



Susan B. Fulmer, P.G.
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2600 Bull Street
Columbia, South Carolina 29201

August 8, 2024

ENVIRONMENTAL COMPLIANCE &

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

AUG - 8 2024

AREA COMPLETION PROJECTS

Re: Effectiveness Monitoring Report (EMR) for the P-Area Groundwater (PAGW) Operable Unit (OU) Zero Valent Iron Permeable Reactive Barrier (ZVI-PRB) Removal Action (U) April 2022 through March 2023, SEMS Number: 81 (SRNS-RP-2023-01281, Revision 0, March 2024) received April 12, 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/DHEC 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: 2024.08.08 11:09:36 -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

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South Carolina Department of Health and Environmental Control Comments on:
Effectiveness Monitoring Report (EMR) for the P-Area Groundwater (PAGW) Operable Unit (OU) Zero
Valent Iron Permeable Reactive Barrier (ZVI-PRB) Removal Action (U) April 2022 through March 2023,
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Specific Comments

1. Section 2.4, Removal Action Implementation and Monitoring Goals, page 12. The last sentence of the first full paragraph on this page states that five annual EMRs will be submitted upon completion and implementation of the PRB and monitoring well network. It would be helpful for future EMRs to indicate which submittal they are numerically.
2. Table 2, Effectiveness Monitoring Plan Well Details, page 58. For future EMRs, please revise this table to include the role/location of each monitoring well (i.e., background, east/upgradient, in-wall, west/downgradient etc.).
3. Appendix C. Section 2.3 discusses discharges of TCE-contaminated groundwater above the MCL at surface water location SC-03. While surface water monitoring is not part of the monitoring plan addressed in this EMR, a time-series plot of TCE concentrations at SC-03 would be a useful and meaningful inclusion in this appendix for future EMRs.