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ENVIRONMENTAL COMPLIANCE &

November 20, 2024

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

NOV 20 2024

AREA COMPLETION PROJECTS

Re: 488-4D Ash Landfill Annual Groundwater Monitoring Report – 2023 Data, SEMS Number: 63 (SRNS-RP-2024-00941, Revision 0, July 2024) received July 30, 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: 2024.11.20 13:42:55 -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:
488-4D Ash Landfill Annual Groundwater Monitoring Report – 2023 Data, SEMS Number: 63 (SRNS-
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Specific Comments

1. Section 3.0, Results, page 4. The third sentence of the first paragraph states that monitoring wells DCB 8 and DCB077 are also used for monitoring in the D-Area Treatability Study (SRNS 2024) and include additional metal sample analyses in October/November. Based on review of the referenced Treatability Study and Table 3 in the report, monitoring well DCB078 was also used for monitoring in the referenced Treatability Study and additional metal sample analyses were taken in November 2023. Please revise the third sentence to include monitoring well DCB078.
2. Figure 10, Beryllium Times Series Plots at DCB078 and DCB079, page 21. The Times Series Plot for Beryllium Station for DCB078 contains a black line for monitoring well DCB 47C and a red line for monitoring well DCB078. However, monitoring well DCB 47C is not mentioned in the report. Please clarify if monitoring well DCB 47C is associated with monitoring well DCB078, and if so, the relationship between the two monitoring wells.
3. Table 2, Monitored Constituents for the 488-4D Ash Landfill, page 23. According to Table 3, field parameters, metals, sulfate and uranium were each sampled during the fourth quarter of 2023 at monitoring wells DCB 8, DCB077, and DCB078. Table 2 lists water elevation only for these wells during the fourth quarter. Also, uranium was sampled at these three wells during the second quarter, but Table 2 does not reflect this. Please revise.
4. Table 3, 488-4D Ash Landfill 2023 Groundwater Monitoring Data. According to the legend provided at the bottom of Table 3, the "NS" listed for mercury at monitoring well DCB078 in the fourth quarter of 2023 has the following explanation: "Requested to be sampled but was not. See comments as to why not." It is unclear if or where these comments are provided. Please explain.