ARF-025385

From:	Caleb Jones
To:	Jon Richards; Susan Fulmer
Cc:	Brianne Martin; Heather Cathcart; Sarah Steeple; Duke Taylor; Joseph Martina; MORROW, KAREN D; BAKER, MATTHEW R; STEPHENS, BRIAN M; HORCHER, ANDY T; JENKINS, BERNICE M; Chris Bergren; Kelsey Holcomb; Thelesia Oliver; Amy Meyer; Regina Marquez; J Ross; Katie Davis; Ryan Mcdaniel; Terry Killeen; Ashley Shull; Bette Ross; Caleb Jones; Shelia Mcfalls; Dena Brett; Mtesa Wright; Gregg O"Quinn; Tabatha Corley
Subject:	Savannah River Site"s Responses to the Regulatory Comments on the D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U) (SRNS-RP-2025-01191, Revision 0, October 2025) SEMS Number: 63
Date:	Thursday, April 23, 2026 7:37:32 AM
Attachments:	SCDES_DAG_2024_Data_Email_Comments_Final.pdf

SRNS-J2000-2026-00300

References:

1. Email, Shelia Mcfalls (SRNS) to Jon Richards (EPA) and Susan Fulmer (SCDES), *Submittal of D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U) (SRNS-RP-2025-01191, Revision 0, October 2025) and Savannah River Site's Responses to the Regulatory Comments on the D-Area Groundwater OU Annual Data Summary Report – 2023 Data (U) (SRNS-RP-2024-01267, Revision 0, November 2024)* (SRNS-J2000-2025-00762, dated October 30, 2025)
2. Email, Heather Cathcart (SCDES) to Shelia Mcfalls (SRNS), Jon Richards (EPA), and Susan Fulmer (SCDES), *Re: Submittal of D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U) (SRNS-RP-2025-01191, Revision 0, October 2025) and Savannah River Site's Responses to the Regulatory Comments on the D-Area Groundwater OU Annual Data Summary Report – 2023 Data (U) (SRNS-RP-2024-01267, Revision 0, November 2024)*, dated December 19, 2025 (SRNS-OS-2025-00408)

Jon and Susan,

The Savannah River Site (SRS) submitted the *D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U)* (SRNS-RP-2025-01191, Revision 0, October 2025) via email on October 30, 2025 (Reference 1). The South Caroliina Department of Environmental Services (SCDES) provided comments on the report via email on December 19, 2025 (Reference 2). The SRS' responses to SCDES' comments are attached to this email. The 2024 Data Report was not revised. However, the responses will be incorporated into the 2025 Data Report, as applicable.

In accordance with the discussion and agreements reached by the Core Team (U.S. Department of Energy, U.S. Environmental Protection Agency [EPA], and South Carolina Department of Environmental Services [SCDES] personnel) at the November 13, 2025, D-Area Groundwater Operable Unit Post-Characterization Scoping Meeting, Savannah River Site is submitting the *Savannah River Site's Responses to the Regulatory Comments on the D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U)* (SRNS-RP-2025-01191, Revision 0, October 2025) for your review. As agreed during the meeting, the data summary report will be shared annually via email until submittal of the RCRA Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment currently scheduled for December 2029.

Please review the attachment and provide your response via email within thirty (30) days of receipt. The effort and time that the SCDES and the U.S. Environmental Protection Agency have given on the subject operable unit are appreciated.

Please contact me if you have any questions, comments, or concerns.

Thanks

Caleb Jones | EC&ACP
SRNS, LLC | 730-4B, Rm 3053
803.952.2906 office | 839.746.3840 cell

Responses to the South Carolina Department of Environmental Services Comments on the D-Area Groundwater Operable Unit (OU) Annual Data Summary Report (U) – 2024 Data, SEMS Number: 63 (SRNS-RP-2025-01191, Revision 0, October 2025) Comments received December 19, 2025.

