Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

SEP 12 2023

Ms. Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Responses to the Regulatory Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) April 2021 through March 2022 Data (SRNS-RP-2022-00963, Revision 0, January 2023) SEMS Number: 81

The U.S. Department of Energy (DOE) is submitting the enclosed responses to regulatory comments for your review. The U.S. Environmental Protection Agency (EPA) and the South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on the Revision 0 document on June 5, 2023, and June 14, 2023, respectively. This report will not be revised; however, all comment responses will be included and/or addressed in the next data report, as applicable. Please review the information and provide your response within thirty (30) days of receipt. The effort and time that the EPA and the SCDHEC have provided on this operable unit are greatly appreciated.

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Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Operable Unit Manager, Mr. Philip Prater, at (803) 952-9333.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2023.09.11 14:22:57 -04'00'

Brian T. Hennessey
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-23-028

Enclosures:
1. SRS Responses to the USEPA's Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) April 2021 through March 2022 Data (SRNS-RP-2022-00963, Revision 0, January 2023) SEMS Number: 81
2. SRS Responses to SCDHEC Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) April 2021 through March 2022 Data (SRNS-RP-2022-00963, Revision 0, January 2023) SEMS Number: 81

cc w/o encl:
J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. R. Stewart, SCDHEC-Columbia
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K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office

Comments Received June 14, 2023

GENERAL COMMENTS

1. There are two statements in Section 4.0, Summary and Recommendations, that the Department disagrees with the conclusions. The first statement states that the tritium contamination within the Gordon Aquifer Unit was adequately defined in the 2010/2011 and 2013 investigations. If it was adequately defined, there would not be a need for further investigation as indicated in this section. This statement should be revised to state that it was thought to be defined. The second statement states that there are no practical treatment technologies that exist to remove tritium from large volumes of groundwater, and therefore, continued monitoring is recommended at this time. While this statement may be true, it should not be the sole reason for continued monitoring in the Gordon Aquifer Unit. Monitoring of tritium should be done to verify there are no detrimental effects to the environment or human health.

   Response: Agree with Clarification

   The 2010/2011 and 2013 groundwater investigations found no evidence of tritium in the GAU beyond the PSB 2 well cluster. Tritium concentrations were initially non-detect and then remained around the MDL from 2014 until 1Q20. Considering the findings of investigative efforts in the GAU and monitoring until 2019, SRS believed the tritium contamination was adequately defined in the GAU, localized around the PSB 2 monitoring well cluster. The depth of nearby monitoring wells is believed to be the depth where tritium contamination would be observed. In 2020, concentrations in the lower GAU monitoring well, PSB002AL, began increasing to a maximum of 68.4 pCi/mL in 2022. This increase indicates a vertical, downward component of groundwater flow at the PSB 2 monitoring well cluster. As stated in section 4.0, SRS is evaluating future plans for additional monitoring of tritium at the PSB 2 well group and future reports will detail SRS plans for future monitoring. Future monitoring reports will clarify that SRS believed the tritium contamination was adequately defined in the GAU until increasing concentrations were observed at greater depths in 2020.

   SRS agrees that the sole reason for continued monitoring should not be only that there are no practical treatment technologies that exist to remove tritium from large volumes of groundwater. The text will be revised in future groundwater monitoring reports similar to the following:

   Section 4.0, Second Paragraph:

   "… Currently, there are no practical treatment technologies that exist to remove tritium from large volumes of groundwater, such as the PAGW OU~~;~~. In order to ensure protection of the environment and human health, ~~therefore,~~ continued monitoring for tritium is recommended at this time."

   No change to the 2022 groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

Comments Received June 14, 2023

SPECIFIC COMMENTS

1. Section 4.0, Summary and Recommendations, page 17-18. The last sentence on page 17 should be revised to state that the Upper Aquifer Zone is being discussed.

   Response: Agree

   The text in future groundwater monitoring reports will be revised similar to the following:

   Section 4.0, Second Paragraph:

   "… In response to deep GAU concentration increases at the PSB 2 well group, SRNS is evaluating future plans for additional monitoring or investigation of tritium at the PSB 2 well group.

