley.shull@srs.gov

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