



ENVIRONMENTAL COMPLIANCE &

September 8, 2022

SEP - 8 2022

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

AREA COMPLETION PROJECTS

Re: Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -5A) Operable Unit - January through December 2021 (U), SEMS Number: 28 (SRNS-RP-2022-00178, Revision 0, May 2022) received May 12, 2022.

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:
Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble
Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A, -5A)
Operable Unit – January through December 2021 (U), SEMS Number: 28
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General Comment

1. It is unclear if Tables 4 and 5 are missing some monitoring wells, or if sampling was not performed for the wells not included. Specifically, wells AHT-07B, -08A, -08B, -11A, -11B, -13 and -14 equipped with MicroBlowers™ are absent from Table 4, and wells AHT-10A, -10B, -12A, -12B, -15, -16 and -17 equipped with BaroBalls™ are absent from Table 5. Additionally, ARV-2D2 is listed in Table 5 as a well equipped with BaroBalls™. Please clarify and revise these tables accordingly if necessary.

Specific Comments

1. Section 1.0, Introduction, page 1. In the second paragraph, please state that the remedial actions for the remaining nine subunits are complete or were not required.
2. Section 2.1.4, Sampling Methods and Results, page 5. The first sentence below the first table shown on this page states: "In CY2021 at ABRP four of 13 wells with MicroBlowers™ had detectable sample results (maximum value was 1.41 ppmV at ASH-06) and only two of 13 wells with BaroBall™ had detectable sample results (maximum value was 0.589 ppmV at AHT-06)." According to Table 4, only 2 wells equipped with MicroBlowers™ (AHT-05 and ASH-06) showed detections of TCE in CY2021 with a max value of 0.841 ppmV at ASH-06. Also, according to Table 5, there were 3 wells equipped with BaroBall™ (AHT-06, -07A and -09B) that showed detections of TCE in CY2021 with a max value of 0.581 ppmV at AHT-06. This statement also appears to contradict Section 4.3, Overall Recommendations, which states that in CY2021 there were 10 of 26 wells at ABRP with detections of TCE. Please correct these discrepancies.