



ARF-024565

SRNS-OS-2024-00171

ENVIRONMENTAL COMPLIANCE &

May 15, 2024

MAY 15 2024

Mr. Joel Cantrell, Director
Environmental, Safety, Health, and Quality
Savannah River Mission Completion, LLC
Savannah River Site
Aiken, South Carolina 29808

AREA COMPLETION PROJECTS

Re: 2023 Annual Groundwater Monitoring Report for the F- and H-Area Radioactive Liquid Waste Tank Farms (U), SEMS Numbers: 23 and 89 (SRNS-RP-2024-00042, Revision 0, March 2024) received via email on March 26, 2024.

Dear Mr. Cantrell:

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

Digitally signed by Susan B.
Fulmer
Date: 2024.05.15 13:28:16 -04'00'

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)
Avery Hammett, DOE-SR
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:
2023 Annual Groundwater Monitoring Report for the F- and H-Area Radioactive Liquid Waste
Tank Farms (U), SEMS Numbers: 23 and 89 (SRNS-RP-2024-00042, Revision 0, March 2024)
received via email on March 26, 2024.**

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General Comments

1. The report states that during the first quarter of 2022, the nonvolatile beta trigger level of 50 pCi/L for contingent radionuclide speciation analysis was exceeded at FTF 19; however, this analysis was not performed due to administrative issues. Please clarify the administrative issues and whether or not there may be a concern for future contingency sampling. For future sampling, the Department expects contingency sampling to be performed during any and all instances of the alpha and nonvolatile beta trigger levels being exceeded at FTF and HTF.

Specific Comments

1. Table of Contents, List of Appendices, page iii and iv. The 2023 Sample Results for F-Area Tank Farm are referred to as Attachment A and the 2023 Sample Results for H-Area Tank Farm are referred to as Attachment B in the text and are included in this report as Attachments. Please revise the Table of Contents to say List of Attachments instead of List of Appendices on pages iii and iv.
2. Section 5, Conclusion, page 11. The text stated that 58 wells (12 wells at FTF and 46 wells at HTF) were sampled during 2023. However, in Section 3.0 Groundwater Monitoring at F-Area Tank Farm, page 3, the text states that 13 of 14 wells in the FTF were sampled during the first and third quarters of 2023. Attachment A confirms that 13 wells in the FTF were sampled during the first and third quarters of 2023. The sentence in the conclusion section should read "SRS performed monitoring in 2023 according to the approved plans and performed sampling in the first and third quarters at 59 wells (13 wells at FTF and 46 wells at HTF)."
3. Attachment A and Attachment B, pages A5 – A11 and pages B5 – B21. Please identify what the qualification code is and define what the qualification codes 9, 11, 18, 21, Q, V, RR1, RR2 stand for.