Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

FEB 17 2026

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 Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) April 2023 through March 2024 Data (SRNS-RP-2024-01436, Revision 0, February 2025) SEMS Number: 81

The U.S. Department of Energy (DOE) is submitting the subject comment responses for your review. The U.S. Environmental Protection Agency's (EPA) and South Carolina Department of Environmental Services' (SCDES) comments were received on July 1, 2025, and July 15, 2025, respectively. This report will not be revised; however, all comment responses will be included in the next report, as applicable. 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 the DOE Operable Unit Manager, April Coffman, at (803) 952-7244.

Sincerely,

MATTHEW BAKER

Digitally signed by MATTHEW BAKER
Date: 2026.02.12 14:58:47 -05'00'

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

RDDD-26-128

FEB 17 2026

Ms. Susan Fulmer
Mr. Jon Richards 2

Enclosures:
1. SRS Response to the South Carolina Department of Environmental Services' Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) April 2023 through March 2024 Data (SRNS-RP-2024-01436, Revision 0, February 2025) SEMS Number: 81
2. SRS Responses to the U.S. Environmental Protection Agency's Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U) April 2023 through March 2024 Data (SRNS-RP-2024-01436, Revision 0, February 2025) SEMS Number: 81

c w/o encl:
M. Reece, SCDES-Columbia
H. J. Porter, SCDES-Columbia
J. Blalock, SCDES-Columbia
S. French, SCDES-Columbia
R. G. Stewart, SCDES-Columbia
M. Mehta, SCDES-Columbia
G. O'Quinn, SCDES-Midlands Aiken Environmental Affairs Office
T. G. Corley, SCDES-Midlands Aiken Environmental Affairs Office
C. L. Robertson, SCDES-Midlands Aiken Environmental Affairs Office
E. G. Downing, SCDES-Midlands Aiken Environmental Affairs Office
H. L. Herlong, SCDES-Midlands Aiken Environmental Affairs Office

c w/encl:
H. Cathcart, SCDES-Columbia
M. McRae, TechLaw, Inc.

**SRS Responses to USEPA Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U), April 2023 Through March 2024
SEMS Number: 81, SRNS-RP-2024-01436, Revision 0, February 2025,
Savannah River Site, Aiken, South Carolina**

Comments Received July 1, 2025

GENERAL COMMENTS

1. The Groundwater Report states that the groundwater in the Lower Aquifer Zone (LAZ) does not currently discharge to surface water based on the depth below ground surface relative to surface water elevations and recent data from shallow well points PSC005 and PSC006. However, it is unclear why PSC005 and PSC006 are referenced, as these wells are located downstream from where the shallow plumes in the Upper Aquifer Zone (UAZ) are discharging to the surface water (i.e., at PSC003 and PSC004) as shown on Figure 17 (Upper Aquifer Zone Tritium Plume for the P-Area Groundwater Operable Unit) and Figure 31 (Upper Aquifer Zone Trichloroethylene Plume for the P-Area Groundwater Operable Unit). In addition, Figure 19 (Cross-Section of the Tritium Plume in P Area) and Figure 33 (Cross-Section of the Trichloroethylene Plume in P Area) indicate the downgradient extent of the plumes in the LAZ are unknown, as samples were not collected from the LAZ at monitoring well PSC003. ***Please revise the Groundwater Report to clarify how shallow wells PSC005 and PSC006 support the conclusion that the LAZ is not discharging to surface water, and discuss how the extent of the downgradient plumes in the LAZ have been delineated in the vicinity of Steel Creek.***

Response: Clarification

Text in the groundwater report states that the P-Area Groundwater (PAGW) Operable Unit (OU) Lower Aquifer Zone (LAZ) *plumes* do not currently discharge to Steel Creek. The LAZ groundwater does not discharge to Steel Creek within the extents of the LAZ groundwater plumes for tritium or trichloroethylene (TCE). This is supported by hydrogeologic picks along the creek. Location PGW016 B is the furthest downgradient location within the tritium plume (Figure CR-1). At PGW016 B, two Savannah River Site (SRS) geologists have picked the top of the LAZ at 168 feet above mean sea level (ft-amsl) and 183 ft-amsl, and the elevation of Steel Creek at the nearest point is approximately 230 ft-amsl based on 2012 LiDAR topography. The Tan Clay Confining Zone (TCCZ) is a clayey confining layer that separates the LAZ and Upper Aquifer Zone (UAZ), and is at least 10 feet (ft) thick based on hydrostratigraphic picks from PGW016 B. Based on the 50+ ft of elevation difference between Steel Creek and the top of the LAZ, including the TCCZ, the LAZ cannot physically discharge to Steel Creek within the extents of the LAZ groundwater contaminant plumes. Beyond the PGW016 monitoring well cluster, SRS has limited hydrogeologic information available to definitively determine where the LAZ will begin discharging to Steel Creek. In a conservative estimate, SRS suggests that the LAZ may discharge to Steel Creek around the PSC006 shallow groundwater cluster and surface water station SC-04. This is supported by previous groundwater modeling of the PAGW OU (Savannah River Nuclear Solutions, LLC [SRNS] 2015). At this time, impact to these monitoring stations has not been observed, supporting that the LAZ plume extent is not discharging to Steel Creek.

LAZ plumes are expected to migrate in parallel to Steel Creek, toward L Lake. This is supported by LAZ potentiometric surfaces and the estimated groundwater flow direction (Figure CR-1 and Figure CR-2). SRS agrees that additional investigation of the LAZ plumes is warranted in the vicinity of Steel Creek and proposes discussing this PAGW OU sampling

plan in a Spring 2026 Core Team scoping meeting.

SRNS, 2015. *Baseline Groundwater Model Update for P-Area Groundwater Operable Unit, NBN,* SRNS-RP-2015-00768, September 2015, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

2. The Groundwater Report figures of the tritium and trichloroethene (TCE) plumes (e.g., Figure 17, Upper Aquifer Zone Tritium Plume for the P-Area Groundwater Operable Unit) should show where the plume boundaries are inferred (e.g., using a dashed line for the plume extent). For example, the tritium plume at the P Reactor Area in the UAZ is not delineated to the south, as there are no wells directly downgradient to well PGW018C (49.3 picocurie per milliliter [pCi/mL]) and side-gradient to well PGW028DU (310 pCi/mL). Therefore, the extent of the UAZ tritium plume is inferred to the south. As another example, Figure 38 (Lower Aquifer Zone Trichloroethylene Plume for the P-Area Groundwater Operable Unit) should indicate the downgradient extent of the TCE plume is inferred (e.g., along Steel Creek). ***Please revise the figures in the Groundwater Report to indicate where the plume boundaries are inferred.***

Response: Agree

TCE and tritium UAZ groundwater plume extent is generalized in the figures based on previous groundwater investigations of the PAGW OU and updated with annual groundwater sampling data. Previous investigations included Direct Push Technology (DPT), Cone Penetration Testing (CPT), and Isoflow sampling in 2010/2011 ; CPT and Isoflow sampling in 2014; and soil borings with soil plug sampling in 2018. The 2010/2011 and 2014 investigation results were summarized and reported in the 2018 PAGW OU Sampling and Analysis Plan (SAP) Addendum (SRNS 2018) and the 2018 investigation results were presented in a scoping meeting to United States Environmental Protection Agency (USEPA), South Carolina Department of Environmental Services (SCDES), and United States Department of Energy in 2020 (Savannah River National Laboratory [SRNL] 2020). Tritium and TCE UAZ plume extent to the south/southwest is based on the previous investigations. TCE plumes in the UAZ remain bounded to the south/southwest by the existing monitoring network (Figure 31). Based on the first quarter of 2024 (1Q24) data, the tritium plume has remained consistent at monitoring wells along the plume extent (monitoring well clusters PGW016 and PGW028), and therefore SRS believes the existing plume delineation remains accurate (Figure 17). TCE concentrations at UAZ monitoring well PGW018 C have increased over the latest sampling events and therefore warrants consideration as suggested. Future PAGW OU groundwater reports will use a dashed line where the plume extent is inferred and not bounded by the existing monitoring well network.

Although the plumes are not bound entirely by the existing monitoring well network, SRS

believes the plume extent has not increased significantly to the south and that the inferred plume extent is adequate at this time.

SRNS, 2018. *Sampling and Analysis Plan Addendum for the P-Area Groundwater Operable Unit (U),* SRNS-RP-2018-00261, Revision 1, August 2018, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

SRNL, 2020. *2018 Sampling & Analysis Plan Addendum Data Review (Steel Creek & Elbow Area) P-Area Groundwater Operable Unit,* SRNL-L3220-2020-00009, July 2020, Savannah River National Laboratory, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

3. The Groundwater Report does not include a data usability assessment for the groundwater results collected between April 2023 and March 2024. It is unclear if the groundwater results were validated, and if all planned samples were successfully collected (i.e., the completeness of the data set). ***Please revise the Groundwater Report to include a data usability assessment, if its available, for the groundwater results discussed in this monitoring report or provide a reference to where this information can be found.***

Response: Agree

Groundwater monitoring data reported for the PAGW OU since 2019 have been Verified and Validated level data, in accordance with the approved Data Quality Objectives (DQOs) and Project Quality Objectives (PQOs) in the 2018 PAGW OU SAP Addendum (SRNS 2018). In 1Q24, all planned samples were collected and all data met the DQOs and PQOs presented in the 2018 SAP Addendum. All data collected in support of monitoring the PAGW OU conform to the *Savannah River Site Area Completion Projects Quality Assurance Project Plan for Environmental Data Collection and Management* (SRNS 2012). This document was developed in agreement with USEPA and SCDES to integrate all technical and quality aspects of environmental data collection and management to provide consistent data objectives and document the comprehensive set of standard operating procedures for sampling, analysis, quality assurance/quality control, and data review. Validation reports are typically not submitted with SRS groundwater Effectiveness Monitoring Reports (EMRs). Additionally, the Environmental Compliance and Area Completion Projects (EC&ACP) organization has a series of administrative procedures (e.g., WSRC-C1, *Environmental Compliance & Area Completion Projects (EC&ACP) Administrative Procedures*, ER-AP-125, *EC&ACP Quality Assurance Program*) and technical memorandums that further define the requirements and responsibilities within EC&ACP for implementation of the quality program. The 2024 dataset meets approved PQOs for the PAGW OU and conforms to all site procedures for data quality, therefore the data is considered usable for the purposes of monitoring the PAGW OU. SRS agrees that the report

does not summarize this information and does not provide a data usability assessment. Future reports will provide this information in Section 3.3 of the report.

