



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

May 4, 2018



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 Response to SRS's RTCs on the Sampling and Analysis Plan Addendum for the C-Area Groundwater (CAGW) Operable Unit (OU) (U), CERCLIS Number: 82, SRNS-RP-2017-00100, Revision 1, dated March 2018, Savannah River Site, Aiken, South Carolina**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the SRS Responses to EPA Comments on the Sampling and Analysis Plan Addendum for the C-Area Groundwater (CAGW) Operable Unit (OU) (U), CERCLIS Number: 82, SRNS-RP-2017-00100, Revision 1, dated March 2018.. EPA's comment to the Revision 1 document are attached.

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

Sincerely,

**JENNIFER** Digitally signed by  
**TUFTS** JENNIFER TUFTS  
 Date: 2018.05.04  
 14:45:04 -04'00'

Jennifer Tufts  
 Remedial Project Manager  
 Superfund Division

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

**EPA Response to SRS's RTCs on the Sampling and Analysis Plan Addendum for the C-Area Groundwater (CAGW) Operable Unit (OU) (U), CERCLIS Number: 82, SRNS-RP-2017-00100, Revision 1, dated March 2018, Savannah River Site, Aiken, South Carolina**

- 1. EPA comment on SRS's response to EPA's original Comment #2.** The response indicates that the Savannah River National Laboratory (SRNL) is in the process of developing a method for analyzing heptane, nonane, decane, undecane, and dodecane with detection limits for each of 1,000 micrograms per Liter (ug/L). According to Table 4 of the CAGW Scoping Summary, n-nonane, n-decane, n-undecane, n-dodecane are considered medium weight compounds. Of these compounds, those with 10 to 28 carbons (i.e., decane, undecane, and dodecane) are found in the diesel range organics. Therefore, only heptane is considered a low molecular weight aliphatic compound and the remaining compounds that will be analyzed at the SRNL are medium weight. The medium weight compounds decane, undecane, and dodecane, are considered part of the diesel range organics. Section 2.1 (Vadose Zone Subunit) of the Sampling and Analysis Plan Addendum For Monitoring the C-Area Groundwater Operable Unit (Addendum) states that diesel fuel was used in the emergency generators at the C-Area and that at the Fuel Unloading Facilities Power (108-3C), spills or leaks resulted in soil being contaminated with petroleum. Since the majority of the compounds listed as potential contaminants in groundwater are medium weight (diesel range organics), it is unclear how the objective to detect these compounds will be met by the method being developed by SRNL which will have a detection limit of 1,000 ug/L when the EPA RSL for diesel range organics is 100 ug/L. Please provide a response to address this concern. It is recommended that SRS consider contracting with a commercial laboratory that can analyze samples for Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) with an achievable detection limit of 100 ug/L for DRO.