Savannah River NUCLEAR SOLUTIONS℠

Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U)

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July 2026

SAVANNAH RIVER SITE • AIKEN, SOUTH CAROLINA

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U.S. Department of Energy
and
Savannah River Nuclear Solutions, LLC
Aiken, South Carolina

CERTIFICATION

PCR/CMIR/RACR for ECODS N-1/CSSLP/Ford Building OU
SRNS-RP-2025-00808, Revision 1, July 2026

[REF: 40CFR270.11 (d)(1)]

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LIST OF ACRONYMS AND ABBREVIATIONS

~	approximately
ac	Acre
ACM	asbestos-containing material
ARAR	Applicable or Relevant and Appropriate Requirement
bgs	below ground surface
BMP	Best Management Practice
CAT	Caterpillar Incorporated
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulation
CMIP	Corrective Measures Implementation Plan
CMIR	Corrective Measures Implementation Report
Co	Cobalt
Cs	cesium
CSBRP	Central Shops Burning/Rubble Pit
CSSLP	Central Shops Scrap Lumber Pile
EA	Excavation Area
ECODS	Early Construction and Operational Disposal Site
EPC	Exposure Point Concentration
FAI	Final Acceptance Inspection
FFA	Federal Facility Agreement
ft	feet
ft^2	square feet
ha	hectare
in	inch
km	kilometer
km^2	square kilometer
LLC	Limited Liability Company
LOE	Limit of Excavation
LUC	Land Use Controls
LUCIP	Land Use Control Implementation Plan
m	meter
m^2	square meter
m^3	cubic meter
mg/kg	milligram per kilogram
mi	mile
mi^2	square mile
NBN	No Building Number
O&M	Operations and Maintenance
OU	Operable Unit
pCi/g	picocurie per gram
PCR	Post-Construction Report
PCB	polychlorinated biphenyls
RA	Remedial Action
RACR	Remedial Action Completion Report

LIST OF ACRONYMS AND ABBREVIATIONS *(continued/end)*

RAIP	Remedial Action Implementation Plan
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RCOC	refined constituents of concern
ROD	Record of Decision
SCDES[1]	South Carolina Department of Environmental Services
SRNS	Savannah River Nuclear Solutions
SRS	Savannah River Site
SWPPP	Storm Water Pollution Prevention Plan
U	Unclassified
USDOE	United States Department of Energy
USEPA	United States Environmental Protection Agency
WSRC	Washington Savannah River Corporation
yd^3	cubic yards

1 South Carolina Department of Environmental Services (SCDES) was known as South Carolina Department of Health and Environmental Control prior to July 1, 2024.

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1.0 INTRODUCTION

1.1 Purpose and Scope

This Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report (PCR/CMIR/RACR) documents the completion of remedial action (RA) for the closure of the Early Construction and Operational Disposal Site N-1 (No Building Number [NBN]), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) *(*ECODS N-1, CSSLP, and Ford Building*)* Operable Unit (OU). It summarizes construction activities performed to implement the RA requirements in the ECODS N-1, CSSLP, and Ford Building OU Record of Decision (ROD) (SRNS 2022) in accordance with the approved Corrective Measures Implementation Plan (CMIP)/Remedial Action Implementation Plan (RAIP) (see Appendix A) (SRNS 2023a). This PCR/CMIR/RACR specifically addresses construction activities for the Land Use Controls (LUC) warning signs at the ECODS N-1 and Ford Building subunits and for the contaminated soil removal at CSSLP subunit.

This PCR/CMIR/RACR was completed after final inspection of operations and a determination that the RA is complete. The Savannah River Site (SRS) notified U.S. Environmental Protection Agency (USEPA) Region 4 and South Carolina Department of Environmental Services (SCDES) regarding completion of the aforementioned final operation and function determination. This PCR/CMIR/RACR documents that the remedial action objectives (RAOs) have been met, and no further Resource Conservation Recovery Act (RCRA) 3004(u) Solid Waste Management Unit/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Unit response is needed to protect human health and the environment. This PCR/CMIR/RACR is submitted to USEPA and SCDES for approval in accordance with Federal Facility Agreement (FFA) requirements (FFA 1993).

