



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

ENVIRONMENTAL COMPLIANCE &

August 25, 2023

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

AUG 25 2023

AREA COMPLETION PROJECTS

**EPA Comments on the TECHNICAL REVIEW OF 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 BURING PIT (731-4A, -5A) OPERABLE UNIT - JANUARY THROUGH DECEMBER 2022 (U) SEMS NUMBER: 28, SRNS-RP-2023-00127, REVISION 0, DATED MAY 2023**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed this PER for these A Area Pits. EPA comments are attached.

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: 2023.08.25  
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Jon Richards  
FFA Remedial Project Manager  
Superfund & Emergency Management  
Division

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

## GENERAL COMMENT

1. The PER discusses the monitoring wells screened in the water table aquifer (M-Area Aquifer Zone [MAAZ]) near the ABRP and 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/MBP OU, a figure depicting the monitoring wells discussed in the PER should be provided. *Please revise the PER to provide a figure depicting the monitoring wells discussed in the PER.*

## SPECIFIC COMMENTS

1. **Section 1.3, Groundwater, Page 2 of 52, and Table 1, ABRP/MCB/MBP OU Subunit Remedial Actions and Regulatory Decision Documents, Page 28 of 52:** 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. *Please revise the text to provide additional information (e.g., concentration trend data) regarding the TCE results for the two MAAZ wells located near the ABRP subunit source as a line of evidence to support vadose zone RA effectiveness.*
2. **Table 5, ABRP PSVE BaroBalls™ Well Exhaust Gas TCE Results, Pages 36 & 37 of 52:** The well exhaust gas TCE results for ABRP passive soil vapor extraction (PSVE) BaroBall™ wells ATH007A, AHT009A and AHT009B are not presented in the table. According to the table notes, wells AHT007A, AHT009A and AHT009B were converted to PSVE BaroBalls™ on 11/17/2025; however, TCE results are not presented. *Please revise the table to present the exhaust gas TCE results for BaroBall™ wells ATH007A, AHT009A and AHT009B.*
3. **Section 2.1.4, Sampling Methods and Results, Page 5 of 52 and Section 2.2.4 PSVE Results, Page 8 of 52:** It is unclear why average TCE results are used for comparison of historic results in ABRP MicroBlower™ and BaroBall™ wells 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 2022 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 2022 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.*
4. **Section 4.3, Overall Recommendations, Page 11 of 52:** The text states “The MAAZ monitoring wells in the area are below respective MCLs for PCE, also indicating no impact to the water table for these units”; however, TCE concentrations exceeding the MCL in two of eight ABRP MAAZ wells are not discussed. According to Section 1.3, the MAAZ wells

near the ABRP source have decreasing VOC trends indicating mass depletion of the source.  
*Please revise the text to discuss the TCE groundwater results that exceed the MCL and how this relates to mass depletion of ABRP source.*