

SRNS-OS-2021-00287



ENVIRONMENTAL COMPLIANCE &amp;

October 12, 2021

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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: RCRA Facility Investigation/Remedial Investigation Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U), SEMS Number: 63 (SRNS-RP-2019-00394, Revision 0, June 2021) received June 14, 2021.

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 Work Plan for the  
D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U), SEMS Number: 63  
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General Comments

1. Figure ES-2 and Figure 2 show the name for Subunit 421-2D as "Drum Storage Facility". Several sections of the RFI/RI WP list and discuss 421-2D as "Moderator Handling and Storage Building". Also, Section 1.2.5 lists "421-4D Drum Storage Building" as a subunit of the Moderator Process Subunit, which is not depicted on any figures nor discussed elsewhere in the document. Please clarify these subunits and revise the Work Plan as necessary.

Specific Comments

1. Figure ES-2, D-Area Operable Unit Subunits and Facilities, page ES-8. Please include the locations of 411-1D and 411-3D on this figure.
2. Section 1.2.4, D-Area Expanded Operable Unit (DEXOU), page 5. In the second paragraph, the third bullet states, "No groundwater impacts after removal was complete." As written, this statement is confusing. Please consider rewording the statement. For example, no groundwater impacts after completion of removal activities.
3. Section 1.2.5, D-Area Operable Unit, page 6. Please include the 715-D Gas Station to the list of subunits for the Bubble Tower Subunit.
4. Section 1.2.5, D-Area Operable Unit, page 7. The text in Section 1.2.5, page 7, second paragraph, incorrectly states that unrestricted land use was selected for the northern 25% of the 489-D Coal Pile Runoff Basin (CPRB) and references the 2011 Early Action Record of Decision (EAROD). The text should have correctly cited that unrestricted land use was chosen for the southern 75% section of the 489-D CPRB as documented in the 2020 Second EAROD.
5. Section 4.2, Primary Source Characterization, page 42. Subunits 411-D, 412-D, 413-D, and 431-2D are listed as subunits which have impacted groundwater at the DAG OU elsewhere in the document but are not included here. Please include.
6. Figure 2, page 63, and Figure 17, page 93. Please include the locations of 411-1D and 411-3D within the D-Area Heavy Water Facility on the figures.

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7. The following comments are regarding Table 7, Laboratory Analytical Specification Table for TAL/TCL Analytes for Surface or Groundwater Media, page 117.
- a. Please include the footnotes for this table.
  - b. Please add a column identifying analyte acronyms for convenience.
  - c. According to PubMed, the CAS numbers for N-ethyl perfluorooctane-sulfonamidoacetic acid (N-EtFOSAA) is 2991-50-6 and N-methyl perfluorooctane-sulfonamidoacetic acid (Me-PFOSA-AcOH) is 2355-31-9.
  - d. EPA Method 537.1 should be used for analytes in c. above, as well as PFTeDA and PFTrDA; and EPA Method 533 for the remaining analytes listed.
8. Table 9, Preservatives, Holding Times, and Sample Containers, page 120. Please add the PFAS analytes to this table.