



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
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APR 13 2022

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  
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:** RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2019-00394, Revision 1 Redline, April 2021) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 63

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy is submitting the subject information for your review. The South Carolina Department of Health and Environmental Control's (SCDHEC) and the U. S. Environmental Protection Agency's (EPA) comments on the Revision 0 document were received on October 12, 2021 and December 12, 2021, respectively. Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the EPA and SCDHEC have given on the subject operable unit are greatly appreciated.

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

Sincerely,

**Brian T. Hennessey**

Digitally signed by Brian T.

Hennessey

Date: 2022.04.07 11:08:45 -04'00'

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

APR 13 2022

Ms. Susan Fulmer  
Mr. Jon Richards

2

Enclosures:

1. RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2019-00394, Revision 1 Redline, April 2022), SEMS Number: 63
2. SRS Responses to South Carolina Department of Health and Environmental Control Comments on: RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2019-00394, Revision 0, June 2021)
3. SRS Responses to EPA Comments on: RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U) (SRNS-RP-2019-00394, Revision 0, June 2021)

cc w/o encl:

J. Blalock, SCDHEC-Columbia  
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**SRS Responses to EPA Comments on:**  
***RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U),***  
**SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022**  
**Page 1 of 8**

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Contact for all responses: Ashley Shull ([ashley.shull@srs.gov](mailto:ashley.shull@srs.gov)) (803-952-7090)

**EPA General Comments:**

1. The RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable Unit (D-area Upgradient Sources) (U), SEMS Number: 63, SRNS-RP-2019-00394, Revision 0, dated June 2021 (the RFI/RIWP) indicates that Sections 5.0 through 7.0 represent the Sampling and Analysis Plan (SAP); however, several elements of the SAP are missing from the RFI/RIWP. Examples of missing elements include, but are not limited to, the following:
  - a. Procedures for collecting split samples
  - b. Identification of key project personnel and contact information, including the analytical laboratory
  - c. Field and laboratory quality control (QC) performance or acceptance criteria
  - d. Project action limits that will be used to evaluate the data
  - e. Calculations for evaluating accuracy and precision
  - f. Standard operating procedures
  - g. Planned assessments and corrective action procedures

Revise the RFI/RIWP to include sufficient information required to perform the tasks outlined in the RFI/RIWP and to ensure data collected is of sufficient quality to meet the data quality objectives (DQOs).

**Response: Clarification.** The Core Team (i.e., USDOE, SCDHEC, USEPA) have previously agreed to cite the appropriate reference documents in lieu of repeating the same information in each Work Plan, sampling plan, etc. In an effort to meet all applicable requirements, a Quality Assurance Project Plan previously approved by the Core Team that integrates all technical and quality aspects of environmental data collection and management is used. All elements of the USEPA guidance on DQOs are instituted within the procedures and operational guidelines for investigative, characterization Work Plans. The following references which are cited within sections 5.0 through 9.0 of the DAG OU RFI/RI Work Plan include the elements noted in the comment.

- WSRC-RP-96-234, Revision 1, Savannah River Site RCRA Facility Investigation /Remedial Investigation Work Plan Safety, Health, and Emergency Response Plan, Quality Assurance/Quality Control, and Data Management Requirements (WSRC 1996)
  - SRS Procedure Manual 1Q, Quality Assurance Manual (U) (SRS 2019a)
  - SRS Procedure Manual 3Q1, Section 9000, Hydrogeological Data Collection Procedures and Specifications (U) (SRS 2019b)
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**SRS Responses to EPA Comments on:  
RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable  
Unit (D-Area Upgradient Sources) (U),  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022  
Page 2 of 8**

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**The exception of key project personnel and analytical laboratory information not specifically called out in each Work Plan provides flexibility for the sampling to be either conducted by SRS employees and laboratories or by contracted samplers and laboratories. In this case, SRS employees will collect the samples and a certified off-site laboratory will conduct the analysis.**

**In both cases, all elements of the DQO process are within the procedures followed by SRS employees and the laboratory contractors. No change to the document is proposed.**

2. Several of the figures throughout the RFI/RIWP include an inset map showing the location of the D-Area Groundwater (DAGW) Operable Unit (OU) within the Savannah River Site; however, it would be helpful if the RFI/RIWP included a larger scaled figure showing the relative location of the site within South Carolina. Revise the RFI/RIWP to include a figure showing the location of the site within South Carolina.

