ENVIRONMENTAL COMPLIANCE &

AUG 24 2026

AREA COMPLETION PROJECTS

REGION 4
ATLANTA, GA 30303

August 24, 2026

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: 2025 ANNUAL COMPREHENSIVE TNX AREA GROUNDWATER MONITORING AND REMEDIAL ACTION EFFECTIVENESS INTERIM REPORT (U) SEMS 21, 29, SRNS-RP-2026-00416, REVISION 0 JUNE 2026, SAVANNAH RIVER SITE AIKEN, SOUTH CAROLINA

Dear Mr. Baker,

EPA has reviewed the TNX 2025 Annual Comprehensive Groundwater Monitoring and Remedial Action Effectiveness Interim Report, R0, June 2026. Attached are our comments:

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: 2026.08.24 08:44:07 -04'00'

Jon Richards, FFA RPM,
Federal Facilities Branch
Superfund & Emergency Management Division

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

GENERAL COMMENT

1. The Report discusses the discontinuation of soil vapor extraction (SVE) in the TNX Area and that eleven SVE wells remain to be used for future remedial actions if warranted; however, it is unclear what conditions would warrant restarting the wells. For example, it is unclear if SVE would be considered based on rebounding concentrations in source area groundwater wells, and how much observed rebound is necessary to restart the wells. *Please revise the Report to clarify the process and the criteria that will be used to determine when the SVE wells should be restarted.*

SPECIFIC COMMENTS

1. **Section 2.5.1.1, Sampling Issues, Page 15 of 62; Section 3.0, Monitoring and Reporting, Page 23 of 62; and Appendix B, Groundwater Monitoring Results (Matrix Tables), Page B-3 of B-6:** Section 2.5.1.1 lists nine samples with rejections of mercury results, but Section 3.0 states that a batch of eight mercury results at eight sample locations were rejected due to laboratory quality assurance (QA)/quality control (QC) issues. Appendix B also indicates nine results for mercury were rejected during the second quarter of 2025 (2Q2025). It is unclear whether an additional result was rejected. *Please revise the Report to clarify the number of mercury results that were rejected and the reason for the rejected results.*

2. **Section 3.0, Monitoring and Reporting, Page 23 of 62:** This section discusses the verification and validation performed on the monitoring results, but it is unclear what is included in the validation review as the level of validation performed on the data is not defined. It is also noted that the end of the first paragraph contains an incomplete sentence regarding SRS Verified and Validated (V&V) level data. Further, data validation reports (DVRs) are not included in the Report to support the data validation conclusions. *Please revise the Report to specify what was included in the validation performed on the monitoring results, clarify the incomplete sentence, and include the DVRs as supporting documentation.*

3. **Section 4.1, Summary, Page 58 of 62:** The discussion of the uranium results states that concentrations of uranium have been sporadic with the concentration in TCM 5 exceeding the maximum contaminant level (MCL) in 2025, but Section 3.2.5.2 (Wetlands) notes that TCM 5 is the only exception where uranium concentrations are not sporadic and have regularly exceeded the MCL. Section 3.2.5.2 also states that it is not clear if the uranium at TCM 5 is from TNX processes or if it is naturally occurring, while Section 4.0 states that uranium is likely naturally occurring. Further, the uranium concentrations at TNX 28D that have a slowly increasing trend with an unclear upgradient source should be mentioned in Section 4.1. *Please revise the discussion of uranium results in Section 4.1 to be consistent with Section 3.2.5.2.*

4. **Appendix B, Groundwater Monitoring Results (Matrix Tables), Table B-1, Regular Groundwater Monitoring Results for TNX Area Wells, Second Quarter, 2025, Pages B-3 to B-6 of B-6:** Some of the analytes have multiple results presented for a sample, but the table does not differentiate the sample analysis method between the results. For example, Section 3.2.7 (1,4-Dioxane) notes that multiple methods were used for 1,4-dioxane analysis, but the Appendix B tables do not identify which method was used for the 1,4-dioxane results presented for each sample. Also, there are multiple results presented for other analytes (e.g., mercury results for surface water samples), but the analyses are not differentiated. *Please revise Appendix B to differentiate the sample analysis*

method between the multiple results presented for the samples.

MINOR COMMENTS

1. **Section 3.1.5.6, Total Organic Carbon [TOC], Page 35 of 62:** The last sentence states that concentrations of TOC continue to be elevated at TBG 3, TBG 4, and TBG 5 and lists maximum concentrations for the fourth quarter of 2025 (4Q2025) at 9.06 x 10^5 µg/L, 7.72 x 10^5 µg/L, and 6.72 x 10^5 µg/L, respectively; however, the specified concentration for TBG 4 (i.e., 7.72 x 10^5 µg/L) was detected in 2Q2025. *Please revise this sentence to indicate the overall maximum concentrations for 2025 are identified.*

2. **Section 3.2.7, 1,4-Dioxane, Page 48 of 62:** The text states that 1,4-dioxane was analyzed using three methods in 2019, but only two methods (EPA 8260BSIM and EPA 522) are identified. The text later identifies a third method (EPA 8270ESIM) that was used in 2024. *Please revise the text to clarify the number of methods used in 2019.*

3. **Section 4.1, Summary, Page 57 of 62:** The first sentence states that there are 43 monitoring wells in the TNX Area OU monitoring well network, but there are 44 wells in the sampling program as noted in Section 2.5.1 (Sampling Events). *Please revise this sentence to state that there are 44 wells in the TNX Area OU monitoring well network.*

4. **Appendix B, Table B-3, Regular Groundwater Monitoring Results for TNX Area Wells, Fourth Quarter, 2025, Page B-5 of B-6:** The number results are hard to distinguish as they appear to be shifted too far to the right in each cell. *Please revise this table to ensure the number results are visible in each cell.*