SRNS, 2018. *Sampling and Analysis Plan Addendum for the P-Area Groundwater Operable Unit (U),* SRNS-RP-2018-00261, Revision 1, August 2018, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

SRNS, 2012. *Area Completion Projects Programmatic Quality Assurance Project Plan for Environmental Data Collection and Management,* ERD-AG-2005-00001, Revision 5, April 2012, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

4. Some of the figures in the Groundwater Report do not include the monitoring well identifications. For example, Figure 23 (Lower Aquifer Zone Tritium Plume for the P-Area Groundwater Operable Unit) does not include labels with the well identifications in addition to the tritium concentrations reported. Also, the figures showing the potentiometric surfaces do not include well identifications. ***Please revise the Groundwater Report figures to include well identifications in addition to the other data reported.***

Response: Agree

SRS agrees that the figures would benefit from adding identifications to the monitoring well locations. Future reports will ensure all locations are identified, similar to the approach used in Figure CR-1 and Figure CR-2, as well as include data reported.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

Comments Received July 1, 2025

SPECIFIC COMMENTS

1. **Section 3.3.1.1, Upper Aquifer Zone, Page 9 of 104:** The text identifies well P003L as a well with decreasing tritium concentrations since 2007, but Figure 21 (Time-Series Plot for Tritium at Upper Aquifer Zone Wells in the Vicinity of the P-Area Reactor Building Complex) indicates tritium was not detected until 2019. In addition, an increase in tritium concentrations after 2014 is discussed on the next page as a source of vertical migration of the tritium plume. ***Please remove well P003L from the list of wells with decreasing tritium concentrations since 2007.***

Response: Agree

The text incorrectly stated that tritium concentrations in P003L decreased since 2007. Future PAGW OU biennial groundwater reports will not describe P003L as having decreasing tritium concentrations since 2007.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

2. **Section 3.3.1.1, Upper Aquifer Zone, Pages 9 to 10 of 104:** This section does not discuss the downgradient wells in the tritium plume. For example, it is unclear whether tritium concentrations in wells PGW018C and PGW028DU are increasing or decreasing. In addition, data gaps exist as there are no additional wells to the south of these plume wells to delineate the extent of the plume. ***Please revise Section 3.3.1.1 to discuss the downgradient plume wells and any trends in these tritium concentrations, including if additional wells are needed to delineate the extent of the plume.***

Response: Agree

Monitoring wells PGW018C, PGW018DU, and PGW028DU are located side-gradient of the tritium plume in the UAZ. Tritium activity concentrations at PGW018DU have remained consistently below the maximum contaminant level (MCL) (20 picocuries per milliliter [pCi/mL]) while activity concentrations at PGW018C have increased steadily, exceeding the MCL for the first time in the first quarter of 2020. The 1Q24 result was 49.3 pCi/mL. At PGW028DU, activity concentrations have decreased steadily since installation in 2011 when the result was above 1,000 pCi/mL. The 1Q24 result at PGW028DU was 310 pCi/mL. The increasing activity concentrations at PGW018C indicate the plume is expanding, likely through dispersion in the aquifer over time. This expansion of the plume is side-gradient in the UAZ and therefore is not expected to significantly increase the extent of the plume to the south. SRS believes the existing monitoring well network is adequate to monitor the UAZ tritium plume at this time. A discussion of the tritium activity concentration trends at southern boundary monitoring wells will be included in future PAGW OU biennial groundwater reports.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

3. **Section 3.3.1.2, Lower Aquifer Zone, Page 11 of 104:** The text states that the tritium plume in the LAZ is bounded to the northeast by monitoring well PGW024B and to the northwest by monitoring wells PRB005C and PGW025B, but these wells are located within the plume boundary. The bounding wells should be located outside the plume to the northeast and northwest. Based on Figure 23 (Lower Aquifer Zone Tritium Plume for the P-Area Groundwater Operable Unit), there are wells located to the north, but no wells are located east of well PGW024B and west of well PGW025B, which has shown an overall increasing trend in tritium concentrations. ***Please revise Section 3.3.1.2 to discuss how the tritium plume is delineated based on the wells and plume configuration shown on Figure 23.***

Response: Agree

The LAZ tritium plume at the P-Reactor Building Complex (P-RBC) is bounded to the north by monitoring wells PGW030B, PGW030BL, and PGW029C. These wells are positioned downgradient of the LAZ tritium plume to the north. To the east, the plumes are delineated by monitoring well PGW024 B in the eastern edge of the plume and bounded by PGW022 B and PGW022 C located far downgradient. The LAZ tritium plume at the P-RBC is not expected to migrate west based on the LAZ potentiometric surface. SRS recognizes that additional LAZ investigation is warranted to verify tritium plume extent. SRS proposes discussing FY27 PAGW OU investigation in a Spring 2026 Core Team scoping meeting.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

4. **Section 3.3.1.2, Lower Aquifer Zone, Page 11 of 104:** The text notes the detection of tritium at well PGW026C (36.1 pCi/L) exceeds the maximum contaminant level (MCL) and is independent of the plumes in the LAZ, but further discussion is not provided. It is unclear if tritium has previously exceeded the MCL at this location or if an increasing trend in tritium concentrations is evident at this well. ***Please revise the text to discuss whether the tritium has previously exceeded the MCL at well PGW026C and if there is an increasing trend in tritium concentrations at this well.***

Response: Agree

Tritium at monitoring well PGW026C has exceeded the MCL since third quarter of 2014. Activity concentration for tritium increased to 53.7 pCi/mL in first quarter of 2021 and has decreased since with a 1Q24 result of 36.1 pCi/mL. Discussion of the tritium activity concentration trend at PGW026C will be added to Section 3.3.1.2 of future PAGW OU biennial groundwater reports.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

5. **Section 3.3.1.3, Gordon Aquifer Unit (GAU), Page 12 of 104:** The text discusses monitoring wells installed at the same depth and surrounding well PSB002AA to constrain the extent of tritium contamination in the GAU, but it is unclear why no wells are located to the south and southwest of PSB002AA as shown on Figure 26 (Gordon Aquifer Unit Tritium Plume for the P-Area Groundwater Operable Unit). Figure 16 (Gordon Aquifer Unit Potentiometric Surface for the P-Area Groundwater Operable Unit) indicates groundwater in the GAU flows to the south from the P Reactor Area. ***Please revise the text to discuss the apparent data gap in the lateral extent of contamination downgradient of well PSB002AA.***

Response: Agree

The Gordon Aquifer Unit (GAU) was investigated in 2010/2011 to address groundwater data gaps which included delineation of horizontal and vertical groundwater contaminant extent in the GAU (Figure CR-3). Specifically, this investigation led to detections of tritium in the LAZ, Gordon Confining Unit, and GAU at the P-Area Reactor Seepage Basins (PRSBs). Detection of tritium in the GAU was limited to the PSB 2 well cluster. The extensive investigative effort from 2010/2011 is illustrated in Figure CR-3 for DPT, CPT, and Isoflow locations. In a 2013 scoping meeting, this finding was discussed, and a SAP was developed to further address this data gap. Field work in support of the 2013 SAP included sampling at three GAU locations in the vicinity of PSB 2, installation of three GAU monitoring wells, and retrofitting of PGW03A to monitoring well status (SRNS 2013). Figure CR-4 presents the locations of the 2013 SAP investigations. In January 2017, a scoping meeting was held to discuss the completeness of the 2013 SAP and it was agreed that work was complete, and no further investigation was warranted (SRNS 2017). However, SRS agrees that 11 years have passed since the GAU tritium contamination was investigated, and increasing concentrations in the deep PSB002AL monitoring well and PSB011A warrant additional investigation. SRS has FY27 PAGW OU investigation planned, including the GAU tritium plume. This investigation will aid in GAU tritium plume lateral and vertical extent delineation surrounding the PRSBs. SRS proposes discussing the FY27 PAGW OU investigation in a Spring 2026 Core Team scoping meeting.

