



November 14, 2019

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



Re: Contaminant Migration Model for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit (U), SEMS Number: 30 (SRNS-RP-2018-01190, Revision 0, January 2019) received July 19, 2019.

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:
Contaminant Migration Model for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit
(U), SEMS Number: 30 (SRNS-RP-2018-01190, Revision 0, January 2019)
received July 19, 2019.

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General Comments

1. The document provides much detail about the various factors and input variables that were used in the different VZCOMML contaminant migration models, but neglects to provide basic information such as VOC source soil concentrations and predicted groundwater concentrations. Sections 3.3.1 and 3.3.2 discuss results of Tier I and Tier II screening results, indicating several COPCs identified for the Tier I screening and PCE and TCE as exceeding Tier II MLSSL_{1/2} levels; but without source soil and groundwater concentrations provided in Figures 3-3 and 3-4, these results and conclusions are not evident. These figures should be revised to include all pertinent information that may clearly show these results and conclusions.

Specific Comments

1. Table 3-3, Site-Specific User Input, and Model Calculated Data, page 25. The source soil concentrations listed for PCE and TCE in Table 3-3 are 4.39 mg/kg and 4.22 mg/kg, respectively; Figure 3-3 lists source soil concentrations of 4,390 mg/kg and 4,170 mg/kg. Please correct these discrepancies and ensure that the correct source soil concentrations were used in all evaluations.