



October 27, 2022

ENVIRONMENTAL COMPLIANCE &

OCT 27 2022

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

AREA COMPLETION PROJECTS

Re: K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP) and P-Area
Burning/Rubble Pit (131-P) (PBRP) Operable Units Detailed Combined Groundwater
Monitoring Report, SEMS Numbers: 40 and 59 (SRNS-RP-2022-00253, Revision 0, June 2022)
received June 30, 2022.

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:
K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP) and
P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units Detailed Combined Groundwater
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Specific Comments

1. Section 2.0, Site Hydrogeology, page 2. This section and further sections of the report refer to the "water table aquifer" at the KBRP OU. Please identify the specific aquifer that "water table aquifer" refers to in this section so that later references to the "water table aquifer" are clear about the exact aquifer being described. Section 3.2.5, Lateral and Vertical Extent of Contamination at the PBRP OU, page 14, offers a good example of this for the PBRP OU: "The water table aquifer beneath the PBRP OU represents the "upper" aquifer zone of the UTRAU. The top of the upper aquifer zone is ~7 m (23 ft) below ground surface and ~17 m (57 ft) thick down to a locally continuous tan clay."
2. Section 3.1.2.4, Sampling Frequency, page 7. The last paragraph of Section 3.1.2.4 describes response actions that will be taken if trigger levels are exceeded during future sampling events. Please add a similar discussion to the document prior to Sections 3.1.2.1 through 3.1.2.3, which define the trigger levels for PCE and TCE in the plume, intermediate, and compliance boundary wells. This addition would make the document clearer to the public by providing background on what the trigger levels represent before defining the above-referenced trigger level values in Sections 3.1.2.1 through 3.1.2.3.