SC DEPARTMENT of ENVIRONMENTAL SERVICES

Susan Fulmer, P.G.
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2600 Bull Street
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ENVIRONMENTAL COMPLIANCE &
SEP 23 2026
AREA COMPLETION PROJECTS

September 23, 2026

Mr. Matthew R. Baker, Acting FFA Remedial Project Manager
Remediation, Deactivation and Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

Re: Treatability Study Data Report for Groundwater Injection and Discharge Canal Neutralization at the D-Area Groundwater Operable Unit (OU) (U) – 2025 Data and Information, SEMS Number: 63 (SRNS-TR-2026-00021, Revision 0, May 2026) received May 29, 2026.

Dear Mr. Baker:

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/SCDES 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: 2026.09.23 16:16:36 -04'00'

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Gregg O'Quinn, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Environmental Services Comments on:
Treatability Study Data Report for Groundwater Injection and Discharge Canal Neutralization at the D-Area Groundwater Operable Unit (OU) (U) – 2025 Data and Information, SEMS Number: 63 (SRNS-TR-2026-00021, Revision 0, May 2026) received May 29, 2026.

General Comments

1. SCDES acknowledges and concurs with the recommendations presented in Section 6.0 of discontinuing groundwater injections, ceasing sampling associated with the D-Area Treatability Study, continuing to collect groundwater elevation data quarterly for a year and a half at eight (8) wells (DCB8, DCB 3A, DCB 33B, DCB 36A/C, DCB37A, and DCB087A/C), and continuing the maintenance and monitoring of the $CaCO_3$ reactive structures in the D-Area Effluent Discharge Canal, which will remain in place. SCDES notes that groundwater and surface water metal and sulfate sampling and analysis will continue annually under DAG OU monitoring, and that the status of the $CaCO_3$ reactive structures and pH monitoring results will be included in future DAG OU monitoring reports.

Specific Comments

1. Section 5.2, $CaCO_3$ Reactive Structures, page 14. In the third paragraph for this section, the second to last sentence states, "The semi-annual maintenance planned for 2025 was skipped..." However, no explanation is provided for why the semi-annual maintenance was skipped. Please include the reasoning for skipping the semi-annual maintenance.

2. Section 6.0, Future Data Collection and Reporting, page 16. The last paragraph of this section states the status of the $CaCO_3$ reactive structures and the surface water pH monitoring results at the four surface water stations (DSWM-4C, DSWM-6, DSWM-7, and DSWM-9) will be included in future DAG OU monitoring reports. Please confirm if the data from the stream flow gauge, DSWM-8B, will also be included in future monitoring reports.

3. Section 7.0, Summary, page 18. The second sentence of the last paragraph of this section states that monitoring of surface water pH in the D-Area Effluent Discharge Canal will continue to be conducted quarterly. The report states earlier in this section on page 17 that monthly monitoring of surface water pH in the canal is occurring, and the response to SCDES General Comment #1 in the Responses to Comments on the 2025 report states: "SRS proposes to keep the CaCO3 reactive structures in place and continue monthly pH monitoring in the D-Area Effluent Discharge Canal." Please clarify the surface water pH monitoring frequency going forward.