

**ENVIRONMENTAL COMPLIANCE &**

February 22, 2023

FEB 22 2023

Ms. Kerri Crawford, Program Manager
Solid Waste Programs
Savannah River Nuclear Solutions
Savannah River Site Building 704-59E
Aiken, South Carolina 29808

AREA COMPLETION PROJECTS

Re: FY21 Annual Review of the E-Area Low-Level Waste Facility Performance Assessment (SRNL-STI-2022-00018, Revision 0, March 2022) dated January 10, 2023.

Dear Ms. Crawford:

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 Digitally signed by Susan B. Fulmer
Date: 2023.02.22 15:05:04 -05'00'

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization
Bureau of Land and Waste Management

cc: Brian Hennessey, DOE-SR
Virginia Rigsby, SRNS
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:
FY21 Annual Review of the E-Area Low-Level Waste Facility Performance Assessment
(SRNL-STI-2022-00018, Revision 0, March 2022) dated January 10, 2023.

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Specific Comments

1. Section 5.1, Vadose Zone Monitoring, page 5. The last paragraph states that six of 93 Action Level (AL) lysimeters exceed the administrative limit by greater than a factor of four. It also states that these exceedances could potentially exceed the Environmental Protection Agency drinking water standard at the compliance point over an extended period of time. Please clarify in the document what the next steps would be if there is an exceedance at the compliance point (i.e., would SCDHEC be notified immediately, etc.)
2. Section 5.2, Trench Cover Monitoring, page 10. The document states two depressions formed due to subsidence of the waste and were noted in the FY2012. It also states that no changes to the depression size or depth were noted during the FY2021 inspection. If the condition were to worsen, please provide what the path forward would be.
3. Table 5-2, Performance Monitoring, pages 12-15. The last column, Performance Assessment (PA)/Composite Analysis (CA) Impacts, states for each disposal facility/unit that the performance objectives (PO) are expected to be met. Please clarify what happens if these objectives are not met.