ARF-025341

SC DEPARTMENT *of*
ENVIRONMENTAL SERVICES

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

ENVIRONMENTAL COMPLIANCE &

March 11, 2026

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SRNS-OS-2026-00084

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

AREA COMPLETION PROJECTS

Re: Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) – July 2024 through June 2025, SEMS Number: 82 (SRNS-RP-2025-00992, Revision 0, October 2025) received November 14, 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: 2026.03.11 11:34:25 -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:

Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) – July 2024 through June 2025, SEMS Number: 82 (SRNS-RP-2025-00992, Revision 0, October 2025) received November 14, 2025.

General Comment

1. The Department agrees with all proposed recommendations including expanding the PFAS sampling network and looks forward to a Core Team meeting to discuss the current implementation schedule in the context of additional PFAS investigation in the soils and groundwater.

Specific Comments

1. Section 5.1, TCE, page 8. It is specified in the report that two contamination plumes exceeding their MCLs are delineated within the CAGW groundwater subunit. While the tritium plume and its evolution from 2002-2024 has been depicted in Figure 11, no such figure exists for the TCE plume, despite it being the principal VOC within the subunit. Please include a figure like that of tritium to show the extent of TCE contamination and the progress made in its remediation.

2. Section 5.6, Tritium, page 14. The first paragraph of this section states that tritium samples above their respective EQL and MDC were collected at 52 of 80 sampled monitoring stations in 4Q24. According to Table A-1, 79 monitoring stations were sampled and 61 of these were above their respective EQL and MDC. According to this table, monitoring well CRP 8D was not sampled and no reason was given; please clarify. Additionally, the next sentence states that tritium concentrations above the MCL were detected at 23 monitoring wells and four surface water stations. However, based on the data provided in Table A-1, this statement should indicate that these concentrations were detected at 19 monitoring wells and four seepline stations, instead of 23 monitoring wells and four surface water stations.

3. Section 5.6, UAZ Tritium, page 15. The second sentence of the top of this page refers to 14 stations screened in the MAZ. Technically, there are a total of 21 monitoring stations screened in the MAZ, 19 of which were sampled for tritium (14 monitoring wells and 5 seepline stations). Also, this sentence appears awkward. Perhaps the word "range" should be changed to "ranging."