



January 6, 2022

ENVIRONMENTAL COMPLIANCE &

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

JAN - 6 2022

AREA COMPLETION PROJECTS

Re: Effectiveness Monitoring Report (EMR) for the P-Area Groundwater (PAGW) Operable Unit (OU) Zero Valent Iron Permeable Reactive Barrier (ZVI-PRB) Removal Action (U) – March 2019 through March 2021, SEMS Number: 81 (SRNS-RP-2021-00016, Revision 0, September 2021) received September 9, 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,

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:
Effectiveness Monitoring Report (EMR) for the P-Area Groundwater (PAGW)
Operable Unit (OU) Zero Valent Iron Permeable Reactive Barrier (ZVI-PRB) Removal Action (U)
– March 2019 through March 2021,
SEMS Number: 81 (SRNS-RP-2021-00016, Revision 0, September 2021)
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Specific Comments

1. Section 2.4, Removal Action Implementation and Monitoring Goals, page 7. The first paragraph states, "Precipitation within the ZVI-PRB leads to a decreased performance as the porosity, and therefore the retention time within the barrier, will decrease." Please clarify in the document if an abnormally high amount of rainfall has been considered when determining the performance and life of the ZVI-PRB.
2. Section 2.4, Removal Action Implementation and Monitoring Goals, page 7. The last sentence in the first paragraph states, "However, overtime, under normal circumstances, it is expected the ZVI will lose some of its reactivity." Please clarify in the document what is the expected life of the ZVI and if there will be ample time for the removal action to be effective.