   In addition to evaluating impact to tritium levels from the PRSB, SRNS has initiated sampling for tritium at existing well PDB 4 to evaluate the extent of tritium in the UAZ, originating from the PRDB near PDB 2, where tritium concentrations have increased significantly in recent sampling events …"

   No change to the 2022 groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

GENERAL COMMENTS

1. The vertical extent of trichloroethylene (TCE) contamination in PAGW is unclear. According to the text in Section 3.3.2.2 (Lower Aquifer Zone [LAZ]), the TCE in the LAZ concentrations are increasing deeper in the aquifer; however, the PAGW Report does not discuss the data that indicates the vertical extent of TCE contamination is defined in the LAZ. As such, it is unclear whether TCE contamination has impacted the Gordon Aquifer Unit (GAU) due to the downward vertical migration from the LAZ. *Please revise the PAGW Report to include the vertical extent of TCE contamination in relation to the GAU.*

   Response: Agree with Clarification

   SRS did not discuss TCE contamination in the GAU because no detections have been determined in GAU wells from prior routine monitoring or investigations. The most recent investigation (SRNL-L3220-2020-00009) in the elbow and distal area near Steel Creek did not determine any evidence of cVOCs in the GAU. The 2018 Sampling and Analysis Plan Addendum (SRNS-RP-2018-00261) outlined the rationale and reasoning behind no monitoring for cVOCs in the GAU as part of the long-term monitoring program at the unit.

   SRS agrees to include a new *Gordon Aquifer Unit* section in future reports to discuss the vertical extent of TCE in the GAU as it relates to the overall discussion of TCE in the area.

   No change to the 2022 PAGW OU groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

2. There is a grey patterned box symbol depicted on multiple site figures that is not defined in the respective figure legends. For example, the grey patterned box is depicted on Figure 7 (Monitoring Well Network for the Upper Aquifer Zone, Page 28 of 100) near upper aquifer zone (UAZ) well PSC002D1/D2, on Figure 8 (Monitoring Well Network for the Lower Aquifer Zone, Page 29 of 100) near LAZ well PGW014C and at a similar location in Figure 9 (Monitoring Well Network for the Gordon Aquifer Unit, Page 30 of 100); however, the symbol is not defined in the legends. This omission is also found on Figures 15, 16, 17, 18, 23, 26, 28, 31, 32, 38 and 42. In addition, Figure 30 (Steel Creek Sampling Access Road completed in January 2023, Page 58 of 100) shows the constructed Steel Creek Sampling Access Road; however, it is unclear whether the gray patterned box symbols shown on the noted figures represent the newly constructed access road. *Please revise the figure legends to define the grey patterned box symbol.*

   Response: Agree

   SRS agrees that the grey patterned shape is not defined in figures for the 2022 groundwater monitoring report. This shape depicts a rip-rap feature in the Steel Creek

discharge canal. The shape will be defined in future PAGW OU groundwater monitoring report figures as shown in Figure CR-1.

No change to the 2022 PAGW OU groundwater monitoring report is proposed.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

SPECIFIC COMMENTS

1. **Section 3.2, Groundwater Elevation Measurements and Groundwater Flow Direction, Page 7 of 100:** The last paragraph indicates that certain wells are excluded from the well elevation data due to being dry or obvious outliers; however, this section does not state the number of wells or identify which wells were excluded. *Please revise the text to list the wells that were not included in the well elevation data.*

   Response: Agree with Clarification

   SRS agrees that the stations excluded from potentiometric contour calculations were not listed in this section. The excluded stations will be included in the figures, depicted by a unique symbol for future reports as shown in Figure CR-2. The excluded station IDs will be identified in Table 2 with highlighting and a note, as shown in Table CR-1.

   No change to the 2022 PAGW OU groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

2. **Section 3.3, Groundwater and Surface Water Results, Page 7 of 100:** This paragraph states, "Sample results above the maximum contamination level (MCL) for tritium and/or TCE from April 2021 to March 2022 are listed in Table 3;" however, the text does not provide the MCL for tritium or TCE, 20 picocuries per milliliter (pCi/mL) and 5 micrograms per liter (µg/L), respectively, for comparative purposes of results that are over the MCLs. *Please revise the text to include the MCLs for tritium and TCE.*

   Response: Agree

   SRS agrees that the MCLs for tritium and TCE were not identified in the text. The text will be revised in future reports similar to the following:

   Section 3.3, First Paragraph:

