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May 13, 2022

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: RFI/RI Work Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit, SEMS Number: 91 (SRNS-RP-2021-05602, Revision 0, February 2022) received February 17, 2022.

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,

Heather Cathcart

Digitally signed by Heather Cathcart
Date: 2022.05.13 13:21:36 -04'00'

for

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:
RFI/RI Work Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit, SEMS Number: 91 (SRNS-RP-2021-05602, Revision 0, February 2022) received February 17, 2022.

General Comments

1. For every mention of TAL and TCL in the document, please include metals along with the other analytes.

Specific Comments

1. Executive Summary, Conclusions and Objectives, page ES-3. Please include PTSM along with the human health assessment, ecological assessment, and contaminant migration analysis in the data support discussions for 131-1L and 131-4L on this page. Also, revise Sections 3.1.3.2 and 3.1.3.3 accordingly.

2. Section 2.2.3, LRP 131-4L Subunit, page 14. Regarding the previous investigation in this subunit, the work plan states, "Sample results corresponding to specific depth intervals and location are not available." Section 3.1.3, LRP 131-4L Subunit, page 25, states that previous sampling at the subunit is inadequate for human health and ecological risk assessment due to inconsistent sampling depths. Please clarify whether information related to sampling depths in this subunit are not available or if the depths are known but inconsistent.

3. Section 2.3, Operable Unit Strategy, LRP 131-1L Subunit, page 15. The work plan states that a 1991 soil gas survey at the subunit identified "methane through hexane." What does "through" mean in this context?

4. Section 2.3, Operable Unit Strategy for LRP 131-1L and LRP 131-4L Subunits, pages 16 and 17. These sections state that visual inspections for suspected asbestos-containing material (ACM) will be conducted during soil sampling. If suspect ACM is identified, samples will be submitted for waste analysis. Tables 5 and 6, Laboratory Analytical Specifications Tables for TAL/TCL analytes and radiological analytes, pages 85 through 89, provide detailed information regarding lab analytical methods for the referenced analytes. However, no such information is provided for analysis of suspected ACM. If possible, please provide more detail on the type of analysis that will be conducted if suspected ACM is encountered. For example, which specific analytical method will be used, how will results be interpreted to determine if ACM is present, etc.

5. Section 3.1.6.2, Develop Decision Rules, LRP 131-1L Subunit, page 27. This section of the work plan states that no previous investigation data exists for the subunit. Section 2.3, Operable Unit Strategy, LRP 131-1L Subunit, page 15, indicates that a

1991 soil gas survey for volatile organic hydrocarbons was conducted at the subunit. Please clarify.

6. Section 3.1.7, Specify the Limits on Decision Errors, page 28. The last bullet point on the page indicates that the acceptable recovery window for matrix spikes and matrix spike duplicates is generally greater than or equal to 135% or less than 30%. Acceptable MS/MSD recoveries are typically within this range of 30% to 135%, not outside of the range as the text indicates. It appears possible that this could be an error with the use of greater than and less than symbols; however, please clarify whether MS/MSD recoveries are supposed to be within this range, not outside of it.

7. Sections 5.2 and 5.3, Sample Design and Rationale, LRP 131-1L and LRP 131-4L, pages 32 and 33. The proposed sampling intervals for the two subunits omit several intervals of soil. Specifically, no sampling intervals are proposed from 4 to 8 ft, 12 to 14 ft, and tentatively 14 to 16 ft. Please explain the rationale for not sampling at all soil intervals to depth or revise the workplan to include them.

8. Sections 5.2 and 5.3, Sample Design and Rationale, LRP 131-1L and LRP 131-4L, pages 32 and 33. The proposed soil sampling interval for these two subunits are inconsistent with the previous investigation at ECODS L-3. Table 1, ECODS L-3 Subunit Site Evaluation Sampling Depth Intervals, page 79, indicates that soil sampling intervals for ECODS L-3 were 0 to 1 ft, 1 to 4 ft, 4 to 8 ft, 8 to 12 ft, and 12 to 16 ft (where applicable). If the data collected from ECODS L-3 are considered sufficient to support a BRA and remedial decision, why are similar sampling intervals not proposed for LRP 131-1L and LRP 131-4L?

9. Preliminary Conceptual Site Model for ECODS L-3 subunit, Figure 21, Page 73. The RCOCs column states that PTSM has yet to be determined. Section 2.2.1 ECODS L-3 Subunit, page 12, second paragraph states that the data screening indicated that there is no PTSM at the ECODS L-3 subunit. Also, several sections of the document state that no additional sampling is required for the ECODS L-3 subunit. Please confirm that the RCOC column in Figure 21 is accurate.

10. Table 7, Minimum Field Quality Control / Quality Assurance Sampling Requirements, page 90. This table, as well as sections of the work plan text, indicate that one equipment blank will be collected per 40 samples. Section 7.2, Equipment and Decontamination Procedures, page 37, lists several pieces of equipment that will come in contact with soil samples, including hand auger buckets, stainless steel scoops, stainless steel mixing bowls, and a balance. Since multiple pieces of equipment will be coming in to contact with the samples, it is unclear whether individual equipment blanks will be collected with rinsate from each piece of

equipment, or if rinsate from each piece of equipment will be composited into one field blank per 40 samples. Please clarify how equipment blanks will be collected and confirm that this frequency is consistent to achieve the desired data quality objectives.

11. Table 9, ECODS L-3, LRP 131-1L, and LRP 131-4L OU Sample Matrix, pages 94 through 99. For LRP 131-4L, the number of proposed samples for each location and their corresponding depths are the same as those listed for LRP 131-1L; according to the proposed sampling strategy for LRP 131-4L discussed in Section 5.3 and throughout the document, there should be one less sample listed per location and at slightly varying subsurface depths than 131-1L. Please correct; also, ensure that the sample numbers listed at the end of this table on page 99 are correct.