



November 25, 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

Re: 2018 Groundwater Monitoring Report for the D-Area Groundwater Operable Unit (U), SEMS  
Number: 63 (SRNS-RP-2019-00454, Revision 0, July 2019) received July 30, 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:**  
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General Comments

1. On August 29, 2019, USDOE, USEPA, and SCDHEC conducted a Core Team meeting to discuss the development of the RFI/RI Work Plan. During the meeting, the topic of adding PFAS analytes to the analyte list was discussed. Please include the sampling results for these analytes (PFAS and AFFF) in the next applicable annual report (either groundwater letter report or groundwater report). Also, the findings should be discussed; and figures indicating the sampling locations should be included in the report.
2. There are several discrepancies between sections of the document that discuss analyte exceedances for various screening values. Specifically, the following discrepancies were noted:
  - a) Thallium is listed in Section 3.0 for exceeding its MCL; yet, according to the results provided in Tables C-1 through C-4, all sampling results were below the MCL.
  - b) The first paragraph of Section 3.1 does not include selenium as an analyte exceeding its MCL; although, it is included in Section 3.0 and indeed does exceed the MCL according to Table C-2.
  - c) Arsenic and selenium are left out in the discussion on metals associated with the coal leachate plume which exceed a MCL, NSDWS, or RSL at the bottom of page 9.
  - d) The last paragraph of Section 3.1 discusses surface water exceedances for beryllium, cobalt, aluminum and manganese but does not include sulfates.
  - e) The contaminant migration discussion for metals in Section 4.2 does not include arsenic or selenium.
  - f) The second paragraph of Section 5.0 includes fluoride and chloride as analytes that exceed their respective MCLs. These are not included in any of the data tables nor are they mentioned anywhere else in the document. Additionally, arsenic and selenium are not listed in this group.
  - g) The first sentence of page 18 lists total dissolved solids as exceeding its NSDWS, and hexavalent chromium as exceeding its RSL. These are not mentioned in the last paragraph of page 8.
  - h) Hexavalent chromium is listed as a metal exceeding a MCL, NSDWS, or RSL in the first paragraph of Section 5.1.1; yet, it is not listed in the metal exceedances discussion in the first paragraph of Section 3.1. Additionally, arsenic and selenium are not listed in this group.
  - i) The first paragraph on page 19 in Section 5.1.1 indicates two source wells at which threshold exceedances were recorded for beryllium, chromium, copper, and selenium. According to Tables C-1, C-3 and C-4, there were threshold exceedances for chromium (estimated) at DCB 34C, copper at DCB 21B, and uranium at DCB 21C, respectively. These exceedances were not shaded orange

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in their respective tables, nor were the chromium exceedance at DCB 34C or uranium exceedance at DCB 21C discussed in Section 5.1.1.

The report should be revised to address these discrepancies and also ensure that the Executive Summary is accurate.

Specific Comments

1. Section 1.4, D-Area Comprehensive Environmental Response, Compensation and Liability Act Related Activities, page 4. It should be noted that the powerhouse soils around and below the structure have not been investigated. Per the RFI/RI Work Plan letter, wells have been added to the groundwater monitoring network to determine if the powerhouse is a source for groundwater contamination. These results, if significant, should be included in the next groundwater letter report or full report.