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Savannah River Operations Office
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Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund and Emergency Management Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Savannah River Site's Responses to the Regulatory Comments on the Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 through June 2025 (SRNS-RP-2025-00992, Revision 0, October 2025) SEMS Number: 82

In accordance with the terms of the Federal Facility Agreement (FFA), the U.S. Department of Energy (DOE) is submitting the subject comment responses for your review. The South Carolina Department of Environmental Services' (SCDES) and U.S. Environmental Protection Agency's (EPA) comments were received on March 11, 2026, and March 16, 2026, respectively. This report will not be revised; however, all comment responses will be included in the next report, as applicable. Additional discussion if needed can be facilitated during the scheduled June 16, 2026, C-Area Groundwater Operable Unit Strategy Meeting. Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the EPA and the SCDES have provided on this operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 522-6427, or Karen Morrow at (803) 989-0063.

Sincerely,

MATTHEW BAKER

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Date: 2026.05.20 14:17:57 -04'00'

Matthew R. Baker
Acting FFA Remedial Project Manager
DOE-Savannah River Operations Office
Remediation, Deactivation, and Decommissioning Division

RDDD-26-145

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Ms. Susan Fulmer
Mr. Jon Richards 2

Enclosures
1. SRS Responses to the U.S. Environmental Protection Agency's Comments on the Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 through June 2025 (SRNS-RP-2025-00992, Revision 0, October 2025) SEMS Number: 82
2. SRS Responses to the South Carolina Department of Environmental Services' Comments on the Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 through June 2025 (SRNS-RP-2025-00992, Revision 0, October 2025) SEMS Number: 82

c w/o encl:
M. Reece, SCDES-Columbia
H. J. Porter, SCDES-Columbia
J. Blalock, SCDES-Columbia
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M. McRae, TechLaw, Inc.

SRS Responses to SCDES Comments on Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 Through June 2025 SEMS NUMBER: 82; SRNS-RP-2025-00992, Revision 0 October 2025

Comments Received March 11, 2026

GENERAL COMMENTS

1. The Department agrees with all proposed recommendations, including expanding the PFAS sampling network and looks forward to a Core Team meeting to discuss the current implementation schedule in the context of additional PFAS investigation in the soils and groundwater.

SPECIFIC COMMENTS

1. Section 5.1, TCE, page 8. It is specified in the report that two contamination plumes exceeding their MCLs are delineated within the CAGW groundwater subunit. While the tritium plume and its evolution from 2002-2024 has been depicted in Figure 11, no such figure exists for the TCE plume, despite it being the principal VOC within the subunit. Please include a figure like that of tritium to show the extent of TCE contamination and the progress made in its remediation.

Response: Agree.

Future reports will include a figure depicting the evolution of the TCE Plume extent and concentrations from 2002 to current TCE Plume extent and concentrations (Figure CR-1).

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

2. Section 5.6, Tritium, page 14. The first paragraph of this section states that tritium samples above their respective EQL and MDC were collected at 52 of 80 sampled monitoring stations in 4Q24. According to Table A-1, 79 monitoring stations were sampled and 61 of these were above their respective EQL and MDC. According to this table, monitoring well CRP 8D was not sampled and no reason was given; please clarify. Additionally, the next sentence states that tritium concentrations above the MCL were detected at 23 monitoring wells and four surface water stations. However, based on the data provided in Table A-1, this statement should indicate that these concentrations were detected at 19 monitoring wells and four seepline stations, instead of 23 monitoring wells and four surface water stations.

Response: Agree.

- **The first paragraph of Section 5.6, Tritium, incorrectly states that 80 monitoring stations were sampled 4Q24. A total of 79 stations, 57 monitoring wells, six (6) seepline wells, and 16 surface water stations were sampled in 4Q24. The 79 monitoring stations (monitoring wells, seepline wells, and surface water) listed in Table A-1 are correct.**

- **It is correct that CRP 8D sample analyses in the fourth quarter of 2024 (4Q24) did not include tritium and 1,2-dichloroethylene (DCE) (identified in Section 4.3 Groundwater Sampling and Analyses). Prior to 2025, monitoring well CRP 8D was only part of the CBRP OU monitoring well network to help delineate and differentiate the CBRP OU TCE plume from the CAGW OU TCE plume. Tritium and 1,2-DCE are not included in the seven (7) constituents analyzed in CBRP OU samples. In 2025, CRP 8D was added to the CAGW OU monitoring network and sampled during the fourth quarter of 2025 (4Q25) for analytes and parameters listed in Section 4.3.**

