ARF-025332

REGION 4
ATLANTA, GA 30303

ENVIRONMENTAL COMPLIANCE &

March 3, 2026

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SRNS-OS-2026-00073

AREA COMPLETION PROJECTS

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

EPA Comments: RCRA Facility Investigation/Remedial Investigation Second Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U), SEMS Number: 63, SRNS-RP-2025-01503, Revision 0, January 2026

Dear Mr. Baker,

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed and provided comments on the RCRA Facility Investigation/Remedial Investigation Second Work Plan Addendum for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (U), SEMS Number: 63, SRNS-RP-2025-01503, Revision 0, January 2026.

If you have any questions or require additional information, please contact Brianne Martin at (404) 683-2220.

Sincerely,

BRIANNE MARTIN Digitally signed by BRIANNE MARTIN
Date: 2026.03.03 14:29:04 -05'00'

Brianne Martin, RPM
Federal Facilities Branch
Superfund and Emergency Management Division

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

GENERAL COMMENTS

1. The Work Plan Addendum should provide contaminant concentration figures showing previous sample results for soil and groundwater in both map view and cross-section view. The previous sample locations and the proposed sample locations are shown on Figures 7, 8 and 9, for the 402-D Tank Farm, Grass Fire Area, and Phytoremediation Study Area, respectively; however, the previous sample results are not depicted on the respective figures and it is unclear whether the proposed locations will be sufficient to the define the lateral and vertical extent of Per- and Polyfluoroalkyl Substances (PFAS) contamination and achieve the objectives listed in Section 4.1.3 (Identify the Decisions). Please revise the Work Plan Addendum to include contaminant concentration maps and cross-section figures that depict previous sample results to support the sufficiency of the proposed sample locations.

2. The Work Plan Addendum should present a figure that reflects the current footprint of all PFAS detections that exceed their maximum contaminant levels (MCLs), including Perfluorooctanesulfonic acid (PFOS) and Perfluorooctanoic acid (PFOA), based on the most recently published MCLs. Currently, only the Perfluorononanoic acid (PFNA) plume is reflected on Figure 5 (Four Potential PFAS Source Areas and Associated 0-1 ft Soil Sampling Locations Collected in 2025) and Figure 6 (Proposed Groundwater Monitoring Well Locations). Please revise the Work Plan Addendum to provide a figure that reflects the current PFAS plume footprint based on recently published PFAS MCLs (i.e., 4 nanograms per liter (ng/L)).

3. Section 4.1.2 (State the Problem) states that volatile organic compounds (VOCs), tritium, low pH/metals, and PFAS in groundwater are discharged to the southwest to the D-Area Effluent Discharge Canal, Beaver Dam Creek, and into the D-Area wetlands; however, neither these locations nor the four PFAS characterization areas of focus are presented on a larger-scaled figure showing their relative locations within the Savannah River Site. Please revise the Work Plan Addendum to include a large-scale figure showing the relative locations of the areas discussed in this section.

4. Section 4.1.7 states, "Savannah River Nuclear Solutions (SRNS) developed specific technical instructions for collecting samples for PFAS analysis, to minimize the risk of anthropogenic PFAS contamination, in the technical report SRS Sample Collection Guidelines for Per- and Polyfluoroalkyl Substances (PFAS) (SRNS 2021);" however, the precautions and procedures used for collecting soil, concrete, and groundwater PFAS samples should be briefly discussed since standard operating procedures (SOPs) for PFAS sample collection were not provided. Please revise the Work Plan Addendum to briefly discuss the precautions and procedures used for collecting PFAS samples.

5. The Work Plan Addendum should provide potentiometric surface maps using the groundwater elevations measured in the Upper Three Runs Aquifer (UTRA) and Gordon Aquifer (GA) wells shown in the figures. Potentiometric surface maps would provide an additional line of evidence to support the sufficiency of the proposed monitoring well locations in delineating the lateral extent of contamination. Please revise the Work Plan Addendum to include potentiometric surface maps for the UTRA and GA using the groundwater elevations measured in wells shown in the figures.

SPECIFIC COMMENTS

1. **Section 3.1, Objectives, Pages 22 and 23 of 84:** Section 3.1 states, "Groundwater samples will be verified and validated (VV) data. Soil and concrete samples will be 5% definitive-level (D) data and 95% VV data;" however, the difference between verified and validated data and definitive-level data is not defined anywhere in the Work Plan Addendum. Section 7.6 (Data Validation and Data Management) defines verification and validation but does not define definitive-level data. Please revise the Work Plan Addendum to include an explanation about the difference between verified and validated data and definitive-level data.

2. **Section 4.1.7, Specify the Limits on Decision Errors, Pages 33 and 34 of 84:** Section 4.1.7 states, "All constituents will be analyzed at levels that allow comparison against established MCLs or RSLs (to the extent practicable);" however, the screening levels that will be used for making each project decision should be defined per EPA's Guidance on Systematic Planning Using the Data Quality Objectives Process, EPA QA/G-4 (the DQO Guidance), dated February 2006. Please revise Section 4.1.7 to provide the screening levels that will be used in decision-making in accordance with the DQO Guidance.

3. **Section 6.1, Data Quality Levels for Analytical Results, Pages 27 and 28 of 84:** The last three sentences included in the Accuracy paragraph of Section 6.1 refer to "Representativeness;" however, representativeness is discussed in the Representativeness paragraph of Section 6.1. Please move these statements from the Accuracy paragraph of Section 6.1 to the Representativeness paragraph.

4. **Table 4, Proposed 402-D Tank Farm PFAS Soil/Concrete Samples, Page 65 of 84 and Table 9, Proposed Downgradient and North of D006 Wells PFAS Soil Samples, Page 68 of 84:** The estimated total depths for the proposed borings at DCB091C (Table 4) and DCB092C and DCB093B (Table 9) do not match those reflected in Table 2 (DAG OU Boring and Monitoring Well Proposed Sample Stations and Samples). The total depth for boring DCB091C is listed in Table 4 at approximately 70 feet (ft) and the total depths for borings DCB092C and DCB093B are listed in Table 9 at 60 feet (ft) each; however, Table 2 lists the total depths for the borings at 75 ft, 75 ft and 40 ft, respectively. Please revise the tables to address these discrepancies as appropriate.