SC DEPARTMENT of ENVIRONMENTAL SERVICES

Susan Fulmer, P.G.
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

ENVIRONMENTAL COMPLIANCE &

October 9, 2025

Mr. Matthew R. Baker, Acting FFA 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

OCT - 9 2025

SRNS-OS-00312

AREA COMPLETION PROJECTS

Re: Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) – April 2024 through March 2025, SEMS Number: 24 (SRNS-RP-2025-00708, Revision 0, June 2025) received June 18, 2025.

Dear Mr. Baker:

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/SCDES 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: 2025.10.09 12:45:35 -04'00'

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Gregg O'Quinn, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Environmental Services Comments on:

Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) – April 2024 through March 2025, SEMS Number: 24 (SRNS-RP-2025-00708, Revision 0, June 2025) received June 18, 2025.

Specific Comments

1. Section 2.2.1, Groundwater Aquifers, page 11. There are a couple of discrepancies between the total number of monitoring wells and their associated aquifer units discussed in the second paragraph of this section, Table 1 and Table 3. First, the third sentence of this paragraph states that the Pen Branch monitoring wells are not identified to a specific aquifer; however, three of these wells (CMP-PB-005D2, -006D1 and -006D2) are listed as MAZ and LAZ wells respectively in Table 1, whereas Table 3 lists aquifer-specific designations for all of the CMB-PB wells. Also, this section states there are 27 MAZ wells and 29 LAZ wells. The number of MAZ wells appears to include Pen Branch well CMP-PB-005D2 according to the number of MAZ wells listed in Table 1; yet Table 1 lists a total of 32 LAZ wells (including the two Pen Branch wells listed with LAZ aquifer units), which contradicts the number stated in Section 2.2.1 (29). The assignment of aquifers to the Pen Branch wells in Tables 1 and 3, contradictory to the statement made in Section 2.2.1, confuses the actual number of wells specific to each aquifer-type. Please clarify the discrepancies between this discussion in Section 2.2.1 and Tables 1 and 3, as well as other applicable sections, if necessary.

2. Section 2.2.2, Groundwater Sampling Results, page 12. For future reports, please indicate the actual number of samples that were collected for each analyte (VOCs, 1,4-dioxane and lindane) alongside the included required numbers. Also, Sections 2.2.2.7 and 2.2.2.13 indicate samples were mistakenly not collected for 1,4-dioxane at CMP062D, CMP062C and CMP062B or for lindane at CMP035B in 2Q2024. This explanation should also be included in this section as well, consistent with providing reasoning for sampling changes at the other wells listed here.

3. Section 2.2.2.7, 1,4-Dioxane, page 23. Two sampling methods for 1,4 Dioxane are described in the first paragraph (USEPA SIM Method and USEPA 522), but when the maximum concentrations of 1,4 Dioxane are discussed for well CMP 35D in the third paragraph, the sampling method is not mentioned. Please clarify which sampling method is used for this concentration reading and if values increased relative to the same acquisition method in 2023. Please also state which sampling technique was used for well CMP 12A values.