UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

October 3, 2017

ENVIRONMENTAL COMPLIANCE &
OCT - 3 2017
AREA COMPLETION PROJECTS

Mr. Brian T. Hennessey, 730-B
SRS Remedial Project Manager
Area Completion Project
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

RE: **EPA comments on the K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP), L-Area Burning/Rubble Pit and Rubble Pile (131-L, 131-3L, and 131-2L) (LBRP), and P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units (OUs) Detailed Combined Groundwater Monitoring Report (U), CERCLIS Numbers: 40, 56, 59, SRNS-RP-2017-00356, Revision 0, June 2017, Savannah River Site NPL Site, South Carolina**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP), L-Area Burning/Rubble Pit and Rubble Pile (131-L, 131-3L, and 131-2L) (LBRP), and P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units (OUs) Detailed Combined Groundwater Monitoring Report (U), CERCLIS Numbers: 40, 56, 59, SRNS-RP-2017-00356, Revision 0, June 2017. EPA's comments are attached.

If you have any questions or require additional information, please contact me at (404) 562-8513.

Sincerely,

Tufts, Jennifer

Digitally signed by Tufts, Jennifer
Date: 2017.10.03 13:20:30 -04'00'

Jennifer Tufts
Remedial Project Manager
Superfund Division

ec: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDHEC

EPA comments on the K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP), L-Area Burning/Rubble Pit and Rubble Pile (131-L, 131-3L, and 131-2L) (LBRP), and P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units (OUs) Detailed Combined Groundwater Monitoring Report (U), CERCLIS Numbers: 40, 56, 59, SRNS-RP-2017-00356 Revision 0, June 2017, Savannah River Site NPL Site, South Carolina

TECHNICAL REVIEW COMMENT

1. Based on the monitoring results for the L-Area Burning/Rubble Pit and Rubble Pit (131-L, 131-3L, and 131-2L) (LBRP) the text in Section 5.0 Recommendations, Page 19 of 36, states SRS is proposing to discontinue monitoring and reporting for the LBRP OU due to carbon tetrachloride (CCL_4) concentrations remaining below MCLs for four sampling periods (four years). Although LBRP OU has met a condition to discontinue monitoring as specified in the ROD (2002), recent EPA groundwater monitoring guidance (Recommended Approach for Evaluating Completion of Groundwater Restoration Remedial Actions at a Groundwater Monitoring Well OSWER 9283.1-44, August 2014) recommends a minimum number of data points required to evaluate each phase of groundwater monitoring as follows:

   - The remediation monitoring phase is completed when monitoring well data demonstrate that the groundwater has reached the cleanup levels for all contaminants of concern (COCs) set forth in the record of decision (ROD). Since the remediation monitoring phase is not the final decision point for completing the restoration of groundwater, the EPA Guidance recommends a minimum of four data points be used for analysis during this phase.

   - The attainment monitoring phase is intended to provide data that help support a defensible determination that: a) the groundwater in the well has met the cleanup level for each COC; and b) provides assurance that the groundwater will continue to meet the COC cleanup level in the future. Since the EPA Guidance recommends that completion of the attainment monitoring phase be based on two lines of evidence, in general, a more robust data set using a visual or statistical (trend test and mean test) evaluation is typically used to make the final attainment determination.

   Therefore, consistent with EPA Guidance, it is recommended that a minimum of eight data points be used for the attainment monitoring phase analysis. SRS proposes to discontinue groundwater monitoring with four sampling periods remaining below MCLs for monitoring well LRP 6R. However, historical groundwater data discussed on Page 15 indicate groundwater concentrations from several wells did not exceed MCLs for the past 10 to 14 years. For example, monitoring of compliance boundary wells LRP 8D, LRP 9D, and LRP 10D was discontinued in 2013 due to groundwater concentrations remaining below MCLs since 2003 (10 years of data according to the Time Series Plots, Appendix C, Page C25-C-29). CCL_4 concentrations in LRP 6R fell below MCLs in 2013, and LRP 7D has not had detections of above MCLs since 2003 (14 years of data). Given that four out of the five monitoring wells have 10 years or more of concentration data below MCLs, and one well with concentration data below MCLs since 2013, sufficient monitoring data has been collected and presented to indicate that the site has met the intent of EPA's 2014 Groundwater Monitoring Guidance. Therefore, EPA concurs with SRS's proposal to discontinue monitoring and reporting at the LBRP OU.