SRNS, 2013. *Sampling and Analysis Plan for the P-Area Groundwater Operable Unit (U)*, SRNS-RP-2011-01284, Revision 1, September 2013, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

SRNS, 2017. *Scoping Summary for the P-Area Groundwater Operable Unit (NBN) (U)*, ERD-EN-2013-0009, January 2017, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

Comments Received July 1, 2025

6. **Section 3.3.1.4, Surface Water, Page 13 of 104:** The ten shallow monitoring wells were installed at five locations based on Figure 28 (Surface Water and Shallow Well Locations for Tritium Plume Impact), but the text does not discuss the difference between the two wells installed at each location (e.g., if they were installed at different depth levels). For example, it is unclear why well PSC004D1 had elevated tritium (374 pCi/mL) compared to PSC004D2 (1.03 pCi/mL) while PSC003D2 had elevated tritium (190 pCi/mL) compared to PSC003D1 (4.67 pCi/mL). ***Please revise this section to clarify the difference between the well pairs screened interval and discuss the difference in tritium concentrations found at each well pair.***

Response: Clarification

For the ten shallow monitoring wells, the designation indicates the relative depth of each well pair. I.e., "D2" wells are installed deeper than "D1" wells. This is presented in the screened intervals shown on Table 1. For clarification, the text in Section 3.3.1.4 will be revised to differentiate between the designations for these well pairs. In addition, discussion will be added to assess the difference in tritium activity concentrations found at each well pair.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

7. **Section 3.3.2.1, Upper Aquifer Zone, Pages 13 to 15 of 104:** This section does not discuss TCE concentration trends in several wells in the vicinity of the source area and in the distal area. For example, well PGW025C is located north of the source area wells PAO001DU and PAO002DL, and it is unclear if TCE concentrations are increasing or decreasing. Also, well PMP004DL had the second highest concentration of TCE at 4,480 micrograms/liter (ug/L) shown on Figure 34 (Upper Aquifer Zone Trichloroethylene Plume at Potential Source Area 3A). It is unclear why the elevated TCE concentration at PMP004DL is shown to be separate from P003L. In the distal area, it is unclear why only wells PGW026DL and PGW014DU are discussed, since PGW035C also has elevated TCE concentrations, and trends in downgradient wells (e.g., PGW027DU and PSC004D2) should also be assessed for plume migration. ***Please revise the text to discuss these wells at the potential source area and distal plume area.***

Response: Agree

In the vicinity of the source area, concentrations at all wells are decreasing (PAO001DU, PAO002DU/DL, PMW001DL, and PGW025 C). This is consistent with expectations following removal of the TCE source at PSA-3A. At location PGW025 C, TCE concentrations have consistently decreased, reaching the MCL (5 micrograms per liter [ug/L]) in the last three sampling events (4.44 ug/L in first quarter of 2022, 7.66 ug/L in first quarter of 2023, and 5.11 ug/L in 1Q24). SRS did not expand on the concentrations at the PGW025 C monitoring well cluster because it is side gradient from PSA-3A and is exhibiting decreasing TCE concentrations since 2004. Trends at the PGW025 monitoring well cluster

are presented in Appendix C on page C-29.

Downgradient of PSA-3A in the UAZ, high TCE concentrations were observed in 1Q24 at PMP004DL and P003L (4,480 ug/L and 5,240 ug/L, respectively). However, in the 1Q24 plume map for the UAZ, the 500 ug/L and 1,000 ug/L isocontours for TCE concentration were not connected between PMP004DL and P003L based on the progression of the plume over time. Since 2020, TCE concentrations at P003L have exceeded 1,000 ug/L (3,240 ug/L in 2020). The 2020 TCE concentration at PMP004DL was 0.72 ug/L, increased to 2,770 ug/L in 2021, and increased each year with a 1Q24 TCE result of 4,480 ug/L. Therefore, it was deduced that the two TCE isocontours above 1,000 ug/L were not connected for the 2022 and 2024 PAGW OU groundwater report. Considering the time that has elapsed since PMP004DL was below 1,000 ug/L, SRS agrees that future reporting of the UAZ TCE plume should depict the isocontours connected if concentrations maintain above 1,000 ug/L at both monitoring wells.

SRS agrees that the UAZ TCE plume discussion in the report would benefit from additional discussion of distal area monitoring well trends, specifically the downgradient leading edge of the UAZ plume location PGW027DU and shallow monitoring well clusters PSC003 and PSC004. Future PAGW OU biennial groundwater reports will include this discussion as suggested.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

8. **Section 3.3.3.1, PCE Exceedance, Page 18 of 104:** It is unclear if the extent of the hot spot of tetrachloroethene (PCE) contamination at monitoring well PGW034DL is being monitored. According to the text, previous investigations delineated the extent of the PCE plume at this location outside of P Area. However, based on Figure 44 (Upper Aquifer Zone PCE "Hot-Spot" at Groundwater Monitoring Well PGW034DL), there are no wells within 500 feet of the plume at PGW034DL to monitor potential plume migration. ***Please revise Section 3.3.3.1 to discuss how the extent of the PCE plume at well PGW034DL is monitored.***

Response: Clarification

Elevated levels of tetrachloroethylene (PCE) contamination (maximum of 58.1 ug/L) northeast of the P-RBC was observed at CPT location PRGW-087 during a 2014 characterization effort in support of the 2013 SAP (SRNS 2013). As a result, additional investigative CPT samples were taken downgradient of the PRGW-087 location in 2015, at locations PRGW-110 and PRGW-111 (Figure CR-4). In response to the elevated detection at PRGW-087, a long-term monitoring well, PGW034DL, was installed at the investigation location. Investigation results from a previous 2010 investigation and the 2014/2015 investigation data was presented to the Core Team in a January 2017 scoping meeting and SRS' stance that the data supported the PCE plume is isolated from the primary PAGW OU groundwater volatile organic compound (VOC) plumes and there is no evidence of a

continuing source to this isolated plume. The Core Team reached agreement that the plume warranted no further investigation and that regular monitoring of PGW034DL is sufficient for this hot-spot plume. As part of the agreement, additional downgradient monitoring well(s) and a surface water station may be implemented if PCE concentrations at PGW034DL increase. At PGW034DL, PCE concentrations have remained below 50 ug/L since 2017 and the 1Q24 result was 38.4 ug/L. Therefore, SRS maintains the 2017 Core Team agreement and will continue to monitor the isolated northeastern PCE plume at monitoring well PGW034DL for an increasing trend and no additional monitoring wells are warranted to monitor the plume extent at this time.

SRNS, 2013. *Sampling and Analysis Plan for the P-Area Groundwater Operable Unit (U)*, SRNS-RP-2011-01284, Revision 1, September 2013, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

SRNS, 2017. *Scoping Summary for the P-Area Groundwater Operable Unit (NBN) (U)*, ERD-EN-2013-0009, January 2017, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

9. **Figure 17, Upper Aquifer Zone Tritium Plume for the P-Area Groundwater Operable Unit, Page 41 of 104:** The locations of some of the wells are difficult to determine and the color shading does not correlate to the concentrations of tritium reported. For example, it is unclear where well PMP008DL (3.16 pCi/L tritium) is located, as a red dot is not visible near this label. A red dot is not visible for well P003U (7.99 pCi/L tritium) as well. It is also unclear if well P002U (11.7 pCi/L) is the red dot to the right of the label located in the purple shading, as this color represents tritium concentrations 100 to 499 pCi/L. As another example, well PDB 4 has a tritium concentration of 124 pCi/L, but appears to be located within the yellow shading, which represents concentrations of tritium between 20 to 99 pCi/L. ***Please revise Figure 17 to ensure all well locations are clearly identified and in the correct shading for concentrations of tritium reported.***

Response: Agree

SRS agrees the location labels are not clearly laid out in Figure 17. SRS will ensure labels are clearly connected to station locations in future PAGW OU biennial groundwater reports. Figure CR-1 and Figure CR-2 provide examples for how future reports may present labels for clarity. The plume extent will be verified in future figures to ensure groundwater data is accurately represented.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

Comments Received July 1, 2025

Additional GW comments:

1. Elevated TCE detected in monitoring wells close to Steel Water Creek

There are five MW clusters located on the east bank of Steel Water Creek: PSC-002, PSC-003, PSC-004, PSC-005, and PSC-006, as shown in Figure 6 below. The TCE levels detected in four of the MW clusters, highlighted in turquoise in Figure 6, are below the maximum clean-up level (MCL) of 5 ug/L, and there is no trend or a decreasing trend for TCE in these MW clusters.

However, one MW, specifically PSC-004-D2 from PSC-004, is highlighted in pink, has shown an increasing trend of elevated TCE levels since 2018. Furthermore, this MW (PSC-004-D2) has a comparable screen interval to PSC-004-DA, both are approximately 230-233 ft above mean sea level (amsl). *It is recommended that further evaluation be conducted regarding this potential increase for TCE.*

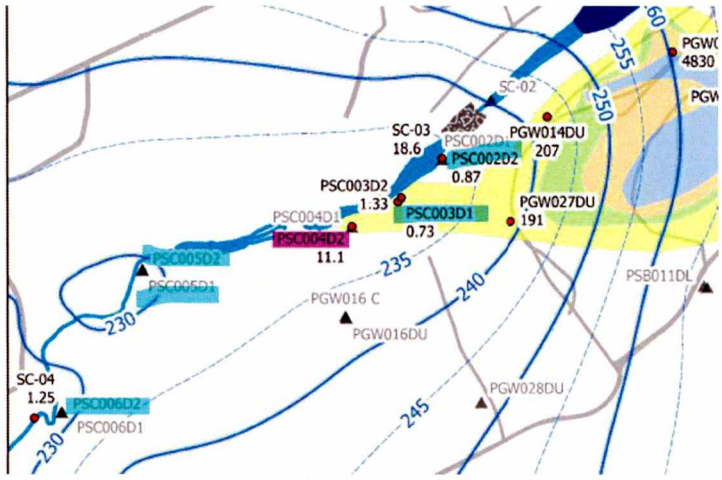


Figure 6. MW clusters that are located on the east bank of Steel Water Creek. The MWs with no trend

or a decreasing trend of TCE are highlighted in turquoise, while the MWs with an increasing trend of elevated TCE are highlighted in pink.

