



August 25, 2022

ENVIRONMENTAL COMPLIANCE &

AUG 25 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: Removal Action Report (RAR) for the D-Area Coal Storage Area (484-17D) (U), SEMS Number: 63 (SRNS-RP-2022-00071, Revision 0, June 2022) received June 29, 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: 2022.08.25 10:48:18 -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:
Removal Action Report (RAR) for the D-Area Coal Storage Area (484-17D) (U),
SEMS Number: 63 (SRNS-RP-2022-00071, Revision 0, June 2022) received June 29, 2022.

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Specific Comments

1. List of Abbreviations and Acronyms, pages vii and viii. Please add the abbreviations for Megagrams (Mg) and tons (tn) to the list.
2. Section 1.2, General Description and History of the Subunit, page 2. The second paragraph states, "representative soil samples were collected after excavation to support visual inspection. The samples confirmed there were no coal-related hazardous constituents remaining at the 484-17D DCSA at levels exceeding a residential risk $>1E-06$ and/or SRS background, whichever is greater."

This statement is confusing and appears to imply that samples were visually inspected to determine that there were no concentrations of coal-related constituents above the referenced risk threshold and/or background. Please clarify this statement since this would be impossible to evaluate without laboratory analysis.
3. Section 2.1, Removal Action Summary, page 4. The last sentence of the first paragraph of this section states: "The amendments were of sufficient quantity to raise the pH level of the 484-17D DCSA vadose zone soils from a pH of <4 to the target pH of 5.5 or higher (not to exceed pH of 7)." Data presented in Section 2.4.10, as well as Tables 6 and 7, indicate exceedances of a pH of 7 across all sampling locations. Please discuss these results with respect to this statement and address any potential concerns or expectations.
4. Section 9.0, References, page 20. The first reference listed on this page, SRNS 2022, does not appear to be referenced anywhere in the document. Does this refer to the third round of sampling performed in May as described on page 12 as well as the Post-RA Sampling Plan for the 484-17D DCSA listed in Appendix A of the RAR? Please clarify.
5. Table 1, Chronology of Events, page 31. Please add the May 2022 final soil pH sampling event to the table.
6. Appendix E-1, 072720 Topographical As-built Drawing of 484-17D DCSA Northern Portion, September 15, 2020, page E-3. Please add a north arrow and scale bar to the figure.
7. Appendix E-1, 093520 Topographical As-built Drawing of 484-17D DCSA Southern Portion October 1, 2020. Please add a scale bar to the figure.