



October 25, 2017

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: K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP), L-Area Burning/Rubble Pit and Rubble Pile (131-L, 131-3L, and 131-2L) (LBRP), and P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units (OUs) Detailed Combined Groundwater Monitoring Report (U), CERCLIS Numbers: 40, 56, 59 (SRNS-RP-2017-00356, Revision 0, June 2017) received June 29, 2017.

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)
Rob Pope, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Health and Environmental Control Comments on:

K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP), L-Area Burning/Rubble Pit and Rubble Pile (131-L, 131-3L, and 131-2L) (LBRP), and P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units (OUs) Detailed Combined Groundwater Monitoring Report (U), CERCLIS Numbers: 40, 56, 59 (SRNS-RP-2017-00356, Revision 0, June 2017) received June 29, 2017.

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General Comment

1. Based on the information presented in Section 3.2.6, LBRP OU Summary and Conclusions and supporting data in Appendices C and D, the Department finds the proposal to discontinue monitoring and reporting at the LBRP OU to be acceptable.

Specific Comments

1. Section 3.1.2, KBRP OU Groundwater Mixing Zone Application Elements, page 6. The third sentence of the second paragraph of this section states: "Groundwater flow and transport modeling of KBRP (WSRC 1999b) was used to establish MZCLs at the location of the compliance boundary." MZCLs are established for the plume definition and intermediate wells; MCLs are used for compliance boundary wells. Perhaps the word "at" should be "and" instead, as presented on page 12 in Section 3.2.2 for LBRP OU. Please correct.
2. Table 1, KBRP GWMZ Monitoring Network and Sampling Conditions, page 31. Well KRP 7 is listed as an intermediate well. According to the second paragraph of Section 3.1.2.3, this well has been changed to a compliance boundary well. Table 1 should be updated accordingly.
3. Table 3, LBRP GWMZ Monitoring Network and Sampling Conditions, page 33. Please modify Table 3 to include separate columns for both Well Use and Data Collected, similar to Table 1, so that the purpose for all wells can be better understood.