Response: Agree

TCE concentration at PSC004D2 does have an increasing trend in latest sampling events. This is not unexpected, as the UAZ TCE plume is migrating downgradient along Steel Creek. Discussion of TCE trends at the PSC004 shallow monitoring well pair will be included in future PAGW OU biennial groundwater reports.

No change to the 2024 Groundwater Report is proposed.

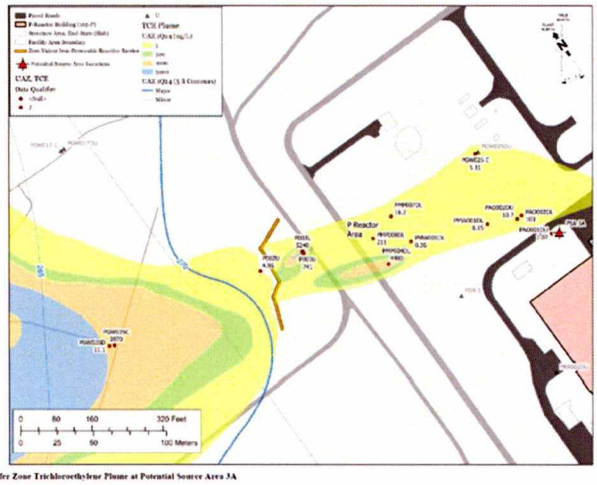
Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

Comments Received July 1, 2025

2. Current status and future plan for source area PSA-3B

The Report identifies two potential source areas for TCE and PCE: PSA-3A and PSA-3B. In 2011, In Situ Chemical Oxidation (ISCO) was conducted in the source area of PSA-3A, which successfully reduced TCE levels in groundwater. In 2019, a ZVI PRB was selected as the remedy for PSA-3B. However, as shown in Figures 7 and 8 below, the ZVI PRB is located further downgradient of the PSA-3B source area. *It is recommended that additional treatment be considered in this area of the Site.*

Moreover, the elevated TCE levels in MW cluster PGW-031-B/C show an increasing trend. This MW cluster is located upgradient of PSA-3B. *It is recommended to investigate this area for potential increased TCE concentration since 2021.*



pper Aquifer Zone Trichloroethylene Plume at Potential Source Area 3A

Figure 7. Location of ZVI PRB

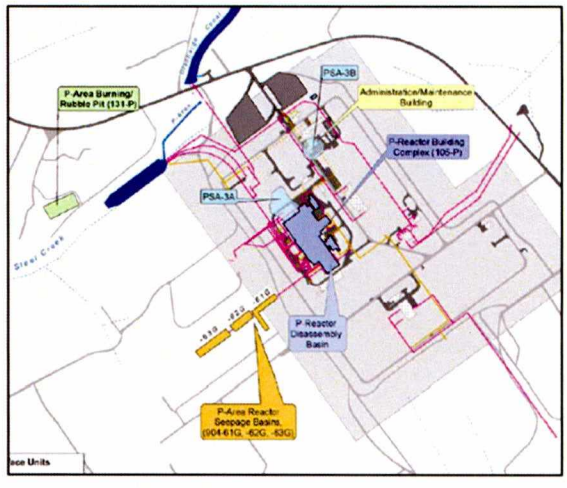


Figure 8. Location of source areas and P area

Response: Clarification

The TCE and PCE source areas (PSA-3A and PSA-3B) were remediated with Soil Vapor Extraction (SVE). The SVE remediation at PSA-3A was enhanced with soil fracturing and in-situ chemical oxidation. Remediation of PSA-3A and PSA-3B was successful and remedial cleanup levels were met (SRNS 2012). The zero-valent iron permeable reactive barrier (ZVI-PRB) was installed to address high concentrations of VOCs, namely TCE, that remained in groundwater just downgradient of the remediated PSA-3A source area. The intent was for the ZVI-PRB to be installed downgradient of PSA-3A and to remediate VOCs in groundwater as the plume migrated through the emplaced barrier. The ZVI-PRB removal action was not intended to address contamination associated with the PSA-3B source area.

Monitoring well cluster PGW031 is located downgradient, within the center of the LAZ TCE plume migrating to the northeast. It is expected that LAZ wells in this cluster (PGW031B and PGW031C) will experience increasing TCE concentrations as the center of the plume migrates toward PAR pond tributaries. The leading edge of the plume is bounded by the PGW022 monitoring well cluster, with PGW022 B and PGW022 C screened in the LAZ

(Figure CR-5). To address the potential for this LAZ plume to migrate north of the PGW022 monitoring well cluster based on potentiometric surfaces, SRS is planning FY27 PAGW OU investigation, including the leading edge of this PCE LAZ plume. SRS proposes discussing FY27 PAGW OU investigation in a Spring 2026 Core Team meeting.

SRNS, 2012. *Performance Evaluation Report for the P-Area Operable Unit Potential Source Areas 3A and 3B Subunits,* SRNS-RP-2012-00335, Revision 1, April 2013, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

3. Additional recommendation

It is recommended to include monitoring data and trend lines for the monitoring wells (MWs) located downgradient from the PRB in future reports submitted to EPA for evaluation. This should encompass data from the following MW clusters: PRW-002, PRW-004, PRW-005, PRW-006, and PRW-007.

Additionally, include detailed construction information for MWs, such as the depth of screen intervals in the unit of "feet below ground surface".

Response: Clarification

Monitoring and assessment of the ZVI-PRB performance is conducted in accordance with the ZVI-PRB Effectiveness Monitoring Plan (EMP) and is discussed in the annual ZVI-PRB EMR submitted separately from the overall PAGW OU biennial groundwater report (SRNS 2019). As agreed to by the Core Team in the EMP, the ZVI-PRB EMR to be submitted this year for April 2024 to March 2025 data is the fifth and final planned EMR. Recommendations on future monitoring and reporting will be made in the final ZVI-PRB EMR.

SRNS, 2019. *Removal Action Design Plan (RADP) with Effectiveness Monitoring Plan (EMP) for the P-Area Groundwater (PAGW) Operable Unit (OU),* SRNS-RP-2019-00105, Revision 1, July 2019, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

Comments Received July 1, 2025

4. *General observations: extension of TCE plume down gradient of PRB in P area – no response required unless any clarification needed below:*

The site has trichloroethylene (TCE) as one of the contaminants of concern (COC). The TCE plume located down gradient of the zero valent iron (ZVI) permeable reactive barrier (PRB) in P area has extended into the top two aquifers: the upper aquifer zone (UAZ) and the lower aquifer zone (LAZ). It may also continue to extend horizontally within the upper aquifer zone along the edge of the plume.

As shown in the clipped map, four monitoring well (MW) cluster locations—PGW-014, PGW-026, PGW-027, and PGW-035—are highlighted in orange. The trend of elevated TCE concentration from the start of groundwater monitoring to 2024 has been assessed. Table 1 summarizes the evaluated information, and Figures 2 to 5 provide clipped images for trend analysis of these four MWs.

Table 1. Trend analysis for four MWs in the TCE plume

MW cluster	MW-ID	Trend	Plume migration potential	Spatial location in the TCE plume	Aquifer designation	Screen zone (ft amsl)	Groundwater monitoring period
PGW-014	PGW-014-B	No trend	Plume extended and increasing in both upper and lower aquifers	Northwest edge of TCE plume	LAZ	123-133	2003-2024
	PGW-014-C	increase			LAZ	178-188	
	PGW-014-DU	Increase since 2016			UAZ	203-213	
PGW-026	PGW-026-B	No trend since 2019	Plume extended to both aquifers	Center area of the plume	LAZ	122-132	2011-2024
	PGW-026-C	No trend			LAZ	152-162	
	PGW-026-DL	No trend			UAZ	197-207	
PGW-027	PGW-027-C	No trend	Plume extended to both aquifers, increasing in the	Southwest edge of TCE plume	LAZ	148-158	2011-2024
	PGW-027-DL	No trend			LAZ	170-180	

SRS Responses to USEPA Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U), April 2023 Through March 2024
SEMS Number: 81, SRNS-RP-2024-01436, Revision 0, February 2025,
Savannah River Site, Aiken, South Carolina

Comments Received July 1, 2025

	PGW-027-DU	increase	upper aquifer zone		UAZ	205-215	
PGW-035	PGW-035-C	No trend	Plume extended to both aquifers, decreasing in the upper aquifer	Center area of the plume	LAZ	187-197	2018-2024
	PGW-035-D	decrease			UAZ	237-252	

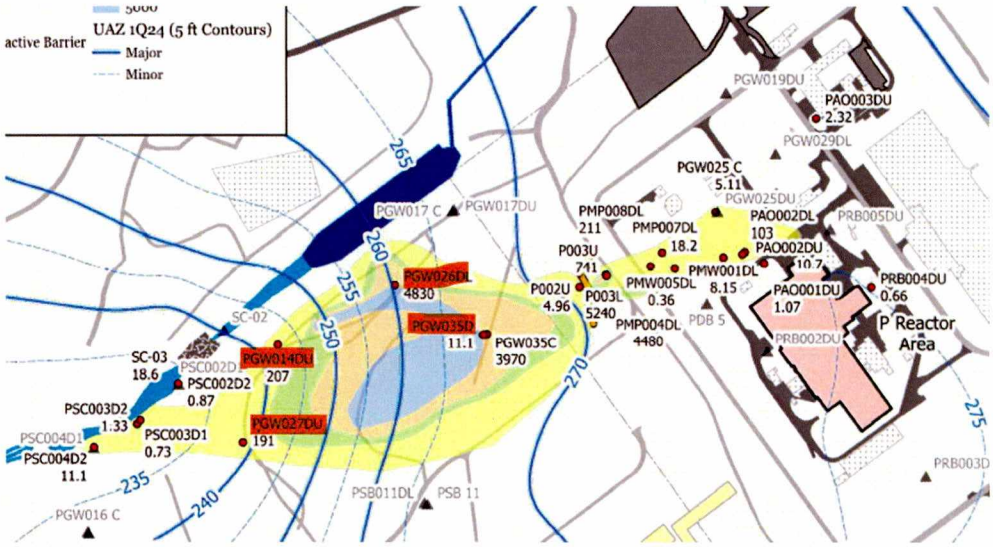


Figure 1. Groundwater monitoring network in P area, and elevated TCE concentrations for the 2023-2024 monitoring period. The four MWs selected for trend evaluation are highlighted in orange.

