



REGION 4
ATLANTA, GA 30303

August 27, 2024

ENVIRONMENTAL COMPLIANCE &

AUG 27 2024

Ms. Avery Hammett
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

AREA COMPLETION PROJECTS

EPA Comments: Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pits (731-4A, -5A) Operable Unit, January through December 2023 (U), SEMS Number: 28, SRNS-RP-2024-00115, Revision 0, dated May 8, 2024 (the PER).

Dear Ms. Hammett:

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the Performance Evaluation Report for the A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pits (731-4A, -5A) Operable Unit, January through December 2023 (U), SEMS Number: 28, SRNS-RP-2024-00115, Revision 0, dated May 8, 2024 (the PER). EPA has the following comments on this report.

If you have any questions or require additional information, please contact Brianne Martin at (678) 906-8075.

Sincerely,

BRIANNE MARTIN

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MARTIN
Date: 2024.08.27 14:06:58 -04'00'

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

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

GENERAL COMMENT

1. A figure depicting the locations of the M-Area Aquifer Zone (MAAZ) monitoring wells was not presented in the PER and the assertions in the text regarding contaminant concentrations and trends could not be evaluated. The PER discusses the monitoring wells screened in the water table aquifer MAAZ near the A-Area Burning/Rubble Pits and Rubble Pit (ABRP) and Miscellaneous Chemical Basin (MCB) source areas and indicates the wells have historically shown elevated levels of tetrachloroethylene (PCE) and trichloroethylene (TCE) contamination. The text also indicates MAAZ wells near the ABRP source have decreasing volatile organic compound (VOC) trends indicating mass depletion of the source; however, a figure depicting the locations of the MAAZ monitoring wells was not provided. While it is understood groundwater is not part of the ABRP/MCB/Metals Burning Pit (MBP) Operable Unit (OU), a figure depicting the monitoring wells discussed in the PER should be provided or a reference to where this information can be found should be provided. Please revise the PER to provide a figure depicting the monitoring wells discussed in the PER or provide a reference to where this information can be found.

SPECIFIC COMMENTS

1. **Section 1.3, Groundwater, Pages 2 and 3 of 54 and Table 1, ABRP/MCB/MBP OU Subunit Remedial Actions and Regulatory Decision Documents, Pages 30 and 31 of 54:** The information in Section 1.3 and Table 1 indicates TCE concentrations will be below the maximum contaminant level (MCL) in the near future in two of eight MAAZ wells where TCE exceeded the MCL; however, there is no information (e.g., concentration trend data) presented as a supporting line of evidence that these concentrations will be below the MCL in the near future. Therefore, the effectiveness of the vadose zone remedial action (RA) on reducing TCE concentrations in the MAAZ is unclear. While it is understood groundwater is not part of the ABRP/MCB/MBP OU, the text should provide reference to where this information can be found in order to support the assertions in the text. Please revise the text to provide a reference to where the additional information can be found (e.g., concentration trend data) regarding the TCE results for the two MAAZ wells located near the ABRP subunit source, in order to support the assertions regarding the vadose zone RA effectiveness.
2. **Section 2.1.3, Current Configuration, Page 5 of 54:** The text states that wells AHT007A and AHT009A are associated with the Ash Pile Subunit; however, these wells appear to be specifically located in the ABRP Trench Subunit (see Figure 5, ABRP Vadose Zone Well Configuration and Treatment Area). Please revise the text to identify the specific wells located within the Ash Pile Subunit and the ABRP Trench Subunit.
3. **Section 2.1.4, Sampling Methods and Results, Page 5 of 54 and Section 2.2.4, PSVE Results, Page 8 of 54:** It is unclear why average TCE results are used for comparison of historic results in ABRP MicroBlower™ and BaroBall™ wells at the MCB when the maximum TCE and PCE concentrations are used for comparison of historical results in MicroBlower™ and BaroBall™ wells located at the miscellaneous chemical basin (MCB). For example, the table in Section 2.1.4 presents the average TCE sample results for comparison of historic (2007) with current 2023 results for MicroBlower™ and BaroBall™ wells at the ABRP; however, the table in Section 2.2.4 presents the maximum TCE and PCE sample results for comparison of historic (before 2009) with current 2023 results for MicroBlower™ and BaroBall™ wells at the MCB. Please revise the PER to present average and maximum exhaust gas results for both ABRP and MCB subunits.