   "… Sample results above the maximum contaminant level (MCL) for tritium (20 picocuries per milliliter [pCi/mL]) and/or TCE (5 microgram per liter [ug/L]) from April 2021 to March 2022 are listed in Table 3…"

   No change to the 2022 PAGW OU groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

3. **Section 3.3, Groundwater and Surface Water Results, Page 7 of 100:** The first paragraph states, "All analytical sampling results for analytes are included in Appendix B along with the respective MCLs or regional screening levels (RSLs);" however, the text does not discuss the groundwater or surface water results that exceed RSLs. *Please revise this section to discuss the relevant RSL values that were exceeded.*

   Response: Agree

   SRS agrees that constituents which exceed RSLs where MCLs are not provided should also be presented, and this was inadvertently omitted. The only constituent to exceed RSLs for the 2022 reporting period was iron. A new section will be included in future reports to discuss RSL exceedances similar to the following:

   Section 3.3.3.5:

   "*3.3.3.6 RSL Exceedances*

   Iron was the only constituent with a RSL exceedance in the 2022 reporting period. The iron exceedance (1Q22 detection was 18.4 mg/L; RSL is 14.0 mg/L) was recorded at UAZ monitoring well P002U, which is down gradient of the ZVI-PRB and is sampled for iron to monitor impacts on the PAGW OU from the NTC RA. Iron has decreased from 28.8 mg/L in May 2021, to 18.4 mg/L in February 2022. Discussions of the ZVI-PRB performance are reserved for the annual PAGW OU NTC RA EMR at this time, which is submitted separately from the overall PAGW OU groundwater monitoring report."

   No change to the 2022 PAGW OU groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

4. **Section 3.3.1.1, Upper Aquifer Zone, Page 9 of 100:** This section states, "As water level rises, tritium residual that has remained in the soil above the water table is released into the groundwater;" however, the text does not discuss the expected potential effects and impacts this additional release of mass has on the estimated cleanup timeframes. *Please revise the text to discuss the additional release of tritium mass that occurs as the water table rises and whether this impacts cleanup timeframes.*

   Response: Agree with Clarification

   All primary sources of tritium (i.e., P-Area Reactor Seepage Basins [PRSB] and P-Area Reactor Building Complex, 105-P, principally the P-Area Reactor Disassembly Basin [PRDB]) have been addressed through previous closure activities. Any residual tritium present in the vadose zone that has not entered the groundwater system because of the closure activities, will in time decay away due to the short half-life of 12.3 years. The reason tritium concentrations have increased has to do with tritium previously entrained beneath a low-permeability cap over the seepage basins and also entrained beneath the PRDB, which was dewatered, grout filled, and cement capped. Closure activities for the PRSB and PRDB prevent rainfall infiltration, whereby the tritium entrained in vadose

zone soil could be mobilized. However, as water levels rise, the entrained tritium at these locations can become remobilized.

Since suspension of reactor operations in the late-1980's, tritium has undergone 3 radioactive decay half-lives. This is evident in groundwater monitoring data as overall tritium concentrations are continuing to decrease since operations suspension and closure of the source units.

Data from wells at the source units have on occasion, though infrequently, shown spikes in tritium concentrations; however, the concentrations are below what has been observed in previous monitoring events and those spikes typically begin to decrease in following sampling events. This is consistent with minor releases of tritium due to rising and falling water levels. Because of the location of the source units, distance to Steel Creek, half-life of tritium, and travel time, the impact to the overall tritium groundwater plume is relatively minor, with no impact to surface water or potential future actions anticipated.

SRS agrees to include text in future reports to discuss potential impact to the groundwater plume and potential future cleanup action(s) if groundwater data at the source units indicate a spike or rise in tritium concentrations beyond that which would be expected with fluctuating water levels.