Comments Received July 1, 2025

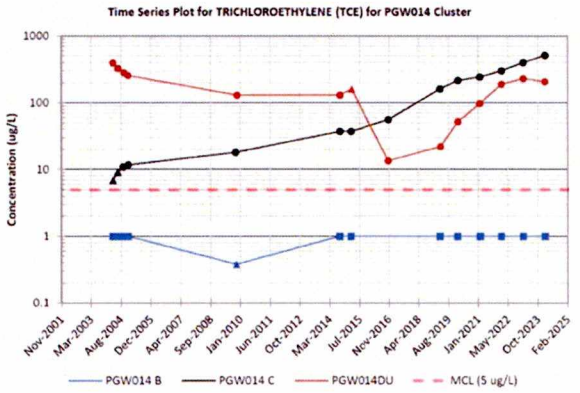


Figure 2. PGW-014 well cluster trend

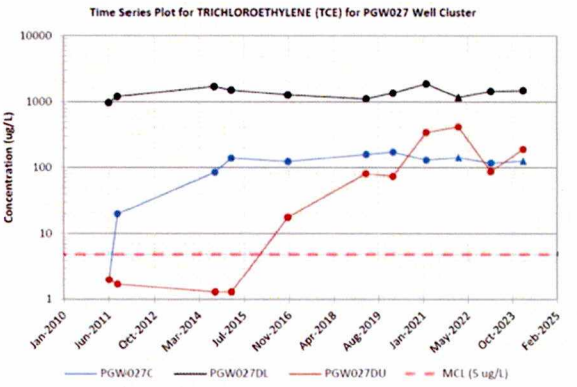


Figure 3. PGW-027 well cluster trend

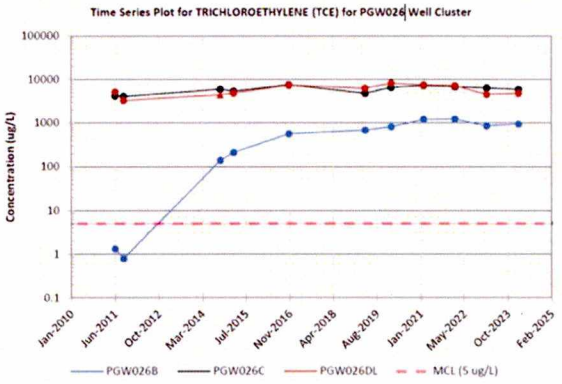


Figure 4. PGW-026 well cluster trend

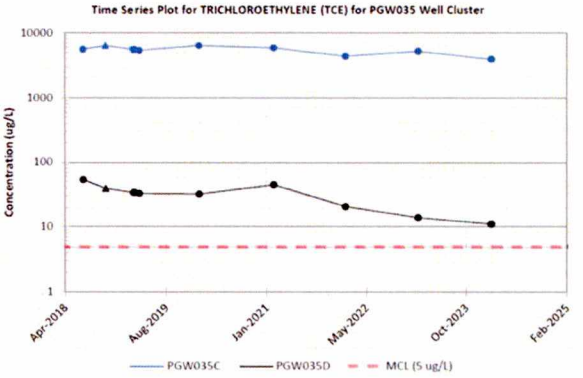


Figure 5. PGW-035 well cluster trend

Comments Received July 1, 2025

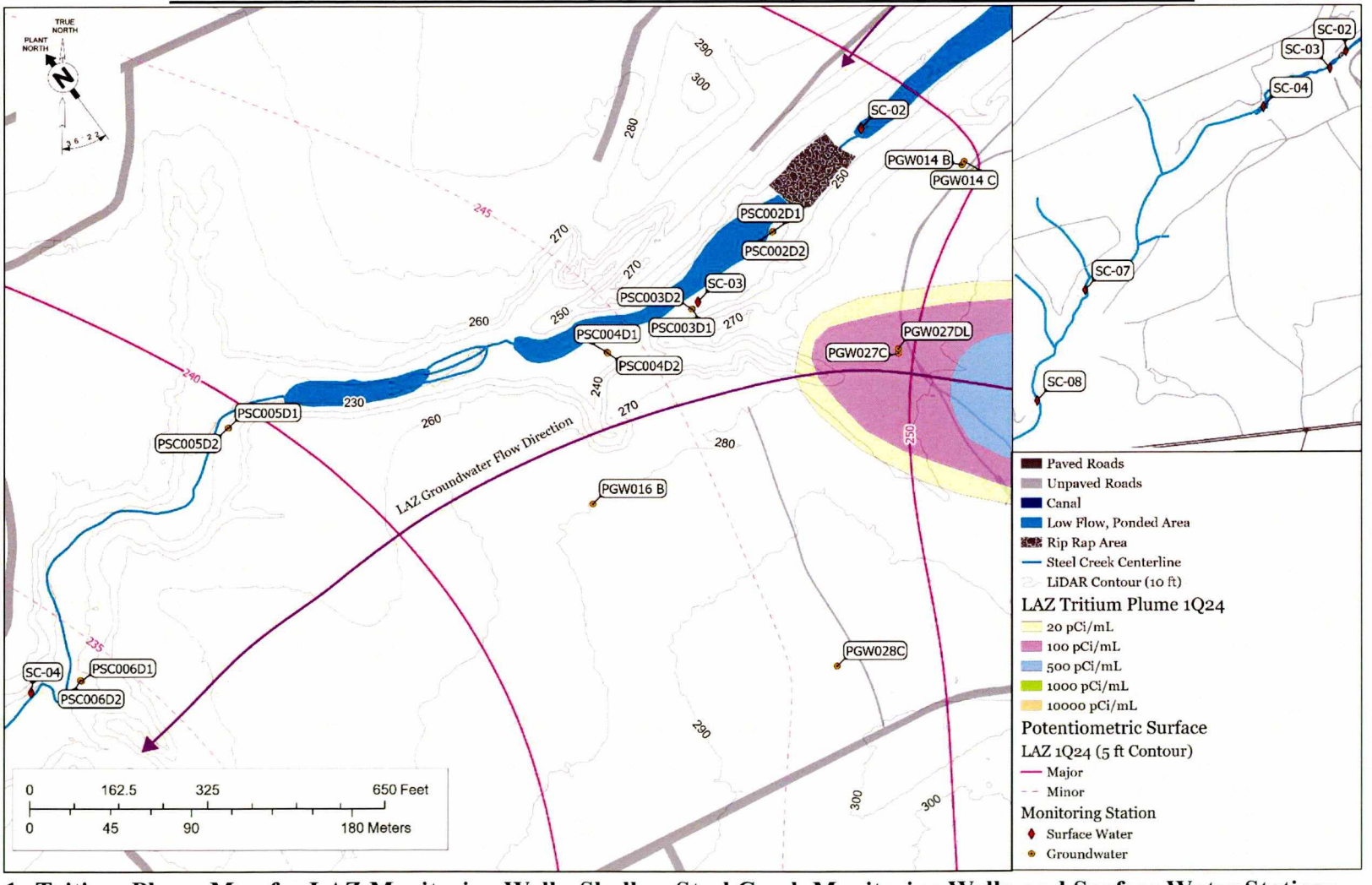


Figure CR-1. Tritium Plume Map for LAZ Monitoring Wells, Shallow Steel Creek Monitoring Wells, and Surface Water Stations

