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February 12, 2019

Ms. Amy J. Meyer, Manager
Environmental Compliance
Environmental Compliance & Area Completion Projects
Savannah River Nuclear Solutions
SRS Building 730-4B
Aiken, South Carolina 29808

Re: Submittal of Savannah River Site Investigation-Derived Waste Management Plan, Appendices A, B, and C (WSRC-RP-94-1227, Redline Revision 9F, December 2018) received January 16, 2019.

Dear Ms. Meyer:

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:
Submittal of Savannah River Site Investigation-Derived Waste Management Plan, Appendices A, B, and C (WSRC-RP-94-1227, Redline Revision 9F, December 2018) received January 16, 2019.

General Comment

1. Appendix A – Health-Based Levels for Radioactive Aqueous IDW, page A12. This table includes radioactive isotopes with the appropriate MCL for alpha and beta/gamma emitters. Since uranium has an MCL of 30 ug/L, please consider removing uranium from this table and add a footnote for explanation. IDW is screened for gross alpha using 15 pCi/L (MCL) and should include uranium, which is an alpha emitter. If the MCL is exceeded, samples are then speciated for individual isotopes and must include U-234, U-235 and U-238.