



# Environmental Bulletin

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*from the Savannah River Site*

Public Invited to Comment

## **Remedial Action Proposed For A-Area Miscellaneous Rubble Pile Operable Unit**

The A-Area Miscellaneous Rubble Pile Operable Unit (ARP OU) is a 5.9-acre unit at the southern end of A/M Area at SRS. The unit is bounded by a gravel road to the north and two drainage ditches from the A/M Area to the east and southwest. Disposal activities at the ARP OU began in the early 1950's, but the exact dates of operation and specific waste disposed at the unit were not documented. However, based on field characterization work performed at the site, it is clear that the primary waste disposed at the site were construction rubble and an ash-like material.

The ARP OU contains three primary sources of contamination: construction debris piles, a near-surface ash layer, and a T-shaped disposal trench. Because these three areas are physically distinct and are located in separate areas of the ARP OU, the OU was divided into three separate subunits: the Piles Area, the Ash Area, and the Trenches Area. Groundwater has not been contaminated by the unit.

An initial 45-day public comment period for the *Statement of Basis/Proposed Plan for the A-Area Miscellaneous Rubble Pile (731-6A) Operable Unit* and draft Resource Conservation and Recovery Act (RCRA) permit modification was held from September 21, 2001 to November 4, 2001. The proposed remedial actions described for the OU at that time were as follows: (1) Piles Area – Hot Spot Removal and Disposal (2) Ash Area – Institutional Controls, and (3) Trenches Area – Passive Soil Vapor Extraction (PSVE), Soil Cover, and Institu-

tional Controls. There were no comments received during this initial public comment period.

PSVE was initially selected for the Trenches Area subunit primarily based on its lower cost as compared to Active Soil Vapor Extraction (ASVE). PSVE was comparable for the other criteria and has been successfully deployed at other operable units at SRS. However, PSVE deployment in shallow trenches containing ash has not been demonstrated at SRS. To reduce the uncertainty associated with the remedy, the United States Department of Energy (USDOE), United States Environmental Protection Agency (USEPA), and South Carolina Department of Health and Environmental Control (SCDHEC) agreed that pre-design testing of a pilot-scale PSVE well system was warranted.

Pre-design testing of the PSVE was carried out in the fourth quarter of calendar year 2001 and the first quarter of calendar year 2002. The testing concluded that perchloroethylene (PCE) and trichloroethylene (TCE) could not be removed at acceptable rates because adequate differential pressure could not be achieved between the surface and the screen zone of the PSVE wells. The lack of adequate differential pressure, necessary to operate PSVE wells, is attributed to the high permeability of the ash material in the Trenches Area.

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Based on these findings, it was concluded that a modified version of the ASVE alternative originally evaluated in the Statement of Basis/Proposed Plan should be selected as the preferred alternative. Originally, ASVE was developed on the basis that it would need to be a stand-alone system because the nearby 782-3M Soil Vapor Extraction Unit (SVEU) did not have the sufficient capacity to support an ASVE system placed in the Trenches Area. However, based on the information obtained from the pre-design testing of the PSVE alternative, it was concluded that ten (10) or fewer ASVE wells would be needed and that the existing 782-3M SVEU would have sufficient air handling capacity to support the scaled down ASVE system at the A-Area Miscellaneous Rubble Pile Operable Unit.

Based on the change in the selected remedial action for the Trenches Area, the SCDHEC has released a second draft RCRA permit modification for the proposed remedial action for the ARP OU at the Savannah River Site (SRS). This permit modification will be available for public review and copying at the locations listed below. The 45-day public comment period is scheduled for September 25, 2002, to November 8, 2002.

