



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
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**JUL 13 2020**

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:** Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Groundwater Remedies (U) Aiken, South Carolina (SRNS-RP-2019-00511, Redline Revision 1, July 2020) (Redline Pages), Sixth Five-Year Remedy Review Report for SRS Operable Units with Groundwater Remedies Fact Sheet (SRNS-RP-2019-00743, July 2020) (Redline Pages), and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Report, SEMS Number: 00

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 Savannah River Site (SRS) submitted the Sixth Five-Year Remedy Review Report for SRS Operable Units with Groundwater Remedies (SRNS-RP-2019-00511, Revision 0, December 2019) and supporting documentation to the regulators on December 19, 2019. The South Carolina Department of Health and Environmental Control's (SCDHEC) approval of the Revision 0 document was received on March 16, 2020. The U.S. Environmental Protection Agency's (EPA) comments on the Revision 0 document were received on April 13, 2020. The final SRS responses to the EPA's comments on the Revision 0 report were incorporated into the Redline Revision 1 page changes for the report and fact sheet.

Please review the enclosed information and provide your response within forty-five (45) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject report are greatly appreciated.

Ms. Susan Fulmer  
Mr. Jon Richards

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JUL 13 2020

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

Sincerely,

**BRIAN  
HENNESSEY**

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

Digitally signed by BRIAN  
HENNESSEY  
Date: 2020.07.09 16:54:47 -04'00'

IACD-20-170

Enclosures:

1. Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Groundwater Remedies (U) Aiken, South Carolina (SRNS-RP-2019-00511, Redline Revision 1, July 2020) SEMS Number: 00 (Redline Pages)
2. Savannah River Site Fact Sheet Sixth Five-Year Remedy Review Report for SRS Operable Units with Groundwater Remedies (SRNS-RP-2019-00743, July 2020) (Redline Pages)
3. SRS Responses to U. S. Environmental Protection Agency Comments on the Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Groundwater Remedies (U) Aiken, South Carolina (SRNS-RP-2019-00511, Revision 0, December 2019) SEMS Number: 00

cc w/o encl:

G. K. Taylor, SCDHEC – Columbia  
J. E. Blalock, SCDHEC-Columbia  
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M. McRae, TechLaw, Inc.

## TECHNICAL COMMENTS

1. The bullet items listed under the subsection Remedial Actions, Page 8 of 36 present the general remedial action objectives (RAOs). However, a RAO committed to restoring contaminated groundwater to concentrations below respective maximum contaminant levels (MCLs) or residential remedial goals (RGs) is not presented. It is noted the fifth bullet on Page D-6 of D-42 indicates one of the RAOs for groundwater at the Chemical, Metals and Pesticides (CMP) Pits Operable Unit (OU) is to reduce the constituents of concern (COCs) concentrations in the groundwater plume to below MCLs. Additionally, the second bullet on Page E-5 of E-42 indicates one RAO for groundwater at the D-Area Oil Seepage Basin (DOSB) OU is to restore groundwater to attain Applicable or Relevant and Appropriate Requirements (ARARS) and RGs. *Revise the Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Groundwater Remedies (U), SEMS Number: 00; SRNS-RP-2019-00511, Revision 0, dated December 2019 (Sixth 5YR Report) to address this issue to ensure all the RAOs for groundwater, including restoration to beneficial use, are clearly presented and understood. However, it is not intended that new RAOs be created in the 5YR.*

**Response: Agree with Clarification.**

**The RAOs published in the appendices for the individual OUs are from the OU specific RODs and will not be modified. However, the general RAOs discussed in Section II, Remedial Actions will be modified to more closely align with the individual OU RAOs as shown below.**

**The third and fourth bullets of the Remedial Actions section in the main portion of the document will be modified as follows:**

- **Prevent or minimize the migration of contaminants to groundwater at levels that exceed maximum contaminant levels (MCLs)/RGs.**
- **Prevent or minimize the discharge of contaminated groundwater to surface water ~~at levels that exceed MCLs.~~**

