

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

October 12, 2023

ENVIRONMENTAL COMPLIANCE &

Mr. Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

OCT 12 2023**AREA COMPLETION PROJECTS**

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 2023

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the 6/19/23 KBRP and PBRP GM Reports and has the following comments attached below.

If you have any questions or require additional information, please contact me at (404) 562-8648.

Sincerely,

JON
RICHARDS

Digitally signed by
JON RICHARDS
Date: 2023.10.12
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Jon Richards
FFA Remedial Project Manager
Superfund & Emergency
Management Division

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

SPECIFIC COMMENTS

- 1. Table 2, K-Area Burning/Rubble Pit (KBRP) Operable Unit (OU) Monitoring Well Data for 2022, Page 5:** One well had elevated turbidity measured (i.e., 35.7 nephelometric turbidity units [NTU] at KRP 6) that is noted to exceed the GWPS (groundwater protection standard; i.e., red highlight) but the elevated turbidity reading is not discussed in the text. It is unclear if this well usually has elevated turbidity or if this is an anomalous reading since the other locations are all less than 4 NTU. Please revise the text to discuss the turbidity measured at KRP 6.
- 2. Figure 1, KBRP OU Monitoring Well Network, PCE and TCE Concentrations, and Water Elevation Measurements during 4Q22, Page 6:** The detection of trichloroethylene (TCE) at monitoring well KRP 9 is not shown on this figure to indicate a concentration greater than 1 microgram/liter (ug/L; i.e., light pink plume as noted in the legend). Table 2 (KBRP OU Monitoring Well Data) reports TCE detected at 2.2 ug/L at KRP 9 during the fourth quarter (October) of 2022. Therefore, the plume map for the AA aquifer should show the TCE at KRP 9. Please revise Figure 1 to include the detected TCE concentration at KRP 9.
- 3. P-Area Burning/Rubble Pit (PBRP) OU, Page 9:** The first paragraph states that Table 3 lists the currently approved PBRP monitoring wells, surface water stations, and additional monitoring wells from the P-Area Groundwater (PAGW) OU; however, Table 3 is not included in the GW Monitoring Report. Please revise the GW Monitoring Report to include the referenced Table 3.
- 4. P-Area Burning/Rubble Pit (PBRP) OU, Pages 9 to 10:** The text discusses the use of Method 522 to achieve lower quantitation limits for 1,4-dioxane; however, it is unclear if the Quality Assurance Project Plan (QAPP) for PBRP annual groundwater monitoring includes this method. Please revise the text to state if Method 522 is included in the QAPP or if an addendum to the QAPP will be generated for the use of this method.