



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

FEB 14 2018

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
 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 Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit – April 2016 through April 2017 (U) (SRNS-RP-2017-00217, Revision 0, July 2017) CERCLIS Number: 30

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the subject comment responses for your review. The South Carolina Department of Health and Environmental Control's (SCDHEC) approval and the U. S. Environmental Protection Agency's (EPA) comments on the Revision 0 document were received on November 21, 2017 and December 21, 2017, respectively. This report will not be revised; however, all comment responses will be included and/or addressed in the next report, as applicable. Please review these responses and provide your approval thirty (30) days from receipt. The time and effort that the SCDHEC and the EPA have given on the subject operable unit are greatly appreciated.

Questions from you or your staff concerning this matter 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 blue ink, appearing to read "B. Hennessey", with a long horizontal flourish extending to the right.

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

FEB 14 2018

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosure:

SRS Responses to U.S. Environmental Protection Agency Comments on the Performance Evaluation Report (PER) for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit (U), April 2016 through April 2017 (U), CERCLIS Number: 30, SRNS-RP-2017-00217, Revision 0, July 2017, Savannah River Site, Aiken, South Carolina

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. H. Pope, EPA-Atlanta

cc w/encl:

J. Tufts, EPA-Atlanta
M. McRae, TechLaw, Inc.

SRS Responses to U.S. Environmental Protection Agency Comments on the
Performance Evaluation Report (PER) for the A-Area Miscellaneous Rubble Pile (731-6A)
Operable Unit (U), April 2016 through April 2017 (U),
CERCLIS Number: 30, SRNS-RP-2017-00217, Revision 0, July 2017,
Savannah River Site, Aiken, South Carolina

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SPECIFIC COMMENTS

1. Section 2.0, Remedial Actions, Page 3 of 12

The second to last paragraph of Section 2.0 states that “Annual Inspections are conducted at the ARP OU to verify that ICs [Institution Controls] are in place and to ensure that no deficiencies exist with the integrity of soil cover at the Trenches Area subunit.” The text further states the ARP OU inspection confirmed that ICs were in place. Although the Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2016 through April 2017 (U), CERCLIS Number: 30, SRNS-RP-2017-00217, Revision 0, July 2017 (2016 PER) states the evaluation of the ICs and soil cover are documented in the Five-Year Remedy Review Reports, the 2016 PER does not provide as an attachment a copy of the Field Inspection Checklist A-Area Miscellaneous Rubble Pile Operable Unit (731-6A) (U) (SRS, 2016). Revise the 2016 PER to provide a copy of the Field Inspection Checklist, so that the 2016 PER can serve as a stand-alone document.

Response: Clarification. Field Inspection Checklists are not included as an attachment to PER documents because the inspection results are summarized in Section 2.0, Remedial Actions. Inclusion of the checklist as an attachment to the document would add no new information. For the ARP OU PER, the results from the January 24, 2017, inspection are summarized in the last paragraph of Section 2.0. Field Inspection Checklists are available in EC&ACP Records Management and in the Administrative Record File for review by the Core Team.

No change to the current document is proposed.

Responsible Party: John Bradley, 803-952-2301, john02.bradley@srs.gov

2. Section 3.0, Conclusions/Recommendations, Page 8 of 12

Section 3.0 states the transition from active soil vapor extraction (ASVE) to passive soil vapor extraction (PSVE) at seven (7) SVE wells from the 782-3M SVE unit took place on March 14, 2017. The text also states additional characterization of the ash layer and vadose zone soils is proposed to take place from May-June 2018 in order to determine the actual migration potential of contaminants from the ash material to the groundwater. However, the 2016 PER does not

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discuss the potential outcome if the results of the additional characterization activities indicate that the concentration of volatile organic compounds (VOCs) remaining in the ash/soil is greater than the remedial goal (RG) of 656 micrograms per kilogram ($\mu\text{g}/\text{kg}$) tetrachloroethylene (PCE) and 87.7 $\mu\text{g}/\text{kg}$ trichloroethylene (TCE). As such, it is not clearly understood whether the transition from PSVE back to ASVE would be implemented. Revise the 2016 PER to provide information on the anticipated course of action and path forward should the results of the characterization of the ash/soil material yield VOC concentrations greater than respective RGs.

Response: Clarification. The transition to PSVE was instituted because VOC removal was determined to be diffusion limited and decidedly inefficient for continued ASVE. Sampling of the ash/soil will be performed in 2018 to confirm if remedial goals have been met. As previously agreed, a Post Construction Report (PCR) Addendum will be submitted on October 24, 2018. The PCR Addendum will document the change in power source for the soil vapor extraction (SVE) system and discuss the 2018 soil and ash sampling results, including a path forward for the SVE system. However, Savannah River Site does not anticipate a return to ASVE based on the sampling results.

No change to the current document is proposed.

Responsible Party: John Bradley, 803-952-2301, john02.bradley@srs.gov