**Response: Agree. An additional figure will be added to the document showing the relative location of the site within South Carolina and the regional area. All figure numbers will be adjusted to accommodate the additional figure, if needed. Additionally, all textual references to figures will be adjusted throughout the document.**

3. The RFI/RIWP discusses several site features that are not shown on a figure. For example, the bulleted list in Section 1.2.3 (Summary of Unit Description, Page 4 of 122) indicates that the DAGW OU consists of groundwater impacted by previous operations from the Fire Training Area (411-1D/411-3D); however, the Fire Training Area is not depicted on Figure ES-2 (D-Area Operable Unit Subunits and Facilities) or Figure 2 (DAOU Subunits and Facilities). As another example, Section 1.2.5 (D-Area Operable Unit, first paragraph, Page 7 of 122) states that the DAGW OU also includes the D-Area Asbestos Pit (080-20G), but this site feature is not shown on a figure. Revise the RFI/RIWP to include figures that depict all site features discussed throughout the document, including the examples provided.

**Response: Agree/Clarification. Based on the scale of the figures, some of the units are not included in an effort to keep the figures readable for the intended purpose. However, Figures ES-2/Figure 2 that are called out in Section 1.2.3 Summary of Unit Description will be revised to include all facilities and units mentioned within the text.**

- a. Please state within this report when PFAS contaminants will be sampled for at the location mentioned above and throughout the D Area to ensure and convey that a comprehensive investigation is/will be performed.

**Response: Agree/Clarification. As identified in the D-Area Groundwater (DAG) Operable Unit Annual Report (SRNS-RP-2021-03748, July 2021), PFAS contaminants**

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Unit (D-Area Upgradient Sources) (U),  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022  
Page 3 of 8**

---

are sampled from a minimum of 16 groundwater monitoring wells on an annual basis. Additional PFAS sampling associated with this DAG OU RFI/RI Work Plan was completed in 4Q21 on sediment, surface water, and additional monitoring wells as identified in Table 1. Figure 7 will be updated to include the exact locations that were sampled. Those results will be discussed with USEPA, SCDHEC, and USDOE (the Core Team) in 2022, reported in future DAG OU Annual Reports, and included in the RFI/RI Report.

**Text will be added to this document in Section 5.4, PFAS Plume stating: “PFAS sampling was conducted in 4Q21 at existing groundwater wells, surface water stations, and sediment locations to further delineate the DAG OU PFAS plume. New soil borings/sampling and monitoring water stations as outlined in Table 1 will be investigated and installed during 2022.”**

4. Several of the figures are incorrectly referenced throughout the RFI/RIWP. For example, the first paragraph in Section 2.3.1 (DAG OU VOC Plume, Page 25 of 122) references Figure 11 for the Gordon Aquifer trichloroethylene (TCE) plume and Figure 12 for a cross-sectional view of the TCE plume; however, the correct references are Figure 10 and Figure 11, respectively. As another example, the first paragraph in Section 2.3.2.1 (DAG OU Tritium Plume, Page 27 of 122) references Figure 16 for the tritium plume, but the correct reference is Figure 15. Ensure the correct figures are referenced throughout the RFI/RIWP.

**Response: Agree. A thorough review of the figures and references will be completed and adjustments within the document will be made to properly reference the correct figures. See also response to General Comment #2.**

5. It is unclear why Section 2.3.2.1 (DAG OU Tritium Plume) and Section 2.3.2.2 (DAG OU PFAS Plume) are subsections to Section 2.3.2 (DAG OU Low pH and Metals Plume). Revise the RFI/RIWP so that Sections 2.3.2.1 and 2.3.2.2 are subsections to Section 2.3 (Unit Evaluation Conclusions), rather than subsections to Section 2.3.2.

**Response: Agree. The assigned header was not properly formatted and allowed the document to list the headers as subsections. The revised document will correctly show the subsections in Section 2.3, *Unit Evaluation Conclusions*, as subsection 2.3.3 for the *DAG OU Tritium Plume* and 2.3.4 for the *DAG OU PFAS Plume* in the revised document.**

6. The discussion of DQOs in Section 3.1.2 through 3.1.8 is insufficiently detailed and should be expanded to provide additional information regarding the decision process and objectives based on EPA’s *Guidance on Systematic Planning Using the Data Quality Objectives*
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SRS Responses to EPA Comments on:  
*RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable  
Unit (D-Area Upgradient Sources) (U),*  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)

Comments Received December 16, 2021 and January 4, 2022

Page 4 of 8

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*Process*, EPA QA/G-4 (the DQO Guidance), dated February 2006. Examples of insufficient detail include, but are not limited to:

- a. Section 3.1.5 (Define the Boundaries of the Study, Page 38 of 122) does not discuss practical constraints that could interfere with sampling or temporal boundaries that describe the timeframe the study will represent and when samples should be taken.
- b. Section 3.1.6 (Develop Decision Rules, Page 38 of 122) does not provide decision statements (i.e., “if..., then...” statements) for how the project data will be used.
- c. Section 3.1.7 (Specify the Limits on Decision Errors, Page 39 of 122) does not define the screening levels that will be used for making each project decision.

