



ARF-021432

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

MAR - 1 2018

Ms. Susan 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 the Regulatory Comments on the D-Area Oil Seepage Basin Operable Unit (631-G) Groundwater Mixing Zone Letter Report for Calendar Year 2016 Data (IACD-17-152, Dated July 27, 2017) CERCLIS Number: 27

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is providing responses to the regulatory comments on the D-Area Oil Seepage Basin Operable Unit (631-G) Groundwater Mixing Zone Letter Report for Calendar Year 2016 (IACD-17-152, dated July 27, 2017). The South Carolina Department of Health and Environmental Control (SCDHEC) approved the letter report on November 21, 2017 and the U. S. Environmental Protection Agency (EPA) provided comments on December 4, 2017. This report will not be revised; however, all comment responses will be included and or addressed in the next report, as applicable. Please review the responses and provide your approval thirty (30) days from receipt. The effort and time that the SCDHEC and the EPA have given on the subject operable unit are greatly appreciated.

Comments or questions from your staff may be directed to me at (803) 952-8365 or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Hennessey".

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

IACD-18-136

MAR - 1 2018

Ms. Susan Fulmer  
Mr. Jon Richards

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**Enclosure:**

**SRS Responses to U.S. Environmental Protection Agency Comments on the D-Area Oil Seepage Basin (631-G) (U) Groundwater Mixing Zone Letter Report for Calendar Year 2016 Data (IACD-17-152) CERCLIS Number: 27**

**cc w/o encl:**

**D. Scaturo, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. D. Wilson, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
T. Fuss, SCDHEC-Aiken Environmental Affairs Office  
R. Pope, EPA-Atlanta**

**cc w/encl:**

**D. Lloyd, EPA-Atlanta  
M. McRae, TechLaw, Inc.**

**SRS Responses to U.S. Environmental Protection Agency  
Comments on the  
2016 D-Area Oil Seepage Basin Operable Unit (631-G),  
Groundwater Mixing Zone Letter Report, SRNS-J2000-2017-00385, July 2017,  
CERCLIS NUMBER: 27  
Savannah River Site, Aiken, South Carolina  
Comments Received December 4, 2017**

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**EPA COMMENTS:**

1. On Page 5 the Calendar Year 2016 D-Area Oil Seepage Basin Operable Unit (631-G) Groundwater Mixing Zone Letter Report, CERCLIS Number: 27, dated July 2017 (2016 Annual Report) presents a discussion of how the Natural Attenuation/Groundwater Mixing Zone (NA/GWMZ) remedy may not be sufficient to meet the remedial action objective for groundwater cleanup, particularly for plume compliance wells DOL 2, DOB 11, and DOB 15 within a reasonable timeframe. Additionally, the text in the Conclusion section on Page 7 states Field data collected in 2016 indicate that the groundwater conditions are not fully balanced for reductive dechlorination. However, the 2016 Annual Report does not include a recommendation as to how this issue is to be addressed (i.e. updating the conceptual site model, discuss with team members to determine an alternative path forward, if necessary, etc.). Please revise and include recommendations in the 2016 Annual Report that will address the above-mentioned issues.

**Response: Agree/Clarification**

**SRS will compile data from 2017 and early 2018 to investigate the Natural Attenuation/GWMZ remedy to date. A Core Team meeting will be held in the future to discuss the options for the D-Area Oil Seepage Basin Operable Unit based on further review of all data. No changes are proposed for the 2016 Annual Report; however, additional information will be reported (expected in the 2018 letter report [July 2019 submittal]) once the Core Team Meeting has been completed and a path forward has been identified.**

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