



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

MAY 23 2024

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: Remedial Investigation Work Plan for the Automotive Repair Shop (716-A) Operable Unit (U) (SRNS-RP-2023-01234, Revision 1, May 2024) (Redline Pages and Clean Copy) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 62

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the subject report for your review. The Remedial Investigation Work Plan Revision 0 was submitted for review on January 16, 2024. The U. S. Environmental Protection Agency (EPA) and South Carolina Department of Health and Environmental Control (SCDHEC) comments were received on April 2, 2024, and April 15, 2024, respectively. Draft Savannah River Site (SRS) responses to the regulatory comments were emailed to EPA and SCDHEC on May 2, 2024. EPA and SCDHEC determined that the draft responses were acceptable on May 8, 2024 and May 16, 2024, respectively. The final responses were incorporated into the enclosed Revision 1 document. Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the EPA and the SCDHEC have given on the subject operable unit are greatly appreciated.

Comments or questions from you or your staff may be directed to me at (803) 952-7805, or the DOE Operable Unit Manager, Charles Bryan, at (803) 952-7505.

Sincerely,

AVERY HAMMETT Digitally signed by AVERY
HAMMETT
Date: 2024.05.23 09:22:52 -04'00'

Avery G. Hammett
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-24-135

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

1. Remedial Investigation Work Plan for the Automotive Repair Shop (716-A) Operable Unit (U) (SRNS-RP-2023-01234, Revision 1, May 2024) SEMS Number: 62 (Redline Pages and Clean Copy)
2. SRS Response to the U.S. Environmental Protection Agency's Comment on the Remedial Investigation Work Plan for the Automotive Repair Shop (716-A) Operable Unit (U) (SRNS-RP-2023-01234, Revision 0, January 2024)
3. SRS Responses to the South Carolina Department of Health and Environmental Control's Comments on the Remedial Investigation Work Plan for the Automotive Repair Shop (716-A) Operable Unit (U) (SRNS-RP-2023-01234, Revision 0, January 2024)

cc w/o encl:

J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. Stewart, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office

cc w/ encl:

B. Martin, EPA-Region 4
M. McRae, TechLaw, Inc.

SRS Response to the U.S. Environmental Protection Agency's Comment on the
Remedial Investigation Work Plan for the Automotive Repair Shop (716-A) Operable Unit (U),
SEMS Number: 62, SRNS-RP-2023-01234, Revision 0, January 2024
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Comment Received: April 2, 2024

EPA General Comment

- 1) Based on the potential for releases to the environment, the soil beneath the Washing 101 area remnant concrete slab located at the southern end of Building 716-A should be considered for sampling to support the principal threat source material evaluation and contaminant migration analysis. According to Figure 4 (Location of 103 Lubrication Pit within the South End Floor Plan of Building 716-A) and Figure 10 (Proposed Soil Sampling Locations at Building 716-A) at least four floor drains appear to have been located in the Washing 101 area that were plumbed to the 716-A storm sewer line that exits the building to the south. It is noted that the activities that occurred in the Washing 101 area could have contributed contaminants that were released to the soil beneath the concrete slab. As such, it is recommended that an additional soil boring and subsurface soil samples be collected from the storm sewer connection area located south of proposed soil boring ARS-005-SB at the southern end of Building 716-A (see Figure 10). *Please revise the RIWP to propose this additional sample boring location.*

Response: Agree.

An additional soil boring (i.e., ARS-006-SB) located at the storm sewer connection area in the previous Washing 101 area at the southern end of Building 716-A will be included in Revision 1 of the RI Work Plan. All appropriate sections in Revision 1 of the RI Work Plan will be revised accordingly.

Responsible Party: Bryce Garner, (803) 952-7801, bryce.garner@srs.gov

SRS Responses to the South Carolina Department of Health and Environmental Control's
Comments on the Remedial Investigation Work Plan for the Automotive Repair Shop (716-A)
Operable Unit (U), SEMS Number: 62, SRNS-RP-2023-01234, Revision 0, January 2024
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Comments Received: April 15, 2024

SCDHEC Specific Comments

1. Section 1.0, Introduction, page 1. The section states that the USEPA and SCDHEC were concerned about the potential for subsurface leaks and requested sampling of the soil beneath the remnant concrete slab. It is not clear if this decision was made during the D&D process. According to Section 4.0 of the scoping summary, these comments requesting this sampling were received during the FDE and DPFER reviews. Please revise Section 1 to clearly state this.

Response: Agree.

The text in Section 1.0, Introduction, will be revised as follows:

During their review of the Facility Decommissioning Evaluation (FDE) and the DPFER, the United States Environmental Protection Agency (USEPA) and South Carolina Department of Health and Environmental Control (SCDHEC) were concerned about the potential for subsurface leaks and requested sampling of the soil beneath the remnant concrete slab at the 103 Lubrication Pit and drain lines and/or sewer lines within the Automotive Repair Shop (716-A) Operable Unit to determine whether there has been a release to the environment.

Responsible Party: Bryce Garner, (803) 952-7801, bryce.garner@srs.gov

2. Section 7.1.4, Sample Management and Shipping, page 22. The last sentence of this page refers to a non-existent Table 8 for proper preservatives, holding times, and sample containers for collected samples. Table 5 should be referenced instead. Please correct.

Response: Agree.

The text in Section 7.1.4, Sample Management and Shipping, will be revised as follows:

“Table 5 lists proper preservatives, holding times, and sample containers for samples collected in the field, stored, and transported to the analytical laboratories.”

Responsible Party: Bryce Garner, (803) 952-7801, bryce.garner@srs.gov

SRS Responses to the South Carolina Department of Health and Environmental Control's
Comments on the Remedial Investigation Work Plan for the Automotive Repair Shop (716-A)
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Comments Received: April 15, 2024

3. Section 8.0, Safety, Health, and Emergency Response Plan, page 24. A unit-specific Health and Safety Plan (HASP) will be prepared in accordance with 29 CFR 1910.120 and approved prior to field investigations. Will the HASP be distributed to USEPA and SCDHEC as part of the review and approval process? Please clarify.

Response: Clarification.

The HASP is an internal document that describes the tasks, hazards correlated to the tasks, and the controls needed to ensure that the workers' exposure to the hazards will be no greater than normally accepted levels. The HASP is not distributed to USEPA and SCDHEC as part of the review and approval process. The HASP will be reviewed and approved by SRNS subject matter experts prior to field investigations. No change to the document is proposed.

Responsible Party: Bryce Garner, (803) 952-7801, bryce.garner@srs.gov