



June 14, 2023

ENVIRONMENTAL COMPLIANCE &

JUN 14 2023

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

Re: Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) – April 2021 through March 2022 Data, SEMS Number: 81 (SRNS-RP-2022-00963, Revision 0, January 2023) received February 16, 2023.

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

Digitally signed by Susan B.

Fulmer

Date: 2023.06.14 09:31:03 -04'00'

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:
Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U)
– April 2021 through March 2022 Data, SEMS Number: 81
(SRNS-RP-2022-00963, Revision 0, January 2023) received February 16, 2023.

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General Comments

1. There are two statements in Section 4.0, Summary and Recommendations, that the Department disagrees with the conclusions. The first statement states that the tritium contamination within the Gordon Aquifer Unit was adequately defined in the 2010/2011 and 2013 investigations. If it was adequately defined, there would not be a need for further investigation as indicated in this section. This statement should be revised to state that it was thought to be defined. The second statement states that there are no practical treatment technologies that exist to remove tritium from large volumes of groundwater, and therefore, continued monitoring is recommended at this time. While this statement may be true, it should not be the sole reason for continued monitoring in the Gordon Aquifer Unit. Monitoring of tritium should be done to verify there are no detrimental effects to the environment or human health.

Specific Comments

1. Section 4.0, Summary and Recommendations, page 17-18. The last sentence on page 17 should be revised to state that the Upper Aquifer Zone is being discussed.