



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

Susan Fulmer, P.G.
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

ENVIRONMENTAL COMPLIANCE &

October 18, 2024

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

OCT 18 2024

AREA COMPLETION PROJECTS

Re: 2023 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action Effectiveness Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2024-00682, Revision 0, June 2024) received June 28, 2024.

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/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: 2024.10.18 07:47:56 -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)
Travis Fuss, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Environmental Services Comments on:

2023 Annual Comprehensive TNX Area Groundwater Monitoring and Remedial Action Effectiveness Interim Report (U), SEMS Numbers: 21, 29 (SRNS-RP-2024-00682, Revision 0, June 2024) received June 28, 2024.

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Specific Comments

1. Section 3.1.4.3, Cis-1,2-Dichloroethylene (cis-1,2-DCE), page 23 of 62. The second paragraph states that during the 4Q2023, cis-1,2-DCE was detected in eight monitoring wells. However, Table B-3, Groundwater Monitoring Results for TNX Area Wells, Fourth Quarter, 2023, indicates cis-1,2-DCE was detected in a total of nine monitoring wells. Please correct this discrepancy between the paragraph and the table.
2. Appendix F, Interim Results from the 2023-2024 Evaluation of the Soil Vapor Extraction System at the TNX Operable Unit. According to Table F-1 of the 2021 TNX Area Groundwater Report, twelve specific VOCs would be analyzed for during all sampling of the SVE Evaluation. Tables F-2 through F-5 of this report, which contain sampling data during the initial baseline, post-shutdown and high frequency sampling events, list only five of these for each SVE well. 1,1,1-Trichloroethane, 1,1,2-Trichloro-1,2,2-Trifluoroethane, 1,1-Dichloroethylene, Chloroform, Toluene, Trans-1,2-Dichloroethylene, and Trichlorofluoromethane were not listed in these tables. Please provide an explanation for the omission of these seven VOC analytes.