**Additionally, a new bullet will be added to this section between the third and fourth bullets as follows:**

- **Reduce the contaminant concentrations in the groundwater plume to below MCLs/RGs.**

**Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

2. The third bullet under “**Question A: Is the remedy functioning as intended by the decision documents?**” on Page 14 of 36 states “Contaminated material has been excavated and consolidated or left in place under protective cover systems breaking the pathway for
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worker exposure and for the migration of contaminants to groundwater.” However, it is noted the cover systems included in the Sixth Five-Year Review (5YR) provide dermal protection only and do not include engineered caps with low permeability. For example, Table A-3. Summary of Remedial Actions without Operating Equipment at SRS (*continued/end*), Page A-13 of A-30 indicates “Compacted Common Fill (no hydraulic conductivity requirements) for the CMP Pits OU where 0.3 acres are covered. *Revise the Sixth 5YR Report to address this issue to ensure it is clearly understood no engineered low permeability caps are included in this Sixth 5YR.*

**Response: Agree with Clarification.**

**The remedial actions associated with the R-Area Operable Unit (RAOU) (in situ decommissioning) and R-Area Reactor Seepage Basins (RRSB) (asphalt and concrete covers) do function to limit transport of contamination in the source zones. Question A will be modified to clarify that the cover systems for the RAOU and the RRSB do function to mitigate migration of contaminants to groundwater.**

**The last bullet of the Question A: Is the remedy functioning as intended by the decision documents? section in the main portion of the document will be modified as follows:**

- **Contaminated material has been excavated and consolidated or left in place under protective cover systems breaking the pathway for worker exposure. The remedial actions associated with the RAOU (in situ decommissioning) and the R-Area Reactor Seepage Basins (RRSB) (asphalt and concrete covers) also serve to mitigate and for the migration of contaminants to groundwater. No other units in this five-year remedy review report with groundwater remedies have an engineered low permeability cap.**

**Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

3. **Table 4. Operation and Maintenance Cost Comparison for SRS OUs with Groundwater Remedies, Page 31 of 36:** According to the table, the estimated costs were \$503,549 and the actual costs were \$2,652,242, or 19% more than the estimated costs for the R-Area Reactor Seepage Basin Operable Unit (OU). However, the actual costs are actually 527% more than the estimated costs. Additionally, the text under the “Comments” column in the table only states “Actual costs are less than expected due to optimization of the groundwater monitoring”, and does not provide an explanation for the increased costs.” *Revise the table to address this issue and ensure the text in the comments column clarify the reasons for why the actual costs were 527% greater than estimated costs.*

**Response: Agree.**

**The actual and estimated costs were inadvertently switched in Table 4. The correct estimated costs were \$2,652,242 and the actual costs were \$503,549. The costs are correct**

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**in Table H-3 of Appendix H. Table 4 will be revised to reflect the correct costs. No change is needed for the % of Estimate and Comments columns.**

**Responsible Party: Eric Schiefer, (803)952-6273, eric.schiefer@srs.gov**

4. **Table D-3. Actual versus Estimated O&M Costs, Page D-31 of D-42:** As shown in the table, the FY2015 through FY2019 five year Total Actual O&M costs (\$) are \$760,231. It is noted the text on Page D-9 of D-42 states an updated groundwater modeling effort was conducted in 2017 to reevaluate the hydrogeologic conditions and contaminant plumes (SRNS 2017b). The updated model included updated monitoring data, new monitoring well information, sorption/desorption criteria, continuing sources in clay horizons, and was calibrated to plume behavior over the 2002-2016 period. The results of the model indicated that PCE would exceed MCLs in groundwater for approximately 91 years (~2107). Therefore, based on the five year total actual costs of \$760,231 and the predicted cleanup timeframe of 91 years for PCE, estimated O&M costs would exceed \$13 million dollars. As such, it is recommended a cost benefit analysis is conducted to evaluate whether implementation of additional source control measures would be effective in reducing overall cleanup timeframe and O&M costs. *Revise the Sixth 5YR Report to address this issue.*

