



October 24, 2019

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: Biennial Effectiveness Monitoring Report (EMR) for Monitored Natural Attenuation (MNA) at the C-Area Burning/Rubble Pit (131-C) and Old C-Area Burning/Rubble Pit (NBN) Operable Unit (U) – January 2017 through December 2019, SEMS Number: 31 (SRNS-RP-2019-00327, Revision 0, June 2019) received June 28, 2019. *2018 Rev 10/28/2019*

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:
Biennial Effectiveness Monitoring Report (EMR) for Monitored Natural Attenuation (MNA) at
the C-Area Burning/Rubble Pit (131-C) and Old C-Area Burning/Rubble Pit (NBN)
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Page 1 of 1

General Comment

1. The EMR discusses the Conceptual Site Model for the CBRP OU TCE plume on page 6 and elsewhere in the document, yet there is no figure provided showing a CSM. Additionally, the significance/explanation of trigger levels for designated monitoring stations is not discussed anywhere throughout the document. The EMR should be updated to include these.

Specific Comment

1. Figure 3, CBRP OU LUC Boundary, page 25. Monitoring well CRP 6DR is labeled on this figure, but the well location is not marked. Please include.