No change to the 2022 PAGW OU groundwater monitoring report is proposed.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

5. **Section 3.3.1.3, Gordon Aquifer Unit, Page 11 of 100:** It is unclear if the lack of detection of tritium in nearby GAU monitoring wells could be attributed to the depth of the well screens in the surrounding GAU wells, which are shallower than the well screen in deep GAU well screen PSB002AL. The text states the lack of tritium detection in nearby GAU wells could be attributed to increased horizontal groundwater flow rate, dilution/dispersion, and radioactive decay; however, it is unclear if the nearby GAU wells are installed at a sufficient depth to monitor plume migration in the vicinity of PSB002AL. *Please revise the text to discuss if the nearby GAU wells are installed at a sufficient depth to monitor the tritium plume migration.*

Response: Agree

SRS agrees that it is unclear if the depth of nearby Gordon Aquifer Unit (GAU) wells is sufficient to monitor plume migration in the vicinity of PSB002AA and PAB002AL. The depth of nearby monitoring wells is believed to be the depth where tritium contamination would be observed. However, as stated in section 4.0, SRS is evaluating future plans for additional monitoring of tritium at the PSB 2 well group and future reports will detail SRS plans for future monitoring.

The following text changes will be included in future reports.

Section 3.3.1.3, First Paragraph:

"... Previous groundwater investigations did not delineate the extent of the tritium plume and it is believed the plume is limited in areal extent. Groundwater samples were collected throughout the GAU at borings near and around the PRSBs during two separate investigations with no detections of tritium. Based on the outcome of these investigations, a~~A~~dditional GAU monitoring wells were installed around this location to monitor the movement of the plume. However, installation of the new wells was completed at a depth relative to the depth tritium was observed at PSB002AA. Because no tritium was found at greater depths, it was believed any future detection would be observed at similar depths. Currently, none of the surrounding wells demonstrates elevated levels of tritium, which would indicate movement of the plume. The GAU plume is shown in Figure 26. In 2014, a ~~A recently installed~~ well screened deeper in the GAU, PSB002AL, was installed and ~~has been~~ first sampled ~~since~~ in 2014. ~~and~~ Tritium concentrations have remained around the MDL from 2014 until 1Q20, when concentrations slowly increased to a 1Q22 result of 68.4 pCi/mL, indicating vertical migration across the aquifer units. ... The lack of detection of tritium in nearby GAU monitoring wells could be attributed to increased horizontal groundwater flow rate, dilution/dispersion, and radioactive decay. However, there are no other wells completed in the GAU as deep as well PSB002AL. ..."

No change to the 2022 PAGW OU groundwater monitoring report is proposed.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

6. **Section 3.3.2.2, Lower Aquifer Zone, Pages 14-15 of 100:** The text states "TCE migration horizontally in the LAZ is parallel to upper Steel Creek and therefore is not anticipated to discharge to surface water in the near term"; however, LAZ data from monitoring locations across from, and to the north of, Steel Creek are not presented to support the assertion that migration in the LAZ is parallel to Steel Creek. As such, it is unclear if TCE contamination is migrating to the north, below Steel Creek. *Please revise the text to discuss how potential TCE contamination migration to the north across Steel Creek is being assessed.*

Response: Agree with Clarification

The area in the vicinity of Steel Creek has undergone numerous characterization activities over the years with the most recently completed 2018 investigation in support of the PAGW Sampling and Analysis Plan Addendum (SRNS-RP-2018-00261). Outcome of that work was provided in the 2020 PAGW EMR (SRNS-RP-2020-00621) and presented to the Core Team in July 2020 (SRNL-L3220-2020-00009). In summary, the findings of the work determined that the LAZ groundwater plume is limited in extent and does not discharge to the upper reaches of Steel Creek based on elevation of measured contamination within the aquifer and surface water elevations. The plume continues to migrate along groundwater flow direction that parallels Steel Creek in a west-southwest direction. Based on the potentiometric surface and surface elevations, it is expected that discharge of LAZ contaminated groundwater might first be detected

further downgradient at surface water location SC-04 and shallow wells PSC006D1 and PSC006D2 (Figure CR-3). Previous groundwater modeling supports this assertion (SRNS-RP-2015-00768). Currently, no contamination is observed at PSC006D1 or PSC006D2. Surface water location SC-04 has sporadically reported detections of TCE; however, these concentrations have been observed at, or below, 1 ug/L. The 2018 investigation determined that the detection of TCE at this location was from the discharge of the UAZ TCE groundwater plume at surface water location SC-03 and subsequent flow downstream until volatilization and/or dilution of TCE brought levels below detection.

