



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

October 4, 2021

ENVIRONMENTAL COMPLIANCE &

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

OCT - 5 2021

AREA COMPLETION PROJECTS

**EPA Comments on: 2020 K-AREA BURNING/RUBBLE PIT AND RUBBLE PILE (131-K AND 631-20G) (KBRP) AND P-AREA BURNING/RUBBLE PIT (131-P) (PBRP) OPERABLE UNITS COMBINED GROUNDWATER MONITORING REPORT (SAMPLING SUMMARY), SEMS NUMBERS: 40 AND 59, ARF-023256, DATED JUNE 29, 2021**

Dear Mr. Hennessey,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the 6/29/21 2020 KBRP and PBRP GM Reports and has the following comments attached below.

If you have any questions or require additional information, please contact me at (404) 562-8648.

Sincerely,

JON  
RICHARDS

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JON RICHARDS  
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Jon Richards  
FFA Remedial Project Manager  
Superfund & Emergency  
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ec: C.L. Bergren, SRNS-  
ACP Susan Fulmer,  
SCDHEC

## REVIEW COMMENTS

- 1. K-Area Burning/Rubble Pit (KBRP) Operable Unit (OU), Page 2:** The sampling frequency at monitoring well KRP 9 is not clearly understood. For example, the last paragraph indicates based on exceeding the maximum contaminant levels (MCLs) for tetrachloroethylene (PCE) and trichloroethylene (TCE) in 2018, the project team initiated an increase in sampling frequency to semi-annually at well KRP 9. However, according to Figure 2 (Time-Series Plots of PCE and TCE for KRP 9), Page 5, it appears only annual sampling has occurred at KRP 9 since 2018. *Please revise the 2020 K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G) (KBRP) and P-Area Burning/Rubble Pit (131-P) (PBRP) Operable Units Combined Groundwater Monitoring Report (Sampling Summary), SEMS Numbers: 40 and 59, ARF-023256, June 29, 2021 (2020 Sampling Report) to address the discrepancy in the reported sampling frequency at KRP 9, and clarify when the increased sampling frequency is scheduled to begin.*
- 2. P-Area Burning/Rubble Pit (PBRP) OU, Page 7:** Based on the information presented, the groundwater flow direction at the PBRP OU is uncertain. For example, the text in this section states the groundwater flow is to the southwest as shown on Figure 7 (PBRP Monitoring Well Network, 1,1-DCE Values, and Water Elevation Measurements During 4Q2020), Page 12. However, based on the northeast-southwest linear alignment of monitoring wells PRP 5, PRP 6 and PRP 7, insufficient triangulation between the monitoring wells creates uncertainty in the groundwater flow direction. To reduce the uncertainty, a monitoring well on the north side of the PBRP OU is needed to address this data gap in local groundwater flow direction. Based on the topographic contours, southeasterly groundwater flow towards Steel Creek is probable. *Please revise the 2020 Sampling Report to address this issue to ensure groundwater flow direction at the PBRP OU is adequately characterized.*
- 3. P-Area Burning/Rubble Pit (PBRP) OU, Page 7:** The text does not discuss that due to the exceedances of respective MCLs at monitoring well PRP 6, the 1,1-dichloroethylene (DCE) and TCE plumes are not laterally defined, particularly to the southeast. Additionally, the text does not present a discussion of whether the vertical extent of contamination is defined. *Please revise the 2020 Sampling Report to discuss the need to define the lateral and vertical extents of contamination at PRP 6 as needed to address the MCLs exceedances in this well.*
- 4. P-Area Burning/Rubble Pit (PBRP) OU, Page 7:** The last paragraph states Savannah River Site will continue to monitor groundwater annually for the constituents of concern identified in Table 2 to determine if the elevated results observed in fourth quarter 2020 are reproduced. However, it is unclear if continued exceedances of MCLs in monitoring well PRP 6 will trigger a recommendation to increase PRP-6 sampling frequency to semiannually. *Please revise the 2020 Sampling Report to clarify if continued exceedances of MCLs in monitoring well PRP 6 will trigger a recommendation to increase PRP-6 sampling frequency to semiannual.*
- 5. Figure 7, PBRP Monitoring Well Network, 1,1-DCE Values, and Water Elevation Measurements During 4Q2020, Page 12:** The dark-colored rectangle-shaped PBRP OU depicted on the figure is not defined in the figure legend. *Please revise the figure legend to address this issue so the PBRP OU is clearly defined.*