Comments Received July 1, 2025

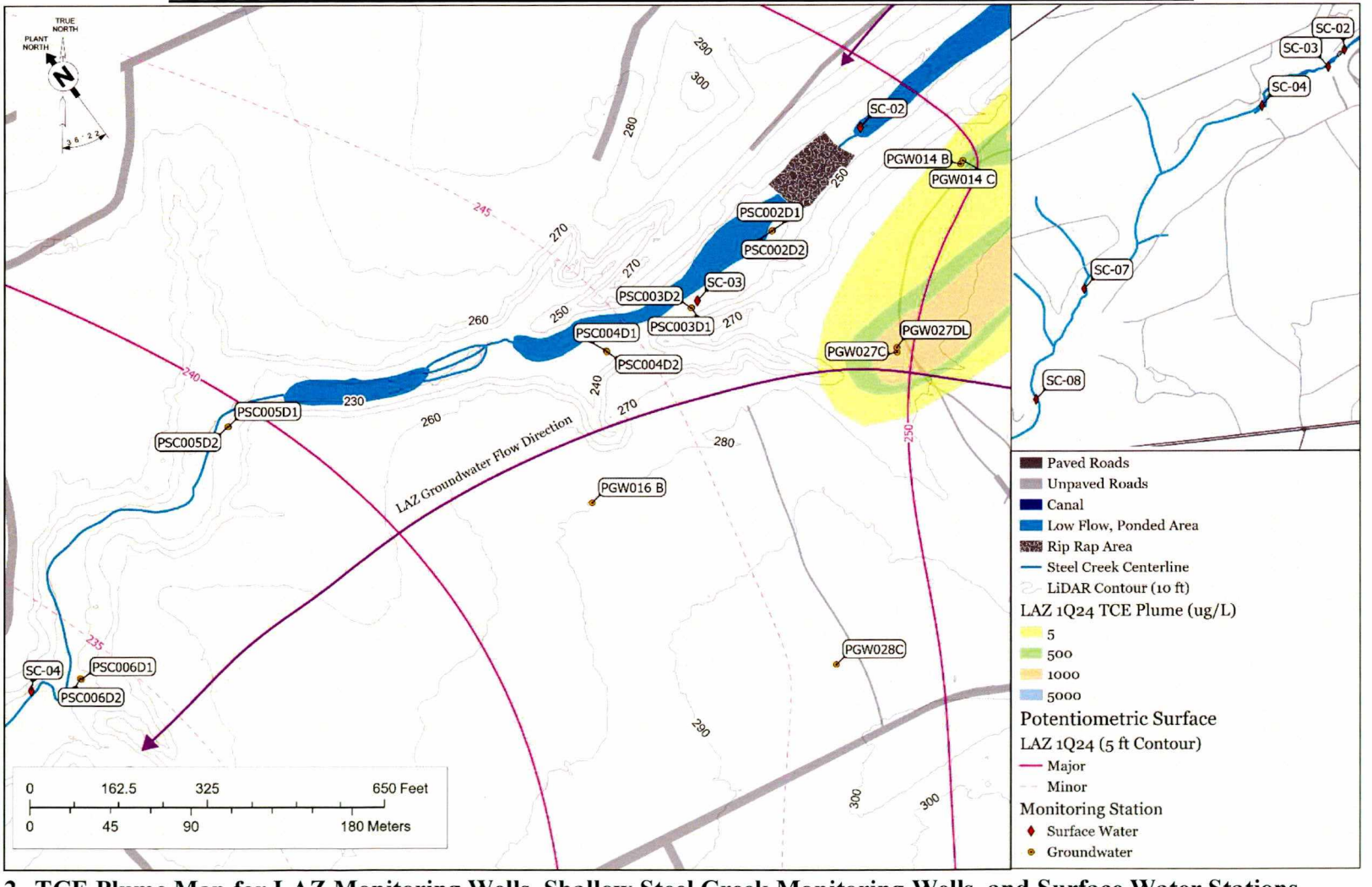


Figure CR-2. TCE Plume Map for LAZ Monitoring Wells, Shallow Steel Creek Monitoring Wells, and Surface Water Stations

Comments Received July 1, 2025

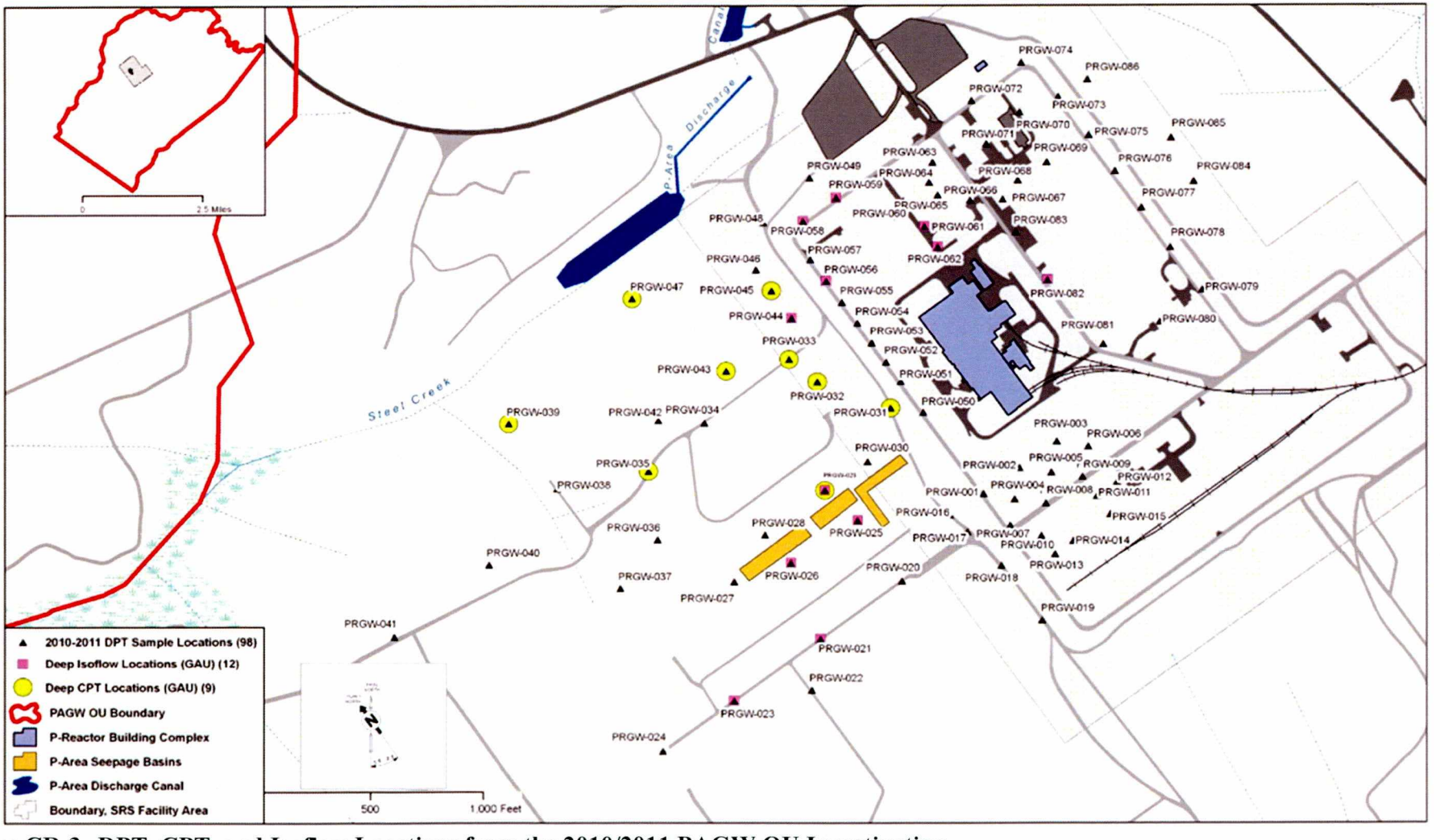


Figure CR-3. DPT, CPT, and Isoflow Locations from the 2010/2011 PAGW OU Investigation

Comments Received July 1, 2025

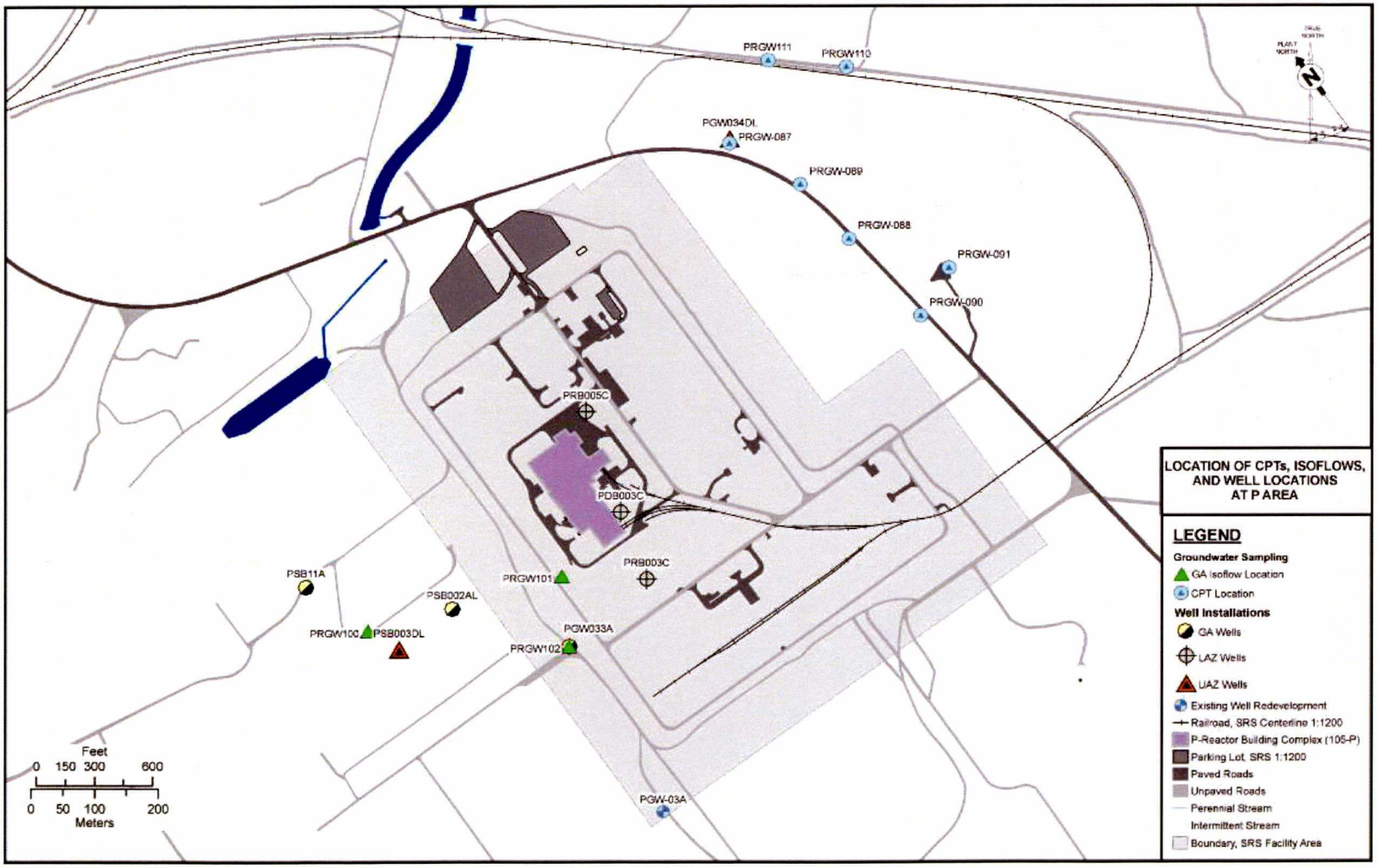


Figure CR-4. Investigation Locations as Part of the 2013 PAGW OU SAP

SRS Responses to USEPA Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U), April 2023 Through March 2024
SEMS Number: 81, SRNS-RP-2024-01436, Revision 0, February 2025,
Savannah River Site, Aiken, South Carolina

