



**ENVIRONMENTAL COMPLIANCE &**

December 19, 2023

**DEC 19 2023**

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

**AREA COMPLETION PROJECTS**

Re: 2022 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action Effectiveness Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2023-00875, Revision 0, August 2023) received August 25, 2023.

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/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: 2023.12.19 10:03:48 -05'00'

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:**  
2022 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action  
Effectiveness Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2023-00875, Revision 0,  
August 2023) received August 25, 2023.

Page 1 of 1

---

General Comments

1. The Department recommends installing the proposed new well TNX-076-D prior to 4Q2024 so that analytical results from this well can be included in the 2024 Annual Report.

Specific Comments

1. Section 1.3, Regulatory and Operational History, page 3. Figure A-2a is referenced at the bottom of this page for the location of the TNX well system for the interim remedial action at the time of its startup and initial operations. Figure A-2b should be referenced instead.
2. Section 5.4.7, Uranium, page 28. The first paragraph of this section states that total recoverable uranium was detected in 18 wells and 3 surface water stations during 2Q2022; however, the data in Table B-1 indicates a total of 19 wells had detections of uranium. Additionally, the second paragraph that discusses 4Q2022 uranium sampling results states that total recoverable uranium was detected in 22 wells and Table B-2 indicates uranium detections for 19 wells and 3 surface water stations. Please correct these discrepancies.
3. Table 5-2, Constituents Exceeding USEPA MCLs in T Area Wells and Surface Water During 2022, page 38. There is an "X" in the uranium column for an exceedance of an MCL in a primary monitoring well; but neither Tables B-1 nor B-2 indicate any MCL exceedances of a constituent at a primary monitoring well, only at auxiliary wells and surface water stations. Please correct.
4. Appendix C, "EPA" Qualifiers – USEPA STORET Codes, page C-9. The language for both K and L qualifiers states: "The actual concentration is known to be less than the reported result." Should one of these qualifiers state "greater than" instead? If so, please correct.