Enclosure 2 to
LTR-RAC-20-94
Date: December 18, 2020

# Enclosure 2

## Response to Request for Additional Information

## March 2019 Environmental Report Updates

Enclosure 2 to
LTR-RAC-20-94
Date: December 18, 2020

**RAI 15 – ENVIRONMENTAL SAMPLING VALUES**

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**Table 6.1-2 Typical Environmental Program Radiological Analytical Sensitivities**

| TYPE OF SAMPLE | ANALYSES | TYPICAL SAMPLE QUANTITY | NOMINAL MINIMUM DETECTION LEVEL |
|---|---|---|---|
| Air Particulates | Alpha | 571 Cubic Meters | 6.0E-14 µCi/ml |
| Surface Water | Uranium | 1 Liter | 0.5 pCi/l |
| | Tc-99 | 1 Liter | 50 pCi/l |
| Well Water | Uranium | 1 Liter | 0.5 pCi/l |
| | Tc-99 | 1 Liter | 50 pCi/l |
| River Water | Uranium | 1 Liter | 0.5 pCi/g |
| | Tc-99 | 1 Liter | 50 pCi/l |
| Sediment | Uranium | 100 Grams | 0.5 pCi/g |
| | Tc-99 | 100 Grams | 1 pCi/g |
| Soil | Uranium | 100 Grams | 0.5 pCi/g |
| | Tc-99 | 100 Grams | 1 pCi/g |
| Vegetation | Fluoride | 100 Grams | Variable (based on dilution level) |
| | Uranium | 100 Grams | 0.5 pCi/g |
| | Tc-99 | 100 Grams | 1 pCi/g |
| Fish | Uranium | 1 Kilogram | 0.5 pCi/g |
| | Tc-99 | 100 Grams | 1 pCi/g |

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**RAI 18 – GENERAL WATER RESOURCES**

To acknowledge the additional information collected regarding private water supply wells and to address RAI 18, items A and B, a new sub-section was added to Section 3.1, Land Use of the ER. The new sub-section was added as 3.1.1 and entitled "Private Property." The remaining subsequent sections were unaltered except for being renumbered.

### 3.1.1 Private Property

In October of 2019, a private water supply well survey was conducted within a 1-mile radius of the facility's property boundary. Four private water supply wells (WSW-01 through WSW-04) located west northwest, southwest and south of CFFF. The private well locations are depicted in Figure 14 of the *Final Interim Remedial Investigation Data Summary Report* (AECOM 2020). These locations are side to downgradient of the known extent of groundwater impact at the facility. Prior to collecting the groundwater samples from the private water supply wells, CFFF personnel obtained access agreements from the property owners (AECOM 2020).

Well WSW-01 runs for long periods of time and is used by a private hunt club to fill a pond. Wells IWSW-01 and IWSW-02 are small diameter wells that are no longer in service and are located on the same private hunt club as well WSW-01. Potable water is supplied to this hunt club by the City of Columbia. Well WSW-03 provides potable water to another private hunt club. Wells WSW-02 and WSW-04 provide potable water to two private cabins. Westinghouse was unable to locate design information for these private wells (AECOM 2020).

Three of the four private water supply wells are located within the 1-mile private water supply well search radius of the site property boundary as specified in the *Final RI Work Plan* (AECOM 2019c). The fourth private water supply well is between the southern edge of this radius and the Congaree River. The closest private water supply well, WSW-03, is approximately 5,400 feet (over 1 mile) downgradient of the known extent of COPC impact.

Groundwater samples from these four private water supply wells did not contain COPCs above their respective MCLs. Concentrations of U-238, fluoride, nitrate, ammonia and antimony were detected in the groundwater samples at concentrations below their respective MCLs and are not related to groundwater impact caused by manufacturing operations at the site.

As discussed in the Westinghouse *Final Interim Remedial Investigation Data Summary Report* (Section 3.7**)** prepared by AECOM, analysis of groundwater samples from four private water supply wells identified no COPCs related to manufacturing operations at CFFF (AECOM 2020, Westinghouse 2020).

