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

December 19, 2019

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 Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2018 through April 2019 (U), SEMS Number: 30, SRNS-RP-2019-00331, Revision 0, July 2019, Savannah River Site, Aiken, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2018 through April 2019 (U), SEMS Number: 30, SRNS-RP-2019-00331, Revision 0, July 2019. EPA comments are attached.

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

Sincerely,

JENNIFER TUFTS
Digitally signed by JENNIFER TUFTS
Date: 2019.12.19 13:16:30 -05'00'

Jennifer Tufts
Remedial Project Manager
Superfund Division

ec: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDHEC

EPA Comments on the Performance Evaluation Report for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2018 through April 2019 (U), SEMS Number: 30, SRNS-RP-2019-00331, Revision 0, July 2019
Savannah River Site, Aiken, South Carolina

I. GENERAL COMMENT

1. It is noted the Performance Evaluation Report (PER) for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit, April 2018 through April 2019 (U), SEMS Number: 30, SRNS-RP-2019-00331, Revision 0, July 2019 (2019 PER) recommends that the remedial goals (RGs) for trichloroethylene (TCE) and tetrachloroethylene (PCE) be revised to reflect current conditions and recent vadose zone fate and transport modeling. Based on the results of the 2018 characterization data, the updated fate and transport model indicated that residual TCE and PCE contamination beneath the Trenches Area soil cover no longer pose a contaminant migration concern. As such, the 2019 PER recommends the respective TCE and PCE remedial goals (RGs) be revised based on the updated model. However, EPA has concerns with some of the model input parameter assumptions and are unsure if model results are representative of site geologic/hydrogeologic conditions (see EPA comments on the Contaminant Migration Model for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit (U), SEMS Number: 30, SRNS-RP-2018-01190, Revision 0, January 2019). Once these issues are addressed, we can discuss path forward for the remedial action.

II. SPECIFIC COMMENTS

1. **Section 2.0, Remedial Actions, Page 3 of 10**

   The text in the last paragraph in Section 2.0 indicates the annual inspection of the A-Area Miscellaneous Rubble Pile (ARP) Operable Unit (OU) conducted on January 16, 2019 identified several issues and/or concerns that required corrective action to ensure the remedial action/institutional controls (ICs) maintain effectiveness and long-term protectiveness. However, only a summary of the issues/concerns and the resulting corrective actions were discussed in the 2019 PER and no further documentation (i.e., Field Inspection Checklist, photographs) were presented. For example, the text indicates pesticides were applied to active ant mounds observed on the Trenches Area soil cover. Additionally, the text indicates standing dead pine trees and trail vegetation were removed and one waste sign damaged by a fallen tree was replaced. However, no further information was presented in the 2019 PER documenting these site conditions and corrective actions that were taken. Revise the 2019 PER to address this issue to ensure the annual inspection evaluations are appropriately reported and documented.

2. **Section 3.0, Conclusions/Recommendations, Pages 7 and 8 of 10**

   The text indicates the fate and transport model for the ARP OU updated in 2019 indicates that TCE and PCE no longer pose a threat to human health and the environment based on changes to three primary factors that led to this result. It is noted the third primary factor that was changed in the model considers a lower water table elevation based on more recent water table data. As such, the lower water table elevation creates a greater vadose zone transport distance resulting in longer travel times and increased attenuation of contaminants. However, the 2019 PER does not present the current groundwater table elevation or state what increase in water table elevation would need to occur to invalidate the results of the fate and transport model and updated remedial goals for TCE and PCE. Revise the 2019 PER to address this issue to ensure the effectiveness and long-term protectiveness of the remedial action.