Additional work was also completed in 2018 associated with design activities for the ZVI-PRB located north of the 2018 SAP Addendum field activities. The outcome of the ZVI-PRB work, and nearby well data from PGW017 well cluster, as well as by earlier work in the area, demonstrated that the LAZ plume was not as extensive as observed downgradient and that there was no indication of plume movement to the north. SRS believes based on these data and groundwater data from well cluster PGW017, the LAZ plume is not moving north. The LAZ potentiometric surface illustrates that the movement of the LAZ plume is directed towards Steel Creek from P Area and as the plume reaches the Steel Creek area, flow direction parallels the creek to a point of discharge downstream near surface water location SC-04. SRS believes it is unlikely that the LAZ plume will migrate to the north side of Steel Creek since groundwater flow on the other side is towards Steel Creek.

The current groundwater monitoring network has wells installed along Steel Creek and downgradient to monitor movement of the groundwater plume. However, as noted earlier, the depth of the contamination in the LAZ is deeper than the surface elevation of Steel Creek at the upper reaches of Steel Creek. It is unlikely the LAZ plume will impact Steel Creek in this vicinity. On the north side of the Steel Creek, the nearest wells are associated with the P-Area Burning Rubble Pit; however, these wells are installed in the UAZ and do not provide data in the LAZ. There are wells installed in the LAZ farther from Steel Creek on the north side; however, these wells are too far away and hydraulically upgradient to provide useful information on detection and movement of the LAZ plume.

SRS agrees to include additional text to discuss movement and potential impact to Steel Creek from contaminated groundwater within the LAZ in future monitoring reports.

No change to the 2022 PAGW OU groundwater monitoring report is proposed.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

7. **Section 3.3.3, Additional Screening Level Exceedances, Page 15 of 100:** The first paragraph states, "In addition to tritium and TCE exceedances, there were 14 detections in additional analytes above their respective screening levels for 1Q22;" however, this section does not provide the screening levels for the respective exceedances. *Please revise the text to list the additional analytes and the respective screening levels that were exceeded.*

   Response: Clarification

   The exceeding analytes are listed in Appendix B and summarized in Table 4, as referred to by the text in Section 3.3.3. Table 4 also provides the respective screening levels as well as a summary for the frequency of detection and exceedances of each analyte, presented by aquifer zones.

   No change to the 2022 PAGW OU groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

8. **Section 4.0, Summary and Recommendations, Page 18 of 100:** The paragraph regarding TCE states, "Previous data for chlorinated volatile organic compounds (cVOCs) collected from this well group did not indicate the presence of cVOCs. However, it has been multiple years since cVOC data was collected;" however, since cVOC migration appears to be occurring, data from this well group is needed to further define the plume. *Please revise the text to define the well group and discuss whether future sampling from these wells will be included in the PAGW monitoring well network.*

   Response: Agree with Clarification.

   The sentence previous to the text beginning, "Previous data for chlorinated volatile organic compounds….", defines the well group as the PSB 11 well group.

   SRS agrees the text should have stated whether cVOCs will be included in future monitoring events for the PSB 11 well group. Future reports will clarify that data collected for cVOCs from the PSB 11 well group will be reviewed and presented in the EMR. If the TCE plume is detected at this well group, the need to include this well group in the PAGW monitoring well network will be evaluated.

   No change to the 2022 PAGW OU groundwater monitoring report is proposed.

   Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

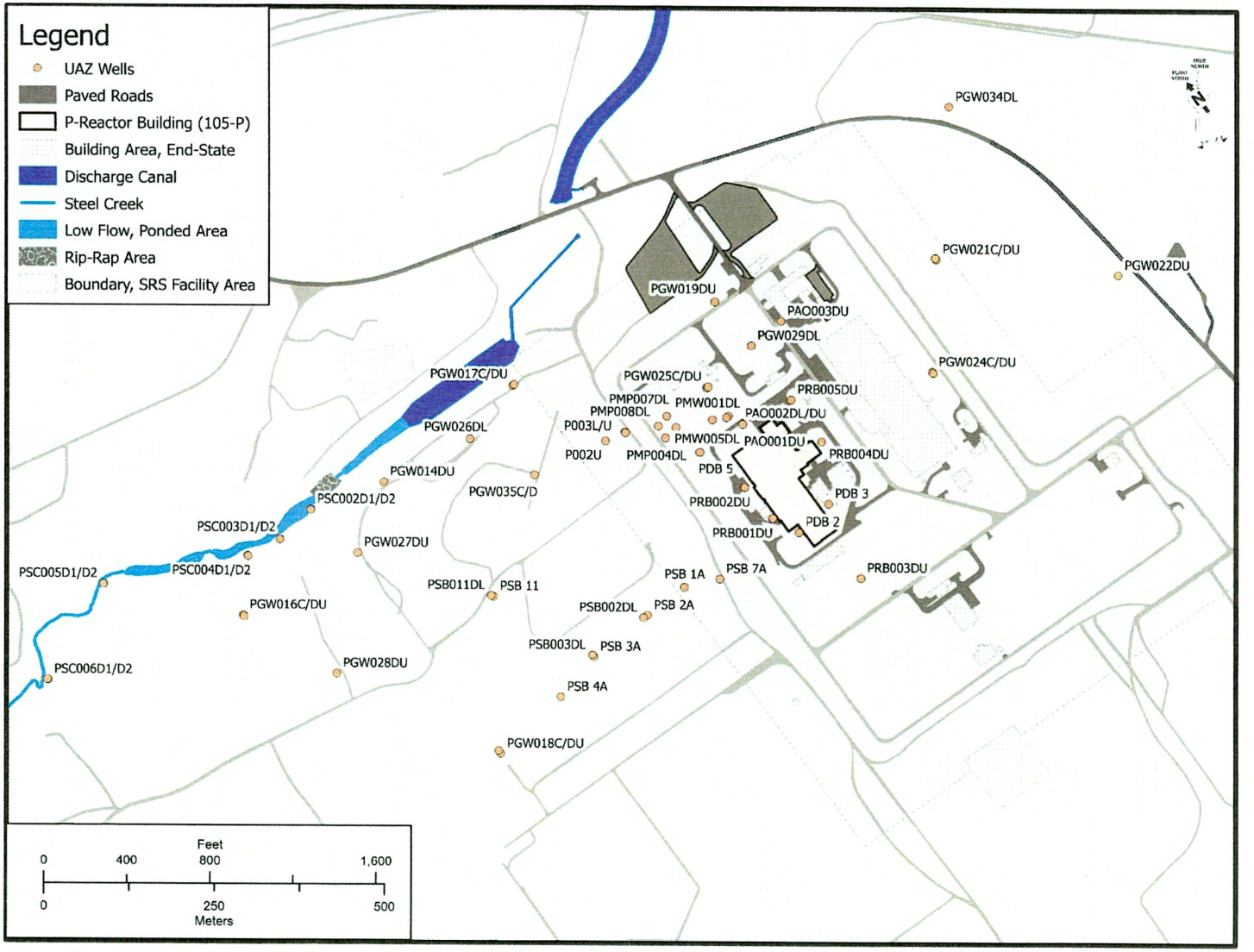

Figure CR-1. Revised Figure 7 to Identify Rip-Rap Feature

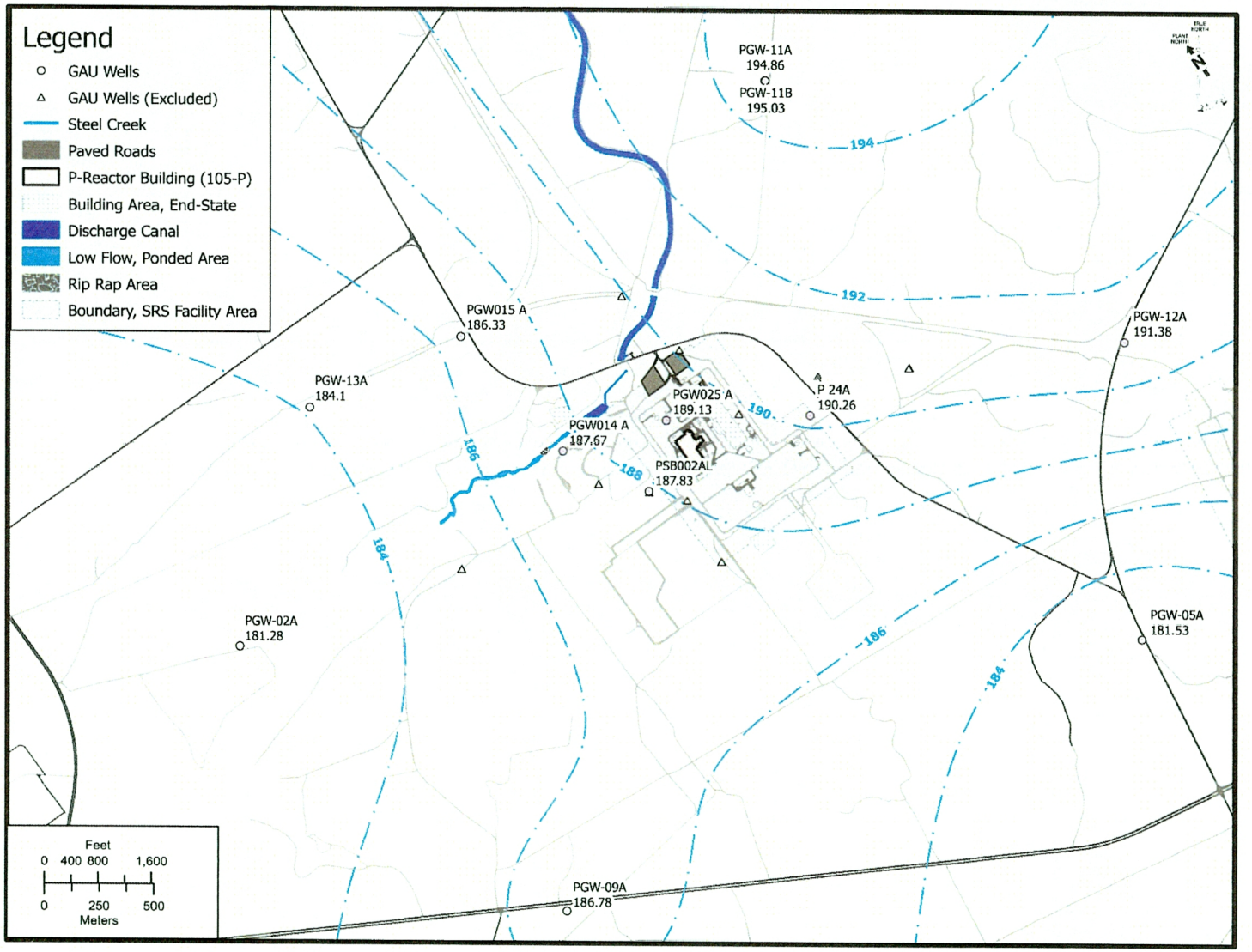

Figure CR-2. Revised Figure 16 to Identify Excluded Water Level Station IDs

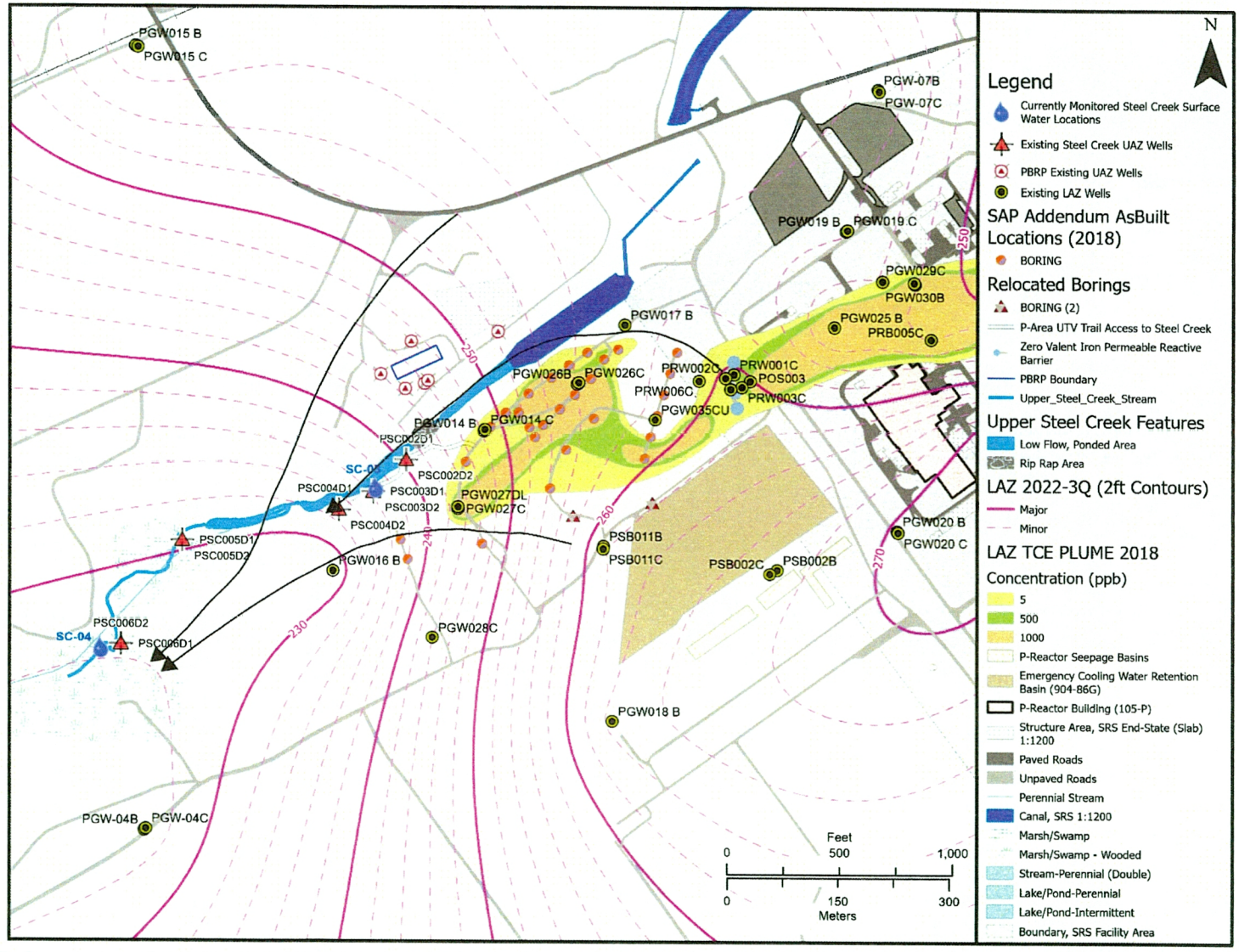

Figure CR-3. 2018 LAZ TCE Plume and Potentiometric Surface with SAP Locations, Wells, and Surface Water Locations

Table CR-1. Revised Table 2 to Include Excluded Water Level Stations (only included GAU for this example)