USDOE, USEPA, and SCDHEC have reviewed the risks associated with this unit and have evaluated cleanup alternatives. The following actions are recommended for the ARP OU:

**1. Piles Area – Hot Spot Removal and Disposal:** Under this remedial action, the PCB/PAH waste pile and the lead hot spot would be excavated, removed, and disposed in an off-unit permitted disposal facility. The lead hot spot would be excavated to a depth of approximately 1-foot below the land surface, while the polychlorinated biphenyl/polycyclic aromatic hydrocarbon (PCB/PAH) waste pile would be excavated to native soil. This alternative would eliminate all unacceptable risks identified in the Piles Area.

**2. Ash Area – Institutional Controls:** This remedial action consists of implementing institutional controls that would prohibit future residential land use and restrict access and activities. Under this alternative, existing work control procedures will provide protection for current workers. Warning signs and deed restrictions or notifications would be used to restrict access and minimize exposure of future industrial workers to the Ash Area. This alternative is considered acceptable due to the low levels of arsenic.

**3. Trenches Area – Active Soil Vapor Extraction, Soil Cover, and Institutional Controls:** This remedial action includes the installation of active soil vapor extraction wells to remove the PCE and TCE in the vadose zone by venting these solvents to the atmosphere where they are quickly photodegraded. A soil cover of a minimum thickness of 1 foot would be placed over both the trenches and asphalt debris source areas. The soil cover would provide a physical barrier between PAH surface contamination and remedial workers and future industrial workers. Institutional controls would prohibit future residential land use and provide additional protection of future industrial workers in the Trenches Area.

These alternatives will be protective of human health and the environment. They are also intended to be the final actions for the A-Area Miscellaneous Rubble Pile operable unit.

*See page 3 for Remedial Approach Proposed*

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***You are Invited To Comment***

Public comments will be accepted  
between September 25, 2002  
through November 8, 2002.

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Comments on the draft RCRA permit modification are requested by November 8, 2002. Upon completion of the public comment period, a Responsiveness Summary that addresses public comments will be prepared. The Responsiveness Summary will be made available with the final RCRA permit decision and will be sent to each person who submits comments.

Copies of the draft RCRA permit modification are available for review at SCDHEC during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

SCDHEC  
Bureau of Land and Waste Management  
8901 Farrow Road  
Columbia, South Carolina 29203  
Phone: (803) 896-4000

or

SCDHEC  
Lower Savannah District  
Environmental Quality Control Office  
206 Beaufort St., N.E.  
Aiken, SC 29801  
Phone: (803) 641-7670

If there is interest in discussing this recommended remedial approach, a public hearing may be requested. Comments on the draft RCRA permit modification or requests for a public hearing should be sent to Mr. John Litton. For additional information or to request a public meeting contact:

SCDHEC  
Attn: John Litton, P.E., Director  
Division of Waste Management  
Bureau of Land and Waste Management  
2600 Bull Street  
Columbia, SC 29201  
(803) 896-4000

## NEPA Announcement

The Savannah River Site (SRS) is committed to providing copies of National Environmental Policy Act (NEPA) documents including environmental impact statements (EISs) and environmental assessments (EAs) to all interested stakeholders. By being added to our mailing list, you will be notified of their availability and receive any SRS NEPA document that is of interest to you.

If you wish to be added to the mailing list for NEPA documents, please contact:

Mr. Andrew R. Grainger,  
NEPA Compliance Officer  
800-881-7292  
or e-mail: [nepa@srs.gov](mailto:nepa@srs.gov).

## SRS Environmental Bulletin Available OnLine

Did you know that the SRS Environmental Bulletin is available to you electronically in a PDF format? In an effort to allow stakeholders to receive more timely information about environmental activities, we are offering this alternative to paper copies. While we are constantly looking for ways to improve our services, we will happily continue to mail copies to those individuals who do not wish to take advantage of this offer.

To receive your copy of the SRS Environmental Bulletin electronically, please provide your name, current address, phone number and your e-mail address by leaving a message on 800-881-7292 or send us an email at [nepa@srs.gov](mailto:nepa@srs.gov).

If you have any questions, call the Public Involvement Office at 800-249-8155.

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Savannah River Site  
Building 742-A  
Aiken, S.C. 29808

