



October 23, 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: 2017 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action Effectiveness Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2018-00573, Revision 0, June 2018) received June 26, 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:
2017 Annual Comprehensive TNX Area Groundwater Monitoring and
Remedial Action Effectiveness Interim Report (U), SEMS Numbers: 21, 29
(SRNS-RP-2018-00573, Revision 0, June 2018) received June 26, 2018.

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General Comments

1. Section 4.1.1 discusses sampling issues at monitoring wells TNX 72S and 72M due to dry conditions. The final paragraph indicates these wells were installed to observe any potential groundwater contamination discharging into the wetlands, and that the conditions of the wetland sediments make it difficult to sample them. This well cluster is approximately 400 feet downgradient from monitoring well TNX 28D, which according to Section 5.4 has a history of TCE detects which have recently exceeded the MCL (7.2 µg/L 2Q, 12 µg/L 4Q). Based on this information, the Department recommends an additional monitoring well installation adjacent to the wetlands border directly between monitoring wells TNX 72S/M/D and TNX 28D, consistent and in line with the layout of wells TNX 16D, 15D and 13D. Section 8 should be updated to include this recommendation.

Specific Comments

1. Table 4-1, TNX Monitoring Well Network, page 17. Monitoring well TVR 1A is listed twice at the bottom of this table, with different parameters. Please correct.
2. Table 7-1, Well Construction and Operation for TNX SVE Wells, page 43. The last column of this table should be updated to include 2017 for all MicroBlower™ wells that operated last year.
3. Tables 7-2 through 7-6, Monthly SVE Well VOC Mass Removal (2017), pages 45 through 49. The layout and data presented in these tables is confusing. It is not clear why these are not one combined table. Additionally, for each month in each table, the measured VOC concentrations at each Microblower™ well is the same. For the months of November and December, there are several inconsistencies between the measured contaminant concentrations and operating hours; i.e., several wells show 0 operation hours; yet, there are measured VOC concentrations listed for these wells during these months. References to Table 7-3 on page 40 and 7-4 on page 42 indicate that Table 7-2 was probably mistakenly segmented by page, and as a result the corresponding data for each month was skewed. Please correct.