

**ENVIRONMENTAL COMPLIANCE &****MAR 17 2021**

March 17, 2021

**AREA COMPLETION PROJECTS**

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: Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) - Aiken, South Carolina (SRNS-RP-2020-00420, Revision 0, December 2020) received December 17, 2020.

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:**  
Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered  
Cover Systems (U) - Aiken, South Carolina (SRNS-RP-2020-00420, Revision 0, December 2020)  
received December 17, 2020.

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#### Specific Comments

##### Central Shops Burning/Rubble Pits (631-1G/631-3G)

1. Appendix C, Figure C-5, Water Level Measurements from CSR 14PZ and CSR 17PZ (2016-2020), page C-16. Please include a notation for the significance of the orange/yellow line (i.e., bottom of the basin) in this figure, similar to the one provided in the previous Five-Year Review Report.

##### K-Area Burning/Rubble Pit (131-K) and K-Area Rubble Pile (631-25G)

1. Appendix H, Attachment H-1, Section III Onsite Documents & Records Verified, page H-25. Item 7, Groundwater Monitoring Results, is checked as "N/A", although MNA is part of the remedy for this OU. Please correct.

##### Mixed Waste Management Facility

1. Appendix K, Remedy Implementation, page K-5The last paragraph of this section states that "Later in 1994, portions of the RCRA LLRWDF 5.3-hectare (13-acre) geosynthetic cover system was tied into the MWMF cover system." The specific portions of the LLRWDF that is tied into the MWMF cover system needs to be identified. Changes in either facility could impact the other.

##### SRL Seepage Basins (904-53G1, 904-53G2, 904-54G, 904-55G)

1. Appendix L, Attachment L-1, Section V Access and Institutional Controls, page L-22. Item A for this section, Fencing, is checked as "N/A" and the comment provided states that "OU-specific perimeter fencing is not required by the remedial action." This statement contradicts discussion and figures elsewhere in Appendix L that clearly indicate fencing is present at this OU. Please correct.