



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

MAR -7 2019

Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Acting Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Responses to the Regulatory Comments on the 2017 Groundwater Mixing Zone Report for the D-Area Oil Seepage Basin (631-G) (U) (SRNS-RP-2018-00647, Revision 0, July 2018), SEMS Number: 27

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the enclosed responses to the regulatory comments on the 2017 Groundwater Mixing Zone Report for the D-Area Oil Seepage Basin (631-G) (U) (SRNS-RP-2018-00647, Revision 0, July 2018) for your review. The South Carolina Department of Health and Environmental Control (SCDHEC) provided approval on November 20, 2018 and the U. S. Environmental Protection Agency (EPA) provided comments on December 10, 2018. This report will not be revised; however, all comment responses will be addressed in the next report, as applicable. Please review the responses and provide your approval within thirty (30) days of receipt.

The effort and time that the SCDHEC and the EPA have given on the subject operable unit are greatly appreciated. Questions from you or your staff may be directed to me at (803) 952-8365 or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

A handwritten signature in black ink, appearing to read "BTH", with a long horizontal flourish extending to the right.

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

MAR -7 2019

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

- 1) SRS Responses to South Carolina Department of Health and Environmental Control Comments on the 2017 Groundwater Mixing Zone Report for the D-Area Oil Seepage Basin (631-G) (U) (SRNS-RP-2018-00647, Revision 0, July 2018), SEMS Number: 27
- 2) SRS Responses to U.S Environmental Protection Agency Comments on the 2017 Groundwater Mixing Zone Report for the D-Area Oil Seepage Basin (631-G) (U) (SRNS-RP-2018-00647, Revision 0, July 2018), SEMS Number: 27

cc w/o encl:

D. Scaturo, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

D. Lloyd, EPA-Atlanta
M. McRae, TechLaw, Inc.

SRS Responses to the United States Environmental Protection Agency (US EPA) Comments on the 2017 Groundwater Mixing Zone Report for the D-Area Oil Seepage Basin Operable Unit

SEMS NUMBER: 27

SRNS-RP-2018-00647; July 2018

Comments received December 10, 2018

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EPA COMMENTS:

1. Based on the steady contaminant trends noted in some monitoring wells, slow progress has been made towards restoring the groundwater aquifer to beneficial use since the removal action was conducted in 1996. For example, the steady contaminant trends of vinyl chloride (VC), cis-1,2-Dichloroethylene (c-DCE) and trichloroethylene (TCE) noted for well DOB 15 and depicted in Appendix D, Figures D-52, D-75, and D-144, respectively, suggest the projected cleanup timeframe for aquifer restoration to beneficial use is uncertain.

With over 22 years of groundwater monitoring data, the noted steady contaminant concentration trends greater than respective maximum contaminant levels (MCLs) appear to represent a potential problem warranting future action. It remains unclear if the natural attenuation (NA)/GWMZ remedy is effective and performing as designed to achieve aquifer restoration within a reasonable timeframe as compared to active remediation. This report states, "...a Core Team meeting will be held in 2019 to discuss the effectiveness of the NA/GWMZ remedy based on further review of all data available for the DOSB [D-Area Oil Seepage Basin] OU." EPA recommends that DOE-SRS propose several potential response actions to address the above stated problem followed by discussion amongst the core team members.

Response: Clarification

SRS proposes to have a Core Team meeting or conference call in the Fall 2019 timeframe to discuss the trends in the DOSB plumes and the overall effectiveness of the NA/GWMZ remedy. This will allow for Core Team review of the 2018 Groundwater Mixing Zone Letter Report. The 2017 results continue to demonstrate that the existing GWMZ boundaries are adequate, with no significant increases in plume concentrations.

Contact: Ashley Shull (803) 952-7090 (ashley.shull@srs.gov)

2. In Appendix B, Figure B-2. DOSB Conceptual Cross-Section A-A', Page B-7 of B-22, the monitoring wells shown in the map inset defining the A-A' line of cross-section are not depicted in the cross-section figure. Revise the GWMZ Report to address this issue.

Response: Agree

Future reports and letters will identify wells in the cross-section on Figure B-2 and other cross-sections. No changes are proposed for the 2017 report.

Contact: Ashley Shull (803) 952-7090 (ashley.shull@srs.gov)
