



**Susan Fulmer, P.G.**  
**Bureau of Land and Waste Management**  
2600 Bull Street  
Columbia, SC 29204

**ENVIRONMENTAL COMPLIANCE &**

March 19, 2025

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SRNS-OS-2025-0080

**AREA COMPLETION PROJECTS**

Mr. Matthew R. Baker, Action 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

Re: Seventh Five-Year Remedy Review Report for the Savannah River Site Operable Units with  
Groundwater Remedies (U) – Aiken, South Carolina, SEMS Number: 00 (SRNS-RP-2024-00934,  
Revision 0, December 2024) received December 30, 2024.

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: 2025.03.19 12:13:09 -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:**  
Seventh Five-Year Remedy Review Report for the Savannah River Site Operable Units with  
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Specific Comments

1. Appendix C: C-Area Groundwater Operable Unit, Section IV. Five-Year Review Process, Summary of Inspections and Interviews, page C-9. The report states, “No storm damages [from Hurricane Helene] have been identified at the CAGW OU that would affect the protectiveness of the remedy.” However, during the February 27, 2025 Core Team Field Visit, it was stated that two groundwater monitoring wells were crushed during this weather event and would need to be replaced. Please revise the document to include this information and clarify if this impacted the protectiveness of the remedy.
2. Appendix C: C-Area Groundwater Operable Unit, Attachment C-1. Five-Year Review Site Inspection Checklist – C-Area Groundwater Operable Unit, Section XI. Overall Observations, Part B. Adequacy of O&M, page C-32. The last three sentences state, “Within a month after Hurricane Helene occurred all monitoring wells were re-inspected for damages. All damages, if any, were repaired prior to the scheduled well sampling events. The well sampling schedules were not impacted.” During the February 27, 2025 Core Team Field Visit, it was stated that the two damaged groundwater monitoring wells, referenced in Specific Comment #1, had not been replaced and, hence, were not sampled. Please revise this section to reflect the current conditions of the monitoring well network.
3. Appendix E: D-Area Oil Seepage Basin (631-G) Operable Unit, Section III Background—Physical Characteristics, page E-1. In the last sentence on this page, please include the year that the interim remedial action was performed at this operable unit.
4. Appendix E: D-Area Oil Seepage Basin (631-G) Operable Unit, Section IV Remedial Actions—Remedy Selection, page E-4. The first sentence of this subsection states that the selected remedy for the DOSB OU is monitored natural attenuation/groundwater mixing zone with institutional controls. Table 4 lists excavation, groundwater mixing zone and land use controls for the main remedy. Please revise this section and/or Table 4 for accuracy and consistency.
5. Appendix E: D-Area Oil Seepage Basin (631-G) Operable Unit, Section IV Remedial Actions—Remedy Selection, page E-4. This section discusses the reasons why methylene chloride was not included as a final COC for deep soils after initially being identified as a COC. The second paragraph of the Initial Response discussion on page E-3 states that eight VOCs were identified as final COCs at DOS. Table E-2 lists six final COCs with selected cleanup levels. Please provide a discussion in the Remedial Actions subsection of this appendix to include the fates of 1,1-dichloroethylene and total 1,2-DCE, similar to the discussion provided for methylene chloride.

**South Carolina Department of Environmental Services Comments on:**  
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6. Appendix E: D-Area Oil Seepage Basin (631-G) Operable Unit, Section IV Remedial Actions—Remedy Implementation, page E-5. For the second bullet listed in this subsection, please include the number of monitoring wells in the current monitoring network for the DOSB OU, similar to information provided in the second bullet of the corresponding subsection on page F-6 for the L-Area Southern Groundwater Operable Unit in Appendix F.
  7. Appendix E: D-Area Oil Seepage Basin (631-G) Operable Unit, Section IV Remedial Actions—Systems Operations/Operation and Maintenance, page E-7. The last sentence of this subsection states that the original ROD estimate was based on monitoring twelve locations, yet 23 wells are currently monitored. Please discuss when and why these extra eleven wells were added.