



October 23, 2019

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

ENVIRONMENTAL COMPLIANCE &

OCT 28 2019

AREA COMPLETION PROJECTS

Re: R-Area Groundwater (NBN) Biennial Effectiveness Monitoring Report in Support of R-Area Operable Unit (U) – January 2017 through December 2018, SEMS Number: 95 (SRNS-RP-2019-00267, Revision 0, June 2019) received June 27, 2019.

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:
R-Area Groundwater (NBN) Biennial Effectiveness Monitoring Report
in Support of R-Area Operable Unit (U) – January 2017 through December 2018,
SEMS Number: 95 (SRNS-RP-2019-00267, Revision 0, June 2019) received June 27, 2019.

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Specific Comments

1. Section 4.1.4, Northern Tritium Plume, page 11. The last sentence of the second paragraph of this section states that the Action Limit for tritium at well RSE 10DU is 252 pCi/mL. Table 2 lists an Action Limit of 168 pCi/mL. Please correct.
2. Table 2, RCOC Maximum Results for 2018 by Plume, page 37. Plume definition well RAG008B is listed in this table with an Action Limit of 37 µg/L for TCE. According to discussion in the first paragraph of Section 3.4 and footnote "a" for Table 2, Action Limits apply to source area zone wells. It is unclear what this value represents for RAG008B since it is a plume definition well. Please explain and/or correct. Also, the listed MCL of 70 µg/L for TCE is incorrect and should be 5 µg/L instead.