



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

June 18, 2020

Mr. Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

ENVIRONMENTAL COMPLIANCE &

JUN 19 2020

AREA COMPLETION PROJECTS

**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 2019 (U) OU 28
SRNS-RP-2020-00220, REVISION 0 MAY 2020**

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the PER for this OU28. Attached are our comments:

If you have any questions or require additional information, please contact me at (404) 562-8648.

Sincerely,

**JON
RICHARDS**

Digitally signed by JON
RICHARDS
Date: 2020.06.18
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Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

cc: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDHEC

1. **Section 1.2 MCB/MBP Subunits, Page 1 of 44:** The first sentence states “The MCB (731-4A) (Figure 2) is believed to have been a disposal site for solvents and oils based on the type of contamination in the vadose zone and groundwater beneath the area.” However, the text in this section does not discuss the nature of contamination in the vadose zone beneath the Metals Burning Pit (MBP) (731-5A). Additionally, Figure 2. ABRP/MCB/MBP OU Subunits at Savannah River Site, Page 17 of 44, depicts the location of not only the MCB (731-4A) but also the MBP (731-5A) waste unit boundaries. It is noted Table 1. ABRP/MCB/MBP OU Subunit Remedial Actions and Regulatory Decision Documents, Page 23 of 44, indicates the remedial action consisting of excavation and off-SRS disposal of elevated levels of aluminum in MBP surface soils from Subunit 731-5A is complete. As such, *revise the 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 2019 (U), SEMS Number: 28, SRNS-RP-2020-00220, Revision 0, May 2020 (PER) to address this issue to ensure the nature of contamination and location of MBP (731-5A) relative to MCB (731-4A) is clearly understood and documented.*
2. **Section 2.2.2 Historical Information, Page 6 of 44:** This section does not discuss the soil removal activity that was conducted at the MCB (731-4A). Figure 4. Miscellaneous Chemical Basin SVE [Soil Vapor Extraction] Wells, Page 21 of 44, identifies an area of soil removal area at the MCB (731-4A) defined by dashed-lines as noted in the figure legend. *Revise the PER to address this issue to ensure the all the historical cleanup activities conducted at the MCB (731-4A) is clearly understood and documented.*
3. **Table 3. ABRP Well Construction Details, Page 25 of 44:** The screen length for wells AHT-16 and AHT-17 is not listed in the table. According to the depth in feet below the ground surface of the top and bottom of the respective well screens listed in the table, the screen lengths are 40-feet and 25-feet, respectively for AHT-16 and AHT-17. *Revise the table to address this issue.*
4. **Table 5. ABRP PSVE BaroBalls™ Well Exhaust Gas TCE Results, Pages 29 & 30 of 44:** The table references #7 as a Well History Note. However, according to the “Well History Notes” located at the end of the table, note #7 was not shown. Accordingly, Well History Notes included only #1 through #6. *Revise the table to address this issue.*