



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 5, 2017

Mr. Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802



RE: EPA Comments on the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for C-Area Groundwater Operable Unit (U), CERCLIS Number: 82, SRNS-RP-2017-00365, Revision 0, September 2017, Savannah River Site, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the RSER/EE/CA for C-Area Groundwater Operable Unit (U), CERCLIS Number: 82, SRNS-RP-2017-00365, Revision 0. EPA comments are attached.

If you have any questions or require additional information, please contact me at (404) 562-8513.

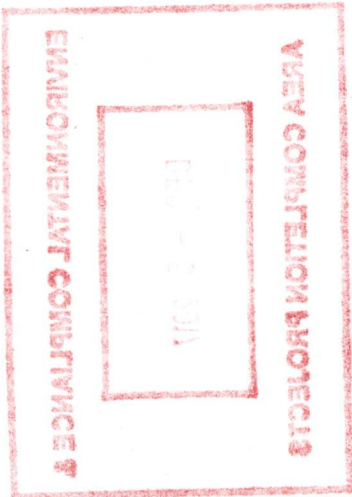
Sincerely,

Tufts,
Jennifer

Jennifer Tufts
Remedial Project Manager
Superfund Division

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Tufts, Jennifer
Date: 2017.12.05
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ec: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDHEC



**Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for
C-Area Groundwater Operable Unit (U), CERCLIS Number: 82, SRNS-RP-2017-00365,
Revision 0, September 2017, Savannah River Site, South Carolina**

TECHNICAL REVIEW COMMENTS

1. The last bullet in Section 5.4 Costs, Page 17 of 34 of the hard copy of the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for the C-Area Groundwater Operable Unit (EE/CA) indicates the monitoring approach for Alternative 3 is the same as for Alternative 2. As such, it would be expected the Direct O&M Costs for groundwater monitoring in Alternative 2 and Alternative 3 would be the same. However, a review of the detailed costs provided in Appendix B, Cost Estimates on Page B-1 for Alternative 2 and Page B-2 for Alternative 3 indicates the groundwater monitoring costs are not the same. For example, Page B-1 indicates the Direct O&M Costs for Alternative 2 is \$272,830.00 versus \$353,312.00 for Alternative 3 on Page B-2. The difference in costs between the groundwater monitoring approach for Alternative 2 and Alternative 3, including the difference in costs for preparation of the removal action report/interim post closure report (RAR/IPCR) of \$30,000.00 versus \$50,000.00, respectively, should be explained in the text. For clarity and completeness, revise the RSER/EE/CA to address this issue.
2. In Figure 6, CAGW OU TCE Plume, 2016, Page 31 of 34 of the hard copy of the EE/CA, the enlarged view of the C-Reactor (105-C) located in the upper right corner of the figure depicts several red circles drawn in the electrical resistivity heating-soil vapor extraction (ERH-SVE) remediation area. However, the meaning or purpose of the red circles is unclear as they were not defined in the figure legend. For clarity and completeness, revise the figure to address this issue.
3. In Figure 8, CAGW OU Distal TCE Groundwater Plume ISCO Treatment Area, Page 33 of 34 of the hard copy of the EE/CA the well location symbol (e.g., purple star) for upgradient Phase 2 well "CRW024C" is not visible in the figure. It appears the upgradient well label CAGW 02 for proposed "Phase 2 DPT" groundwater sample is covering well location CRW024C. For clarity and completeness, revise the figure to address this issue.
4. In the hard copy version of the RSER/EE/CA, Appendix B, Page B-2 of B-2 is mistitled as "Appendix C: Cost Estimates..." Revise the title to state "Appendix B: Cost Estimates..." in the hard copy version.