Comments Received July 1, 2025

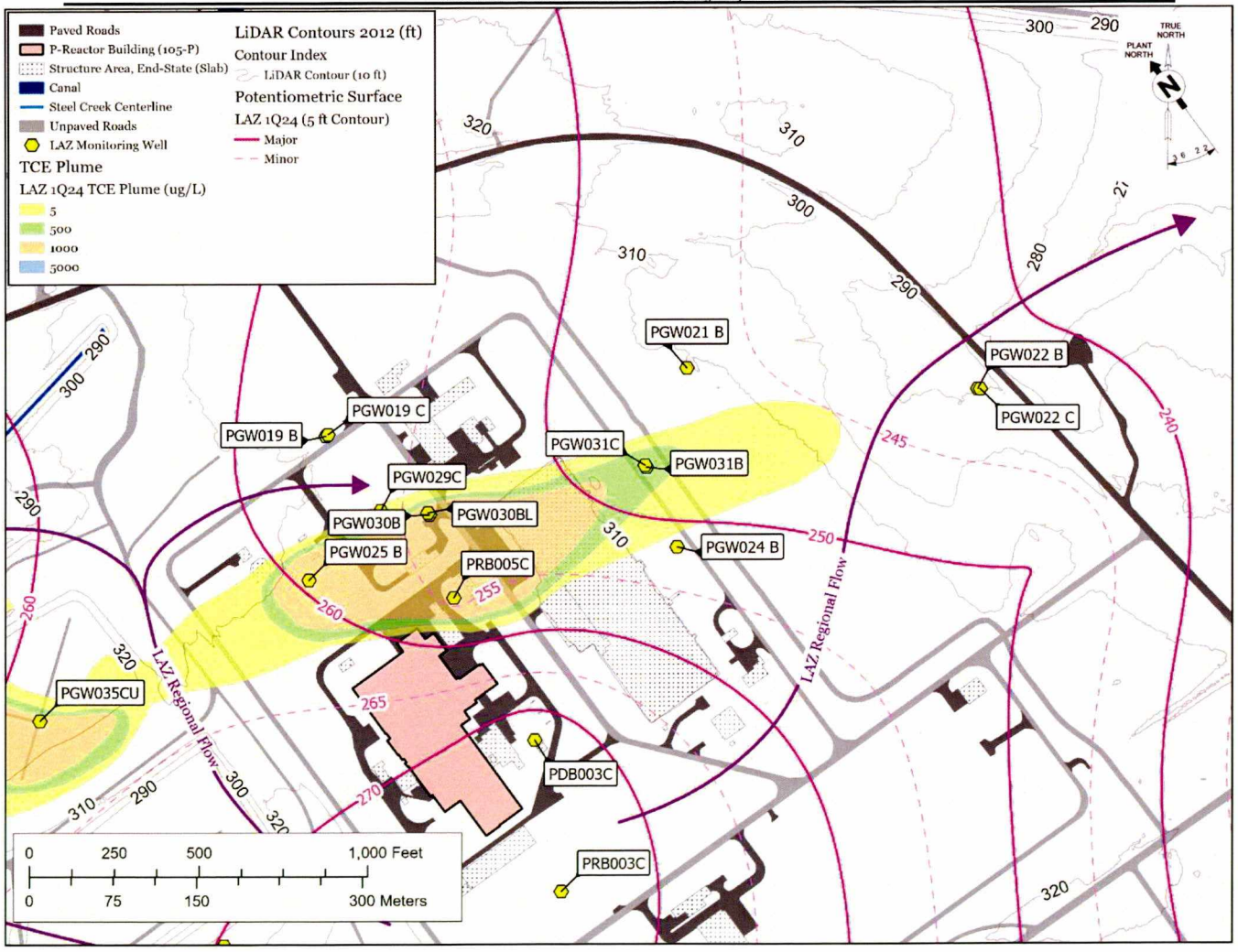


Figure CR-5. LAZ TCE Plume Map with Monitoring Locations

This page is intentionally left blank.

**SRS Responses to SCDES Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U), April 2023 Through March 2024
SEMS Number: 81, SRNS-RP-2024-01436, Revision 0, February 2025,
Savannah River Site, Aiken, South Carolina**

Comments Received July 15, 2025

GENERAL COMMENTS

1. Throughout the report, there is language stating that the Lower Aquifer Zone (LAZ) tritium plume/aquifer is not currently discharging to surface water due to the depth of the LAZ aquifer relative to surface water elevations. However, the LAZ trichloroethylene (TCE) plume discussion at the end of Section 3.3.2.2 states that the LAZ TCE plume is expected to eventually discharge to Steel Creek. ***The report should be revised to clarify this expectation of surface water discharge from the LAZ aquifer since according to the report only the UAZ aquifer is currently discharging to surface water.***

Response: Clarification

Text in the groundwater report states that the P-Area Groundwater (PAGW) Operable Unit (OU) Lower Aquifer Zone (LAZ) *plumes* do not currently discharge to Steel Creek. The Upper Aquifer Zone (UAZ) plumes are known to discharge to Steel Creek around surface water station SC-03. This is supported by trichloroethylene (TCE) and tritium results at surface water stations SC-02, SC-03, SC-04 and shallow UAZ groundwater stations PSC002D1, PSC002D2, PSC003D1, PSC003D2, PSC004D1, and PSC004D2.

The LAZ groundwater does not discharge to Steel Creek within the extents of the LAZ groundwater plumes for tritium or TCE. This is supported by hydrogeologic picks along the creek. Location PGW016 B is the furthest downgradient location within the tritium plume (Figure CR-1). At PGW016 B, two Savannah River Site (SRS) geologists picked the top of the LAZ at 168 feet above mean sea level (ft-amsl) and 183 ft-amsl, and the elevation of Steel Creek at the nearest point is approximately 230 ft-amsl based on 2012 LiDAR topography. The Tan Clay Confining Zone (TCCZ) is a clayey confining layer that separates the LAZ and UAZ, and is at least 10 feet (ft) thick based on hydrostratigraphic picks from PGW016 B. Based on the 50+ ft of elevation difference between Steel Creek and the top of the LAZ, including the TCCZ, the LAZ cannot physically discharge to Steel Creek within the extents of the LAZ groundwater contaminant plumes. Beyond the PGW016 monitoring well cluster, SRS has limited hydrogeologic information available to definitively determine where the LAZ will begin discharging to Steel Creek. In a conservative estimate, SRS suggests that the LAZ may discharge to Steel Creek around the PSC006 shallow groundwater cluster and surface water station SC-04. At this time, impact to these shallow groundwater monitoring stations has not been observed. Tritium and TCE concentrations detected at surface water station SC-04 are due to UAZ impact to Steel Creek at SC-03 and surface water transport downstream.

Future reports for the PAGW OU will ensure clarity when referring to the plume and/or the aquifer zone discharges to Steel Creek. No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

2. Figure 17, which shows the monitoring well network coverage for the Upper Aquifer Zone (UAZ) tritium plume, and Figure 23, which shows the monitoring well network coverage for the LAZ tritium plume, indicate potential data gaps for adequate characterization of each plume. For the UAZ tritium plume, the south-southwest edge of the plume appears to be estimated as there are no UAZ monitoring wells beyond PGW028DU or PGW018C, which indicate MCL exceedances of 310 pCi/mL and 49.3 pCi/mL respectively. For the LAZ tritium plume, the western edge of the plume also appears to be undefined as there are no LAZ monitoring wells beyond PGW027C/DL, which indicate MCL exceedances of 242 pCi/mL and 328 Ci/mL respectively. Regarding the LAZ tritium plume network coverage, according to language in several sections of the report, the LAZ aquifer does not discharge to Steel Creek, implying the potential for the tritium plume in this aquifer to migrate beyond and beneath Steel Creek. ***These potential data gaps in the UAZ and LAZ tritium plume monitoring well networks should be addressed in the report, and whether further groundwater investigation is warranted.***

Response: Agree

SRS agrees that the tritium plume extent in the UAZ is not bound by the current monitoring well network, as shown in Figure 17. Future biennial PAGW OU groundwater reports will depict the UAZ tritium plume extent to the west as dashed to indicate it is estimated based on the existing monitoring well network. The UAZ tritium plume discharge to Steel Creek is limited to the area localized at the SC-03 surface water station. This is supported by results at the "PSC" shallow groundwater stations and surface water stations SC-02, SC-03, and SC-04. The UAZ tritium plume migration is not expected to result in a significantly larger plume extent than is estimated by the existing monitoring network. Further groundwater investigation needs will be discussed in future biennial PAGW OU groundwater reports.

