



March 14, 2022

ENVIRONMENTAL COMPLIANCE &

MAR 14 2022

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: Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Geosynthetic or Stabilization/Solidification Cover System (U) (SRNS-RP-2021-04229, Revision 0, December 2021) received December 16, 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 Digitally signed by Susan B. Fulmer
Date: 2022.03.14 15:25:13 -04'00'

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
Geosynthetic or Stabilization/Solidification Cover System (U)
(SRNS-RP-2021-04229, Revision 0, December 2021) received December 16, 2021.

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General Comments

1. The report carries forward two recommendations from the Fifth Five-Year Remedy Review Report to this report: the redevelopment of the BMW wells at B Area Operable Unit and the regulatory discussions regarding the cover systems at E-Area Low Level Waste Facility. Further explanation should be provided as to why these recommendations were not completed prior to the submittal of the Sixth Five-Year Remedy Review Report.
2. There are a few discrepancies between Table 2 (SRS OUs with Geosynthetic or S/S Cover Systems) and Table 3 (LUC Summary Table) in the Savannah River Site Summary at the beginning of the document. For all OUs covered in the document, Table 3 lists "Yes" under "LUCs Needed" and "LUCs Called for in the Decision Documents"; however, LUCs are not listed under "Remedial Action" in Table 2 for OUs in Appendices G, H, and J. LUCs for these OUs are discussed in their respective appendices as being deferred until final closure, and therefore, should be included in Table 2 as well. Section I in each of the OU-specific attachments should be revised to indicate LUCs as well under the "Remedy Includes" subsection.

Specific Comments

1. Table A-3, Summary of Remedial Actions without Operating Equipment at SRS, pages A-11 through A-13. The FTF and HTF OUs are not listed in this table. Please include.
2. Table A-5, Chronological Listing of SRS Issued Decision Documents, page A-23. H-Area Tank Farm (Waste Tank 16) IROD and H-Area Tank Farm (Waste Tank 12) ESD to the IROD should be shaded identifying these units as SRS OUs being evaluated in this report. Please correct.
3. Appendix E, Attachment E-1, Section III, Onsite Documents and Records Verified, page E-29. For Subsection 7, Groundwater Monitoring Records, the "N/A" box is checked; however, page E-10 discusses groundwater monitoring that is being performed as part of DAOU to evaluate effectiveness of the remedial action for this OU. Please revise this subsection accordingly.
4. Appendix L, Figure L-3 Photograph of the Remediated LAOCB OU (2021), page L-15. This photograph shows fencing directly behind a warning sign; however, there is no discussion of OU-specific fencing throughout Appendix L. Furthermore, Section V Access and Institutional Controls in Attachment L-1 on page L-22 specifically states that OU-specific perimeter fencing is not required. Please explain.

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5. Appendix M, Attachment M-1. The title for this attachment lists LRSB; CRSB is not included and does not have a separate inspection checklist. One reason this is significant is because groundwater monitoring is discussed in Appendix M for LRSB and is not required for CRSB. Additionally, Section III Onsite Documents and Records Verified in Attachment M-1 shows "N/A" as checked for Subsection 7, Groundwater Monitoring Records. Please correct these discrepancies.
 6. Appendix N, Figure N-4, Tritium Plume Map for the Western GSA Groundwater OU – 2020 (SRNS 2021), page N-18. Although one can determine the location of the waste unit by reading preceding information, it would be helpful to label the Old F-Area Seepage Basin on the figure.
 7. Appendix R, Attachment R-1, Section III, Onsite Documents and Records Verified, page R-29. For Subsection 7, Groundwater Monitoring Records, the "N/A" box is checked; however, a groundwater monitoring program for evaluating effectiveness of the remedial actions for this OU is discussed on page R-8. Also, the Monitoring Wells subsection of Section VII in Attachment R-1 on page R-33 has several items checked. Please correct.
 8. Appendix R, Attachment R-1, Section VII, Landfill Cover/Containment, page R-34. Subsection E, Cover Penetrations, of Attachment R-1 on page R-34 repeats everything verbatim listed on page R-33 for Subsection D Cover Penetrations. Please correct.