



ENVIRONMENTAL COMPLIANCE &

October 12, 2023

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Mr. Brian T. Hennessey, 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: Biennial Effectiveness Monitoring Report (EMR) for Monitored Natural Attenuation (MNA) at the C-Area Burning/Rubble Pit (131-C) and Old C-Area Burning/Rubble Pit (NBN) Operable Unit (U) – January 2021 through December 2022, SEMS Number: 31 (SRNS-RP-2023-00678, 00648 *dmn* 10/12/2023) Revision 0, June 2023) received June 23, 2023.

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

Digitally signed by Susan B. Fulmer
Date: 2023.10.12 13:13:13 -04'00'

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)
Avery Hammett, DOE-SR
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:
Biennial Effectiveness Monitoring Report (EMR) for Monitored Natural Attenuation (MNA) at
the C-Area Burning/Rubble Pit (131-C) and Old C-Area Burning/Rubble Pit (NBN)
Operable Unit (U) – January 2021 through December 2022, SEMS Number: 31
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General Comments

1. The Department does not agree with the recommendation to replace wells CRW010CU, CRW 10A, and CRW 10C with wells CRP 6DR and CRP 8D as LUC boundary wells. Due to the exceedance of a trigger level at well CRW010CU, the Department prefers that the Core Team be convened to discuss a path forward as per protocols mentioned in Section 4.4.

Specific Comments

1. Section 4.6.1, Trichloroethylene, page 9. The last complete sentence of this page should be corrected to state that the trigger level for LUC boundary well CRW010CU was exceeded in 2021. The reasons for this exceedance may be unclear, but the fact that this trigger level was exceeded should be noted. Reference to the discussion of this exceedance later in this section may be provided.
2. Section 4.6.1, Trichloroethylene, pages 9-13. This section discusses TCE results for monitoring wells screened in each aquifer zone except for those designated as TCCZ monitoring wells. Please include a discussion of TCE results in these wells or provide a reason for the omittance. Furthermore, the second paragraph of the MAZ discussion indicates that there are two monitoring wells in the MAZ; however, Tables A-1 and 4 list a total of six MAZ monitoring wells. The two wells referred to (CRP 20CU and CRW 12C) are part of the compliance monitoring well network listed in Table 3 and this should be clarified as it is misleading.
3. Section 4.6.1, Trichloroethylene, page 12. The first paragraph of the LAZ discussion states that the well with the highest TCE concentration was CRP 20CL with 57.4 µg/L in 2022; however, according to Table A-1, the LAZ well with the highest TCE concentration was CRP 18C (83.8 µg/L) in 2021. Please correct.