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

October 9, 2020

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

RE: EPA Comments on the Removal Action Report for the P-Area Groundwater Operable Unit Non-Time Critical Removal Action (U), SEMS Number: 81, SRNS-RP-2020-00021, Revision 0, July 2020, Savannah River Site, Aiken, South Carolina

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Removal Action Report for the P-Area Groundwater Operable Unit Non-Time Critical Removal Action (U), SEMS Number: 81, SRNS-RP-2020-00021, Revision 0, July 2020. EPA's comments are attached.

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

Sincerely,

JENNIFER TUFTS
Digitally signed by JENNIFER TUFTS
Date: 2020.10.09 17:43:12 -04'00'

Jennifer Tufts
Remedial Project Manager
Superfund Division

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

EPA Comments on the Removal Action Report for the P-Area Groundwater Operable Unit Non-Time Critical Removal Action (U), SEMS Number: 81, SRNS-RP-2020-00021, Revision 0, July 2020, Savannah River Site, Aiken, South Carolina

COMMENTS

1. **Section 5.1.2, Field Observations, Page 30 of 78:** Section 5.1.2 states, "Visual evidence can be in the form of surface cracks along the ZVI-PRB alignment, although none were observed for this project, or through PPR [pore pressure relief];" however, it is unclear if any surfacing of amendment occurred during the amendment injections. Please clarify if any surfacing of amendment occurred during the injections.

2. **Section 5.1.4, Post-Construction, Pages 31-32 of 78; Table 10, Comparison of Pre- and Post-Construction HPIT Data; and, Appendix G, Hydraulic Pulse Interference Testing Data:** It does not appear that any pre-construction hydraulic pulse interference testing (HPIT) plots were provided in Appendix G. As a result, insufficient information is provided to verify pre-PRB HPIT statements in Section 5.1.4 or Table 10. Also, there is insufficient information regarding how calculations were conducted (e.g., where did the curve that was matched come from, at what point during each test were the other parameters measured, and what were the results). Also, it should be noted that Table 10 indicates that there was a one to two order of magnitude apparent increase in hydraulic conductivity between the pre- and post-HPIT which should be discussed in the RAR. Please provide the pre-construction HPIT plots in Appendix G. Also, clarify calculations and to discuss the increase in hydraulic conductivity between the pre- and post-HPIT.

3. **Section 7.1, Removal Action Effectiveness Monitoring, Page 34 of 78:** According to Section 7.1, "Sampling will be conducted for five years and results will be reported annually in an Effectiveness Monitoring Report (EMR);" however, it is unclear why monitoring is limited to five years. At some point, the ZVI in the PRB may become ineffective (i.e., passivated), so it is important to monitor PRB performance long-term. Please clarify that long-term monitoring of the PRB will be conducted until groundwater remedial objectives are met.