UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 24, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mr. Brian T. Hennessey, 730-B
SRS Remedial Project Manager
Savannah River Operations Office
Area Completion Projects
Post Office Box A
Aiken, South Carolina 29802

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Energy, Savannah River Site Performance Evaluation Report of 2017 for the M-Area Inactive Process Sewer Lines (MIPSL) Operable Unit (OU), January through December 2017, CERCLIS Number: 19, March 2018.

EPA cannot provide approval for this report until the below comments have been addressed. As always, please feel free to call with any questions or comments.

Sincerely,

Diedre Lloyd
Remedial Project Manager
Restoration and Sustainability Branch
Superfund Division

cc: Angelia Adams, DOE-SRS, Phil Prater, DOE-SRS, Karen Adams, DOE-SRS, C.L. Bergren, SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

EPA COMMENTS on the
PERFORMANCE EVALUATION REPORT of 2017
M-AREA INACTIVE PROCESS SEWER LINES (MIPSL)
JANUARY THROUGH DECEMBER 2017

MARCH 2018

SAVANNAH RIVER SITE
SOUTH CAROLINA

EPA GENERAL COMMENT:

EPA understands and appreciates that a larger Microblower™ was installed to address remaining MIPSL contamination and that the above mentioned report further notes additional information will be evaluated during the next reporting interval. EPA renews the request to address the issue noted below in italics from previous EPA comments made during the last MIPSL reporting effort in order to ensure that this concern is addressed during the next reporting interval in 2018.

EPA's comment on the 2016 Performance Evaluation Report for MIPSL comment is copied (in italics) and pasted below:

> *Based on the information presented in the 2016 MIPSL it appears the contaminant mass that exists below the Upland Unit is more significant than has been previously reported. For example, the text in Section 2.1 (System Overview) states the contamination is predominately within the fine-grained sediments (Upland Unit) in the zone below the sewer line to 35-feet below ground surface (bgs). However, the text in Section 1.2 (Nature and Extent of Contamination), Page 2 of 56 states the Upland Unit has limited contaminant mobility to a significant degree although volatile organic compounds (VOCs) have migrated downward, into the more permeable sediments below the Upland Unit. Furthermore, the text in Section 3.0 (Conclusions/Recommendations) on Page 10 of 56, states the vast majority of VOC production at MIPSL has been from MH-01, and approximately 94% of MH-01 production has been from the deeper extraction well screened in the Tobacco Road formation. As seen in Figure 3 Surface Well Configuration (Typical Cutaway View), Page 17 of 56 the SVE well is screened from 60 to 100 feet bgs and only a fraction of the total well screen length is located within the silty sand unit below the Upland Unit and above the clay unit. As such, it appears a majority of the mass removal is from below the Upland Unit and it is uncertain how this may impact the mass removal estimates and the overall remedial cleanup timeframes. Please revise the **next submittal** of the Performance Evaluation Report for the M-Area Inactive Process Sewer Lines (MIPSL) (081-M) Operable Unit (OU) (U), CERCLIS Number 19, (2017 MIPSL) to address this issue.*

EPA SPECIFIC COMMENTS:

1. Section 3.0, Conclusions/Recommendations, Page 11 of 58:

Section 3.0 states, "SRS recommends that the monitoring of the ASVE unit and the sampling frequency remain unchanged, but that a different approach to flow rate evaluation be implemented for the MicroBlower™ systems. SRS determined that the eleven fractured MicroBlower™ wells with the smaller blower (Wells F11-1, F11-2, F11-3, F11-4, F12-1, F12-2, F12-4, F13-1, F13-2, F13-3, and F13-4) have an average flow rate of 2 cubic feet per

minute (cfm). This average was obtained by taking the average of the second, third, and fourth highest flow rates of the five most recent flow measurements at each well..." However, it is unclear why the average flow rate was not calculated using all of the data obtained from the most recent flow measurement events at each well location. Revise the 2017 PER to provide a calculated average flow measurement using all of the recent flow rates for a comparison.

2. **Figure 8, Illustration of Flow Volume and PCE Concentration Extracted by ASVEU and Figure 9, Graph Illustrating at MH-01 PCE Soil Gas Concentrations, Page 24 of 58:**

Figures 8 and 9 depict PCE (tetrachloroethylene) concentrations extracted by the active soil vapor extraction unit (ASVEU) and PCE soil gas concentrations, respectively. However, because the graph depicts this data over the system operational period (approximately 10 years), it is difficult to see the fluctuation of PCE concentrations over the 2017 operating period. For clarity and consistency, the 2017 PER should prepare graphs that depict PCE concentration data over both the operational term for the system and for the 2017 operational year.