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

SRNS-OS-2024-00109

April 17, 2024



Ms. Avery G. 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

RE: EPA Comments on the **P-AREA GROUNDWATER (PAGW) OPERABLE UNIT DATA SUMMARY TABLES FOR APRIL 2022 THROUGH MARCH 2023, SEMS NUMBER: 81 DATED DECEMBER 2023 SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA**

Dear Ms. Hammett,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the GW Report for the P-Area Groundwater (PAGW) Operable Unit (OU)(U), April 2022 through March 2023 Data, SEMS Number: 81, dated Dec 13,2023. EPA has the attached comments.

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: 2024.04.17 16:35:04 -04'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management Division

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

**SPECIFIC COMMENTS**

1. **Tritium Results, Page 3:** The text in the last paragraph states "Downgradient of the PRSBs [P-Area Seepage Basins], a significant decrease in tritium concentration was observed at monitoring well PSB011DL in 1Q23. The tritium result decreased between 1Q21 (3,060 pCi/mL), 1Q22 (2,900 pCi/mL), and 1Q23 (1.01 pCi/mL). PSB011DL monitors downgradient of the PRSBs. A similar decrease was observed in PSB011B, which monitors the LAZ [lower aquifer zone]." *Please revise the text to provide the specific sample results for PSB011B from 1Q21, 1Q22, and 1Q23 to validate the similar decrease in concentrations to PSB011DL.*

2. **Tritium Results, Page 4:** The text in the first paragraph states "The 1Q23 tritium result decreased to below the minimum detection limit (MDL) (0.634 pCi/mL)"; however, the text should clarify that the first quarter 2023 (1Q23) tritium results in LAZ well PSB011B decreased to 0.55 picocurie per milliliter (pCi/mL) and below the MDL of 0.634 pCi/mL. *Please revise the text to include this information.*

3. **Tritium Results, Page 4:** The text in the second paragraph states "Separate from the main two tritium plumes in the PAGW OU, there is an independent location at monitoring well PGW026C that has detectable tritium concentrations above the MCL of 20 pCi/mL. In 1Q23, the tritium result at this well remains elevated at 45.0 pCi/mL." Please revise the text to include previous tritium sampling results for monitoring well PGW026C from 1Q20, 1Q21 and 1Q22 (similar to other wells in this report) for reference to allow for additional text that discusses upward, downward or stable trends for well PGW026C. In addition, there seems to be a potential data gap in the lateral extent of the LAZ Tritium Plume associated with monitoring well PGW026C in relation to the two main plumes as shown in Figure 23 of the 2022 Groundwater Report for the PAGW OU. *Please ensure that the upcoming biennial report discuss the potential data gap in the lateral extent of tritium contamination at LAZ well PGW026C.*

4. **Tritium Results, Page 5:** The text in the first paragraph states "Results for two of the well pairs downstream of SC-03 (PSC005 and PSC006) remained around the MDL in the 1Q23 sampling"; however the text should provide the tritium results and corresponding MDLs for the two well pairs to support the assertion the results remained around the MDL. *Please revise text to include specific sample results for PSC005D1, PSC005D2, PSC006D1, and PSC006D2.*

5. **Summary Section, Page 6**: The text in the third paragraph states "In the UAZ [upper aquifer zone], TCE [trichloroethene] concentrations are consistent with previous reporting while concentrations in the LAZ are increasing slightly." However, Table 3, TCE Data Comparison Between 1Q22 and 1Q23, shows increasing concentrations of TCE at 11 out of the 23 locations that had detections in the UAZ. *Please provide text verifying whether TCE concentrations are increasing, decreasing or stable in the UAZ.*

6. **Table 2, Tritium Data Comparison Between 1Q22 and 1Q23:** *Please revise the legend of Table 2 to include text that defines "pCi/mL", "U" qualifier and "J" qualifier.*

7. **Table 3, TCE Data Comparison Between 1Q22 and 1Q23:** *Please revise the legend of Table 3 to include text that defines "ug/L", "U" qualifier and "J" qualifier.*