dhec
Healthy People. Healthy Communities.

October 21, 2020

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: 2020 Effectiveness Monitoring Report (EMR) for Monitored Natural Attenuation (MNA) at the L-Area Southern Groundwater (LASG) Operable Unit (OU) (U) – Data from 2018 through 2019, SEMS Number: 77 (SRNS-RP-2020-00332, Revision 0, June 2020) received June 24, 2020.

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

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:
2020 Effectiveness Monitoring Report (EMR) for Monitored Natural Attenuation (MNA) at the L-Area Southern Groundwater (LASG) Operable Unit (OU) (U) – Data from 2018 through 2019, SEMS Number: 77 (SRNS-RP-2020-00332, Revision 0, June 2020) received June 24, 2020.

Specific Comments

1. Table 2-1, LASG OU MNA Monitoring Network, page 9. Station LSW031DL is listed in this table as a LUC Boundary Monitoring Well; Table B-1, which shows MCL exceedances for tritium at this location, lists it as a Monitoring Well. Based on the information provided in Section 4.3.1 stating that no tritium exceedances were observed in any of the LUC boundary wells, it appears that Table 2-1 should be revised.

2. Section 4.3.1, Tritium, page 21. The fourth sentence of this section states: "The KSZ monitoring wells were all below their KSZCLs and also below MCLs." However, according to Table B-1, there was a tritium MCL exceedance (23.8 pCi/L) at KSZ monitoring well LDB 3 in March 2018. Please address this discrepancy.