

Shelia Mcfalls

From: Heather Cathcart <Heather.Cathcart@des.sc.gov>
Sent: Friday, December 19, 2025 8:57 AM
To: Shelia Mcfalls; Jon Richards; Susan B. Fulmer
Cc: Brianne Martin; Steeple, Sarah M.; William F. Taylor; Joseph E. Martina; MORROW, KAREN D; BAKER, MATTHEW R; STEPHENS, BRIAN M; HORCHER, ANDY T; JENKINS, BERNICE M; Chris Bergren; Kelsey Holcomb; Thelesia Oliver; Amy Meyer; Regina Marquez; J Ross; Katie Davis; Ryan Mcdaniel; Terry Killeen; Ashley Shull; Bette Ross; Caleb Jones; Dena Brett; Mtesa Wright; Gregory N. O'Quinn; Tabatha G. Corley; Crystal L. Robertson; Downing, Emma G.; Hannah L. Herlong; Mac McRae
Subject: [EXTERNAL] Re: Submittal of the D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U) (SRNS-RP-2025-01191, Revision 0, October 2025) and Savannah River Site's Responses to the Regulatory Comments on the D-Area Groundwater OU ...

Shelia,

SCDES has reviewed the report and has the following comments.

General Comments

1. As presented in Section 3.2.4 and Section 4.0, SCDES acknowledges that the rationale for the proposed optimized PFAS sampling, inclusion of PFAS sampling into the DAG OU monitoring plan, and the proposed PFAS sampling stations to add to the DAG OU monitoring plan were discussed and agreed upon during the Core Team meeting on November 13, 2025. As per the meeting, an updated Scoping Summary will be provided which will list the exact Core Team agreements.
2. SCDES acknowledges and concurs with the proposed recommendations presented in Section 4.0 of reducing 4Q sampling to water elevations only, PFAS sampling starting in 2026, and adding DUT005 to the PFAS and VOC sampling on an annual basis. Please update future tables accordingly.

Specific Comments

1. Section 2.0, Groundwater and Surface Water Monitoring, page 2. The second sentence of the first full paragraph on this page states that monitoring wells DCB 23A, -23D and -64 were among five additional wells included for PFAS and/or other additional DAG OU constituent sampling; however, Table 1 lists only water-level measurements for these wells. Please clarify the constituents that were sampled for at these wells, and update future tables accordingly.
2. Section 3.2, Results Above Regulatory Threshold Limits, page 4. The first sentence states that two (2) VOC constituents were detected in at least one groundwater monitoring well and/or surface water station at concentrations above their applicable regulatory limits. However, in the list below the sentence, TCE is the only VOC listed. After review of Section 3.2.2 and Table 3, both confirm that TCE was the only VOC detected above the MCL. In the first sentence, please correct number of VOC constituents detected above applicable regulatory limits.

3. Table 2, Required Annual Surface Water Samples Analyte List, page 47. The last paragraph of Section 3.2.4 states that SRS plans to continue PFAS sampling for surface water at the same stations until the Core Team reaches an agreement on official PFAS sampling requirements. Based on this statement and according to the footnote denotation for surface water station SR-DownRWI in Table 2, it appears that a “P” designation was inadvertently left off for this station. Please confirm.

If you should have any questions or require comment clarification, please contact the SCDES project lead, Sarah Steeple, at sarah.steeple@des.sc.gov or 803-898-0832.

Thanks,
Heather

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From: Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>

Sent: Thursday, October 30, 2025 1:08 PM

To: Jon Richards <richards.jon@epa.gov>; Susan B. Fulmer <Susan.Fulmer@des.sc.gov>

