

October 14, 2020

Ms. Diana P. Joyner Principal Environmental Engineer Westinghouse Electric Company LLC Nuclear Fuel Columbia Fuel Fabrication Facility 5801 Bluff Road Hopkins, SC 29061

Re: Westinghouse Electric/Columbia Plant Phase II Remedial Investigation Work Plan dated September 15, 2020 Richland County Consent Agreement CA-19-02-HW File # 51377

Dear Ms. Joyner:

The South Carolina Department of Health and Environmental Control (Department) has reviewed the Phase II Remedial Investigation Work Plan. The Department approves the work plan with the exception of the following issues:

- Section 3.1. Please specify how many sampling locations and the size of offset grid in the secondary soil gas survey (SGS) area. The Department agrees to meet with Westinghouse once the SGS results are received to determine the soil sampling locations.
- 2. Section 3.2. In assessing the chlorinated volatile organic compounds (CVOCs) source areas the soil samples will have continuous soil cores that will be collected in approximately four (4) ft intervals to the depth of the seasonal high-water table in each soil gas survey area. Each soil sample will be composited at one (1) foot interval and measured with an organic vapor analyzer photoionization device (PID). A soil sample will be collected at the highest PID reading and from the deepest interval. The Department requests that if the PID reading remains similar throughout the boring, then samples should be collected at the deepest interval and one other interval in the boring.
- 3. In section 3.5. Sediment sampling will be collected at 6-inch intervals (0.0-6.0 inches, 6.0-12.0 inches) at a minimum depth of one (1) foot. Should borings yield sediments from deeper than one foot these sediments should be analyzed.

The Department concurs with removing Target Analyte List (TAL) metals and semi-volatile organic compounds (SVOCs) from the analytical list for groundwater sampling because previous sampling has shown these not to chemicals of concern for this Site.

The comprehensive sampling plan for the Sanitary Lagoon should be submitted as a separate plan.

An addendum addressing the Department's comments should be submitted by November 5, 2020. Westinghouse can move forward with implementation of the work plan, with the exception of the areas that need revisions.

Sincerely,

Kmk

Kimberly M. Kuhn, Project Manager State Voluntary Cleanup Section Division of Site Assessment, Remediation and Revitalization Bureau of Land and Waste Management

Enc: Monitoring Well Approval Permit (MW-12563)

Cc: Lucas Berresford, BLWM Veronica Barringer, Midlands EA Office Chuck Suddeth, P.G., AECOM, 101 Research Drive, Columbia, SC 29203 Jeremy Grant, AECOM, 101 Research Drive, Columbia, SC 29203 File # 51377



Monitoring Well Approval

Date of Issuance: October 9, 2020 Approval #: MW-12563 Expires: October 9, 2021

Approval is hereby granted to: AECOM 101 Research Drive Columbia, SC 29203

Facility: Westinghouse CFFF 5801 Bluff Road Hopkins, South Carolina 29061 Richland County

This approval is for the installation of up to forty (40) temporary points and ten (10) permanent monitoring wells. The monitoring wells are to be installed at the locations identified and per the proposed construction details provided in the September 15, 2020 monitoring well installation permit applications. These monitoring wells are to be installed following all of the applicable requirements of R.61-71.

Please note that R.61-71 requires the following:

- 1. All wells shall be drilled, constructed, and abandoned by a South Carolina certified well driller per R.61-71.D.1.
- 2. All wells shall be properly developed per R.61-71.H.2.d. A Water Well Record Form or other form provided or approved by the Department shall be completed and submitted within 30 days after well completion or abandonment unless another schedule has been approved by the Department. The form should contain the "as-built" construction details and all other information required by R.61-71.H.1.f
- 3. All analytical data and water levels obtained from each monitoring well shall be submitted to the author of this approval within 30 days of receipt of laboratory results unless another schedule has been approved by the Department as required by R.61-71.H.1.d.
- 4. All monitoring wells shall be labeled as required by R.61-71.H.2.c.
- 5. If any of the information provided to the Department changes, including the proposed drilling date, Kimberly Kuhn (803-898-0722) shall be notified at least twenty-four (24) hours prior to well construction as required by R.61-71.H.1.a.

This approval is pursuant to the provisions of Section 44-55-40 of the 1976 South Carolina Code of Laws and R.61-71 of the South Carolina Well Standards, dated May 27, 2016.

Kimberly Kuhn, Project Manager State Voluntary Cleanup Program Site Assessment, Remediation & Revitalization Division Bureau of Land and Waste Management