**Response: Agree with Clarification.**

**The estimate in the ROD is based on a 40-year MNA period with a twelve well network, which is not applicable to the current remedy with a 91-year MNA period and approximately 70 well network. After peaking in Fiscal Year 2015 at \$334,400, O&M costs have steadily decreased, which indicates the MNA costs are within acceptable limits. By projecting current annual O&M costs until Fiscal Year 2107 and assuming that O&M costs do not continue to decline, the estimated O&M costs would be approximately \$8,000,000.**

**The USEPA comments (SRNS-OS-2020-00045, dated January 8, 2020) on the *Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) March 2018 through March 2019* (SRNS-RP-2019-00274, Revision 0, June 2019) lists multiple lines of evidence that are not favorable to a MNA remedy. SRS responded and agreed that a Core Team meeting should be held after the submittal of the next CMP Pits Effectiveness Monitoring Report, scheduled for June 2020, to discuss recent data collected subsequent to the submittal of the Sixth Five-Year Remedy Review Report for SRS Operable Units with Groundwater Remedies and to discuss the appropriate path forward with respect to remedial alternatives. For this reason, no change is needed to include a cost benefit analysis in the Sixth Five-Year Remedy Review Report.**

**Please note that the Total Actual O&M costs for Fiscal Year 2016 are incorrect in Table D-3. The actual costs should be shown as \$146,004, rather than \$416,004 and will be corrected in the revised report.**

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**Responsible Party: Eric Schiefer, (803)952-6273, eric.schiefer@srs.gov**

### **Legal Comments**

1. Page 8 of 36, states that RAOs at SRS generally include, as listed in the fourth bullet, an RAO to “Prevent or minimize the discharge of contaminated groundwater to surface water at levels that exceed MCLs.” However, as is correctly stated on page A-4 of A-30, it is *surface water standards* [not MCLs] that cannot be exceeded at the groundwater discharge point. Please clarify this in the text on page 8.

**Response: Agree with Clarification.**

The remedial actions evaluated in the *Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Groundwater Remedies* do not include RAOs for surface water. The intent of the general RAO listed in Section IV is to prevent the discharge of groundwater that exceeded MCLs/RGs (i.e., contaminated groundwater) to surface water, rather than establishing a RAO for surface water. For clarity, the fourth general RAO discussed in Section II, Remedial Actions will be modified as follows:

**“Prevent or minimize the discharge of contaminated groundwater to surface water at levels that exceed MCLs.”**

**Responsible Party: Terry Killeen, (803) 952-6850, terry.killeen@srs.gov**

2. Second para. on page 11 of 36 states “Monitoring for 1,4-dioxane is no longer required at RAOU based on monitoring results and regulatory agreement.” Please clarify in the text what threshold the monitoring results were compared against to determine monitoring was no longer required. For example, EPA risk assessments indicate that the drinking water concentration representing a  $1 \times 10^{-6}$  cancer risk level for 1,4-dioxane is 0.35 µg/L (EPA IRIS 2013).

**Response: Clarification**

In 2015, samples from twelve wells and three surface water stations located in the RAOU R-Area Groundwater (RAGW) volatile organic compound (VOC) plume were analyzed for 1,4-dioxane using EPA8260BSIM method and the lowest detection limit (0.85 µg/L) available with this method. Likewise, in 2016, one additional monitoring well was sampled and analyzed for 1,4-dioxane using the EPA8260BSIM method. All 1,4-dioxane analyses from the samples collected in 2015 and 2016 were below detection for 1,4-dioxane, including all samples with detectable TCE. Because there is no continuing source of TCE to the groundwater and the RAOU RAGW VOC plume will continue to attenuate over time, it is highly unlikely that future sampling will result in detectable 1,4-dioxane results. Therefore, SRS recommended in the *R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R-Area Operable Unit (U) January 2015*

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*through December 2015* (SRNS-RP-2016-00347, Revision 0, June 2016) and subsequent comment responses to discontinue 1,4-dioxane analyses, which was approved by the USEPA on January 13, 2017 (ARF-020943) and SCDHEC on February 7, 2017 (ARF-020972). For clarity, in Section III. Progress Since Last Review, last sentence in the first bullet, will be revised as follows:

**“...Based on comprehensive sampling, 1,4, dioxane was added to the annual groundwater monitoring at the DOSB, ~~but m~~Monitoring is no longer required at RAOU as agreed to by the approved R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R-Area Operable Unit (U) January 2015 through December 2015 (SRNS 2016) and subsequent comment responses.”**

Additionally, the last bullet in Major Developments Since Last Five-Year Remedy Review of the Fact Sheet will be revised as follows:

**“...Monitoring for 1,4-dioxane is no longer required at RAOU based on monitoring results and ~~regulatory agreement~~ as agreed to by the approved R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R-Area Operable Unit (U) January 2015 through December 2015 and subsequent comment responses.”**

**Responsible Party: Terry Killeen, (803) 952-6850, terry.killeen@srs.gov**

3. Second bullet on page 14 of 36 in response to “Question A: Is the remedy functioning as intended by the decision documents?” states “Groundwater data at Monitored Natural Attenuation (MNA) remedy plumes indicates that groundwater concentrations are generally decreasing, and plumes are not expanding.” Please clarify whether MNA is expected to attain remedial goals within an acceptable timeframe, as this factor relates to whether MNA remedy is functioning as intended as well.

**Response: Agree.**

The 2<sup>nd</sup> bullet of Section V. Technical Assessment, Question A will be split and rewritten as follows:

- **“Thermal technologies (e.g., electrical resistance heating [ERH]) have been successful in removing very high concentrations of VOCs from subsurface zones. Groundwater data at Monitored Natural Attenuation (MNA) remedy plumes indicates that the groundwater concentrations are generally decreasing, and plumes are not expanding.”**
  - **Groundwater data at Monitored Natural Attenuation (MNA) remedy plumes indicates that the groundwater concentrations are generally decreasing, and plumes are not expanding.**
  - **None of the expected time frames to achieve RGs in groundwater as identified in the respective RODs have been exceeded.”**
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**Responsible Party: Terry Killeen, (803) 952-6850, terry.killeen@srs.gov**

4. Page C-2. End of first paragraph states that: “TCE does not exceed the MCL in surface water in either Castor Creek or Fourmile Branch, but TCE does exceed the MCL in an unnamed tributary to Castor Creek.” Surface water standards, ambient water quality criteria (or AWQC criteria equivalent if no promulgated standard is available), should not be exceeded at the groundwater discharge point to surface water. Please clarify whether contaminant levels in Castor Creek or Fourmile Branch are within acceptable surface water quality criteria.

**Response: Clarification.**

**As stated in Appendix C, Section IV. Remedial Actions, the interim RAO for the C-Area Groundwater Operable Unit (CAGW OU) is to reduce TCE concentration in the vadose zone so that any leaching of the contaminant will not cause groundwater to exceed the MCL. The IROD does not address surface water. Section III. Background, Physical Characteristics provides general information about the C-Area Groundwater Operable Unit and used the MCLs as a point of reference in describing contaminant concentrations.**

**To simplify, the text in Appendix C, Section III. Background, Physical Characteristics, second paragraph will be revised as follows:**

**“...The contaminated groundwater in the MAZ and LAZ discharges into Fourmile Branch or Castor Creek (SRNS 2014a). ~~TCE does not exceed the MCL in surface water in either Castor Creek or Fourmile Branch, but TCE does exceed the MCL in an unnamed tributary to Castor Creek.~~”**