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**RAI 18 – GENERAL WATER RESOURCES & RAI 19 – FATE AND TRANSPORT ASSESSMENT**

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ER Revision of Section 3.4.1, Groundwater to address RAI 18 Item C and RAI 19 Item B:

### 3.4.1 Groundwater

Groundwater levels reflect both the climatic conditions of the region and groundwater withdrawals. The groundwater level also depends upon a combination of the permeability of the strata and the hydraulic head. The inclination of different strata may cause the water tables in the surrounding area to be higher or lower than the water level in the nearby Congaree River since movements of the groundwater are, to a large extent, independent of the river. Because of friction encountered by water in its passage through pervious strata, the water table is not always horizontal. Several water tables may exist at different levels, separated by impermeable strata.

Regional Area

Groundwater in the Upper Coastal Plain occurs in multiple aquifer systems, mostly under artesian or confined conditions. These aquifers consist of rocks of Paleozoic age and are typically composed of one to several layers of eastward thickening, permeable sands or limestone split by discontinuous, clay-rich materials. Confining units, consisting of clay-rich sediments, exist above and below the aquifers. Aquifers found below the site are the Peedee, Black Creek, and Upper Cape Fear with the Peedee aquifer being the closest to the surface. In large portions of these aquifers, sands and limestone materials are so well connected that withdrawals cause pressure reductions many miles from the pumping center.

The upper Cape Fear aquifer is present in the western portions of the Coastal Plain at elevations of 90 m to 463 m (295 ft to1,519 ft), with an average elevation of 76.2 m (250 ft). The upper Cape Fear aquifer varies in thickness from 2.4 to 203 m (8 to 665 ft) thick and averages 46 m (50 ft) thick. The aquifer is composed of very fine to coarse sands and occasional gravels. Wells typically yield 757 to 1,514 L/min [200 to 400 gpm].

The Black Creek aquifer is present in the central and southwestern portions of the Coastal Plain. Elevations range from 97 m to 368 m (317 ft to 1207 ft) and average 41 m (135 ft). The thickness of the Black Creek aquifer ranges from 5 -296 m (18 to 972 ft) thick, averaging about 53 m (175 ft) thick. The aquifer is composed of very fine to fine “salt and pepper” sands. Wells typically yield 757 to 1514 L/min (200 to 400 gpm).

The Peedee aquifer is present in the central to southeastern portion of the Coastal Plain at an average elevation of -9 m (–30 ft). Elevations vary from 35 m to -243 m (114 ft to –796 ft). The thickness of the aquifer ranges from 2.4 m to 123 m (8 to 404 ft) thick and averages about 41 m (135 ft) thick. The Peedee aquifer is composed of fine to medium sand, and wells typically yield up to 757 L/min (200 gpm).

Site Area

The average depth to the water table in the area of the CFFF site is approximately 4.6 m (15 ft). Since September 1971, the highest mean water level recorded was at 0.9 m (2.95 ft) below the land-surface datum, and the lowest level was 13.66 m (44.83 ft) below the land-surface datum.

The CFFF is located in the Upper Coastal Plain physiographic province. The CFFF is underlain by three hydrogeologic units: the surficial aquifer, Black Mingo aquifer, and Middendorf aquifer.

Groundwater in the surficial aquifer occurs under unconfined (water table) conditions and generally flows from areas of higher topography in the vicinity of the plant building towards areas of lower topography in the floodplain of the Congaree River along Mill Creek. Previously, the water table aquifer above the bluff and the water table aquifer below the bluff were described as the two separate aquifers: the surficial aquifer and the floodplain aquifer. Although the river terrace sediment above and below the bluff were deposited during different time periods, the deposits are of similar lithology and have been found to be connected based on data collected during Phase I of the RI. Since groundwater flows continuously from above the bluff into the floodplain in a single surficial aquifer, groundwater above the Black Mingo confining clay will be referred to as the surficial aquifer henceforth (AECOM 2020a).

Surficial aquifer sediments generally occur to a depth of 30 to 40 feet below land surface (BLS), both above and below the bluff, and consist of clay, silt or silty sand at the surface coarsening downward to coarse sand and gravel on top of the Black Mingo confining clay. Silt and clay lenses occur at varying depths with the coarsening downward sands of the surficial aquifer. One notable surficial aquifer total thickness anomaly was discovered during Phase I of the RI near the location of monitoring well W-95, where there is over 80 feet of sediment above the Black Mingo confining clay. Further assessment in this area will be performed during Phase II of the RI (AECOM 2020a).