- **For clarification, in Table A-1, 61 stations are above their respective MDC for tritium but only 52 stations have concentrations above the MDC and EQL (red-colored or white-colored cells). The nine (9) stations with detections above the MDC but below the EQL are identified with a purple-colored cell.**

- **The first paragraph of Section 5.6, Tritium, page 14 incorrectly states that tritium sample concentrations above the MCL (20 pCi/mL) were collected from 23 monitoring well stations and four (4) surface water stations. The text should state 19 monitoring well stations, four (4) seepline well stations, and four (4) surface water stations.**

The text in future reports will state the correct number of stations sampled in each event, the correct type of station, and the correct number of wells with concentrations above the respective MCLs. Future CAGW OU reports will include tritium and 1,2-DCE analyses results for CRP 8D.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

3. Section 5.6, UAZ Tritium, page 15. The second sentence at the top of this page refers to 14 stations screened in the MAZ. Technically, there are a total of 21 monitoring stations screened in the MAZ, 19 of which were sampled for tritium (14 monitoring wells and 5 seepline stations). Also, this sentence appears awkward. Perhaps the word "range" should be changed to "ranging."

For consistency, the paragraph in Section 5.6, Tritium, describing MAZ tritium concentrations should be structured similar to the other paragraphs and state the number of reported sample concentrations above the MCL in the first sentence. For clarification the paragraph should state:

Fourteen tritium sample concentrations above the MCL were collected from monitoring stations screened in the MAZ, ranging from 25.4 pCi/mL (CCSL-11) to 825 pCi/mL

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Comments Received March 11, 2026

(CRW024C) (Table A-1, Appendix A). The highest tritium concentrations exceeding the MCL are now in the distal part of the plume in the MAZ near Castor Creek (Figure D-5).

In future reports, the paragraphs describing the sample concentrations of monitoring stations in each aquifer, aquifer zones, and surface waters, will be consistently stated using the same format for clarity.

No changes are proposed to the existing GMR.
Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

SRS Responses to SCDES Comments on Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 Through June 2025 SEMS NUMBER: 82; SRNS-RP-2025-00992, Revision 0 October 2025