Revise the RFI/RIWP to provide comprehensive DQOs in accordance with the DQO Guidance.

**Response: Agree/Clarification.** As discussed in the response to General Comment #1, the executed Work Plan will comply with USEPA guidance on DQOs. Specifically, the following revised text will be inserted into the following sections:

**Section 3.1.5: “This work plan is using the guidance of monitoring stations that have been previously installed and established for years and provide a benchmark for the spatial boundaries of the individual contaminant plumes of concern. A planned comprehensive sampling event will commence after the installation of additional monitoring points and is expected in early 2023.”**

**Section 3.1.6: last sentence, second paragraph on: “PFAS water concentrations will also be compared to USEPA drinking water health advisory limits; PFAS soil concentrations will be used to determine if future potential impacts to groundwater exist.**

**Completion of the comprehensive sampling analysis will lead to the presentation and analysis of sampling results for potential continued characterization of contamination extent, determination of COCs, and evaluation of remedial alternatives with the support of groundwater modeling.”**

**Section 3.1.7: “All constituents will be analyzed at levels that allow comparison against established MCLs or RSLs or risk-based concentrations (RBCs). The analytical method chosen must be capable of achieving a Practical Quantitation Limit (PQL) below the established MCL, RSL, or RBC. The project will use the results to determine COCs and support a remedial decision that can be agreed to by the USDOE, USEPA and SCDHEC.”**

7. Section 3.1.3 (Identify the Decisions, first paragraph on Page 37 of 122) indicates that limited sediment samples will be collected; however, insufficient information is provided in
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**SRS Responses to EPA Comments on:**  
***RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable***  
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**SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022**  
**Page 5 of 8**

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the RFI/RIWP for sediment sampling. For example, sediment samples are not discussed in Section 4.4 (Exposure Media Characterization), equipment and decontamination procedures for sediment sampling are not provided in Section 7.2 (Equipment and Decontamination Procedures), the locations of sediment samples are not included on Figure 7 (DAG OU Monitoring Well and Surface Water Stations), and sediment samples are not listed in Table 1 (DAG OU Monitoring Well and Surface Water Network Details and Additional Samples and Sample Stations). Revise the RFI/RIWP to provide sufficient information for the collection and analysis of sediment samples, including the examples provided.

**Response: Agree/Clarification**

**Comprehensive sediment sampling is associated with the DAOU and/or the Savannah River Floodplain/Swamp Integrator Operable Unit (IOU), not the DAG OU Work Plan characterization effort. However, SRS agreed to collect some sediment samples during the DAG OU characterization in response to SCDHEC's request at the November 2020 DAG OU RFI/RI Work Plan scoping meeting.**

**During 4Q21, sediment samples were collected from two locations upgradient of the DAG OU and three locations (also including 1 split and 1 duplicate sample) were sampled associated with the expanded groundwater and surface water sampling event specifically for PFAS constituents. Tables 1 and 7 will include more detailed information associated with the sediment sampling and analytical details, and Figure 7 will be updated to display the locations that have been sampled for PFAS.**

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**SRS Responses to EPA Comments on:**  
**RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable**  
**Unit (D-Area Upgradient Sources) (U),**  
**SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022**  
**Page 6 of 8**

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**EPA SPECIFIC COMMENTS:**

1. **Figure ES-2, D-Area Operable Unit Subunits and Facilities, Page ES-8 of ES-10, and Figure 2, DAOU Subunits and Facilities, Page 63 of 122:** Site features are not easily identifiable, and it is unclear whether the Former Dead/Stressed Vegetation Area, Borrow Pit, and Lake/Pond/River are depicted on these figures. For example, the legends present a color to depict the Former Dead/Stressed Vegetation Area that is too similar to the facility labels. In addition, the legends present a color to depict the Borrow Pit that is too similar to the background features (e.g., land) on the figure. Further, the color used to depict Lake/Pond/River is too similar to the Moderator Processing Subunit, and the Savannah River is not identified according to the legend. Revise Figures ES-2 and 2 to clearly depict site features using colors that can be easily distinguished from the D- Area Operable Unit (DAOU) Subunits and background features and to identify the Savannah River according to the legend.

