REGION 4
ATLANTA, GA 30303

ENVIRONMENTAL COMPLIANCE &

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AREA COMPLETION PROJECTS

Nov.2, 2026

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

EPA Comments: K-AREA BURNING/RUBBLE PIT AND RUBBLE PILE (131-K AND 631-20G) (KBRP) AND P-AREA BURNING/RUBBLE PIT (131-P) (PBRP) OPERABLE UNITS COMBINED GROUNDWATER MONITORING REPORT (SAMPLING SUMMARY), SEMS NUMBERS: 40 AND 59, JUNE 2026 SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

Dear Mr. Baker,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the KBRP [131-K and 631-20G] and PBRP [131-P] Combined GMR [Samp Summary], dated June 29, 2026. EPA comments are attached:

If you have any questions or require additional information, please contact me at (404) 431-1340.

Sincerely,

JON RICHARDS

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Date: 2026.11.02 13:41:47 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Managment Division

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

GENERAL COMMENTS

1. The Summary Report concludes that the K-Area Burning/Rubble Pit (KBRP) Operable Unit (OU) has completed the remediation monitoring phase and should transition to the attainment monitoring phase; however, there is no real discussion regarding suitability of the proposed attainment sampling program based on the conceptual site model (CSM). Per EPA's Recommended Approach for Evaluating Completion of Groundwater Restoration Remedial Actions at a Groundwater Monitoring Well, OSWER 9283.1-44, dated August 2014 (the Recommended Approach Guidance), as part of the transition to the attainment monitoring phase, it is recommended that the site team should evaluate the CSM and monitoring program to ensure that appropriate data will be collected to support the attainment monitoring evaluation, including consideration of monitoring locations and sampling frequency. As such, the Summary Report should document an evaluation of whether the existing monitoring program will provide the quantity, frequency, and spatial coverage needed to support the subsequent attainment determination. For example, KRP 9 remains on a semi-annual sampling program, no wells are sampled in the lower aquifer zone (LAZ), and the remaining wells are sampled annually in the fourth quarter, but the Summary Report does not discuss whether this program is suitable for the attainment monitoring phase. *Please revise the Summary Report to demonstrate that the current sampling program remains suitable for the attainment monitoring phase to ensure the groundwater has met the cleanup level for each contaminant of concern (COC) and will continue to meet the cleanup level in the future. This includes as needed based on the demonstration, an updated attainment monitoring program that contains the quantity, frequency, and spatial coverage needed to support the future attainment determination.*

2. The Summary Report does not discuss the spatial relationship between the P-Area Burning/Rubble Pit (PBRP) OU and P-Area Groundwater (PAGW) OU or explain why PAGW surface water monitoring locations are being used to evaluate PBRP remedy performance. The Summary Report presents surface water monitoring results from SC-02, SC-03 and SC-04 within the PBRP OU discussion, but also indicates that these stations are associated with the adjacent PAGW OU and attributes the elevated trichloroethylene (TCE) concentrations detected in surface water at SC-03 (14 micrograms per liter [ug/L]) and SC-04 (9.12 ug/L) to the PAGW OU. As such, the role of SC-02, SC-03, and SC-04 in the approved PRBP monitoring program should be explained. *Please revise the Summary Report to discuss the spatial relationship between the PAGW and PBRP, explain why these locations were chosen to evaluate PBRP-related groundwater impacts, and provide additional lines of evidence to support that contamination is not from the PBRP.*

3. The KBPR time-series plots appear to include non-detect results plotted at the sample-specific estimated quantification limit (EQL); however, the trend plots do not include a note/explanation of this methodology. There are numerous methods of plotting non-detect values (e.g., at the EQL, one half the reporting limit, at the detection limit, one half the detection limit, etc.) and apparent trends may be influenced by the value used to represent the non-detect. Therefore, the Summary Report should clarify the selected method of handling non-detects. *Please revise the KBPR trend plots to include a note explaining how non-detects were plotted.*