Comments Received March 11, 2026

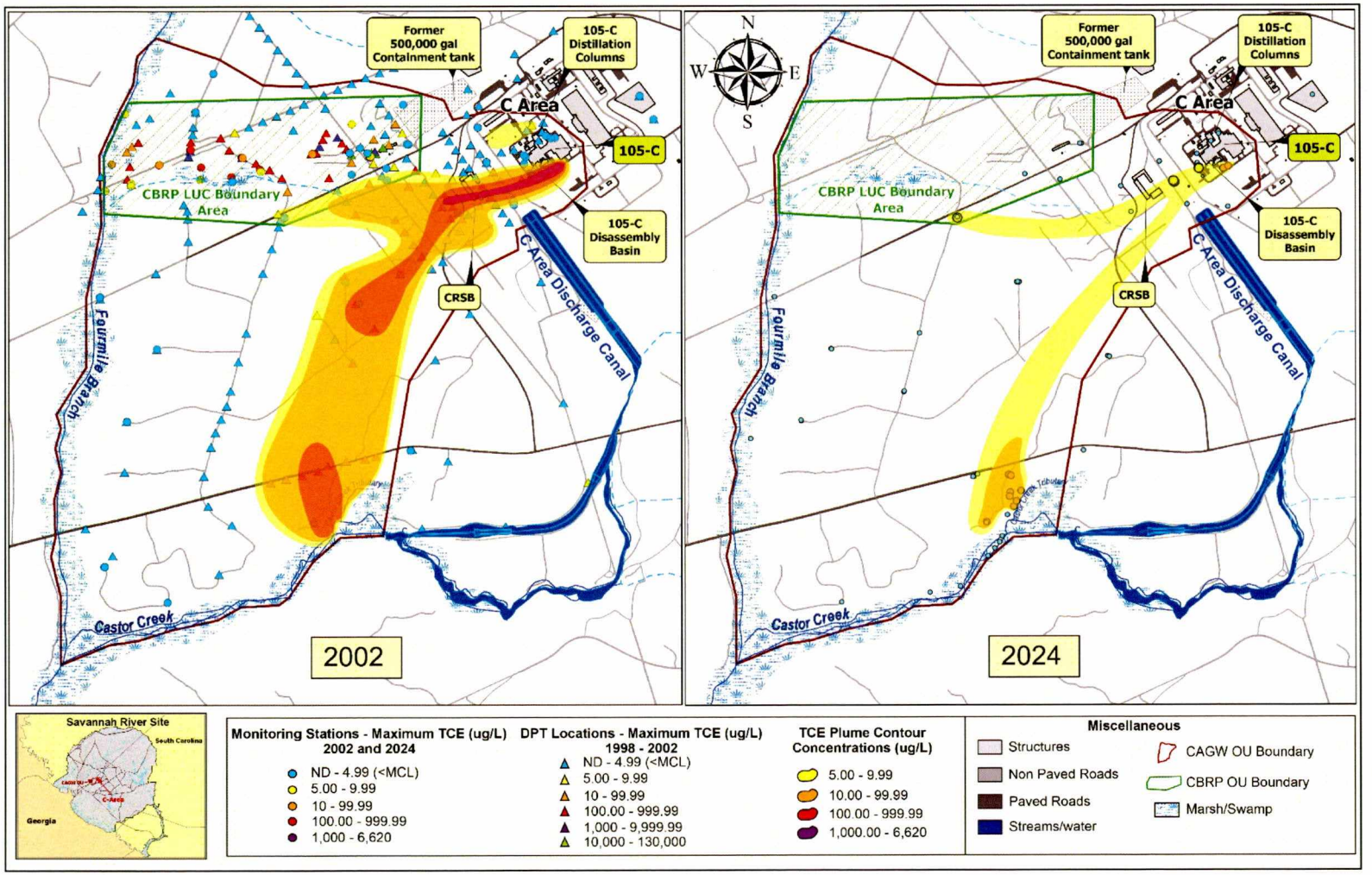


Figure CR-1 2002 -2024 TCE Plumes

SRS Responses to USEPA Comments on Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 Through June 2025 SEMS NUMBER: 82; SRNS-RP-2025-00992, Revision 0 October 2025

Comments Received March 16, 2026

GENERAL COMMENTS

1. The GMR does not discuss whether the completeness goals and other data usability requirements were met. Section 5.0 (CAGW OU Groundwater Sample Results) notes that four wells and two seepline stations were not sampled, but completeness goals are not discussed. In addition, Appendix A (CAGW OU Analytical Data 2024-2025 Tables) indicates tritium and 1,2-dichloroethylene (DCE) were not sampled in well CRP 8D, but the GMR does not explain why only these two analytes were not sampled at this monitoring well and whether there were any data validation or usability concerns due to the lack of results. In addition, it is unclear why the oxidation-reduction potential (ORP) and dissolved oxygen field measurements are listed as not sampled or zero, when Section 4.3 (Groundwater Sampling and Analyses) identifies these parameters as collected during the groundwater sampling event. *Please revise the GMR to explain why CRP 8D was not sampled for all proposed analytes and certain field measurements appear to have not been collected and include a discussion of the data validation and usability for the reported results.*

Response: Clarification.

- **It is correct that CRP 8D sample analyses in the fourth quarter of 2024 (4Q24) did not include tritium and 1,2-dichloroethylene (DCE) (identified in Section 4.3 Groundwater Sampling and Analyses). Prior to 2025, monitoring well CRP 8D was only part of the CBRP OU monitoring well network to help delineate and differentiate the CBRP OU TCE plume from the CAGW OU TCE plume. Tritium and 1,2-DCE are not included in the seven (7) constituents analyzed in CBRP OU samples. In 2025, CRP 8D was added to the CAGW OU monitoring network and sampled during the fourth quarter of 2025 (4Q25) for analytes and parameters listed in Section 4.3. Future CAGW OU reports will include tritium and DCE analyses results for CRP 8D.**

- **During CAGW OU routine sampling events, dissolved oxygen (DO) and oxidation/reduction potential (ORP) field measurements are only collected at the Castor Creek seepline monitoring stations CCSL-08, CCSL-11, CCSL-14, CCSL-21R, CCSL-22R, and CCSL-23R. Appendix A, Table A-1, reported DO and ORP values for some of the monitoring wells incorrectly as "0". These entries should have been "NS" (not sampled). In future reports, Section 4.3 will clarify that DO and ORP are collected only at the Castor Creek seepline stations and Appendix A, Table A-1, entries where DO and ORP are not measured will be marked as NS.**

