



August 2, 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: Statement of Basis/Proposed Plan for the G-Area Oil Seepage Basin (GOSB) (761-13G)
Operable Unit (OU) (U), SEMS Number: 93 (SRNS-RP-2018-00460, Revision 0, June 2018)
received June 7, 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:
Statement of Basis/Proposed Plan for the G-Area Oil Seepage Basin (GOSB) (761-13G)
Operable Unit (OU) (U), SEMS Number: 93 (SRNS-RP-2018-00460, Revision 0, June 2018)
received June 7, 2018.

General Comment

1. The document as a whole should be revised to clearly indicate the purpose and intended effectiveness of the selected remedy regarding human and ecological exposure to contaminated media. Specifically, the fifth paragraph of Section I on page 1 and the first paragraph of Section IX on page 15 state that the selected remedy Alternative A-4 "...is effective in reducing exposure of contaminated media to human and ecological receptors..." Elsewhere in the document, the discussion for Alternative A-4 on page 11 and the second paragraph for Section IX on page 15 state the selected remedy "...will prevent exposure to pesticides buried at depth", and the first complete paragraph of page 14 states that the selected remedy "will ensure that exposure to contaminated sediments will be eliminated..." Within these sections, the discussion also uses the word "mitigated" regarding residual risks. Use of the words "reducing" and "mitigated" along with "prevent" and "eliminated" is confusing. The intent of the remedy regarding potential exposure to contaminated media should be stated more clearly and consistently throughout the document.

Specific Comments

1. Section IX, Preferred Alternative, page 16. The second paragraph states that the preferred alternative "... provides the best balance of tradeoffs among the other alternatives with respect to the evaluation criteria." Table 4, Comparison of Alternatives against the CERCLA Evaluation Criteria, shows that the Alternatives A-3, A-4 and A-5 are fairly similar in comparison except some of the Long-Term Effectiveness, Cost, and State Support/Agency Acceptance. The tradeoffs and the "Not acceptable" designations in Table 4 are not clearly defined or explained in this document. Clarification needs to be provided.
2. Draft Appendix VIII-A. Changes to the remedy selection are submitted to be more consistent with existing permit language. See Below.

Solid Waste Management Unit	Remedy Selection
G-Area Oil Seepage Basin (GOSB) (761-13G) Operable Unit	The Basin Interior subunit of the G-Area Oil Seepage Basin (GOSB) Operable Unit (OU) shall be remediated by dewatering, backfilling the basin to natural grade with clean soil, establishing a vegetative cover and managing the surface water. The remaining three subunits require no action. The Permittee shall remediate the GOSB as documented in the approved Statement of Basis/Proposed Plan (SRNS-RP-2018-00460 Rev. X, Month 2018) and the effective Record of Decision for the GOSB OU (insert revision number and date).