



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

ENVIRONMENTAL COMPLIANCE &

August 5, 2021

AUG - 5 2021

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

AREA COMPLETION PROJECTS

RE: EPA Comments on 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 2020 (U), SEMS 28, SRNS-RP-2021-00584, Revision 0, May 2021

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the SRS's 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 2020 from the report May 2021. EPA comments are attached.

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: 2021.08.05
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Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management
Division

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

GENERAL COMMENT

1. 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) (the PER) indicates the soil-gas vapor samples have remained at very low (near the laboratory detection limits) asymptotic levels indicating volatile organic compounds (VOCs) are no longer productively being removed and VOCs are nearly depleted. However, this statement does not recognize the increasing soil-gas concentration trend in A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) (ABRP) well ASH-06. According to Table 4, ABRP MicroBlowers™ Well Exhaust Gas TCE Results, Page 29 of 46, Trench Subunit well ASH-06, trichloroethene (TCE) soil-gas concentrations have been increasing since the conversion of the well from active soil vapor extraction (ASVE) to passive SVE (PSVE) in last quarter of 2018 when the well was equipped with a MicroBlower™. As such, it is not clear how the increasing TCE soil-gas trends impact the current recommendation to perform confirmation soil sampling at ABRP/Miscellaneous Chemical Basin (MCB) to evaluate the current soil concentrations against the remedial goals (RGs) with the intent to justify shutting down the PSVE. *Please revise the PER to address this issue to ensure any increasing soil-gas trends are adequately evaluated in order to demonstrate progress towards meeting the soil RGs.*

SPECIFIC COMMENTS

1. **Section 1.1 ABRP Area Subunits, Page 1 of 46 and Section 2.1.2, Historical Information, Page 4 of 46:** The text does not clearly state the A-Area Ash Pile (788-2A) is one of the subunits located in the ABRP area. For example, the text states the Trench Subunit is located beneath the A-Area Ash Pile (788-2A). Additionally, the A-Area Ash Pile is not identified as a subunit of the ABRP Area in Section 2.1.2. *Please revise the text to state the A-area Ash Pile (788-2A) is a subunit of the ABRP Area.*
2. **Section 2.2.4, PSVE Results, Page 8 of 46:** The last sentence indicates wells near the dilute edge of the plume at the MCB Vadose Zone Subunit produce very little contaminant removal, as indicated by sampling. However, a plume map depicting the locations of the wells near the dilute edge of the plume is not provided in the PER. As such, their locations relative to the dilute plume edge is not known. *Please revise the PER to include a map depicting the wells near the edge of the dilute plume.*
3. **Section 4.3, Overall Recommendations, Page 10 of 46:** The PER does not present a soil-gas vapor concentration over time trend diagram to support that soil-gas levels have reached asymptotic levels. For example, the text indicates the soil-gas vapor samples have remained at very low (near the laboratory detection limits) asymptotic levels VOCs are no longer productively being removed from and VOCs are nearly depleted; however, no trend diagram was presented. *Please revise the PER to present a vapor concentration over time trend diagram to support that soil-gas levels have reached asymptotic levels.*