



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

October 19, 2017

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 R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R Area Operable Unit (U), January 2016 through December 2016, CERCLIS Number: 95, SRNS-RP-2017-00232, 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 R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R Area Operable Unit (U), January 2016 through December 2016, CERCLIS Number: 95, SRNS-RP-2017-00232, Revision 0, June 2017. EPA comments are attached.

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

Sincerely,

**Tufts,  
 Jennifer**

Jennifer Tufts  
 Remedial Project Manager  
 Superfund Division

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 Tufts, Jennifer  
 Date: 2017.10.19  
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cc: C.L. Bergren, SRNS-ACP  
 Susan Fulmer, SCDHEC

**EPA comments on the R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R Area Operable Unit (U), January 2016 through December 2016, CERCLIS Number: 95, SRNS-RP-2017-00232, Revision 0, June 2017, Savannah River Site NPL Site, South Carolina**

**TECHNICAL REVIEW COMMENTS**

1. The text in Section 3.3 (RAGW Compliance) states that with the approval of the Core Team, SRS may suspend monitoring on any station with stable or decreasing refined constituents of concern (RCOC) concentrations that are below maximum contaminant levels (MCLs) for six consecutive years consistent with the 2011 Environmental Monitoring Plan (EMP). However, the determination to suspend monitoring should be performed consistent with the EPA guidance document titled "Recommended Approach for Evaluating Completion of Groundwater Restoration Remedial Actions at a Groundwater Monitoring Well OSWER 9283.1-44, August 2014" (EPA Guidance). The EPA Guidance recommends groundwater monitoring well data and other related subsurface information be evaluated to make defensible conclusions during the remediation monitoring phase and the attainment monitoring phase of groundwater monitoring. This guidance recommends a minimum number of data points to evaluate each phase 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 the EPA Guidance, it is recommended that a minimum of eight data points be used for the attainment monitoring phase analysis. Revise the R-Area Groundwater (NBN) Effectiveness Monitoring Report in Support of R Area Operable Unit (U), January 2016 through December 2016, CERCLIS Number: 95, SRNS-RP-2017-00232, Revision 0, dated June 2017 (2016 EMR) to address this issue. Alternatively, if the 2016 EMR will not be revised based on review comments, ensure this issue is addressed in the report prepared for the 2017 monitoring period.

2. The text in Section 4.1.1 (Eastern VOC Plume), Page 6 of 30 states well RAG008B is designated as a plume definition well and well RPB011B is designated as the new plume boundary well which is consistent with the information presented in Table 1 (RAGW Monitoring Stations), Page 27 of 30. However, it is noted that RAG008B is designated as a Plume Boundary Well and the new well RBP011B well is designated as a Plume Definition Well in Table A-1 (RAOU EMR Monitoring Wells, Fourth Quarter 2016), Appendix A, Page A-3 of A-4 and is not consistent with the information presented in Section 4.1.1 and Table 1. Revise the 2016 EMR to address this issue to ensure all the well use designations are presented consistently across all text figures and tables.
3. In Section 6.0, SRS recommends that groundwater sampling be reduced to biennial (every two years) starting in 2018 for all locations with the exception of the new plume boundary well RBP 011B, which will continue to be sampled annually for three years. EPA supports that recommendation given that VOC and tritium concentrations fluctuate very little in the majority of monitoring wells (with the exception of RAG008B) indicating stable or decreasing trends.