



REGION 4

ATLANTA, GA 30303

October 27, 2025

ENVIRONMENTAL COMPLIANCE &

OCT 27 2025

AREA COMPLETION PROJECTS

Mr. Matthew Baker, 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

**EPA comments: RESULTS FROM THE 2023-2024 EVALUATION OF THE
SOIL VAPOR EXTRACTION SYSTEM AT THE TNX OPERABLE UNIT
SEMS NUMBERS: 21, 29, SRNS-RP-2025-00815, REVISION 0, JUNE 2025**

Dear Mr. Baker:

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the 2023-2024 Evaluation of the Soil Vapor Extraction System at the TNX OU 21 & 29, June 26, 2025. EPA's comments are attached.

If you have any questions or require additional information, please contact Jon Richards at (404) 431-1340.

Sincerely,

JON RICHARDS Digitally signed by JON RICHARDS
Date: 2025.10.27 14:49:23 -04'00'

Jon Richards FFA RPM
Federal Facilities Branch
Superfund and Emergency Management Division

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

GENERAL COMMENTS

1. The SVE Report concludes by recommending that SVE should be discontinued at the TNX Operable Unit (OU), owing to the decline in mass removal rates of volatile organic compounds (VOCs) from the subsurface; however, there are no criteria presented with which to compare the results such that the potential for exposure risks could be determined. Vapor Intrusion Screening Levels (VISLs), calculated using EPA's VISL calculator (online at <https://www.epa.gov/vaporintrusion/vapor-intrusion-screening-level-calculator>), as per OSWER Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air (EPA 2015), should be prepared for each detected constituent of potential concern (COPC) at a hazard quotient of 0.1 and a target risk of 1E-06, and the maximum concentration compared to the VISLs. If all COPCs are below the screening levels, this is another line of evidence that the SVE system has performed as intended and can be discontinued. *Please revise the SVE Report to calculate VISLs for each COPC and tabulate the results to substantiate that the system can be shut off.*
2. It is unclear whether the SVE remedial action should remain on standby until the TNX OU long-term monitoring (LTM) groundwater results support, as a line of evidence that contaminant migration is no longer occurring from the vadose zone to the water table. The SVE Report recommends that select SVE wells be kept for use in the future for neat edible oil injections if needed; however, it appears that TNX OU LTM groundwater results will be used to determine if another deployment of neat edible oil to the capillary fringe will be needed to address future contaminant migration from the vadose zone to the water table. As such, the SVE remedial action should remain on standby until the TNX OU LTM groundwater results support that contaminant migration is no longer occurring. *Please revise the SVE Report to indicate that the SVE remedial action should remain on standby until the TNX OU LTM groundwater results provide another line of evidence that contaminant migration is no longer occurring from the vadose zone to the water table.*

SPECIFIC COMMENT

1. **Figure 1, Location of SVE Wells at TNX Area OU, PDF Page 19 of 36:** The nomenclature used to identify SVE wells in the figure is inconsistent with the nomenclature used in the text. For example, SVE wells identified as TVM 1U, TVM 1V, TCM 2U, TVM 2V, TVM 3U, TVM 3V, TVM 4U, TVM 4V and TVX 1L are shown on the figure; however, the text identifies these wells as TVM-001-U, TVM-001-V, TVM-002-U, TVM-002-V, TVM-003-U, TVM-003-V, TVM-004-U, TVM-004-V and TVX-001-L. Also, SVE wells are identified on the figure as TVX002 L, TVX002 U, TVX003 L, TVX004 L, TVX004 U, TVX005 L, TVX005 U, TVX006 U, TVX006 L, TVX007 L and TVX007 U; however, the text identifies these wells as TVX-002-L, TVX-002-U, TVX-003-L, TVX-004-L, TVX-004-U, TVX-005-L, TVX-005-U, TVX-006-U, TVX-006-L, TVX-007-L and TVX-007-U. *Please revise the figure so the nomenclature used to identify SVE wells is consistent with the identifications used in the text.*