**Response: Agree/Clarification. Due to scale of these figures to accommodate the number of identified units, site features are difficult to distinguish with different colors that are transparent enough to show the building or unit within the shaded subunit. As such, some changes in the colors for the individual subunits and features will be made to shade the features in Figures ES-2/Figure2 to a different color scheme for easier identification.**

2. **Section 2.3, Unit Evaluation Conclusions, Pages 24 to 29 of 122:** Statements are made throughout this section that cannot be substantiated. For example, the second paragraph of Section 2.3.1 (DAG OU VOC Plume, Page 25 of 122) states, “Most concentrations of TCE in the UTRA [Upper Three Runs Aquifer] source area are decreasing, indicating depletion of the source and degradation of the TCE plume;” however, insufficient information is provided in the RFI/RIWP to substantiate this statement. As another example, Section 2.3.2 (DAG OU Low pH and Metals Plume, first full paragraph on Page 27 of 122) states, “Metals trends show lingering contaminant concentrations are likely due to ongoing low (acidic) pH levels in the vadose zone and in the groundwater,” but trend graphs are not provided in the RFI/RIWP to verify this statement. Revise Section 2.3 to provide sufficient information to substantiate conclusions made about each plume (e.g., provide historic data, include trend graphs, or reference the document[s] where the information can be found).

**Response: Clarification. These unit evaluation conclusions are based on several years of data that has been presented in the D-Area Groundwater Operable Unit Annual Letter Reports. General statements such as those noted in the comment are correct, but not essential to the Work Plan; detailed substantiation of them will be reserved for the RFI/RI/BRA Report. The reference to these trends will be provided in the revised text for each section as shown in the following revised text for Section 2.3.1 and 2.3.2.**

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**SRS Responses to EPA Comments on:  
RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable  
Unit (D-Area Upgradient Sources) (U),  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022**

**Page 7 of 8**

---

**Section 2.3.1: “As indicated in the D-Area Groundwater Annual Report (SRNS 2021a), data indicates a general decline in concentrations of TCE”,**

**Section 2.3.2: “Measurements of pH and metal concentrations are shown in the D-Area Groundwater Annual Report (SRNS 2021a) which indicate an acidic condition and the likely consequence of lingering metal trends.”**

3. **Section 4.1, Objectives, Pages 41 to 42 of 122; Section 6.2, Field Analytical Sampling Quality Assurance/Quality Control, Page 49 of 122; and Table 8, Minimum Field Quality Control/Quality Assurance Sampling Requirements, Page 118 of 122:** The last paragraph in Section 4.1 indicates that rinsate blanks will be collected at a rate of one per 30 samples and that field blanks will be collected at a rate of 10 percent (%) of the sampling locations; however, Section 6.2 and Table 8 indicate that equipment blanks (i.e., rinsate blanks) will be collected at a rate of one per 40 samples. Table 8 also indicates that field blanks will be collected at a rate of one per 40 samples (optional). In addition, it is unclear why the RFI/RIWP does not include the collection of matrix spike (MS)/matrix spike duplicate (MSD) samples. Revise the RFI/RIWP to resolve discrepancies in the required frequency of field QC samples and to include the collection of MS/MSD samples.

**Response: Agree/Clarification. Section 4.1 will be updated to clarify that rinsate blanks will be collected at a rate of one per 40 samples and that field blanks will be collected at a rate of 10 percent.**

**Through the laboratory contracts, the SRS requests that duplicate samples are part of the laboratory QA program and therefore must provide a matrix spike/matrix spike duplicate analysis. Duplicate samples are collected, and the laboratories run duplicate analyses as required by the certified method which includes MS/MSD samples. Analytical results are generated using SCDHEC-certified laboratories and follow published USEPA SW-846 Update III methodologies. Results of the spiked sample is noted if it is used as a qualified result within the reported results. All results of the field and laboratory duplicate samples will be provided in the final report.**

