

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

December 08, 2018

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

**ENVIRONMENTAL COMPLIANCE &**

DEC 10 2018

**AREA COMPLETION PROJECTS**

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Energy, Savannah River Site 2017 Groundwater Mixing Zone Report for the D Area Oil Seepage Basin Operable Unit (631-G), SEMS Number 27, dated July 2018.

EPA cannot provide approval for this report until the below comments are addressed. If you have any concerns or questions, please contact me at (404) 229-9500.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diedre Lloyd".

Diedre Lloyd  
Remedial Project Manager  
Restoration and Sustainability Branch  
Superfund Division

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

**EPA COMMENTS on the  
2017 GROUNDWATER MIXING ZONE REPORT**

**For the D AREA OIL SEEPAGE BASIN OPERABLE UNIT**

**SEMS NUMBER: 27**

**JULY 2018**

**SAVANNAH RIVER SITE  
AIKEN, SOUTH CAROLINA**

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**EPA COMMENTS:**

1. Based on the steady contaminant trends noted in some monitoring wells, slow progress has been made towards restoring the groundwater aquifer to beneficial use since the removal action was conducted in 1996. For example, the steady contaminant trends of vinyl chloride (VC), cis-1,2-Dichloroethylene (c-DCE) and trichloroethylene (TCE) noted for well DOB 15 and depicted in Appendix D, Figures D-52, D-75, and D-144, respectively, suggest the projected cleanup timeframe for aquifer restoration to beneficial use is uncertain.
  - a. With over 22 years of groundwater monitoring data, the noted steady contaminant concentration trends greater than respective maximum contaminant levels (MCLs) appear to represent a potential problem warranting future action. It remains unclear if the natural attenuation (NA)/GWMZ remedy is effective and performing as designed to achieve aquifer restoration within a reasonable timeframe as compared to active remediation. This report states, "...a Core Team meeting will be held in 2019 to discuss the effectiveness of the NA/GWMZ remedy based on further review of all data available for the DOSB [D-Area Oil Seepage Basin] OU." EPA recommends that DOE-SRS propose several potential response actions to address the above stated problem followed by discussion amongst the core team members.
2. In Appendix B, Figure B-2. DOSB Conceptual Cross-Section A-A', Page B-7 of B-22, the monitoring wells shown in the map inset defining the A-A' line of cross-section are not depicted in the cross-section figure. Revise the GWMZ Report to address this issue.