



**Susan Fulmer, P.G.**  
**Bureau of Land and Waste Management**  
2600 Bull Street  
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October 23, 2025

**ENVIRONMENTAL COMPLIANCE &**

Mr. Matthew R. Baker, Acting FFA 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

**OCT 23 2025**

SRNS-OS-2025-00322

**AREA COMPLETION PROJECTS**

Re: 2024 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action Effectiveness Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2025-00676, Revision 0, June 2025) received June 27, 2025.

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: 2025.10.23 09:22:37 -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:**  
2024 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action Effectiveness  
Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2025-00676, Revision 0, June 2025)  
received June 27, 2025.

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General Comments

1. Section 4.2, Recommendations, page 60 of 66. The last sentence of the first paragraph states that a meeting with the Core Team to present the results and discuss the proposed recommendation of discontinuing SVE at TNX OU will be scheduled if requested. SCDES requests that this meeting be scheduled.

Specific Comments

2. Section 3.1.4.11, Nitrate-Nitrite as Nitrogen (NO<sub>3</sub>/NO<sub>2</sub> as N), page 27 of 66. The first paragraph states that during the 2Q2024, nitrate (NO<sub>3</sub>)/nitrite (NO<sub>2</sub>) as nitrogen (N) was detected in 36 monitoring wells and three surface water stations. However, Table B-1, 2Q2024 TNX Annual Groundwater and Monitoring Report, indicates NO<sub>3</sub>/NO<sub>2</sub> as N was detected in a total of 35 monitoring wells and three surface water stations. Please correct the discrepancy between the paragraph and the table.
3. Section 3.1.5.1, Dissolved Oxygen, page 29 of 66. The fourth bullet point states that at TRW 3, the DO concentration was 2.82 mg/L in 4Q2024. However, Table B-3, 4Q2024 TNX Annual Groundwater and Monitoring Report, indicates the DO concentration at TRW 3 was 2.85 mg/L. Please correct this discrepancy between the paragraph and the table.
4. Section 3.1.5.6, Total Organic Carbon, page 33 of 66. The last sentence of the paragraph states that TOC concentrations continue to be elevated at TBG 3, TBG 4, and TBG 5 with maximum concentrations of 2.12 x 10<sup>6</sup> µg/L, 9.37 x 10<sup>6</sup> µg/L, and 2.78 x 10<sup>6</sup> µg/L respectively, in the 4Q2024. However, Table B-3, 4Q2024 TNX Annual Groundwater and Monitoring Report, indicates the TOC concentrations at TBG 3, TBG 4, and TBG 5 were an estimated (J qualifier) at 212,000 [2.12 x 10<sup>5</sup>] µg/L, 937,000 [9.37 x 10<sup>5</sup>] µg/L, and an estimated (J qualifier) at 278,000 [2.78 x 10<sup>5</sup>] µg/L, respectively. The values presented in the paragraph are a power of 10 different from the values presented in the table. Please correct this discrepancy between the paragraph and the table.