Well PGW-016-B, which is located ~700 feet downgradient to the west-southwest of PGW027, did not have tritium detected. However, SRS has Fiscal Year 2027 (FY27) field work planned in the PAGW OU that includes LAZ groundwater sampling that will aid in more closely bounding tritium plume with sampling locations west and north of the tritium plume's leading edge. This investigation will provide depth discrete data throughout the LAZ in the plume to update the current plume extent and provide useful data for future monitoring well considerations. SRS proposes discussing FY27 PAGW OU investigation in a Spring 2026 Core Team scoping meeting.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

Comments Received July 15, 2025

SPECIFIC COMMENTS

1. **Section 3.3.1.1, Upper Aquifer Zone, pages 9-10:** The next-to-last paragraph in this section discusses tritium concentrations in monitoring wells west of the P-Area Reactor Building Complex. Tritium concentrations in well P003L are described as decreasing since 2007, but later in the same paragraph are stated as experiencing a significant increase since 2014. Well P003L is also shown in Figure 21 as undetected until 2019. ***Please clarify these statements and ensure this well is not described as having decreasing Tritium levels.***

Response: Agree

The text incorrectly stated that tritium concentrations in P003L decreased since 2007. Future PAGW OU reports will not describe P003L as having decreasing tritium concentrations since 2007.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

2. **Section 3.3.1.1, Lower Aquifer Zone, page 11:** It is stated that tritium at well PGW026C is above the maximum contaminant level, and this contamination is separate from the plumes in the LAZ. However, a description of where this tritium originated is not provided. ***Please clarify whether this tritium detection has historically been above the MCL, been increasing, and possible origin.***

Response: Agree

Figure 17 of the 2024 Groundwater Report presents the UAZ tritium plume. Tritium contamination in the northern lobe of the UAZ plume is likely related to various spills during P-Reactor operations that occurred to the northwest of the P-Reactor Building (105-P). The UAZ tritium plume extends toward Steel Creek and monitoring well PGW026DL, before connecting to the distal portion of the UAZ tritium plume. The PGW026 monitoring well cluster has one well screened in the UAZ, PGW026DL, and two wells screened in the LAZ, PGW026C screened above PGW026B. In Figure 23, the LAZ tritium plume is shown with the primary contribution west of 105-P coming from the P-Reactor Seepage Basins (PRSB). Tritium contamination in the LAZ that is sourced from the P-Reactor Disassembly Basin is migrating east toward PAR Pond. LAZ monitoring well PGW026C is side gradient of the PRSB and not connected to the upgradient LAZ tritium plume at the PRDB.

Tritium in the LAZ, detected at PGW026C, is suspected to be from vertical migration from the UAZ into the LAZ, and not from upgradient LAZ tritium migration. The time-series plot for tritium at the PGW026 monitoring well cluster is presented in Appendix C, page C-11 of the 2024 Groundwater Report. Since 2014, tritium concentrations in the UAZ at PGW026DL have decreased from ~100 picocuries per milliliter (pCi/mL) to 45.3 pCi/mL, whereas tritium

concentrations have steadily increased in the LAZ at PGW026C and PGW026B. The time-series plot for the well cluster supports that tritium has migrated vertically from the UAZ and into the LAZ. Tritium concentrations at PGW026C remain well below the tritium maximum contaminant level of 20 pCi/mL. SRS will continue to monitor the migration of tritium in the UAZ and LAZ at this location. SRS will ensure future reports discuss the trends at the PGW026 monitoring well cluster.

No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

3. **Section 3.3.1.3, Gordon Aquifer Unit, page 12:** The first paragraph of this section states: "Groundwater samples were collected throughout the GAU at borings near and around the PRSBs during two separate investigations with no detections of tritium. Based on the outcome of these investigations, additional GAU monitoring wells were installed around this location to monitor the movement of the tritium plume." These two sentences appear to contradict each other; i.e., there does not appear to be a need for installation of wells to monitor a plume that was not detected. ***Please clarify.***

Response: Agree

The sentence mentioned in the comment is not correct. Groundwater samples collected from the Gordon Aquifer around the PRSBs were all non-detect, with the exception of the PSB002 location. PSB002AA was installed to monitor tritium based on this detection. Following the second investigation in 2014, PSB002AL was installed to monitor for tritium at depth in the Gordon Aquifer and monitor vertical migration through the Gordon Aquifer.

Future PAGW OU groundwater reports will be revised to clarify this contradiction. No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

4. **Table 1, Monitoring Well Network for the P-Area Groundwater Operable Unit and Table 2, Water Level Data for P-Area Groundwater Operable Unit Monitoring Wells, pages 91 through 102:** Table 1 lists monitoring wells PAO002DL, PAO002DU, PMP004DL, PMP007DL and PMP008DL as wells that were added to the synchronous water level list, yet these wells are not included in Table 2 for water level data. Also, monitoring well LSW 20A is listed in Table 2 but not in Table 1 for the monitoring well network. ***Please revise these tables accordingly.***

Response: Agree

Monitoring wells PAO002DL, PAO002DU, PMP004DL, PMP007DL, and PMP008DL were added to the synchronous water level list after the first quarter of 2024 (1Q24) sampling event was completed. Therefore, they are correctly included on Table 1 and had no available

data to be included on Table 2 for this report.

Location LSW 20A will be added to Table 1 in future reporting. No change to the 2024 Groundwater Report is proposed.

Responsible Party: Adam Willey, adam.willey@srs.gov, 803-646-4944

This page intentionally left blank.

SRS Responses to SCDES Comments on the Groundwater Report for the P-Area Groundwater (PAGW) Operable Unit (OU) (U), April 2023 Through March 2024
SEMS Number: 81, SRNS-RP-2024-01436, Revision 0, February 2025,
Savannah River Site, Aiken, South Carolina

Comments Received July 15, 2025

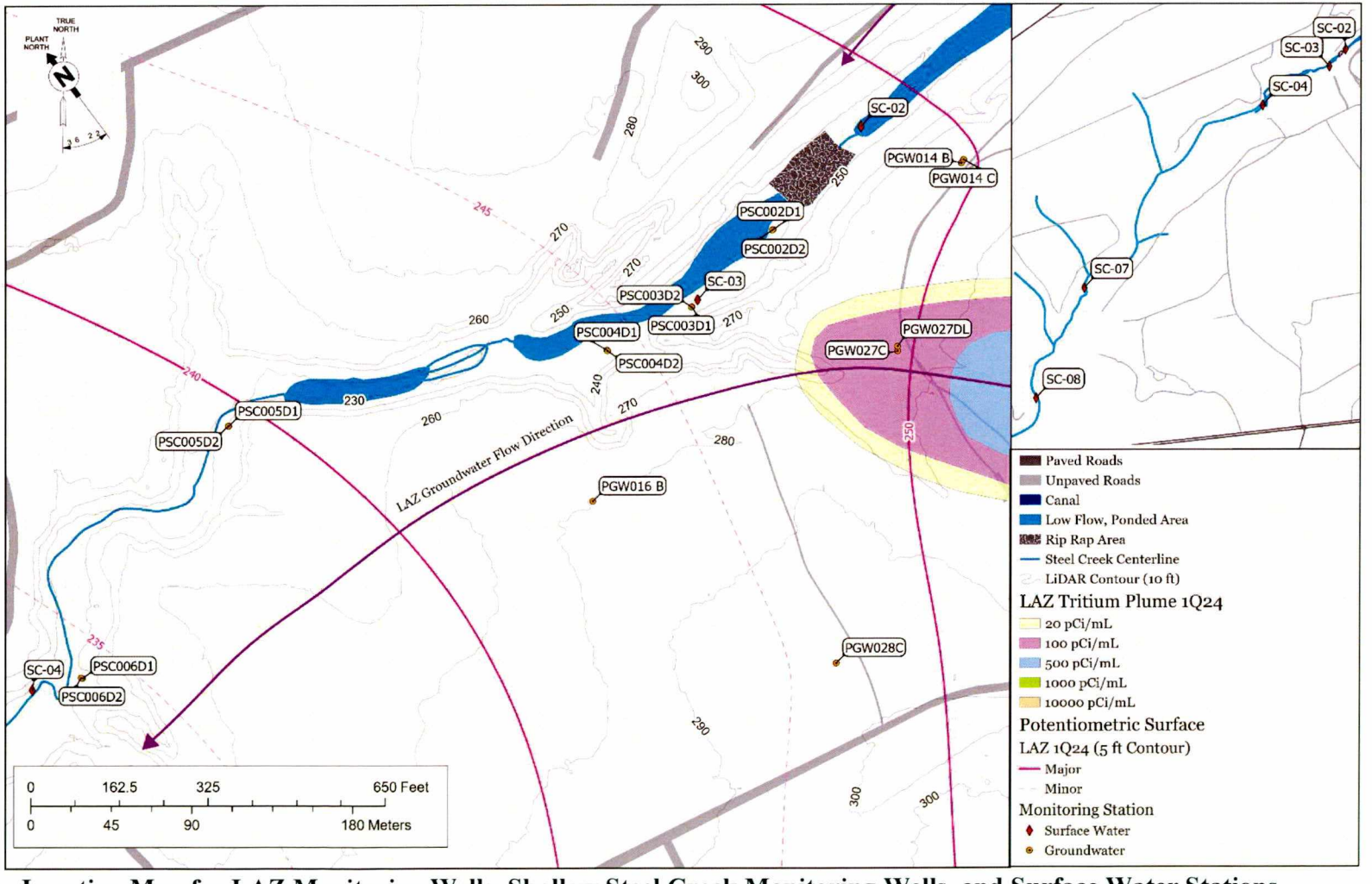


Figure CR-1. Location Map for LAZ Monitoring Wells, Shallow Steel Creek Monitoring Wells, and Surface Water Stations

Comments Received July 15, 2025

This page intentionally left blank.