This report includes the following items:

- A brief description of the OU background, including RA requirements and objectives in the ROD
- A chronology of completed events related to remediation of the OU
- A summary of construction activities performed
- Deviations from the original design per the approved CMIP/RAIP (SRNS 2023a)
- Maps depicting source unit before and after RA completion
- Performance standards and quality control inspections, including a summary of performance test results documenting verification of compliance with the acceptance criteria in the CMIP/RAIP
- Verification of construction completion
- Final inspection and verification of OU closure
- As-built drawings
- LUCs
- Forecasts of post-construction activities per the CMIP/RAIP and the ROD (as appropriate)
- Project costs

1.2 Operable Unit Background

The ECODS N-1, CSSLP, and Ford Building OU is listed as a RCRA 3004(u) Solid Waste Management Unit/CERCLA Unit in Appendix C of the FFA for SRS. The media of

concern is surface soils. Groundwater is not part of the OU and will be addressed under the Central Shops Groundwater OU.

The ECODS N-1, CSSLP, and Ford Building OU Statement of Basis/Proposed Plan (SRNS-RP-2022-00202, Revision 1, December 2022) 45-day public comment period began on February 16, 2023, and ended on April 2, 2023. No comments were received during the public comment period. After regulatory approval, the ROD (SRNS 2022) was signed by USDOE, SCDES, and USEPA on August 29, 2023, September 20, 2023, and September 22, 2023, respectively. The public was notified of its availability on October 12, 2023. The Remedial Design Fact Sheet (Appendix A of the CMIP/RAIP [SRNS 2023a]) was made available to the public on April 4, 2024 prior to the start of the remedial activities. Public notification occurred through the mailings of the SRS Environmental Bulletin and newspaper publications. These documents and publications are available in the Administrative Record File.

1.2.1 General Description and Location

SRS occupies approximately (~) 803 square kilometers (km^2) (310 square miles [mi^2]) of land adjacent to the Savannah River, principally in Aiken and Barnwell counties of South Carolina (Figure 1). SRS is located ~40.2 kilometers (km) (25 miles [mi]) southeast of Augusta, Georgia, and 32 km (20 mi) south of Aiken, South Carolina.

The OU consists of the following three subunits: ECODS N-1, CSSLP, and Ford Building as shown in Figure 2. These three subunits are located in three distinct locations within and near N Area (Central Shops) in an area of relatively flat terrain. The ECODS N-1, CSSLP, and Ford Building OU is located within an industrial area, and the future land use is reasonably anticipated to remain industrial.

1.2.1.1 ECODS N-1 Subunit

ECODS N-1 is one of 25 ECODS at SRS that were used during the construction and early operation of SRS for disposal of construction debris and other non-radioactive waste

materials. ECODS N-1 is located in a relatively flat area that slopes gradually to the south. It is located within the Pen Branch watershed (Figure 2). Historical aerial photographs revealed that the area where the subunit is located was farmland prior to construction of SRS. ECODS N-1 is 107 meters (m) (350 feet [ft]) long by 15 m (50 ft) wide. Waste disposed of in ECODS N-1 was buried in two trenches, each ~46 m (150 ft) long and located end-to-end (Figure 3). ECODS N-1 was in use from August 1952 to June 1954. The media associated with this unit are soils.

ECODS N-1 is currently a wooded area containing mature pine trees, providing a moderate habitat quality for ecological receptors.

1.2.1.2 CSSLP Subunit

The CSSLPsubunit is located in the Fourmile Branch watershed in N Area (Figure 2). The former scrap lumber pile lies in the southwestern sloping plain adjacent to the Central Shops Burning/Rubble Pits (631-1G and 631-3G) (CSBRP). The CSSLP subunit is segregated into two areas: the Upland Area (~1.3 hectares (ha) [3.3 acres (ac)]) and the Surface Water Impoundment Area (~0.41 ha [1.02 ac]) (Figure 4). A wetland and intermittent stream (located within the wetland area) is located south of the CSSLP subunit. The Upland Area was cleared in 1951 and used for equipment laydown and rubble storage in addition to being an area for burning construction-related material. Before 1951, the area was farmland. Starting in 1975, operating procedures called for the CSSLP to receive inert, nonhazardous materials, including items such as nails, hinges, scrap lumber, poles, crates, pallets, and unsalvageable wood products. Historically, the CSSLP was used to burn various unknown types and quantities of wood, which may have included treated lumber and creosote-treated wood. Historical burning at the CSSLP produced ash that was placed directly into CSBRPs, which were closed under a ROD in 2002 (WSRC 2002). Between 1992 and 1994, the Surface Water Impoundment Area was constructed in the southern portion of the CSSLP subunit to capture stormwater runoff from the CSSLP. Active burning at the CSSLP ended in the mid-2000s. The media associated with this unit are soil, sediment, and surface water.