- **The data quality level for the monitoring well, surface water, and seepline stations for the CAGW OU is Verified (process examining laboratory data and associated records to determine conformance to stated requirements) and Validated (process of examining laboratory data and associated records to determine conformance to user needs) (V&V), in accordance with the approved Data Quality Objectives and Project**

Quality Objectives in the 2017 CAGW OU SAP Addendum (SRNS 2018). Based on review (V&V) of the data, the completeness and quality objectives were met, and the data is usable for updating groundwater conditions for the CAGW OU. SRS will provide this information in Section 4.3 of future reports.

SRNS, 2018. *Sampling and Analysis Plan Addendum for the C-Area Groundwater Operable Unit (U)*, SRNS-RP-2017-00100, Revision 1.1, June 2018, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

2. The locations of the monitoring wells shown on Figure 6 (CAGW OU Monitoring Stations) and the figures in Appendix D (TCE and Tritium Plume Maps) are not clearly labeled. For example, Section 5.1 (TCE [Trichloroethylene]) discusses the TCE concentrations in Upper Aquifer Zone (UAZ) monitoring well CRW021DR as 23.9 micrograms/liter (µg/L), but this well is not identified on Figure 6. In Appendix D, Figure D-1 (4Q24 TCE Plume for the UAZ) lists the TCE concentration for well CRW021DR (i.e., 23.9 ug/L) under the identification for well CRW020D. It is noted that the TCE concentration for well CRW020D (i.e., 66.9 µg/L) is not listed on this figure. *Please revise the GMR figures to clearly label the locations of the wells and their contaminant concentrations.*

Response: Agree.

Monitoring station CRW021DR is plotted correctly in the inset on Figure 6 but is obscured by the CRW020D label. In Figure D-1, CRW020D and CRW021DR are both plotted correctly, but the label for CRW021DR is obscured by the CRW020D label and the concentration for CRW020D is obscured by the CRW021DR concentration. The intent of Figures D-1, D-2, and D-3 are to provide reference of the TCE plume in the UAZ, MAZ, and LAZ for comparison to scale. Future reports will adjust location names and reported concentrations on the monitoring network and all plume map figures to account for overlaps in labeling.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

3. The different types of monitoring stations are inconsistently presented in Section 4.1 (Groundwater Monitoring Network) and Table 1 (CAGW OU Monitoring Stations). The text lists four monitoring stations in groundwater contamination source areas, but Table 1 identifies seven wells as source area wells. In addition, Section 4.1 states that there are eight seepline and 16 surface water stations, but Table 1 lists FMT 01 and FMT 02 as both surface

water and seepline stations. This distinction is not described in the text. It is also unclear how the total of 64 monitoring stations in the mid and distal portions of the plumes was determined in Section 4.1, as only 61 stations are identified within mid or distal plume areas in Table 1. *Please revise Section 4.1 and Table 1 to provide consistent lists of the different types of monitoring stations.*

Response: Agree.

- **The text in Section 4.1 incorrectly states "four (4) monitoring stations in the groundwater contamination source areas". The plume areas for the seven (7) monitoring stations identified in Table 1 as "Source area" are correct. The text identifying source area monitoring stations in Section 4.1 will be corrected to "seven (7)" in future reports.**

- **Section 4.1 statement identifying eight (8) seepline and 16 surface water stations is correct. Table 1 lists FMT 01 and FMT 02 as "surface water/seepline" station types to identify the locations as surface water locations collected from seepline tributaries to the Fourmile Branch. Table 1 station type for FMT 01 and FMT 02 will be changed to "Surface Water" in future reports for clarity.**

- **The text in Section 4.1 incorrectly states "64 monitoring stations in the mid and distal portions of the contamination plumes". The plume areas for the 61 monitoring stations identified in Table 1 as Mid or Distal Plume are correct. The text identifying monitoring stations in the mid and distal portions of the contamination plumes in Section 4.1 will be changed to "61" in future reports.**

  No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

4. The numbering of the figures is inconsistent with the figure numbers referenced in the text. For example, Section 5.6 (Tritium) references Figure 12 for the trend of tritium concentrations in the monitoring wells found in the distal part of the plume near Castor Creek, but this figure number is identified as Figure 52 (Distal Well Tritium Plume Trends) in the GMR. *Please ensure the GMR figures are accurately numbered and referenced in the text.*

Response: Agree.

