



September 19, 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: Removal Action Design Plan with Effectiveness Monitoring Plan for the C-Area Groundwater Operable Unit (U), SEMS Number: 82 (SRNS-RP-2018-00807, Revision 0, August 2018) received August 17, 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:
Removal Action Design Plan with Effectiveness Monitoring Plan for the C-Area Groundwater
Operable Unit (U), SEMS Number: 82 (SRNS-RP-2018-00807, Revision 0, August 2018)
received August 17, 2018.

Page 1 of 1

Specific Comments

1. Section 2.1, Design Overview, pages 4 and 5. At the end of the second paragraph in this section, it states, "the emulsified oil is not anticipated to migrate far from the injection points, and the treatment barrier is estimated to enhance TCE biodegradation for three to five year." Please elaborate what conditions exist that inhibit the migration of the oil and cause it to remain in place for the period of treatment.