



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

JUL 25 2019

Ms. Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Acting Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Responses to Regulatory Comments on the Corrective Measures Implementation/Remedial Action Implementation Plan (CMI/RAIP) for the G-Area Oil Seepage Basin (761-13G) Operable Unit (U) (SRNS-RP-2019-00081, Revision 0, April 2019) SEMS Number: 93

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the subject document for your review and approval. The U. S. Environmental Protection Agency (EPA) and the South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on the Revision 0 document on July 12, 2019 and July 16, 2019, respectively. Please review and provide comments or approval within fifteen (15) days of receipt of the enclosures. Since no change to the Revision 0 document is proposed, *your approval of these responses will constitute approval of the Revision 0 document.* The certified clean copy will be submitted upon receipt of your approval. The effort and time that the SCDHEC and the EPA have provided on this operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian T. Hennessey".

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

1. SRS Responses to EPA Comments on the Corrective Measures Implementation/Remedial Action Implementation Plan (CMI/RAIP) for the G-Area Oil Seepage Basin (761-13G) Operable Unit (U) (SRNS-RP-2019-00081, Revision 0, April 2019)
2. SRS Responses to SCDHEC Comments on the Corrective Measures Implementation/Remedial Action Implementation Plan (CMI/RAIP) for the G-Area Oil Seepage Basin (761-13G) Operable Unit (U) (SRNS-RP-2019-00081, Revision 0, April 2019)

cc w/o encl:

D. Scaturo, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. Cameron, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

J. Tufts, EPA-Atlanta
M. McRae, TechLaw, Inc.

Comments Received July 12, 2019

COMMENTS

1. Section 4.5 (Quality Assurance) on Page 12 of 30 states that soil compaction testing will be performed by a qualified testing facility; however, the soil compaction will also need to be tested in the field at the GOSB. Therefore, it is unclear what is meant by the statement that compaction testing will be completed at a testing facility. Please provide a response, and as appropriate, text revisions to clarify this statement to ensure the soil compaction testing requirements in the laboratory and/or field are clearly understood.

Response: Agree with clarification

The text in Section 4.5 Quality Assurance (QA) states that “Soil compaction testing will be performed by a qualified testing facility” and is not intended to imply testing will be performed at a testing facility. The soil compaction testing will be performed on site at the GOSB during backfilling by a qualified testing service. Section 5.4 further states that the SRNS project team will perform periodic surveillance of construction activities and will compile the results of the compaction testing in the PCR/CMIR/RACR. No change to the document is proposed.

Responsible Party: Adam Willey, (803) 952-8738, adam.willey@srs.gov

2. Section 5.4 (Requirements or Project Closeout) on Page 13 of 30 states that completion of construction will be verified by the SRNS project team; however, the CMI/RAIP does not state if the team conducting the completion of construction inspection will include a licensed engineer or if a certification of construction completion will be completed by a licensed engineer. Please revise the CMI/RAIP to address this concern.

Response: Agree with clarification

The SRNS project team verifying the completion of construction does include a licensed engineer, but certification by a licensed engineer is not required for verifying the completion of construction of this remedial action. The documentation of completion per the design is provided through the submittal and approval of the PCR/CMIR/RACR. Therefore, this information was not included in the CMI/RAIP and no change to the document is proposed.

Responsible Party: Adam Willey, (803) 952-8738, adam.willey@srs.gov

Comments Received July 16, 2019

COMMENTS

1. According to the CMI/RAIP, the basin will be dewatered by pumping and irrigating an area/spray field east of the G-Area Oil Seepage Basin. However, per discussion held during the July 16, 2019 Core Team conference call, dewatering of the basin may not be needed after placement of the bridging material. Nevertheless, if a significant amount of water remains in the basin after placement of the bridging material, the water will need to be managed. The water may either be pumped out and transported to a treatment facility or land applied per a letter of approval from the Bureau of Water. Please note that if the water is land applied, treatment may be needed as per R.61-9.505.

Response: Agree

The placement of aggregate bridging material in the G-Area Oil Seepage Basin (GOSB) is anticipated to present a condition where dewatering would not be required prior to backfilling the basin. If removal of any water within the basin becomes necessary, other treatment options, such as containerization and treatment, will be pursued. The change in the remedy implementation will be captured in the PCR/CMIR/RACR. No change to the document is proposed.

Responsible Party: Adam Willey, (803) 952-8738, adam.willey@srs.gov