4. **Figure 17, DAG OU PFAS Plume (2Q2020), Page 93 of 122:** The legend on this figure is incomplete. For example, there are wells designated with red squares and green circles, but it is unclear what these symbols represent. In addition, the dashed lines around the plume have not been defined. While it is assumed that the dashed lines indicate the boundary of the plume is inferred, the dashed lines should still be defined in the legend as inferred. Further, a red rectangle is shown on the northeast side of the plume around the 411-D Fire Fighting Simulation Area and 411-3D Fire Fighting Simulator Building, but it is unclear what the red rectangle represents. Revise Figure 17 to include a complete legend that defines all items presented on the figure.
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SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022**

**Page 8 of 8**

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**Response: Agree. The legend will be updated to include all necessary features to define the inferred PFAS plume boundary (dashed lines), existing monitoring wells sampled for PFAS constituents in 2020 (orange pentagons), existing DAG OU monitoring wells (small green circles), injections wells (red squares), and locations of the PFAS release sites (red fire hydrants).**

5. **Table 7, Laboratory Analytical Specifications Table for TAL/TCL Analytes for Surface or Groundwater Media, Page 115 of 122:** This table lists the analytical method for mercury in surface water and groundwater as EPA 7471B; however, EPA Method 7471B is a solids/semisolids method. Revise Table 7 to indicate that surface water and groundwater samples will be analyzed for mercury by EPA Method 7470A, which is the method for mercury in liquid.

**Response: Agree. The table will be revised to insert EPA Method 7470A for analysis of mercury in surface or groundwater samples.**

6. **Table 7, Laboratory Analytical Specifications Table for TAL/TCL Analytes for Surface or Groundwater Media, Pages 115 to 117 of 122:** The column headers in Table 7 reference footnotes A and B; however, there are no footnotes at the end of the table. In addition, the last column header is “CRDL,” but “CRDL” is not defined, and it is unclear if this column represents the laboratory limit of quantitation (LOQ) or a different value. Revise Table 7 to include footnotes A and B, or remove the references to these footnotes. Further, revise Table 7 to define “CRDL” and to clarify what the values in this column represent.

**Response: Agree. The footnotes were inadvertently left off Table 7 and will be included in the revised document as follows:**

**“A) CRDL is the Contract Required Detection Limit and is not always attainable.**

**B) Extraction and preparation methods differ depending upon media, concentration, instrument, laboratory, and analytical method. Preparation methods will also influence detection limits.**

**C) Laboratory instructed to obtain the lowest possible method detection limit.”**

7. **Table 9, Preservatives, Holding Times, and Sample Containers, Page 120 of 122:** Table 9 indicates that the holding time for metals analysis is 6 months; however, target analyte list (TAL) metals include mercury, which has a maximum holding time of 28 days according to Section 6.3 in EPA Method 7470A. Revise Table 9 to indicate that mercury has a holding time of 28 days.

**Response: Agree. The table will be revised to indicate mercury with a hold time of 28 days.**

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**SRS Responses to South Carolina Department of Health and Environmental Control Comments  
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Unit (D-Area Upgradient Sources) (U),  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022  
Page 1 of 4**

---

Contact for all responses: **Ashley Shull** ([ashley.shull@srs.gov](mailto:ashley.shull@srs.gov)) (803-952-7090)

General Comments

1. Figure ES-2 and Figure 2 show the name for Subunit 421-2D as “Drum Storage Facility”. Several sections of the RFI/RI WP list and discuss 421-2D as “Moderator Handling and Storage Building”. Also, Section 1.2.5 lists “421-4D Drum Storage Building” as a subunit of the Moderator Process Subunit, which is not depicted on any figures nor discussed elsewhere in the document. Please clarify these subunits and revise the Work Plan as necessary.

**Response: Agree.**

**The name for Building 421-2D will be corrected throughout figures and the text to list “421-2D Moderator Handling and Storage Building”. Also, the 421-4D Drum Storage Building will be identified on Figure E-2 and Figure 2 and a brief description of the facility will be included within the text in Section 1.2.5.1, *DAOU First Early Action ROD*.**

Specific Comments

1. Figure ES-2, D-Area Operable Unit Subunits and Facilities, page ES-8. Please include the locations of 411-1D and 411-3D on this figure.

**Response: Agree.**

**The location of the 411-1D and 411-3D Fire Training Facilities will be identified on Figure ES-2 and Figure 2.**

2. Section 1.2.4, D-Area Expanded Operable Unit (DEXOU), page 5. In the second paragraph, the third bullet states, “No groundwater impacts after removal was complete.” As written, this statement is confusing. Please consider rewording the statement. For example, no groundwater impacts after completion of removal activities.

