



March 21, 2023

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

ENVIRONMENTAL COMPLIANCE &

MAR 21 2023

AREA COMPLETION PROJECTS

Re: Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Operating Equipment (U) – Aiken, South Carolina (SRNS-RP-2022-00468, Revision 0, December 2022) received December 22, 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 Digitally signed by Susan B. Fulmer
Date: 2023.03.21 07:56:39 -04'00'

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:
Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with
Operating Equipment (U) – Aiken, South Carolina
(SRNS-RP-2022-00468, Revision 0, December 2022) received December 22, 2022.

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Specific Comments

1. Savannah River Site Summary, Section II. Response Action Summary, Systems Operation and Maintenance, page 9. The Department recommends that prevention of disturbance from hog activities be included in the components listed under the O&M activities listed in the first paragraph of this subsection.
2. Table 4. Operation and Maintenance Cost comparison for SRS OUs with Operating Equipment, pages 33-34. The third column, "Remedy Decision Document Year" indicates that there is a footnote "a". However, no such footnote is listed at the end of the table. Please clarify and/or correct.
3. Appendix A, Table A-7 List of OU Subunits with Remedial Actions, page A-7. For the ABRP/MCB/MBP OU subunits listed in this table, Burning/Rubble Pits 731-1A and -A should not be included since according to page C-5 in Appendix C no COCs were identified for these subunits and there were no problems warranting action. Additionally, the A-Area Ash Pile subunit 788-2A is not included in this table. Please correct.
4. Attachment D-1. Five-Year Review Site Inspection Checklist – A/M-Area Groundwater. XI. D. Opportunities for Optimization, page D-49. The IROD issued in 1992 stated that the remedy was to prevent further groundwater plume migration. To date, the distal portion of the plume has migrated quite a distance. Savannah River Site needs to address optimization for the leading edges of the plume.
5. Appendix E, Table E-2 Remedial Goals for OU Soil under Industrial Land Use, page E-27. Please include arsenic as a RCOC for the Trenches Area subunit.
6. Appendix F, Attachment F-1 Section III Onsite Documents & Records Verified, item 7 Groundwater Monitoring Records, page F-31. This section of Attachment F-1 is marked "N/A" although groundwater monitoring is ongoing and part of the remedy selected for CBRP OU. Please correct.
7. Appendix K, Section VII – Technical Assessment, page K-9. This section states that the remedial goals for soil were achieved in 2019 and the soil vapor extraction system was shut down in 2020. Land use controls remain in effect to prevent access to soils and groundwater. At the Core Team meeting held on March 15, 2023, it was mentioned that the MIPS L Operable Unit (OU) and the M Area Operable Unit (MAOU) boundaries overlap. Since both operable units have similar land use controls, it would make sense to incorporate the MIPS L OU into the MAOU eliminating the O&M cost for the smaller operable unit. The Department recommends that the Core Team consider this administrative action rather than moving the operable unit to the

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Seventh Five-Year Remedy Review Report for the SRS OUs with Native Soil Covers
and/or Land Use Controls.