



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

FEB - 8 2023

Ms. Susan Fulmer, P. G., Manager
Federal Facility Agreement Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Responses to the Regulatory Comments on the Biennial Effectiveness Monitoring Report (Sampling Summary) for the Monitored Natural Attenuation at the L-Area Southern Groundwater Operable Unit, 2020 through 2021, (IACD-22-172, Dated August 25, 2022) SEMS Number: 77

In accordance with the terms of the Federal Facility Agreement, the U.S. Department of Energy (DOE) is submitting the subject comment responses for your review. The U.S. Environmental Protection Agency (EPA) approved, and the South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on, this report on November 10, 2022, and December 20, 2022, respectively. This report will not be revised; however, all comment responses will be included in the next report, as applicable. Please review these responses and provide your approval thirty (30) days from receipt. The time and effort that the SCDHEC and the EPA have given on the subject operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365, or DOE Program Manager, Mr. Philip Prater, at (803) 952-9333.

Sincerely,

Brian T. Hennessey

Digitally signed by Brian T.
Hennessey
Date: 2023.02.07 13:53:34 -05'00'

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

IACD-23-130

FEB -8 2023

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosure:

SRS Responses to South Carolina Department of Health and Environmental Control (SCDHEC) Comments on the Biennial Effectiveness Monitoring Report (Sampling Summary) for the Monitored Natural Attenuation at the L-Area Southern Groundwater Operable Unit, 2020 through 2021, (IACD-22-172, Dated August 25, 2022) SEMS Number: 77

cc w/o encl.:

J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
R. G. Stewart, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. N. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

M. McRae, TechLaw, Inc.

SRS Responses to South Carolina Department of Health and Environmental Control (SCDHEC) Comments on: Biennial Effectiveness Monitoring Report (Sampling Summary) for the Monitored Natural Attenuation at the L-Area Southern Groundwater Operable Unit, 2020 through 2021, SEMS Number: 77 (IACD-22-172, dated August 25, 2022)

Comments received December 20, 2022.

Page 1 of 1

General Comments

1. Throughout the document, the MCL for tritium is incorrect due to its units. In the section labeled "LASG Tritium" on page 3, the MCL is stated to be 20 pCi/mL. However, on Table 1: LASG MNA Monitoring Results (2020 through 2021), the MCL is stated as 20 pCi/L. Please make the necessary corrections throughout the document.

Response: Agree/Clarification

SRS acknowledges the MCL for tritium is 20 pCi/mL. The units listed in Table 1 for tritium was incorrectly stated as pCi/L and should be pCi/mL. Reported tritium concentrations provided in the text, data tables, and plume map are in the units pCi/mL. All assessments of tritium MCL exceedances are correctly stated in the text and color coded in the Tables.

In future reports, Table 1 will correctly list the tritium MCL as 20 pCi/mL. Additionally, the well specific KSZCL for tritium in Table 1 will also have the units correctly stated as pCi/mL, not pCi/L. No changes to the 2022 Letter Report are proposed.

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

2. Due to the unit error, it is unclear how many wells are above the MCL for tritium. Although the section labeled "LASG Tritium" on page 3 states that tritium exceeds the MCL at four groundwater monitoring wells during the 2020 and 2021 sampling events, the data may need to be reevaluated to determine whether this statement is still true.

Response: Agree/Clarification

See response to general comment #1 for corrections to the tritium units in Table 1 in future reports. The text on page 3 stating that tritium exceeds the MCL at four groundwater monitoring wells is correct. No changes to the 2022 Letter Report are proposed.

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