**Response: Agree.**

**The third bullet will be rewritten as “No groundwater impacts after completion of removal activities ~~was complete~~.”**

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Unit (D-Area Upgradient Sources) (U),  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022  
Page 2 of 4**

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3. Section 1.2.5, D-Area Operable Unit, page 6. Please include the 715-D Gas Station to the list of subunits for the Bubble Tower Subunit.

**Response: Agree**

**The 715-D Gas Station will be added to the list of Bubble Tower Subunits in the second paragraph of section 1.2.5, D-Area Operable Unit.**

4. Section 1.2.5, D-Area Operable Unit, page 7. The text in Section 1.2.5, page 7, second paragraph, incorrectly states that unrestricted land use was selected for the northern 25% of the 489-D Coal Pile Runoff Basin (CPRB) and references the 2011 Early Action Record of Decision (EAROD). The text should have correctly cited that unrestricted land use was chosen for the southern 75% section of the 489-D CPRB as documented in the 2020 Second EAROD.

**Response: Agree**

**The text will be corrected to state “... unrestricted land use for the ~~northern 25%~~ southern 75% section of the 489-D CPRB ...”.**

5. Section 4.2, Primary Source Characterization, page 42. Subunits 411-D, 412-D, 413-D, and 431-2D are listed as subunits which have impacted groundwater at the DAG OU elsewhere in the document but are not included here. Please include.

**Response: Agree**

**Subunits 411-D, 412-D, 413-D, and 431-2D will be included in the bulleted list of previously identified sources of groundwater contamination in section 4.2, Primary Source Characterization.**

6. Figure 2, page 63, and Figure 17, page 93. Please include the locations of 411-1D and 411-3D within the D-Area Heavy Water Facility on the figures.

**Response: Agree**

**The location of the 411-1D and 411-3D Fire Training Facilities will be shown and identified on Figures 2, 17 and ES-2.**

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Unit (D-Area Upgradient Sources) (U),  
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**Comments Received December 16, 2021 and January 4, 2022  
Page 3 of 4**

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7. The following comments are regarding Table 7, Laboratory Analytical Specification Table for TAL/TCL Analytes for Surface or Groundwater Media, page 117.
- a. Please include the footnotes for this table.
  - b. Please add a column identifying analyte acronyms for convenience.
  - c. According to PubMed, the CAS numbers for N-ethyl perfluorooctane- sulfonamidoacetic acid (N-EtFOSAA) is 2991-50-6 and N-methyl perfluorooctane-sulfonamidoacetic acid (Me-PFOSA-AcOH) is 2355-31- 9.
  - d. EPA Method 537.1 should be used for analytes in c. above, as well as PFTeDA and PFTrDA; and EPA Method 533 for the remaining analytes listed.

**Response: Agree**

**The footnotes were inadvertently left off Table 7 and will be included in the revised document as follows:**

**“A) CRDL is the Contract Required Detection Limit and is not always attainable.**

**B) Extraction and preparation methods differ depending upon media, concentration, instrument, laboratory, and analytical method.**

**Preparation methods will also influence detection limits.**

**C) Laboratory instructed to obtain the lowest possible method detection limit”**

**Additionally, an analyte acronym column will be added to Table 7. CAS numbers will be added for sulfonamidoacetic acid (N-EtFOSAA) and N- methyl perfluorooctane-sulfonamidoacetic acid (Me-PFOSA-AcOH).**

**PFAS have already been collected in 4Q21. At the time of preparing the Rev 0 DAG OU RFI/RI Work Plan, the contract labs were still working on getting the Method 533 set up and approved. All water samples (groundwater and surface water) were analyzed using Method 533 (total of 25 analytes). Sediment samples and 4 split samples were analyzed using Methods 537MOD or 537.1MOD (total of 18 analytes). These methods and analytes will be updated in Table 7.**

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**SRS Responses to South Carolina Department of Health and Environmental Control Comments  
on:  
RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable  
Unit (D-Area Upgradient Sources) (U),  
SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021)**

**Comments Received December 16, 2021 and January 4, 2022  
Page 4 of 4**

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**Discussions of the results of the 4Q21 PFAS data and the need for or extent of additional sampling will be held with SCDHEC, USEPA, and USDOE in 2022.**

8. Table 9, Preservatives, Holding Times, and Sample Containers, page 120. Please add the PFAS analytes to this table.

**Response: Agree**

**Table 9 will be updated to include PFAS analytes.**

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