Cc: Brianne Martin <martin.brianne@epa.gov>; Heather Cathcart <Heather.Cathcart@des.sc.gov>; Steeple, Sarah M. <Sarah.Steeple@des.sc.gov>; William F. Taylor <Duke.Taylor@des.sc.gov>; Joseph E. Martina <Joseph.Martina@des.sc.gov>; Karen.Morrow@srs.gov <Karen.Morrow@srs.gov>; BAKER, MATTHEW R <matthew.baker@srs.gov>; Brian.Stephens@nnsa.srs.gov <Brian.Stephens@nnsa.srs.gov>; Andy.Horcher@nnsa.srs.gov <Andy.Horcher@nnsa.srs.gov>; Bernice.Jenkins@srs.gov <Bernice.Jenkins@srs.gov>; chris.bergren@srs.gov <chris.bergren@srs.gov>; Kelsey.Holcomb@srs.gov <Kelsey.Holcomb@srs.gov>; thelesia.oliver@srs.gov <thelesia.oliver@srs.gov>; Amy.meyer@srs.gov <Amy.meyer@srs.gov>; regina.marquez@srs.gov <regina.marquez@srs.gov>; j.ross@srs.gov <j.ross@srs.gov>; Katie.Davis@srs.gov <Katie.Davis@srs.gov>; ryan.mcdaniel@srs.gov <ryan.mcdaniel@srs.gov>; terry.killeen@srs.gov <terry.killeen@srs.gov>; Ashley.Shull@srs.gov <Ashley.Shull@srs.gov>; bette.ross@srs.gov <bette.ross@srs.gov>; caleb.jones@srs.gov <caleb.jones@srs.gov>; Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>; dena.brett@srs.gov <dena.brett@srs.gov>; mtesa.wright@srs.gov <mtesa.wright@srs.gov>; Gregory N. O'Quinn <Gregory.OQuinn@des.sc.gov>; Tabatha G. Corley <Tabatha.Corley@des.sc.gov>; Crystal L. Robertson <Crystal.Robertson@des.sc.gov>; Downing, Emma G. <Emma.Downing@des.sc.gov>; Hannah L. Herlong <Hannah.Herlong@des.sc.gov>; Mac McRae <mmcrae@techlawinc.com>

Subject: Submittal of the D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U) (SRNS-

RP-2025-01191, Revision 0, October 2025) and Savannah River Site's Responses to the Regulatory Comments on the D-Area Groundwater OU Annual Data *

* Summary Report – 2023 Data (U) (SRNS-RP-2024-01267, Revision 0, November 2024)

SRNS-J2000-2025-00762

References:

1. Email, Caleb Jones (SRNS) to Jon Richards (EPA) and Susan Fulmer (SCDES), *Submittal of D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2023 Data (U) (SRNS-RP-2024-01267, Revision 0, November 2024) and Associated Scoping Summary (ERD-EN-2019-0022, Final, November 2023)*, SRNS-J2000-2024-00855, dated November 20, 2024
2. Email, Heather Cathcart (SCDES) to Caleb Jones (SRNS), Jon Richards (EPA), and Susan Fulmer (SCDES), *Re: Submittal of D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2023 Data (U) (SRNS-RP-2024-01267, Revision 0, November 2024) and Associated Scoping Summary (ERD-EN-2019-0022, Final, November 2023)*, dated January 17, 2025 (SRNS-OS-2025-00228)

Jon and Susan,

In accordance with the discussion and agreements reached by the Core Team (U.S. Department of Energy, U.S. Environmental Protection Agency [EPA], and South Carolina Department of Environmental Services [SCDES] personnel) at the November 30, 2023, D-Area Groundwater Operable Unit Post-Characterization Scoping Meeting, Savannah River Site is submitting the *D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2024 Data (U) (SRNS-RP-2025-01191, Revision 0, October 2025)* for your review. The Excel file containing Tables 3 to 5 is also attached. PDFs of the tables are included in the 2024 Data Report. As agreed during the meeting, the data summary report will be shared annually via email until submittal of the RCRA Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment currently scheduled for December 2026.

This is the second annual report to be submitted. The Savannah River Site (SRS) submitted the *D-Area Groundwater Operable Unit (OU) Annual Data Summary Report – 2023 Data (U) (SRNS-RP-2024-01267, Revision 0, November 2024)* via email on November 20, 2024 (Reference 1). The SCDES provided comments on the report via email on January 17, 2025 (Reference 2). The SRS responses to SCDES' comments are also attached to this email. The 2023 Data Report was not revised. However, the responses were incorporated into the 2024 Data Report, as applicable.

SRS plans to discuss the attachments at the November 13, 2025, D-Area Groundwater Operable Unit meeting.

Please review the attachments and provide your comments or approval via email within sixty (60) days of receipt. The effort and time that the SCDES and the EPA have given on the subject operable unit are appreciated.

Please contact me if you have any questions, comments, or concerns.

Thanks

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