



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

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

November 13, 2024

ENVIRONMENTAL COMPLIANCE &

Ms. Avery G. Hammett, 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

NOV 13 2024

AREA COMPLETION PROJECTS

Re: Effectiveness Monitoring Report (EMR) for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Units (OU) (U) – April 2023 through March 2024, SEMS Number: 24 (SRNS-RP-2024-00606, Revision 0, July 2024) received July 22, 2024.

Dear Ms. Hammett:

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: 2024.11.13 14:16:31 -05'00'

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

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

South Carolina Department of Environmental Services Comments on:

Effectiveness Monitoring Report (EMR) for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Units (OU) (U) – April 2023 through March 2024, SEMS Number: 24 (SRNS-RP-2024-00606, Revision 0, July 2024) received July 22, 2024.

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Specific Comments

1. Section 1.4, Observed Hydrology at the CMP Pits OU, page 7. Table 2 includes horizontal groundwater flow velocity calculations for a flow path B-B' in the Gordon Aquifer (GA). This GA flow path is not listed along with A-A' on this page. Please include.
2. Section 1.4, Observed Hydrology at the CMP Pits OU, page 8. The first complete sentence on this page states that values of 35 ft/day and 25% were used for the hydraulic conductivity constant and porosity values, respectively, for the GA horizontal groundwater linear velocity calculations. Table 2, however, lists values of 20 ft/day and 30%, and the resulting calculated horizontal groundwater flow velocities indicate that these were the values used in the calculations. Please correct this discrepancy.
3. Section 2.2.2.2, PCE and TCE, page 12. The last sentence of the paragraph at the top of this page states that 20 wells had TCE concentrations greater than the MCL during the 2023 groundwater sampling. According to Table 3, a total of 24 wells had TCE concentrations above the MCL. Please correct.