The CSSLP subunit is currently sporadically covered by immature volunteer pine trees and provides marginal habitat quality for ecological receptors.

1.2.1.3 Ford Building Subunit

The Ford Building subunit is located within the N Area facility boundary in the Pen Branch watershed (Figure 2) and is located in a relatively flat area that slopes gradually to the east. The Ford Building was a one-story metal frame structure on a concrete pad, covering 900 square meters (m^2) (9,700 square feet [ft^2]). Ancillary equipment and other areas are included in the Ford Building subunit, including the remnants of a 13.8 kilovolt Substation (652-44N), a Fuel Oil Tank Containment Dike, a shielding remnant area, and the Excess Equipment Yard (745-N) (Figure 5). The Ford Building was constructed in the 1950s to test Ford Company-manufactured motor control packages for control rod drive mechanisms before they were installed in the SRS reactors. The primary area of the building consisted of a machine shop with offices, storage rooms, restrooms, and a service area. The media associated with this unit are soils and concrete.

In 2021, the building structure was demolished to its slab, and an engineered concrete cover system was installed over the entire concrete remnant slab area extending out 0.3 m (1 ft) from the building edge per the Closure Cap Design (SRNS 2019) (Figure 6). The 15-centimeter (6-inch [in]) concrete cover was designed to be compliant with polychlorinated biphenyl (PCB) capping requirements found in Toxic Substances Control Act regulations (40 Code of Federal Regulations [CFR] 761.61[a][7]). The concrete cover system serves to break the direct exposure pathway to PCBs and cesium-137 (Cs-137) in the remnant slab. The concrete cover system also achieves the substantive requirements under 40 CFR 761.62(c) for risk-based disposal of bulk product waste. The deactivation and decommissioning phase of the Ford Building (690-N) was completed and documented in the Decommissioning Project Final Report Building 690-N, Process Heat Exchanger Repair Facility (SRNS 2021a).

1.2.2 Nature and Extent of Contamination

The refined constituents of concern (RCOCs) and associated media are summarized for the ECODS N-1, CSSLP, and Ford Building subunits below. Results of the contaminant migration evaluation indicate the contaminants at the ECODS N-1, CSSLP, and Ford Building are not potential sources for groundwater contamination (SRNS 2021b).

1.2.2.1 ECODS N-1 Subunit Nature and Extent of Contamination

ECODS N-1 was used to dispose of trash and construction debris, some containing asbestos, associated with the construction and operation of N Area. A portion of one pit may have been used as a burn pit for disposing of combustible waste.

There were no RCOCs identified at the ECODS N-1 subunit. However, asbestos was identified in subsurface soils that poses a risk for human exposure if land disturbance activities occur. Suspected asbestos-containing material (ACM) (fragments of cementitious paneling) was recovered by hand auger at a depth of ~1 m (3 ft). Two of the three samples collected at sampling location ECN1-044 were verified positive for asbestos, indicating the potential presence of ACM within the entire subunit boundary (Figure 3).

1.2.2.2 CSSLP Subunit Nature and Extent of Contamination

The CSSLP was used to burn various unknown types and quantities of wood, which may have included treated lumber and creosote-treated wood. The primary contaminants at the CSSLP (Figure 7) are the following:

- Arsenic is present in Upland Area surface soil (0 to 0.3 m [0 to 1 ft]) (exposure point concentration [EPC] = 16.4 milligram per kilogram [mg/kg]) exceeding 1E-06 risk level for the resident (risk = 2.4E-05) and industrial worker (risk = 5.5E-06) scenarios; and

- Arsenic is present in Surface Water Impoundment Area surface sediment (0 to 0.3 m [0 to 1 ft]) (EPC = 8.27 mg/kg) exceeding 1E-06 risk level for the resident (risk = 1.2E-05) and industrial worker (risk = 2.8E-06) scenarios.

1.2.2.3 Ford Building Subunit Nature and Extent of Contamination

Ford Building was used as a machine shop to test motor control packages for control rod drive mechanisms. Contaminants associated with the Ford Building Subunit are as follows (Figure 8):

- Ford Building (690-N) slab covering 901 m^2 (9,700 ft^2)– Prior to placement of a concrete cover with minimum 0.46 m (18 in) gravel underlay in 2021, PCBs (Aroclor 1254 and 1260) and Cs-137 (+D) were present at the Ford Building remnant slab in concentrations exceeding 1E-06 risk level for both the resident and industrial worker scenarios; and

- Cobalt-60 (Co-60) is present in surface soil (0 to 0.3 m [0 to 1 ft]) (EPC = 0.545 picocuries/gram [pCi/g]) exceeding 1E-06 risk level for the resident (risk = 5.5E-05) and industrial worker (risk = 1.1E-05) scenarios.

