



October 30, 2019

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



Re: RCRA Facility Investigation / Remedial Investigation (RFI/RI) Letter Work Plan in Support of the D-Area Groundwater Operable Unit (D-Area Upgradient Sources), SEMS Number: 63 (IACD-19-185, dated October 1, 2019) received October 3, 2019.

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:
RCRA Facility Investigation / Remedial Investigation (RFI/RI) Letter Work Plan
in Support of the D-Area Groundwater Operable Unit (D-Area Upgradient Sources),
SEMS Number: 63 (IACD-19-185, dated October 1, 2019) received October 3, 2019.

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General Comments

1. On August 29, 2019, the USDOE, USEPA and SCDHEC conducted a Core Team meeting to discuss the development of the RFI/RI Work Plan. During the meeting, the topic of adding PFAS analytes to the analyte list was discussed since there had been fire training exercises that used aqueous firefighting foam (AFFF) in the D-Area Operable Unit. The referenced document does not capture this discussion nor does it discuss the addition of the analytes to the analyte lists. Please revise the referenced document to include PFAS compounds in the discussion and add to Table 1.