



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

Susan Fulmer, P.G.
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
ENVIRONMENTAL COMPLIANCE

May 14, 2025

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Mr. Wesley H. Bryan, Director
Environmental, Safety, Health, and Quality
Savannah River Mission Completion, LLC
Savannah River Site
Aiken, South Carolina 29808

AREA COMPLETION PROJECTS

Re: 2024 Annual Groundwater Monitoring Report for the F- and H-Area Radioactive Liquid Waste Tank Farms (U) (SRNS-RP-2025-00345, Revision 0, March 2025) received March 26, 2025.

Dear Mr. Bryan:

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: 2025.05.14 08:35:03 -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:
2024 Annual Groundwater Monitoring Report for the F- and H-Area Radioactive Liquid Waste Tank
Farms (U) (SRNS-RP-2025-00345, Revision 0, March 2025) received March 26, 2025.

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Specific Comments

1. Section 3.0, Groundwater Monitoring at F-Area Tank Farm - Nonvolatile Beta, pages 5 and 6. It is stated on the bottom of page 5 that during the third quarter sampling event of 2024, the nonvolatile beta trigger level of 50 pCi/L was exceeded at well FTF 12 R (91.7 pCi/L). The first complete sentence of page 6 then states that analysis for specific radionuclides will be performed at FTF 12 R during the first quarter 2025 sampling. As stated in SRS's response to SCDES (formally SCDHEC) General Comment #1 in the Responses to Comments on the 2023 Annual Groundwater Monitoring Report, SRS has agreed to request the lab to notify their data management team when the trigger level is exceeded at any well so that prompt mobilization for the required specific radionuclide sampling may occur. The Department does not consider delaying specific radionuclide sampling until the next scheduled quarter to be a prompt response to a trigger exceedance and expects any future trigger exceedances to be addressed in a more proactive manner.