



February 20, 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: Treatability Study Work Plan for Groundwater Injection and Discharge Canal Treatment at the D-Area Groundwater (OU) (U), SEMS Number: 63 (SRNS-TR-2018-00128, Revision 1 Redline, January 2019) received January 23, 2019.

Dear Mr. Hennessey:

The Department has completed its review of the above reference document pursuant to the Savannah River Federal Facility Agreement. Due to the nature of Specific Comment #1 and the similarities to our Specific Comment #2 from the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for the D-Area Coal Storage Area (484-17D) (SRNS-RP-2018-00813, Revision 0 dated November 2018), the Department is confident that the necessary changes can be made to the final clean copy version with resolution. Therefore, the above referenced Revision 1 is conditionally approved pending successful resolution of our Specific Comment #2 from the RSER/EE/CA. The referenced comment is listed below.

1. Section 4.0, Identification of Removal Action Objectives, Alternative 2, last paragraph, page 9. The document states: "The 15-20 cm layer of coal fragments in the southern 2-ha section has similar pH measurements to the vadose zone soils, is *likely weathered/oxidized, and poses no greater leaching threat...*" Please expand on how this is known to pose no greater threat, and how the characterization of the layer of coal fragments is known to have limited leaching potential. It is the State's opinion that if Alternative 2 is the accepted remedy and the coal layer is not removed, then additional follow-up soil pH sampling events be conducted to confirm the effectiveness of the removal action.

If you have any questions, please contact me at (803) 898-4331.

Sincerely,



Susan B. Fulmer, P.G., Manager  
Federal Remediation Section  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)  
Jon Richards, EPA Region IV  
Travis Fuss, Aiken Environmental Affairs Office (via email)  
Heather Cathcart, BLWM