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

December 16, 2022

ENVIRONMENTAL COMPLIANCE &

DEC 16 2022

AREA COMPLETION PROJECTS

Mr. Brian T. Hennessey, 730-B
SRS Remedial Project Manager
Savannah River Operations Office
Area Completion Projects
Post Office Box A
Aiken, South Carolina 29802

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has received the Department of Energy, Savannah River Site 488-4D Ash Landfill Annual Groundwater Monitoring Report 2021 Data, SEMS #63, Revision 0, July 2022.

EPA can not approve this document until the comments below have been addressed. Should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely,

DIEDRE LLOYD
Digitally signed by DIEDRE LLOYD
Date: 2022.12.16 12:32:29 -05'00'

Diedre Lloyd
Remedial Project Manager
Federal Facilities Branch
Superfund Division

cc: Angelia Adams, DOE-SRS, Brian Hennessey, DOE-SRS, Phil Prater, DOE-SRS, Karen Adams, DOE-SRS, Candice Freeman, DOE-SRS, C.L. Bergren, SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

Above Letter was also emailed to list below and can be found at the e-file location noted below.

ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE 488-4D ASH LANDFILL ANNUAL GROUNDWATER MONITORING REPORT, 2021 DATA

SEMS # 63, REVISION 0

JULY 2022

SAVANNAH RIVER SITE
AIKEN, SOUTH CAROLINA

EPA COMMENTS:

1. **Section 3.1, Results Above Regulatory Threshold Limits, Page 3 of 14:** The text states metals contamination is sourced from the D-Area Coal Pile Storage Area (DCSA) and the coal pile runoff basin (CPRB); however, it is noted that:
   a. Figure 2 (Beryllium Concentrations at the 488-4D Ash Landfill, Second Quarter 2021) shows a separate beryllium plume northwest of the 488-4D Ash Landfill that is not discussed in the Annual Report.
   b. Additionally, Figure 1 (Monitoring Well Locations at the 488-4D Ash Landfill and 2Q2021 Water Level Elevations) depicts a waste site area located upgradient of separate beryllium plume that is not discussed in the Annual Report.

   Please provide additional information and discussion for each a. and b. notes above to ensure clarity if the waste site area is the source of the secondary beryllium plume or another alternative? Please revise the Annual Report to further discuss the nature of the secondary beryllium plume.

2. **Section 3.1, Results Above Regulatory Threshold Limits, Page 3 of 14**: The text indicates that tritium and volatile organic compounds (VOC) contaminants are not associated with the 488-4D Ash Landfill and are from upgradient sources within D-Area; however, a figure showing the location of these upgradient sources relative to 488-4D Ash Landfill was not included in the Annual Report. Please revise the Annual Report to include a figure showing the location of the upgradient sources of VOCs and tritium relative to the 488-4D Ash Landfill.

3. **Table 3. 488-4D Ash Landfill Groundwater Monitoring Data, Page 13 of 14:** The table indicates the analytical estimated quantitation limit (EQL) for beryllium in well DCB 8 was 5 micrograms per liter (µg/L); however, the EQL of 5 µg/L is greater than the beryllium maximum contaminant level (MCL) of 4 µg/L. This text does not discuss the beryllium data usability at DCB 8 and how this impacts the evaluation of beryllium contamination in groundwater. Please revise the text to address this issue and please ensure the lab MCLs are met in the future.

4. **Table 2. Monitored Constituents for the 488-4D, Page 12 of 14**: It is unclear why Table 2 does not include dissolved oxygen (DO) in the list of field parameters, as Table 3 includes DO results for the monitoring wells sampled. Please revise Table 2 to include DO as a field parameter.