



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

May 18, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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



Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the following document:

**2017 ANNUAL GROUNDWATER MONITORING REPORT FOR THE F- AND H-AREA
RADIOACTIVE LIQUID WASTE TANK FARMS, CERCLIS NUMBER: 23 & 89
[SRNS-RP-2018-00226], REVISION 0, MARCH 2018**

The EPA's comments on the 2017 GW Report for F & H Areas are enclosed with this letter, If you have any questions, please contact me at 404-562-8648.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Richards".

Jon Richards, Acting FFA RPM
Superfund Division

Enclosure

cc: Susan Fulmer, SCDHEC
C. L. Bergren, SRNS-ACP
M.D. Wilson, SCDHEC-Columbia

TECHNICAL REVIEW COMMENTS

1. **Section 1.0 (Introduction)** states that during both groundwater sampling events in 2017, FTF background well FBG 1D was dry despite having an above average annual precipitation of 55.15 inches in 2017, which was noted to be greater than the 30-year average of 46.5 inches per year. The 2017 Annual report concurrently states that in 2017, FTF groundwater elevations for the upper aquifer zone (UAZ) were approximately 1-foot (ft) above normal levels and groundwater elevations for the lower aquifer zone (LAZ) were approximately 3-ft above normal levels; and the HTF UAZ and LAZ groundwater elevations were approximately 1-ft above normal levels. In addition, it was noted that this same well, FBG 1D was dry and not sampled in 2016. It therefore appears that an alternate background groundwater well may need to be selected for the F-Area in order to ensure background data is collected as required by the FTF Sampling and Analysis Plan. *Please provide a response to address this concern.*
2. The text in **Section 5.0 (Conclusions)** and trend depictions in Figure 10, Nonvolatile Beta and Technetium-99 Concentrations for FTF 28, indicate that both nonvolatile beta and Technetium-99 (Tc-99) continue to exhibit an upward concentration trend in groundwater. Please provide a response which indicates how this continuing trend will be addressed and whether an increased monitoring frequency or additional wells will be considered for identifying the source of these contaminants. Additionally, *please ensure any further actions considered be presented to the regulators/core team for decision making.*