



ENVIRONMENTAL COMPLIANCE &

October 14, 2021

OCT 14 2021

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

AREA COMPLETION PROJECTS

Re: Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemical, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) – April 2020 through March 2021, SEMS Number: 24 (SRNS-RP-2021-03832, Revision 0, June 2021) received June 16, 2021.

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,

A handwritten signature in blue ink, appearing to read "Susan B. Fulmer", is written over a faint, light blue grid background.

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

SRNS-OS-2021-00290

South Carolina Department of Health and Environmental Control Comments on:
Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA)
at the Chemical, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) –
April 2020 through March 2021, SEMS Number: 24
(SRNS-RP-2021-03832, Revision 0, June 2021) received June 16, 2021.

Page 1 of 1

Specific Comment

1. Table 1, CMP Pits OU MNA Monitoring Network, pages 96 and 97, and Table 3, CMP Pits OU Annual MNA Results, April 2020 through March 2021. There are a few discrepancies between these two tables regarding the sampling frequencies for some of the wells and analytes.

For VOCs, monitoring wells CMP 31B and 33D show 2Q and 4Q as the sampling frequency on Table 1, yet Table 3 only shows sampling data for 2Q. Also, VOC data is shown for wells CMP 32B and 34D on Table 3, yet Table 1 does not include any sampling frequency for VOCs at these wells.

Additionally, for 1,4-dioxane, Table 1 indicates 4Q sampling at wells CMP 31B and 33D, yet Table 3 shows that no sampling was performed at these wells. Table 3 indicates well CMP 34D was sampled and analyzed for 1,4-dioxane yet, Table 1 does not include a sampling frequency.

Finally, for lindane, Table 3 shows data for wells CMP 010A, 11D, 13D and 52, and Table 1 does not include a sampling frequency for lindane at these wells.

Please revise these tables so that they are consistent and accurate. Also, discuss why 4Q sampling was not performed at wells CMP 31B and 33D for VOCs and 1,4-dioxane in the report.