SC DEPARTMENT of ENVIRONMENTAL SERVICES

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

ENVIRONMENTAL COMPLIANCE &

October 15, 2026

Mr. Matthew R. Baker, Federal Facility Agreement Remedial Project Manager
Remediation, Deactivation and Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

OCT 15 2026

AREA COMPLETION PROJECTS

Re: Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) April 2025 through March 2026, SEMS Number: 24 (SRNS-RP-2026-00316, Revision 0, June 2026) received June 19, 2026.

Dear Mr. Baker:

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: 2026.10.15 11:21:10 -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:
Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits Operable Unit (OU) (U) April 2025 through March 2026, SEMS Number: 24 (SRNS-RP-2026-00316, Revision 0, June 2026) received June 19, 2026.

Specific Comments

1. Section 2.2.2, Groundwater Sampling Results, page 13. This section, which describes additions to and omissions from the planned sampling for 2025, does not include the apparent omitted VOC sampling for monitoring well CMP067B during 2Q2025 as indicated in Table 3, although Table 1 includes this as required sampling for this monitoring well. Please include and discuss this omission in this section and address this in other applicable sections of the report.

2. Section 2.2.2.2, PCE and TCE: Lower Aquifer Zone, page 19. The first paragraph discusses the maximum concentrations of PCE and TCE for the LAZ and references Figure 11 for both. However, Figure 11 only shows the PCE concentrations at monitoring wells. Please revise to include Figure 18 as the reference for maximum TCE concentrations.

3. References, page 34. The reference attributed to Adrian A. Schieflera,b, et al., 2018. *Extent of natural attenuation of chlorinated ethenes at a contaminated site in Denmark*, is not cited in the report. Please include this reference where appropriate or remove it from the citation list if it is unnecessary.