SPECIFIC COMMENTS

1. K-Area Burning/Rubble Pit (KBRP) Operable Unit (OU), Page 3: The text indicates that the four wells screened in the lower aquifer zone (LAZ) of the Upper Three Runs Aquifer Unit (UTRAU) were

suspended for sampling due to continuous non-detects; however, it is unclear why water levels are not being collected. Even though sampling is suspended, water levels should still be collected in order to evaluate current LAZ flow direction and whether hydrogeological conditions remain consistent with the CSM during the attainment monitoring phase. *Please revise the Summary Report to recommend continued collection of LAZ water levels to support the attainment monitoring phase.*

2. P-Area Burning/Rubble Pit (PBRP) OU, Page 10: The text indicates that water elevations at PRP 2, PRP 5, PRP 6 and PRP 7, were considered suspect values and a 5-year historical average was used to plot these elevations instead; however, the text does not discuss the implications of this method. Specifically, these four wells represent a substantial portion of the monitoring network and include important wells within the contaminant plume and replacing synchronous heads with five-year average can materially alter the gradient and flow directions. While Table 4 (PBRP OU Groundwater Data (1Q26)) provides the suspect water levels, there is no discussion of why these values were considered suspect, comparison to historical water elevations, or why a 5-year average was considered a suitable replacement. In addition, Table 4 includes two sets of water elevations, March 2026 (sampling event) and January 2026 (synchronous water elevation), but does not explain why the March 2026 water elevations were not considered a more suitable replacement for the suspect elevations. *Please revise the Summary Report to explain why the four synchronous water elevations were considered suspect, discuss why the 5-year average was selected and why it is more appropriate than the March 2026 elevation data, provide the historical five-years of water level data that were used to generate the average elevations, and discuss any uncertainty that the selected averaging method has introduced.*

3. P-Area Burning/Rubble Pit (PBRP) OU, Page 10 and Table 4, PBRP OU Groundwater Data (1Q26), PDF Page 13: The text indicates that the PBRP OU underwent routine annual monitoring during the first quarter of 2026 (1Q26) and Table 4 indicates the synchronous groundwater-elevation event occurred in January 2026, surface water samples were collected in February 2026, and groundwater samples were collected in March 2026; however, the discussion does not explain why temporally different hydrologic and analytical datasets are appropriate for characterizing current site conditions at the PBRP OU. Specifically, the text should discuss whether temporal conditions are expected to remain sufficiently consistent throughout first quarter, or whether differences in groundwater elevations, gradients, or surface water conditions could affect interpretation of analytical results. For example, Figure 6 (1,4-Dioxane Contaminant Distribution (1Q26)) includes both surface water and groundwater analytical results collected approximately one month apart but the text does not explain whether temporal differences (i.e., significant rainfall leading to increased dilution) could materially affect groundwater-surface water interpretation. *Please revise the Summary Report to discuss whether temporally different hydrologic and analytical datasets are appropriate for characterizing current site conditions at the PBRP OU.*

4. P-Area Burning/Rubble Pit (PBRP) OU, Page 10 and Table 4, PBRP OU Groundwater Data (1Q26), PDF Page 13: The text concludes that 2026 sampling results confirm that the PBRP OU remedy is functioning as intended; however, 1,4-dioxane trends at PRP-6 and PRP-7 (as shown in Figure 7 [Time-Series Plot for 1,4-Dioxane at PRP 6] and Figure 8 [Time-Series Plot for 1,4-Dioxane at PRP 7]) appear to have stabilized or exhibited no clear decreasing trend since approximately 2017 and remain above the groundwater protection standard (GWPS). Because 1,4-dioxane can be resistant to natural attenuation, the Summary Report should discuss whether attenuation mechanisms are expected to reduce 1,4-dioxane concentrations and achieve cleanup within a reasonable timeframe. *Please revise the text to discuss how these 1,4-dioxane trends were evaluated in order to conclude that the remedy is*

functioning as intended and whether monitored natural attenuation is expected to reduce 1,4-dioxane concentrations.