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ENVIRONMENTAL COMPLIANCE &

October 21, 2025

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 21 2025

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 2023 through December 2024, SEMS Number: 31 (SRNS-RP-2025-00608, 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: 2025.10.21 11:52:27 -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:
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) –
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General Comments

1. Section 4.3, Groundwater Elevation Measurements and Groundwater Flow Direction, page 8. Multiple times in the final paragraph of Section 4.3, the CBRP OU is referred to as the CRPB OU. Please correct the name in this section and throughout the rest of the document, as needed.

Specific Comments

1. Section 2.1, Remedial Action Requirements and Objectives, page 3. The discussion of RAOs in this section involve all VOCs that contribute to contamination of groundwater at the CBRP OU; however, only TCE is specifically stated as an RCOC. As indicated in Section 4.4, there are a total of six RCOCs associated with this unit. Section 2.1 should mention these other RCOCs as well.
2. Section 3.2, Hydraulic Setting, page 5. The last paragraph of this page, which discusses water level trends, states a slight water level increasing trend within the UAZ, MAZ, and upper LAZ. These changes are depicted in Figures B-2, -3, -6, -7, -13, -14, and -15. Some of the shallow screened wells' changes have been attributed to rainfall; however, it is not specified what could be causing the water level increasing trend throughout the other, non-shallow monitoring points in the UAZ, MAZ, and LAZ if it is not rainfall related. Please clarify whether these changes are also caused by rainfall or otherwise state the cause.
3. Section 4.6.1, Trichloroethylene, page 15. The second paragraph of this page discusses groundwater sampling around two distinct plumes and states that groundwater monitoring has ceased at monitoring well CRP 4. This well helps mark the boundary of an uncontaminated zone between the two distinct plumes and serves as a useful data point to map the extent of contamination. Please explain why groundwater monitoring has been stopped at this point, and if there is another point being used as a reference to collect this same data.
4. Section 4.6.7, MNA Summary, page 23. The last paragraph of this page, which discusses TCE degradation products, states: "This trend in higher concentrations at the "B" wells relative to the paired "A" wells is consistent with the CSM which predicts increased biodegradation occurring as groundwater migrates upward from the lower screened "B" well elevation through the higher screened "A" well elevation." This statement appears to contradict the following statement from Section 4.2, page 7: "The CSM predicts higher TCE concentrations in the lower wells, but higher concentrations of TCE degradation products in the upper wells, due to biodegradation occurring as the TCE groundwater plume discharges upward to surface water at a given location." Please clarify.