



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

ARF-024744

October 24, 2024

**ENVIRONMENTAL COMPLIANCE &**

SRNS-OS-2024-00458

**OCT 24 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

**AREA COMPLETION PROJECTS**

**EPA Comments: 2023 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, DATED JUNE 24, 2024 SAVANNAH RIVER SITE, AIKEN, SOUTH CAROLINA**

Dear Ms. Hammett,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Combined GW Sampling Summary Report for the KBRP and PBRP Operable Unit 40 and 59, dated June 24, 2024. EPA's comments are attached.

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: 2024.10.24  
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Jon Richards  
FFA Remedial Project Manager  
Superfund & Emergency  
Management Division

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

## GENERAL COMMENTS

1. The use of sample results from (SW) surface-water station SC-03 is not appropriate for evaluating potential of impacts to Steel Creek from the P-Area Burning/Rubble Pit (PBRP) Operable Unit (OU) trichloroethylene (TCE) plume due to groundwater to surface water discharge. According to the text on page 10, the TCE detections in the P-Area Groundwater (PAGW) OU SW station SC-03 are attributed to the PAGW OU upper aquifer zone (UAZ) TCE plume. According to Figure 6 (TCE Contaminant Distribution), SW station SC-03 is located on the south side of Steel Creek and within the PAGW OU TCE plume; however, a more representative SW sample station located north of and slightly upstream of Steel Creek would be more appropriate for detecting potential impacts to Steel Creek from the PBRP OU. The GW Monitoring Report states that surface water sampling will continue at the current locations to confirm that the recent elevated concentrations of volatile organic compounds (VOCs) have no impact within Steel Creek. As such, *please revise the text to recommend moving SW station SC-03 to the north side of Steel Creek and upstream of the PAGW TCE plume, during future sampling events.*
2. It is unclear whether there is potential for groundwater elevations to rise and contact the bottom of the PBRP OU and impact groundwater quality. Figure 14 (PRP 6 Water Elevation vs Concentration Trend Plot) shows concentration values of both TCE and 1,1-dichloroethylene (DCE) increasing slowly after periods of higher water availability in recent years and whether this is the result of groundwater in contact with the waste unit is unclear. The text states, “The recent increase in 1,1-DCE and TCE concentrations in well PRP 6 are believed to be associated with an increase in water elevations that possibly resolubilized contaminants that were entrained in sediments below the unit;” however, this section does not discuss the potential for groundwater contacting the waste unit and contributing to groundwater contamination. *Please revise the GW Monitoring Report to discuss the potential for groundwater elevations to rise and contact the bottom of the PBRP OU and impact groundwater quality.*

## SPECIFIC COMMENT

1. **Figure 4, PBRP OU Well Network, Page 13 of 25:** The legend for Figure 4 shows that the topographic contour interval is 2 feet (ft); however, according to the figure, the topographic contour interval is 10 ft (see contour intervals near the PBRP OU shown at 260 ft, 270 ft, 280 ft, 290 ft and 300 ft). *Please revise the legend of Figure 4 to show that the topographic contour interval is 10 ft.*