Groundwater monitoring wells were installed at differing depths to assess COPC migration within the surficial aquifer. Monitoring wells installed near the top of the surficial aquifer are designated as surficial aquifer upper zone monitoring wells, whereas wells installed on top of or within 5 feet of the Black Mingo confining clay are designated as surficial aquifer lower zone monitoring wells. One exception of the criteria above is well W-95. Monitoring well W-95 is designated as a surficial aquifer lower zone monitoring well because chlorinated volatile organic compounds (CVOCs) migrating within the lower zone of the surficial aquifer are found in it and the Black Mingo Formation is anomalously deep at this location (AECOM 2020a).

There is a dynamic relationship between surface water in the ditches that transect the site above the bluff and groundwater in the upper zone of the surficial aquifer. The ditches continually or intermittently receive discharge of groundwater from the upper surficial aquifer depending on the elevation of the water table. The northern portions of the ditches are above the elevation of the seasonal high water table and thus the ditches at these locations are often dry. Runoff from precipitation that enters the dry portions of the ditches may infiltrate the water table, temporarily recharging the surficial aquifer. The southern portions of the ditches where the ditches are deeply incised may intermittently be above or below the water table, depending upon the extent of incisement and seasonal variations in the elevation of the water table. Middle portions of the ditches may recharge the shallow aquifer during low water table conditions and may receive groundwater discharge during high water table conditions (AECOM 2020a).

The predominant direction of groundwater flow in the surficial aquifer is to the southwest with components of flow to the south and southeast. Discharge of groundwater to the deeply incised

portions of the ditches appears to influence groundwater flow and COPC migration within the upper zone of the surficial aquifer. The Gator Pond also appears to influence COPC migration as evidenced by COPC impacts in surficial aquifer groundwater migrating in a more easterly or westerly direction in the vicinity of the Gator Pond (AECOM 2020a).

The surficial aquifer is underlain by a confining unit composed of dry silt/clay and brittle shale of the upper Black Mingo Formation. Previous geologic cross sections (AECOM, 2013) and Phase I of the RI indicate that the Black Mingo confining clay ranges in thickness from 39 to 83 feet. Beneath the clay confining unit is an artesian sand aquifer within the lower Black Mingo Formation known as the Black Mingo aquifer. Groundwater flow in the Black Mingo aquifer is inferred to the southwest based upon groundwater elevations from the four monitoring wells that are screened within this aquifer (AECOM 2020a).

The Middendorf Formation occurs below the Black Mingo Formation. Sediments of the Middendorf Formation generally consist of multi-colored clay interbedded with fine to coarse grained sand. Subsurface investigations at CFFF have not extended into the Middendorf aquifer since there is no potential that it has been impacted. The Middendorf aquifer is unconformably underlain by bedrock (AECOM 2020a).

Previous hydraulic characterization by AECOM Technical Services, Inc. (AECOM) and Rust Environment and Infrastructure (Rust), estimated the average linear flow velocity in the surficial aquifer to be 0.42 feet per day or 153 feet per year. The potential for flow between the surficial aquifer and the Black Mingo aquifer was previously assessed to be downward at vertical hydraulic gradients ranging between 0.04 and 0.1 feet per foot (Rust 1995 and AECOM 2013). However, low moisture content and vertical hydraulic conductivities of less than 10-7 centimeters per second (S&ME, 1982) throughout the 39 to 83 foot thickness of the Black Mingo confining clay preclude migration of groundwater between the surficial aquifer and the Black Mingo aquifer which in turn precludes potential migration to the Middendorf Aquifer (AECOM 2020a).

The state of South Carolina regulations R61-68, “Water Classifications and Standards” considers all groundwaters to be drinking waters.

**RAI 18 – GENERAL WATER RESOURCES**

ER Revision of Section 10.0, List of References to address Item F of RAI 18:

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Please note that this document was the cover letter and supporting documentation for the submission of the AECOM ***Final*** Interim Remedial Investigation Data Summary Report listed in this document as reference AECOM 2020.