



May 18, 2018

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: Periodic Report 5 for the Upper Three Runs Integrator Operable Unit (IOU) (U), CERCLIS
Number: 70 (SRNS-RP-2017-00548, Revision 0, February 2018) received February 28, 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:

Periodic Report 5 for the Upper Three Runs Integrator Operable Unit (IOU) (U), CERCLIS Number: 70 (SRNS-RP-2017-00548, Revision 0, February 2018) received February 28, 2018.

Page 1 of 2

General Comments

1. There are several discrepancies between the figures showing all of the operable units (OU) for each area in the UTR IOU (all of the figures associated with Figures 1-3 and 1-4) and Table 1-1, which lists all of the OUs for each area. Specifically, the following OUs are listed in Table 1-1 but are not shown in figures corresponding with their respective areas:
 - a. A/M Area (Figures 1-3a and 1-4a): 24, 44, 133, 134, 195, 384, 400, 406, 409, 410, 419, 420, 436, 446, 449, 451, 480, 484 and 521
 - b. B Area (Figures 1-3b and 1-4b): 530
 - c. F and E Areas (Figures 1-3c and 1-4c): 35, 199, 200, 227, 263, 284, 308, 368, 372, 399, 414, 416, 422, 424, 435, 438, 445, 485 and 490
 - d. H, S and Z Areas (Figures 1-3d and 1-4d): 260, 264, 295, 364, 383, 403, 412, 423, 433 and 512
 - e. G Area (Figures 1-3f and 1-4f): 38, 40, 140, 174, 186, 213, 333, 463, 541 and 568

These figures should be revised to include all applicable OUs that are listed in Table 1-1, including insets showing expanded high population areas if necessary. The figures showing G Area OUs can be expanded and modified to show only the G Area OUs.

Additionally, the following OUs were depicted inside the UTR IOU footprint on the following figures but were not included in Table 1-1:

- a. Figure 1-3a: 12, 100, 189, 197, 397 and 486
- b. Figure 1-3c: 592
- c. Figure 1-3d: 285

Please correct these discrepancies.

Specific Comments

1. Figure 1-4a through Figure 1-4f, pages 1-23 through 1-33. Figures 1-4a through 1-4f should be labeled "Operable Units, Potentiometric Contours, and Groundwater Plumes Associated with the UTR IOU" for each unit area as stated on pages 1-23 through 1-33. Also, in the revision of PR5, please delete the additional copy of Figure 1-4c and insert Figure 1-4d.
2. Figure 1-5, Upper Three Runs IOU Conceptual Site Model, page 1-35. There are a few discrepancies between the CSM and Table 1-1 regarding the potential for listed OUs to impact groundwater and/or surface water at the UTR IOU. The CSM lists the following OUs as impacting both surface water and groundwater, yet Table 1-1 lists only the potential for groundwater impact: 141, 142 and 591. Also, 429 is listed as potentially impacting only groundwater; yet, Table 1-1 lists the potential for impact to both groundwater and surface water. Please revise.
3. Figure 1-5. Upper Three Runs IOU Conceptual Site Model, page 1-35. Please add unit ID #456, Steed Pond, G-Area, to the UTR IOU CSM.

Periodic Report 5 for the Upper Three Runs Integrator Operable Unit (IOU) (U), CERCLIS Number: 70 (SRNS-RP-2017-00548, Revision 0, February 2018) received February 28, 2018.

Page 2 of 2

-
4. Section 2.1.3, Ecological Benchmark Screening and Results (Surface Water), page 2-15. The last sentence on this page states that the DDD exceedance in the Tinker Creek subunit is one detect out of 70 samples; Table 2-5 shows 9 analyses. Please correct or explain.
 5. Table 1-1 Operable Units Associated with the Upper Three Runs IOU, page 1-53 of 1-58. Area H, Unit ID #275, please correct the FFA start date to 2039 under the Unit Status column.