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January 20, 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

Re: Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U), SEMS Number: 93 (SRNS-RP-2021-00548, Revision 0, October 2021) received October 26, 2021.

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:
Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U), SEMS Number: 93 (SRNS-RP-2021-00548, Revision 0, October 2021) received October 26, 2021.

Specific Comments

1. Section 2.2.3, Surface Water Hydrology, page 2-6. Figure 2-3 is referenced at the top of page 2-6; Figure 2-2 should be referenced instead.

2. Section 3.2.3, Ford Building, page 3-6, second paragraph and Appendix C, Human Health Risk Assessment, page C-12, second paragraph. Please state the correct PCB-1254 concentration units for both locations.

3. Figure 3-1, ECODS N-1 Sample Locations, page 3-35. The sentence beginning on page 3-13 and finishing at the top of page 3-14 in Section 3.7.2 states that samples were collected at a depth of 18 to 20 feet in three locations. Please include the locations of these samples on Figure 3-1.

4. Figure 3-2, Central Shops Scrap Lumber Pile (631-2G) Sample Locations, page 3-36. This figure shows an insert of Carolina Bay #125, yet the location of the bay in relation to the CSSLP is unclear. Please depict the location of Carolina Bay #125 on this figure or a separate one.

5. Figure 3-3, ECODS N-1 Sample Locations, page 3-37. This figure should be renamed to indicate the Ford Building Operable Unit.

6. Section 5.2.1.1.2, Alternative A-2: Land Use Controls, page 5-8 and Section 5.2.2.1.2, Alternative A-2: Land Use Controls, page 5-13. For the discussions of LUCs as a Remedial Alternative at ECODS N-1, please include language that specifically addresses signage indicating the presence of asbestos.

7. Appendix B, Section B-2.5.1.2 ECODS N-1 Subunit Tier II Analysis, page B-24. The update to the VZCOMML© model with regards to the analysis for cyanide appears to account for the deepest detection being at 10 feet, using a more realistic parameter rather than the deepest sampling location as discussed on page B-22. Please include more discussion on the new soil layer that was modeled below the source zone as well as any cyanide concentration assumptions for this new soil layer.

8. Appendix B, Section B-2.6.1 CSSLP Subunit Upland Soil Uncertainty Analysis, page B-29. The 3rd bullet under Manganese reads, "It does not appear to be unit related since it is indistinguishable from background." Does this analysis use

manganese speciation to make this determination, or is the manganese indistinguishable due to its similarity to SRS background? Please explain.

9. Appendix C, Section C-1 Introduction, page C-10, first paragraph. Please correct the last sentence in the paragraph to reference Figures 2-5 through Figure 2-7.

10. Appendix C, Section C-1.2.3 Ford Building, page C-15, first bullet. Please confirm the number of soil samples taken at each depth.

11. Appendix C, Section C-2.3.2.2 Sediment Media, page C-27. Lead is listed as a HH COPC in sediment in the first paragraph of this section; however, the data presented in Table C-7 indicates otherwise. Please correct.

12. Appendix C, Section C-2.3.3.1 Soil Media, page C-33. The references to Tables C-11, C-12 and C-13 in the first three paragraphs of this section should be changed to Tables C-12, C-13 and C-14 respectively.

13. Appendix C, Section C-2.3.3.1 Soil Media, page C-36. The first paragraph of the thallium discussion indicates a total of 37 samples with 3 detects. Table A.3.1 lists a total of 38 samples with 4 detects. Also, 23.6 mg/kg is listed as the maximum thallium concentration detected at the Ford Building Subunit in the first paragraph; however, the last paragraph on this page states higher concentrations of 43.3 mg/kg and 55.1 mg/kg. Please clarify the discussion of thallium detections and maximum concentrations.