Figures 12, 13, 14, and 16 are correctly numbered in the List of Figures and throughout the text body of the report. Figures 12, 13, 14, and 16 are incorrectly numbered on their respective pages of the report. In future reports, the List of Figures, the text body, and the pages for the figures will match correctly.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

SPECIFIC COMMENTS

1. **Section 4.3, Groundwater Sampling and Analyses, Page 7 of 44:** The note for total petroleum hydrocarbons (TPH) states that only one well (CRW022D) was analyzed for TPH diesel range organics because it monitors a remediated diesel storage tank site, but it is unclear where the TPH results are reported as they are not included in Appendix A (CAGW OU Analytical Data 2024-2025 Tables). *Please revise the GMR to clarify where and how the TPH results are reported.*

Response: Clarification.

Monitoring well CRW022D was installed in the spring of 2017 to monitor TPH diesel range organics (DRO) concentrations in groundwater. Since monitoring began in 2018, no concentrations of TPH DRO have been detected above the method detection limit (MDL).

In future reports, text will be added to Section 4.3 to state that TPH DRO is sampled at CRW022D but remains below the detection limits. If TPH DRO concentrations are reported above the MDL at CRW022D a discussion will be added in Section 5.0 (CAGW OU Groundwater Sample Results) and the analyte results will be added to Appendix A, Table A-1.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

2. **Section 5.6, Tritium, Page 14 of 44:** The section discussing the UAZ plume notes that only three wells had exceedances of the maximum contaminant level (MCL), so it is unclear how the downgradient extent of the plume shown on Figure D-4 (4Q24 Tritium Plume for the UAZ) was determined. The plume is shown to extend farther southwest than CSB020D, but there are no wells located south or west of this well or well CSB02D in the UAZ. *Please revise the text to discuss how the downgradient extent of the plume shown on Figure D-4 was determined.*

Response: Agree.

The depicted plume extent that is south and west of CSB020D on Figure D-4 is not only based on tritium concentrations from currently installed wells. The extent of the plume is based on three assumptions:

- **The approximate extent of the groundwater in the UAZ (i.e., the farthest plume extent demarcates where the top of the water table is no longer in the UAZ).**

- **The natural attenuation of original plume concentrations that are annotated on Figure 11 (2002 Tritium Plume) which are based on 1998-2002 DPT locations.**

- **The lack of reported concentrations of tritium at upgradient MAZ monitoring stations CSB011C and CSB019C above the MCL indicates that the tritium residing in the UAZ is the contributor of the concentrations reported in the MAZ locations downgradient of CSB011C and CSB019C (Figure D-5, 4Q24 Tritium Plume for the MAZ).**

In future reports, the plume extents that are not based on groundwater monitoring well concentrations will be marked clearly with a dashed line to indicate approximation and the rationale for the location of the plume extents will be clearly stated in the text.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

3. **Section 5.6, Tritium, Page 15 of 44:** The section for the Middle Aquifer Zone (MAZ) wells does not discuss the trends in concentrations of tritium for all of the monitoring wells. Although the distal plume wells are noted to show a decreasing trend, it is unclear why the tritium concentration in well CSB 3C increased above the MCL in 2018 and remains above the MCL (Appendix C, Figure C-109, Time Series Plot for Tritium Station for CSB 3). Based on the groundwater elevations shown on Appendix E, Figure E-2 (4Q24 Potentiometric Contours for the MAZ), there is a groundwater mound in the MAZ at the location, such that the direction of groundwater flow is unclear. *Please revise this section to discuss the trends in tritium concentrations for CSB 03C and discuss whether the groundwater flow in the MAZ at this location may require further evaluation.*

Response: Clarification.

