



April 2, 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: Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Native Soil Covers and/or Land Use Controls (U) – Aiken, South Carolina (SRNS-RP-2018-00811, Revision 0, December 2018) received December 27, 2018.

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:
Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Native
Soil Covers and/or Land Use Controls (U) – Aiken, South Carolina (SRNS-RP-2018-00811,
Revision 0, December 2018) received December 27, 2018.

Page 1 of 2

General Comments

1. There are discrepancies and inconsistencies throughout the document regarding native soil covers and whether or not they are applicable to each operable unit (OU). According to Table 2 in the Savannah River Site Summary section, not every OU discussed in this report has a native soil cover included as a remedy component. Gunsite 012 is one of these; however, in Appendix G for Gunsite 012, the first full paragraph on page G-9 mentions soil covers, as well as Section VI of Attachment G-1. Also, Table 2 indicates water as the “soil cover” for PAR Pond and LTR Tail Portion. In Appendix K for this OU, the last paragraph of page K-10 indicates ant mounds on soil covers. It should be noted that the sentence mentioning this along with down trees and overgrown vegetation near signs is not included in Section VI of Attachment K-1. Finally, Footnote b of Table 2 states that maintenance of native soil covers is a component of remedy implementation. However, several of the “Remedy Implementation” and/or “System Operations/Operation and Maintenance” sections for each OU do not list this component. The report should be revised to clearly and consistently state the applicability of native soil covers for each OU.

Specific Comments

Appendix C: C-Area Operable Unit

1. Disturbance of the ECODS C-1, Pages C-9 and C-10. A disturbance of the ECODS C-1 was discovered in January of 2016. This occurred when “...USFS disturbed the top foot of soil at the ECODS C-1 based on a misunderstanding of the previous site use permit conditions...” Actions were taken to correct the issue and “No activities inconsistent with the CAOUCs have occurred since the resolution of this discovery.” The disturbance was discovered after the ROD was issued (September 2015) but before remedial actions were completed in August of 2016. Please clarify the following :
 - a. Did the disturbance happen prior to the implementation of the LUCs?
 - b. While the LUC boundary was modified, was the misunderstanding addressed in the site use permit conditions and/or the LUCs?

Appendix K: PAR Pond (685-G) (Including the Pre-Cooler Ponds and Canals) and Lower Three Runs Integrator Operable Unit Tail Portion (Middle and Lower Subunits)

1. During the regulatory walkdown on March 21, 2019, signs of recent human interaction with the Lower Three Runs tail portion were observed at the Patterson Mill Road, Boiling Springs Road, and Rocky Point Road bridge crossings in the forms of litter, fishing equipment, and trampled or cleared stream banks. At the Highway

South Carolina Department of Health and Environmental Control Comments on:
Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Native
Soil Covers and/or Land Use Controls (U) – Aiken, South Carolina (SRNS-RP-2018-00811,
Revision 0, December 2018) received December 27, 2018.

Page 2 of 2

SC 125 bridge crossing, Soil Contamination Area (SCA) signs have been posted and the decrease in signs of human trespassing was considerable (though only 1 of 4 banks was observed). Although contamination levels at the other bridge crossings may not necessarily warrant the Radiological SCA signs, posting the signs at all bridge crossings may help to curtail trespassing and human interaction with the Lower Three Runs tail portion.