SCDES General Comments

1. As presented in Section 3.2.4 and Section 4.0, SCDES acknowledges that the rationale for the proposed optimized PFAS sampling, inclusion of PFAS sampling into the DAG OU monitoring plan, and the proposed PFAS sampling stations to add to the DAG OU monitoring plan were discussed and agreed upon during the Core Team meeting on November 13, 2025. As per the meeting, an updated Scoping Summary will be provided which will list the exact Core Team agreements.

   Response: Agree

   An updated Scoping Summary was provided on January 8, 2026, that included a record of key agreements from the meeting (Table 1).

   Responsible Party: Ashley Shull ashley.shull@srs.gov (803) 952-7090

2. SCDES acknowledges and concurs with the proposed recommendations presented in Section 4.0 of reducing 4Q sampling to water elevations only, PFAS sampling starting in 2026, and adding DUT005 to the PFAS and VOC sampling on an annual basis. Please update future tables accordingly.

   Response: Agree

   Future reports will include updated tables capturing the new monitoring network and sampling schedule.

   Responsible Party: Ashley Shull ashley.shull@srs.gov (803) 952-7090

SCDES Specific Comments

1. Section 2.0, Groundwater and Surface Water Monitoring, page 2. The second sentence of the first full paragraph on this page states that monitoring wells DCB 23A, -23D and -64 were among five additional wells included for PFAS and/or other additional DAG OU constituent sampling; however, Table 1 lists only water-level measurements for these wells. Please clarify the constituents that were sampled for at these wells, and update future tables accordingly.

   Response: Clarification

   Table 1 lists the required sampling for DAG OU during the reporting period of 2024 data. PFAS had not yet officially been added to the DAG OU monitoring network and only the proposed future sampling (not what was sampled for PFAS) is listed on the last column of Table 1. Future reports will include the required PFAS sampling as agreed upon in the

November 13, 2025 scoping meeting. Any future omissions or additional sampling will be identified in the text in Section 2.0 and also in Table 1.

Responsible Party: Ashley Shull ashley.shull@srs.gov (803) 952-7090

2. Section 3.2, Results Above Regulatory Threshold Limits, page 4. The first sentence states that two (2) VOC constituents were detected in at least one groundwater monitoring well and/or surface water station at concentrations above their applicable regulatory limits. However, in the list below the sentence, TCE is the only VOC listed. After review of Section 3.2.2 and Table 3, both confirm that TCE was the only VOC detected above the MCL. In the first sentence, please correct number of VOC constituents detected above applicable regulatory limits.

   Response: Agree

   The text in Section 3.2 should have stated "… one (1) VOC constituent..." not two. TCE was the only VOC constituent to exceed MCLs in 2024. Future reports will ensure the number of constituents exceeding MCLs is correctly described. No changes to the 2024 report are proposed.

   Responsible Party: Ashley Shull ashley.shull@srs.gov (803) 952-7090

3. Table 2, Required Annual Surface Water Samples Analyte List, page 47. The last paragraph of Section 3.2.4 states that SRS plans to continue PFAS sampling for surface water at the same stations until the Core Team reaches an agreement on official PFAS sampling requirements. Based on this statement and according to the footnote denotation for surface water station SR-DownRWI in Table 2, it appears that a "P" designation was inadvertently left off for this station. Please confirm.

   Response: Clarification

   The spade footnote was used to show surface water stations that were added for PFAS sampling but are not currently part of the DAG OU monitoring network. Additionally, station SR-DownDArea should have also included the spade footnote. SRS is not proposing to continue annual sampling of the SR-DownRWI station as it is redundant as surface water results within the Savannah River are very similar. SRS proposes continuing annual sampling at the other four Savannah River sample locations including upgradient of any D-Area groundwater discharge (SR-UpgradientD) and downgradient of D Area (SR-DownDArea).

SRS has sampled Savannah River surface water station SR-DownRWI in 4Q2025 as agreement on the DAG OU PFAS sampling had not yet been determined. This data will be provided in the upcoming 2025 data report.

Responsible Party: Ashley Shull ashley.shull@srs.gov (803) 952-7090