1.3 Remedial Action Requirements and Objectives

1.3.1 Remedial Action Objectives

As stated in the ROD (SRNS 2022), the following RAOs have been identified for the ECODS N-1, CSSLP, and Ford Building OU RA to support the future land use, which is reasonably anticipated to remain industrial with United States Department of Energy (USDOE) maintaining control of the land:

ECODS N-1 subunit

- Prevent residential and industrial exposure to asbestos that is present in the subsurface. The primary route of exposure is the inhalation pathway.

CSSLP subunit

- Prevent residential and industrial exposure to arsenic in surface soils in the Upland Area at levels exceeding 1E-06 risk and/or SRS background concentration. The primary route of exposure is the incidental ingestion pathway; and

- Prevent residential and industrial exposure to arsenic in surface sediments in the Surface Water Impoundment Area at levels exceeding 1E-06 risk and/or SRS background concentration. The primary route of exposure is the incidental ingestion pathway.

Ford Building subunit

- Prevent residential and industrial exposure to Co-60 in surface soils at levels exceeding 1E-06 risk. The primary route of exposure is the external radiation pathway; and

- Prevent residential and industrial exposure to PCBs and Cs-137 at the Ford Building (690-N) remnant concrete slab at levels exceeding 1E-06 risk and PCB Applicable, or Relevant and Appropriate Requirements (ARAR) concentration of 1 mg/kg for free release. There is no human health exposure risk under the current configuration (i.e., no exposure pathway) due to the presence of the engineered concrete cover system over the remnant slab.

1.3.2 Selected Remedial Action

As stated in the ROD (SRNS 2022), the following RAs have been selected for the ECODS N-1, CSSLP, and Ford Building OU:

The selected remedy for the ECODS N-1 subunit is LUCs to prevent human exposure to asbestos that is present in subsurface soils. This remedy was selected at the ECODS N-1 subunit due to the overall protection and effectiveness of the remedy.

The selected remedy for CSSLP subunit is excavation (hot spot removal) and disposal of contaminated media, which supports unrestricted land use and will not require LUCs, annual site inspections, or five-year remedy reviews. This remedy will eliminate exposure of contaminated media to human receptors. This remedy includes excavating contaminated media exceeding the arsenic cleanup level (8.2 mg/kg) down to 0.3 m (1 ft) below ground surface (bgs), disposing of the contaminated media off-site, and backfilling with clean soil to grade.

The selected remedy for the Ford Building subunit is LUCs to prevent human exposure to Cs-137 and PCBs on the Ford Building remnant concrete slab and Co-60 in surface soils underlying a portion of the gravel apron surrounding the slab. This remedy was selected at the Ford Building subunit due to the short half-life (~5.3 years) of Co-60. The risks to the industrial worker will be below 1E-06 within 20 years, thereby eliminating any long-term requirements other than LUCs for the concrete cover that currently exists over the remnant slab.

LUCs for the ECODS N-1 subunit and Ford Building subunit will be in effect until concentrations of hazardous substances are at levels that allow for unrestricted use and exposure and include the following:

- Warning signs posted at the ECODS N-1 and Ford Building subunits around the waste unit boundaries/areas, operations and maintenance of the signage, operations and maintenance of the concrete cover over the Ford Building remnant slab;

- Administrative/Worker Access Controls: Includes SRS administrative controls and land use restrictions for onsite workers as implemented under the Site Use/Site Clearance Program and other controls that are in place to ensure worker safety, including work controls/work packages that specify worker training, health and safety requirements, and pre-work briefings; and

- Engineering controls: SRS access controls that limit and inform SRS workers and inadvertent trespassers as described in the 2023 RCRA Permit Renewal Application, Volume I, Section F.1 (SCDES 2025), which describes the security procedures and equipment, 24-hour surveillance system, artificial or natural barriers, entry control systems, and warning signs in place at the SRS boundary.

This remedy was selected because it meets the RAOs, provides overall protection of human health and the environment, complies with ARARs, and is cost-effective. The remedy provides a high level of long-term protection to the radioactive and hazardous constituents that remain in place. A conceptual site model to illustrate how implementation of the RA breaks the exposure pathways is provided in Figure 9.

