



September 19, 2018

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: Treatability Study Work Plan for the Groundwater Injection and Discharge Canal Treatment at the D-Area Groundwater (OU) (U), SEMS Number: 63 (SRNS-TR-2018-00128, Revision 0, July 2018) received July 26, 2018.

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:
Treatability Study Work Plan for the Groundwater Injection and Discharge Canal Treatment
at the D-Area Groundwater (OU) (U), SEMS Number: 63 (SRNS-TR-2018-00128, Revision 0, July
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Specific Comments

1. Section 1.0, Introduction, page 1. The first sentence of the third paragraph of this section states, "Maintenance actions conducted in 2012 and 2013 removed the majority of coal present at the 484-17D Coal Storage Area..." What percentage of the coal in the storage area is remaining? Please clarify 1) if the remaining coal will inhibit the success of the treatability study and 2) how long this remaining coal will be expected to continue to contribute to the low pH conditions in the soil and groundwater. This question focuses specifically on the southern grassed section of the Coal Storage Area where a layer of coal, 4 to 8 inches thick, was detected in the 0-1 foot samples under the top soil, as noted in the 6/22/18 email from DOE (Brian Hennessey to DHEC and EPA).
2. Section 2.0, Project Description, page 3. The last paragraph of this section on page 3 refers to Figure 4 for carbonate consumption rates and titration test results. Figure 5 should be referenced instead.