REGION 4
ATLANTA, GA 30303

ENVIRONMENTAL COMPLIANCE &

SEP 22 2026

AREA COMPLETION PROJECTS

September 21, 2026

Mr. Matthew Baker
Acting FFA Remedial Project Manager
Remediation, Deactivation, and Decommissioning Division
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

EPA Comments: Treatability Study Data Report for Groundwater Injection and Discharge Canal Neutralization at the D-Area Groundwater (DAG) Operable Unit (OU) (U), 2025 Data and Information (SRNS-TR-2026-00021, Revision 0, dated May 2026) SEMS Number: 63

Dear Mr. Baker,

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed and commented on the Treatability Study Data Report for Groundwater Injection and Discharge Canal Neutralization at the D-Area Groundwater (DAG) Operable Unit (OU) (U), 2025 Data and Information (SRNS-TR-2026-00021, Revision 0, dated May 2026) SEMS Number: 63

If you have any questions or require additional information, please contact Brianne Martin at (404) 683-2220.

Sincerely,

BRIANNE MARTIN Digitally signed by BRIANNE MARTIN
Date: 2026.09.21 16:19:35 -04'00'

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

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

GENERAL COMMENTS

1. The text does not discuss future plans for the passive piping system, making it unclear whether the piping system will be removed or left in place for future use. As shown on Figure 16 (Injection Well Connection to Pipeline (DGI010)), the piping setup consists of aboveground high-density polyethylene (HDPE) pipes and equipment (e.g., valves, flow totalizer, etc.) routed to the injection wells. Given that the Treatability Study will be discontinued, decommissioning of the passive piping system may be appropriate. Please revise the text to discuss future plans for the passive piping system.

SPECIFIC COMMENTS

1. **Section 4.0, Sampling and Analysis, Page 6 of 72:** It is unclear whether third quarter (3Q2025) sampling was performed at the surface water stations DSWM-4C, DSWM-6, DSWM-7, and DSWM-9. For example, the text states that "Quarterly sampling and monthly pH measurements were continued at the four surface water stations upgradient, in-between, and downgradient of the $CaCO_3$ [calcium carbonate] reactive structures (DSWM-4C, DSWM-6, DSWM-7, and DSWM-9)." However, as shown on Table 1 (Required D-Area Treatability Study 2025 Monitoring Network and Sampling Schedule), the sampling frequency for these stations does not include sampling results in 3Q2025, making it unclear if the monitoring requirements of the Treatability Study were met. Please revise the text and Table 1 to clarify whether 3Q2025 sampling was performed at surface water stations DSWM-4C, DSWM-6, DSWM-7, and DSWM-9 and clarify whether the requirements of the Treatability Study were met.

2. **Section 5.1.4, Overall Observations of Groundwater Injections, Pages 12 and 13 of 72:** The basis for selecting the six monitoring well locations (DCB 8, DCB 3A, DCB 33B, DCB 36A/C, DCB 37A, and DCB087A/C) to monitor changes observed after ceasing groundwater injections is unclear. The text indicates water elevation data will continue to be collected through fourth quarter 2027 (4Q2027) at these monitoring well locations; however, the text should discuss the rationale and technical basis for selecting these locations. For example, wells DCB 33B and DCB 8 may be monitored to assess upgradient conditions after groundwater injection operations cease, while well DCB 3A may provide data to evaluate side gradient conditions. Please revise the text to discuss the rationale and technical basis for selecting the six monitoring well locations to monitor changes observed after ceasing groundwater injections.

3. **Section 5.2, $CaCO_3$ Reactive Structures, Page 14 of 72:** The text should discuss why the semi-annual $CaCO_3$ reactive structures maintenance planned for 2025 was not conducted. Also, the text should discuss whether there was limited surface water flow through the $CaCO_3$ reactive structures during the reporting period. Please revise the text to clarify why maintenance was not conducted as planned, discuss whether surface water flow was limited during the reporting period and whether the lack of planned maintenance had an effect on surface water flow through the $CaCO_3$ reactive structures.

4. **Section 6.0, Future Data Collection and Reporting, Page 16 of 72 and Section 7.0, Summary Pages 17 and 18 of 72:** The text states that the $CaCO_3$ reactive structures in the D-Area Effluent Discharge Canal will remain in place and maintenance will continue to be conducted on the structures, as needed; however, Section 5.2 ($CaCO_3$ Reactive Structures) indicates that semi-annual maintenance activities are planned for the $CaCO_3$ reactive structures. In addition, Section 7.0 (Summary) also states "Routine semi-annual maintenance of the reactive structures will be implemented to minimize sediment and leaf detritus build-up on the new reactive structures to allow water flow through the structures." Please revise the Report to clarify whether maintenance activities will be conducted on a semi-annual basis or "as needed."