- **In Section 5.6 Tritium (MAZ paragraph) the intent of the discussion was to highlight the area of the plume with the highest concentrations currently in the MAZ and the overall trend of groundwater concentrations (overtime) as the tritium plume attenuates and migrates towards the discharge points along the FMB, Castor Creek, and the Castor Creek Tributary. Monitoring well CSB 3C is located in the Mid Plume area downgradient from the source area where tritium has vertically migrated from the UAZ and entered into the MAZ and LAZ. In this area of the plume if contamination has migrated vertically from the UAZ into the MAZ and LAZ, the plume direction shifts primarily to the west (towards the FMB and the Twin Lakes**

area near CRW010CU). This direction shift is also noted in the MAZ TCE plume depicted in Figure D-2 (4Q24 TCE Plume for the MAZ). The increase in tritium concentration at CSB 3C is evidence of the breakthrough of tritium from the UAZ into the MAZ and LAZ reflected upgradient at Mid Plume location CSB017D and CSB017B (Appendix C, Figure C-115, Time Series Plot for Tritium Station CSB017). At this location, tritium concentrations in the LAZ (CSB017B) increased above the tritium concentrations in the UAZ (CSB017D) beginning in 2015.

- **The potentiometric contours shown on Appendix E, Figure E-2 (4Q24 Potentiometric Contours for the MAZ), are based on water level measurements collected from monitoring wells installed in the MAZ. The MAZ is a zone of sandy to clayey-sand layers residing in the informal aquitard referred to as the Tan Clay Confining Zone (TCCZ). The TCCZ is continuous throughout the CAGW OU. Although continuous, the TCCZ (as the MAZ) varies in thickness and elevation across the CAGW OU (Figure 2 through Figure 5). The potentiometric 10-foot contour interval in Figure E-2 is based on the available locations and shorter contour intervals (i.e., less than 10 feet) cannot be accurately depicted. The 200-foot contour drawn around CSB 3C is reflective of the change in thickness and elevation of the MAZ in this area of the CAGW OU and not reflective of groundwater mounding. The overall direction of groundwater flow in the MAZ is towards the FMB and Castor Creek.**

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

4. **Section 6.2, Tritium, Page 19 of 44:** The discussion of the Lower Aquifer Zone (LAZ) states that increasing concentrations of tritium are noted in the western part of the plume and the part nearer to the Fourmile Branch as tritium moves vertically from the UAZ to the MAZ, but well CSB017B in the eastern part of the plume (see Appendix D, Figure D-6, 4Q24 Tritium Plume for the LAZ) shows the largest increase (i.e., concentrations increased from 10 picocurie per milliliter [pCi/mL] in 2013 to 451 pCi/mL in 2024 as shown on Appendix C, Figure C-115, Time Series Plot for Tritium Station for CSB017). It is noted that UAZ well CSB017D shows a similar decrease in tritium, indicating vertical movement from the UAZ to the LAZ. In addition, it is unclear if additional wells should be sampled in the LAZ in the vicinity of CSB017B to track the movement of this increasing tritium concentration. *Please revise Section 6.2 to discuss the increasing concentration of tritium at CSB017B, the vertical movement of tritium to the LAZ, and whether additional monitoring wells in the LAZ should be sampled to track these increases.*

Response: Clarification.

- **In Section 2.0 Operational Unit Description, two (2) comingled contamination plumes (TCE and tritium) are described as extending from the source areas toward the FMB and Castor Creek in a southwesterly direction with a narrow part extending to the west (near the Twin Lakes area). It is correct that the CSB017B location is east of the center of the overall plume extent, but in Section 6.2, Tritium, the discussion of tritium concentrations in the LAZ western part of the plume refers to the narrow part of the plume (east of the plume extent center) extending to the west.**

  Once tritium contamination breaks through the TCCZ in the Mid Plume area near the source areas, the tritium concentrations at CSB 3C (downgradient and to the west of the CSB017B/D location) indicate that contamination moves in the direction of the Twin Lakes. The low concentrations at CSB011C, CSB011B, and CSB019C (MAZ /LAZ Mid Plume) and the high concentration at CSB021D (UAZ Mid Plume), indicate the tritium contamination mass remaining in the UAZ (downgradient of the CSB017 location) moves to the southwest and breaks through the TCCZ nearer to the FMB.