**Responsible Party: Terry Killeen, (803) 952-6850, terry.killeen@srs.gov**

5. Page C-7, second para. states “Subsequent to the interim action and based on TCE discharge to a tributary of Castor Creek, removal action alternatives were evaluated to address this problem. Per the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis for the CAGW OU (SRNS 2018a), the removal action objective to protect human health and the environment is to reduce discharge of groundwater contaminated with TCE above MCLs to surface water, so that the MCL (5 µg/L) is no longer exceeded in the unnamed tributary to Castor Creek.” See previous comment. Please clarify whether contaminant levels in tributary to Castor Creek are within acceptable surface water quality criteria. *Per South Carolina R.61-69, CLASSIFIED WATERS. A. Criteria for Classes. All adopted classifications must conform to the standards and rules contained within R.61-68, Water Classifications and Standards or site-specific standards listed within this regulation. Unless noted, site specific standards apply only to the water named and not to tributary or downstream waters. B. Tributaries to Classified Waters. Where surface waters are not classified by name (unlisted)*
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*in this regulation, the use classification and numeric standards of the class of the stream to which they are tributary apply, disregarding any site-specific numeric standards for the named waterbody. c. Toxic pollutants listed in the appendix. As prescribed in Section E of SC R. 61-69 regulation. SC R. 61-69.E.14.b states “Application of numeric criteria to protect human health. (1) If separate numeric criteria are given for organism consumption, water and organism consumption (W/O), and drinking water Maximum Contaminant Levels (MCLs), they shall be applied as appropriate. The most stringent of the criteria shall be applied to protect the existing and classified uses of the waters of the State. Per table in Appendix the more stringent standard for TCE for protection of HH is 2.5 micrograms/L (W&O), not the MCL of 5.0.*

**Response: Clarification.**

**A discussion of the non-time critical removal action was added to Appendix C, Section V. Progress Since Last Review, for information only and is not part of the Sixth Five-Year Remedy Review process.**

**Please note that the removal action objective documented in the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (SRNS-RP-2017-00365, Revision 1, February 2018) was modified in the Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the C-Area Groundwater Operable Unit (U) SEMS Number: 82 (IACD-18-150, dated May 18, 2018) as follows: “The objective of this removal action is to protect human health and the environment by reducing the mass of TCE present in the groundwater.” In Appendix C, the 4<sup>th</sup> paragraph in Section V. Progress Since Last Review, will be revised to include the correct removal action objective as follows: “Subsequent to the interim action and based on TCE discharge to the tributary of Castor Creek, removal action alternatives were evaluated to address this problem. Per the Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the C-Area Groundwater Operable Unit (USDOE 2018) Removal Site Evaluation Report / Engineering Evaluation / Cost Analysis for the CAGW OU (SRNS 2018a), the removal action objective is to protect human health and the environment is to reduce by reducing the mass of discharge of groundwater contaminated with TCE present in the groundwater above MCLs to surface water, so that the MCL (5 µg/L) is no longer exceeded in the unnamed tributary to Castor Creek. The selected non-time critical removal (NTCR) action remedy is treatment ...”**

**Responsible Party: Terry Killeen, (803) 952-6850, terry.killeen@srs.gov**

6. Page D-2 bulleted list states: “Pen Branch Surface Water and Sediment – Groundwater from CMP Pits flows towards and discharges to Pen Branch; however, the stream has never seen contaminant concentrations above MCLs. The sediment at Pen Branch has not been impacted by the CMP Pits operations.” Please see previous comment regarding SC R. 61-69, application of numeric criteria in surface water to the COCs evaluated for this OU. Discharge
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of contaminated groundwater should not cause exceedances of numeric ambient water quality criteria in the surface water body.

**Response: Agree with Clarification.**

As stated in Appendix D, Section IV. Remedial Actions, Surface Water and Sediment, “No RAOs were established for the Pen Branch surface water and sediment because no COCs were identified.” As stated in the *Record of Decision Remedial Alternative Selection for the Chemicals, Metals, and Pesticides Pits Operable Unit (080-170G, 080-171G, 080-180G, 080-181G, 080-182G, 080-183G, and 080-190G) (U)* (WSRC-RP-2004-4090, Revision 1, December 2004), “...surface water samples are collected to ensure that the groundwater discharge does not result in any statistically significant increase of constituents from the groundwater to the surface water at the point of entry or at any point where there is reason to believe accumulation of constituents might occur downstream.” Surface water results are reviewed against the same criteria established for groundwater (i.e., MCLs) for comparative purposes to groundwater contaminant concentrations to evaluate the effectiveness of the MNA remedy.

