



**REGION 4**  
ATLANTA, GA 30303

November 20, 2024

**ENVIRONMENTAL COMPLIANCE &**

**NOV 20 2024**

Ms. Avery Hammett  
SRS Remedial Project Manager  
Remediation and Deactivation & Decommissioning Division  
U.S. Department of Energy  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

**AREA COMPLETION PROJECTS**

**EPA Comments: 488-4D ASH LANDFILL ANNUAL GROUNDWATER MONITORING REPORT 2023 DATA (SRNS-RP-2024-00941, REVISION 0, JULY 2024)**

Dear Ms. Hammett:

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the 488-4D ASH LANDFILL ANNUAL GROUNDWATER MONITORING REPORT 2023 DATA (SRNS-RP-2024-00941, REVISION 0, JULY 2024) EPA has the following comments on this report.

If you have any questions or require additional information, please contact Brianne Martin at (678) 906-8075.

Sincerely,

**BRIANNE MARTIN**

Digitally signed by BRIANNE MARTIN  
Date: 2024.11.20 09:27:54 -05'00'

Brianne Martin, RPM  
Federal Facilities Branch  
Superfund and Emergency Management Division

cc: C.L. Bergren, SRNS-ACP  
Susan Fulmer, SCDES

## SPECIFIC COMMENTS

- 1. Section 2.1, Site Geology and Hydrogeology, Page 2 of 24 and Figure 5, Lithostratigraphic and Hydrostratigraphic Units at SRS, Page 15 of 24:** The text states that the pertinent stratigraphic component beneath D-Area in ascending order, is the Snapp, Fourmile Branch, Congaree, Warley Hill, Tinker/Santee, and Clinchfield Formations, however, the Clinchfield Formation is not shown on Figure 5. Please revise Figure 5 to include the location of the Clinchfield Formation or revise the text as appropriate.
- 1. Table 2, Monitored Constituents for the 488-4D Ash Landfill, Page 23 of 24:** Uranium is a monitored constituent in well DCB 8; however, according to Table 3 (2023 Sampling Results for the 488-4D Ash Landfill) samples collected from wells DCB077 and DCB078 were also analyzed for uranium. Additionally, uranium is not included in the Metals constituents section of Table 2. Please revise the information presented in Table 2 to be consistent with the information reported in Table 3.
- 2. Table 2, Monitored Constituents for the 488-4D Ash Landfill, Page 23 of 24:** There is a discrepancy between the information presented in Table 2 and the text of the AMR. For example, according to Table 2, monitoring of field parameters, metals, sulfate and uranium occurred during the second quarter only and gauging of water elevation data only occurred during the fourth quarter; however, Table 3 (2023 Sampling Results for the 488-4D Ash Landfill) shows that monitoring of field parameters, metals, sulfate and uranium were performed for DCB 8, DCB077, and DCB078, with the exception of Mercury at DCB078, during the fourth quarter of 2023. Also, the text in Section 2.2 (Groundwater Flow) states that water elevation data for April/May 2023 and October/November 2023 are provided in Table 3. The text states, “Monitoring wells DCB 8 and DCB077 are also used for monitoring in the D-area Treatability Study (SRNS 2024) and include additional metal sample analyses in October/November”; however, this statement does not address the metals analysis performed at DCB078 during the fourth quarter. Please revise the AMR text and tables as appropriate to clarify the frequency of monitoring of field parameters, metals, sulfate and uranium and water level gauging performed for the 488-4D Landfill.

## MINOR COMMENTS

- 1.** There are two sets of page numbers shown on every page, one in the header and one in the footer, and they do not match. Furthermore, the last page (Table 3 - 2023 Sampling Results for the 488-4D Ash Landfill) is not included in the total page count for the numbering system used in the header and Table of Contents. Please revise the AMR to use one page numbering system, ensure the inclusion of the last page in the total page count, and ensure consistency with the Table of Contents.
- 2. Figure 10, Beryllium Time Series Plots at DCB078 and DCB079, Page 21 of 24:** The title of Figure 10 states that the beryllium time series plots shown are for DCB078 and DCB079; however, DCB 47C is also shown. Please revise the title of Figure 10 to reflect that the beryllium time series plot for DCB 47C is also shown.
- 3. Table 3, 2023 Sampling Results for the 488-4D Ash Landfill, PDF Page 29:** The title of Table 3, is shown on page 24 of 24; however, Table 3 is presented on the following Page 29 of 29. Please revise the AMR and move Table 3 to Page 24 of 24.