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

October 27, 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

EPA comments: 2020 EFFECTIVENESS MONITORING REPORT (EMR) FOR MONITORED NATURAL ATTENUATION (MNA) AT THE L-AREA SOUTHERN GROUNDWATER (LASG) OPERABLE UNIT (OU) DATA FROM 2018 THROUGH 2019 SEMS Number: 77, SRNS-RP-2020-00332 REVISION 0 JUNE 2020

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed this EMR for L Area GW OU 77 and we have a few comments on this R0.

If you have any questions or require additional information, please contact me at (404) 562-8648.

Sincerely,

JON RICHARDS
Digitally signed by JON RICHARDS
Date: 2020.10.27 18:52:31 -04'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management Division

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

TECHNICAL REVIEW COMMENTS

1. **Section 4.0 Monitoring and Reporting, Page 12 of 40:** It is not clearly understood whether the monitoring results of the L-Area Oil and Chemical Basin (LAOCB) and the L-Reactor Seepage Basin (LRSB) which are included as part of the LASG OU monitoring program would be reported in timely manner, particularly if unexpected results occur. For example, the text in the last paragraph states the next performance monitoring sampling for the LAOCB and the LRSB is scheduled for 2020 and will be reported in the next LASG OU data sampling summary report to be submitted in 2022. *For clarity, revise the 2020 EMR for MNA at the L-Area Southern Groundwater (LASG) Operable Unit (OU) 77, SRNS-RP-2020-00332, Revision 0, dated June 2020 (2020 MNA Report) to indicate whether the sampling results of the LAOCB and LRSB monitoring will be submitted in a summary report to regulators prior to the LASG OU 2022 data sampling report.*

2. **Section 4.3.2 Tetrachloroethylene (PCE), Page 29 of 40:** It is currently uncertain whether the trend in PCE concentrations in well LSW 25DL is slowly declining as indicated in the text. For example, based on the Time Series Plot for Tetrachloroethylene (PCE) Station for LSW 25DL, Page C-10 of C-62, a declining PCE concentration trend in well LSW 25DL is not readily observed and appears to be stable or no trend. Statistical analysis (e.g., Mann Kendall) of the time-series data would help to quantify the trend results. *Revise the 2020 MNA Report to address this issue.*