- **LAZ monitoring stations CSB011B and CRW 10C are downgradient of CSB017B and are currently monitored for tritium.**

In future reports, text referring to concentration trends will be clearly stated to differentiate between the location in the plume and direction from the source area. Monitoring stations CSB011C and CRW 10C adequately monitor tritium groundwater concentrations downgradient and to the southwest and west of CSB017B. No additional LAZ monitoring stations are recommended to track tritium concentrations downgradient of CSB017B at this time.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

5. **Section 6.4, Recommendations, Page 20 of 44:** The text recommends additional wells to be analyzed for per- and polyfluoroalkyl substances (PFAS), but these wells are not shown on a figure. For example, some of the proposed wells are not shown on the current GMR figures (i.e., CRW 3D, CRW 3C, CRW 3A, CSB 7D, CSB 1C, and CSB 10D). In addition, it is unclear why wells located downgradient from the fire training exercise location (e.g., CSB 9D, CRP 6 DR, CRW010CU, CRP 5C, etc.) were not included in the list of proposed wells. *Please revise the GMR to include a figure that shows the proposed well locations in addition to the locations already sampled for PFAS and ensure downgradient wells from both potential sources are proposed.*

Response: Clarification.

- **Some of the proposed wells (i.e., CRW 3D, CRW 3C, CRW 3A, CSB 7D, CSB 1C, and CSB 10D) are not sampled for tritium and VOCs and are not in the current CAGW OU monitoring network. Therefore, these wells were not shown on the current GMR figures.**

- **The additional monitoring stations suggested in Section 6.4, Recommendations, were based on close proximity to the suspected PFAS source areas. Proposed monitoring wells downgradient and farther away from the potential source areas are located between the potential source areas and downgradient monitoring stations with confirmed PFAS concentrations.**

In future reports, all monitoring stations that are sampled for PFAS will be included in a separate GMR figure. Any monitoring stations added to the CAGW OU monitoring network will be depicted on the CAGW OU Monitoring Stations figure.

No changes are proposed to the existing GMR.

Responsible Party: Heath McGregor, (803) 952-6043, heath.mcgregor@srs.gov

6. **Table 3, CAGW OU 4Q24 Maximum Concentrations, Page 43 of 44:** The historical maximum concentrations for vinyl chloride (VC) are indicated to be less than the method detection limit (MDL), but Section 5.5 (VC) states that surface water station TL-03 included a detection of VC in 2004 at 2.56 ug/L. It is unclear why this concentration was not identified as the highest historical maximum concentration. *Please revise Table 3 to include VC detected at surface water station TL-03 as the historical maximum concentration of VC or clarify why it should not be listed.*

Response: Clarification.

The 2.56 µg/L concentration of VC at surface water location TL-03 in 2004 is the highest and only time VC has been detected at any of the current CAGW OU monitoring stations. Table 3 lists the monitoring stations with the 4Q24 maximum concentrations and the historic maximum concentrations at the identified station for context. Trans-1,2-DCE and VC were not detected at any of the monitoring stations in 4Q24. The VC and trans-1,2-DCE 4Q24 maximum concentrations were determined by the monitoring station with the highest 1,2-DCE concentration.

Table 3. CAGW OU 4Q24 Maximum Concentrations

Station ID	Station Type	Constituent	4Q24 Maximum Concentration	Historic Maximum Concentration*
CRW026C	MW	1,2-dicholroethylene (1,2-DCE)	12.5 µg/L	12.5 µg/L (4Q24)
CRW026C	MW	cis-1,2-dichloroethylene (cis-1,2-DCE)	12.5 µg/L	12.5 µg/L (4Q24)
CRP 5C	MW	Tetrachloroethylene (PCE)	7.10 µg/L	14.20 µg/L (2Q17)

SRS Responses to USEPA Comments on Groundwater Monitoring Report for the C-Area Groundwater (CAGW) Operable Unit (OU) July 2024 Through June 2025 SEMS NUMBER: 82; SRNS-RP-2025-00992, Revision 0 October 2025

Comments Received March 16, 2026

CRW026C**	MW	trans-1,2-dichloroethylene (trans-1,2-DCE)	> 0.333 µg/L (MDL)	> 0.333 µg/L (MDL)
CRW023C	MW	Trichloroethylene (TCE)	75.3 µg/L	75.3 µg/L (4Q24)
CRW024C	MW	Tritium	825 pCi/mL	2,780 pCi/mL(2Q18)
CRW026C**	MW	Vinyl Chloride (VC)	> 0.333 µg/L (MDL)	> 0.333 µg/L (MDL)

Table 3 Notes:

MDL = Method detection Limit
MW = Monitoring Well
SW = Surface Water
pCi/mL = picocuries per milliliter
µg/L = micrograms per liter
*Historic maximum concentration at station
**Station decided by highest 1,2-DCE

No changes are proposed to the existing GMR.

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