For clarity, the text in Appendix D, Section III. Background, Physical Characteristics, will be revised as follows: “Pen Branch Surface Water and Sediment – Groundwater from CMP Pits flows towards and discharges to Pen Branch; ~~h~~However, the stream has ~~never seen contaminant concentrations above MCLs~~ only been intermittently and minimally impacted. The sediment at Pen Branch has not been impacted by the CMP Pits operations.”

**Responsible Party: Ashley Shull, (803) 952-7090, ashley.shull@srs.gov**

7. Page D-13 bulleted list states: “MNA has shown effectiveness in preventing discharge of contaminated groundwater to surface water. With one exception, RCO concentrations of surface water are generally below MCLs. Most results are non-detect. Overall, RCO concentrations have been reduced in the groundwater and the plumes overall footprints are not expanding. There has only been one MCL exceedance in surface water.” See previous comments regarding SC R. 61-69, application of numeric criteria in surface water to the COCs evaluated for this OU. Discharge of contaminated groundwater should not cause exceedances of numeric ambient water quality criteria in the surface water body.

**Response: Agree with Clarification.**

Please see the response to EPA Legal Comment #6. Surface water results are reviewed against the same criteria established for groundwater (i.e., MCLs) for comparative purposes to groundwater contaminant concentrations to evaluate the effectiveness of the MNA remedy. Out of 150 Pen Branch surface water samples and 1,649 analytical results collected since 2002, there have been only six non-estimated results for PCE, TCE, and cis-1,2-dichloroethylene.

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**In Appendix D, Section VII. Technical Assessment, Is the Remedy Functioning as Intended by the Decision Document?, the 8<sup>th</sup> bullet will be revised as follows: “MNA has shown effectiveness in preventing discharge of contaminated groundwater to surface water. ~~With one exception, RCOC concentrations of surface water are generally below MCLs. Most surface water results are non-detect. Overall, RCOC concentrations have been reduced in the groundwater and the plumes overall footprints are not expanding. There has only been one MCL exceedance in surface water. This occurred in fourth quarter of 2015 at surface water station CMP-SW-08 with a PCE concentration of 8.49 µg/L. All subsequent results have been non-detect at all surface water stations. Out of 150 Pen Branch surface water samples and 1,649 analytical results collected since 2002, there have been six non-estimated results for the VOCs monitored at CMP Pits. This number includes detections of PCE, TCE, and cis-1,2-dichloroethylene.”~~**

**Responsible Party: Ashley Shull, (803) 952-7090, ashley.shull@srs.gov**

8. Page F-4 states: “Basis for Taking Action. The potential exposure to or ingestion of groundwater and surface water contaminated above maximum contaminant levels (MCLs) poses a potential increased risk of cancer to human receptors and is the basis for taking action at the LASG OU.” *Please correct text to clarify that, as is correctly stated on page A-4 of A-30, it is surface water standards that cannot be exceeded at the groundwater discharge point. See previous comments regarding application of SC R. 61-69 numeric criteria in surface water.*

**Response: Clarification.**

**As stated in Appendix F, Section IV. Remedial Actions, the RAOs for the LASG OU are to prevent human exposure to groundwater above MCLs and to treat and/or mitigate groundwater contaminated above MCLs to reduce the discharge of groundwater exceeding MCLs to L-Lake. The surface water media is not part of the remedial action for the LASG OU, and remediation of surface water is not addressed by the LASG OU ROD. Rather, surface water results are reviewed against the same criteria established for groundwater (i.e., MCLs) in the ROD for comparative purposes to groundwater concentrations to evaluate the effectiveness of the selected MNA remedy.**

**For clarity, Appendix F, Section III. Background, Basis for Taking Action, first paragraph will be revised as follows: “The potential exposure to or ingestion of groundwater ~~and surface water~~ contaminated above maximum contaminant levels (MCLs) poses a potential increased risk of cancer to human receptors and is the basis for taking action at the LASG OU.”**

**Responsible Party: Ashley Shull, (803) 952-7090, ashley.shull@srs.gov**

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