Station ID	Date	Aquifer Designation	Reference Elevation [ft amsl]	Depth to Water [ft bgs]	Sample Water Elevation
P 24A	6-Jan-2022	GAU	315.3	125.04	190.26
PGW014 A	6-Jan-2022	GAU	277.77	90.1	187.67
PGW015 A	6-Jan-2022	GAU	304.64	118.31	186.33
PGW-01A	6-Jan-2022	GAU	312.99	82.32	230.67
PGW024 A	6-Jan-2022	GAU	319.34	96.3	223.04
PGW025 A	6-Jan-2022	GAU	315.83	126.7	189.13
PGW-02A	6-Jan-2022	GAU	253.84	72.56	181.28
PGW033A	6-Jan-2022	GAU	332.14	96.4	235.74
PGW-03A	6-Jan-2022	GAU	326.36	98.56	227.8
PGW-04A	6-Jan-2022	GAU	280.27	53.36	226.91
PGW-05A	6-Jan-2022	GAU	245.63	64.1	181.53
PGW-06A	6-Jan-2022	GAU	297.13	81.3	215.83
PGW-06B	6-Jan-2022	GAU	297.61	80.4	217.21
PGW-07A	6-Jan-2022	GAU	323.8	95.6	228.2
PGW-09A	6-Jan-2022	GAU	311.78	125	186.78
PGW-11A	6-Jan-2022	GAU	276.06	81.2	194.86
PGW-11B	6-Jan-2022	GAU	275.83	80.8	195.03
PGW-12A	6-Jan-2022	GAU	275.48	84.1	191.38
PGW-13A	6-Jan-2022	GAU	290.2	106.1	184.1
PSB002AA	7-Jan-2022	GAU	324.93	90.12	234.81
PSB002AL	7-Jan-2022	GAU	325.34	137.51	187.83
PSB011A	7-Jan-2022	GAU	310.07	80.71	229.36

Grey highlighted stations were excluded from potentiometric contouring.