



ENVIRONMENTAL COMPLIANCE &

November 29, 2021

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Mr. Brian T. Hennessey, SRS Remedial Project Manager
Infrastructure and Area Completion Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

Re: 2020 Groundwater Monitoring Report for the D-Area Groundwater Operable Unit (U), SEMS
Number: 63 (SRNS-RP-2021-03748, Revision 0, July 2021) received August 4, 2021.

Dear Mr. Hennessey:

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:
2020 Groundwater Monitoring Report for the D-Area Groundwater Operable Unit (U),
SEMS Number: 63 (SRNS-RP-2021-03748, Revision 0, July 2021) received August 4, 2021.

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Specific Comments

1. Section 3.4 PFAS Plume, page 14 of 26. This section states that PFAS contamination was confirmed in the groundwater at the Fire Training Area and the Former Gas Station using EPA method 537.1MOD. In March 2020, USEPA published a final method 537.1 Version 2.0 for PFAS analysis in drinking water utilizing SPE and LC/MS/MS. If DOE used a 'modified' method 537.1, please include this information in the text.
2. Section 3.5, Additional Sampling Around the 484-D Powerhouse, page 15 of 26. The first sentence of this section states that six wells were sampled around 484-D, but only five were listed. Please include DCB 026D.
3. Section 5.1.1, Metals (Low pH Coal Leachate) Plume, page 21 of 26. The final paragraph of this section states that the majority of threshold exceedances at DCB 21B and 21C remain below MCLs, with concentrations below those of nearby source wells, and are not new occurrences. Beryllium should be pointed out as an exception to this statement and briefly discussed in this paragraph, as the concentration at 21C has steadily increased over the past several years above both TL and MCL and is the highest of all source wells.
4. Section 5.1.4 PFAS Plume, page 22 of 26. The second to last sentence in this section states that the USEPA RSL for PFOS is 401 ng/L. Please correct to 40.1 ng/L.
5. Appendix C, Table C-1 2Q2019 D-Area Compliance Monitoring and Table C-3 2Q2020 D-Area Compliance Monitoring. Table C-1 shows text in blue for metals data collected at several wells designated for metals analysis during 2Q sampling, indicating that these were not required analyses. This appears to be a typographical error, mirroring data presented for 4Q sampling activities. Table C-3 shows the correct black text for these wells, with the exception of DCB 026D. Please correct.
6. Appendix C, Table C-7 2020 Additional Sample Results, pages C-50 through C-54. This table, which is referenced on page 9 for the results for additional sampling wells, contains data for only 7 of the 32 wells listed on Table B-3. Please correct the document as necessary.
7. Appendix D, Figure D-35 Additional Sample Locations 2020, page D-73. Please include the locations for DOB 9 and DOL 1 on this figure, and add a PFAS symbol for DAP 2.