



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

Susan Fulmer, P.G.
Bureau of Land and Waste Management

2600 Bull Street
Columbia, SC 29201

ENVIRONMENTAL COMPLIANCE &

January 24, 2025

Ms. Avery G. Hammett, SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

JAN 24 2025

AREA COMPLETION PROJECTS

Re: Focused Corrective Measures Study / Feasibility Study for D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U), SEMS Number: 69 (SRNS-RP-2024-01034, Revision 0, October 2024) received October 31, 2024.

Dear Ms. Hammett:

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: 2025.01.24 13:43:25 -05'00'

Susan B. Fulmer, P.G., Manager

Federal Remediation Section

Division of Site Assessment, Remediation, Revitalization

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Travis Fuss, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Environmental Services Comments on:

Focused Corrective Measures Study / Feasibility Study for D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U), SEMS Number: 69 (SRNS-RP-2024-01034, Revision 0, October 2024) received October 31, 2024.

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Specific Comments

1. Figure 8, D-Area Ash Basin Arsenic Results for Groundwater (2Q23), page 6-11. This figure, which is referenced in the discussion of groundwater results for seven shallow DABW monitoring wells in Section 1.2.4.3, shows the following results for arsenic: three detects below MCL, three non-detects and one not sampled. Table 2 indicates five detections out of eight samples, with an exceedance of the MCL (elevated turbidity, which was explained in Section 1.2.4.3). There appears to be a discrepancy in the number of detects listed in Table 2 and the results shown on Figure 8. Please correct and include the location of the arsenic MCL exceedance in addition to the other seven results.
2. Table 7, Summary of the Screening of Alternatives for the DABW, page 6-34. In the Comments column for A-3 – Excavation and Disposal, the last sentence states “Requires five-year remedy reviews.” However, in Section 3.1.3 Alternative A-3: Excavation and Disposal, the last sentence of the section states, “This alternative would not require five-year remedy reviews.” Please revise Table 7 to the correct statement regarding five-year remedy reviews for A-3 – Excavation and Disposal.