The RCRA permit will be revised to reflect selection of the final remedy using the procedures under 40 CFR Part 270, and South Carolina Hazardous Waste Management Regulations R.61-79.264.101; 270.

1.4 Chronology of Events

A tabular summary of major milestones related to the RA for the ECODS N-1, CSSLP, and Ford Building OU during the construction phase are provided in Table 1.

2.0 CONSTRUCTION ACTIVITIES

2.1 Pre-construction Activities

2.1.1 SRS Site Clearance Permit

A Site Clearance Permit was obtained prior to the start of any construction or sampling activities. At the CSSLP the Surface Water Impoundment Area was drained through Best Management Practices (BMPs) via installation of a drainage ditch from the Surface Water Impoundment Area to a nearby intermittent stream. Initial land clearing was performed to allow access to the CSSLP for sampling and surveying. Trees were cut above grade and

pushed to the side. No grubbing was performed so there was minimal disturbance to the soil.

2.1.2 Soil Sampling

In June 2019 and October 2020 contaminated soil sampling was conducted in the CSSLP to delineate the extent of contaminated media exceeding the arsenic cleanup level (8.2 mg/kg). See Appendix B of the RAIP (SRNS 2023a) for the statistical summary. A third round of sampling per a Field Sampling Plan, Appendix B of the RAIP (SRNS 2023a), was performed in 2024 to collect definitive level data in order to document the acceptance of the selected remedy at the CSSLP subunit. The samples obtained in 2024 within the CSSLP were collected from step-out locations and sent for laboratory analysis at certified laboratories, General Engineering Laboratory and Test America Laboratories (Figure 7). The step-out locations were determined by encompassing any pre-excavation confirmation sample that was verified above the cleanup level. The Limit of Excavation (LOE) boundary was minimized to the innermost sampling location that is consecutively identified below the cleanup level. The 2024 arsenic results ranged from 2.0 to 79 mg/kg. Table 2 provides the 2019, 2020, and 2024 arsenic results from all sampling locations.

2.1.3 Site Surveying

Savannah River Nuclear Solutions (SRNS) Site Survey performed the surveying of the LUC corner boundaries and sign locations for the ECODS N-1 and Ford Building subunits (Figure 10). The CSSLP excavation areas (EAs) were surveyed prior to excavation to delineate the boundaries of the four EAs which were staked with wood posts and survey flags (Figure 11). See Appendix C, Figure C-1 for the CSSLP pre-remedial action topographical survey. Temporary benchmarks for vertical and horizontal control within the project site were established, as necessary for execution of the specified tasks. The survey activities were performed in accordance with the SRNS Layout/Survey Measurement and Equipment Control Program Procedure. A Third Order/Class I survey accuracy as specified in Federal Geographic Data Committee STD-007.4 was used. The area of disturbance was

more than 0.4 ha (1 ac). Therefore, a Storm Water Pollution Prevention Plan (SWPPP) was required and prepared.

2.2 Remedial Action

The construction of the remedial action included the installation of the warning signs and corner survey rebar markers at the ECODS N-1 (Figure 12) and the Ford Building (Figure 13) in June 2024. The survey as-builts were completed by SRNS in late July 2024.

At CSSLP, SRNS provided oversight, surveying, the SWPPP, stormwater inspections, worker protection, waste management support, and regulatory integration. The RA was performed by CTI and Associates, Inc. Hauling services were provided by Turnkey Trucking and Hubbard Trucking.

2.3 Equipment

Refer to Table 4 for a summary of the general equipment types used during construction at CSSLP. Photos of several pieces of equipment are provided in Figures 14 through 17.

2.4 Remedial Action Implementation

The following provides a summary of construction activities performed during the RA at the CSSLP.

2.4.1 Pre-Mobilization and Mobilization Activities

The subcontractor established a laydown area for clean fill, stone, and topsoil storage. The access road was barricaded to control access to the work area.

As a precautionary measure, SRNS Radiological Protection Department personnel surveyed all equipment prior to entering and leaving the site.

2.4.2 CSSLP Contaminated Soil Excavation and Backfill

Site prep work for the CSSLP included tree clearing. The trees in the Upland Area were cut above ground surface and pushed to the perimeter of the CSSLP by SRS site forces (Figure 18). The trees in the Surface Water Impoundment Area were cut near the ground surface and disposed of at the C&D Landfill. Material below the cut was separated into two distinct waste streams for soil and root balls. Root balls were separated from the soil and reduced in size as much as feasible. Soil and root balls were disposed separately as CERCLA waste at the Three Rivers Landfill by CTI. An SRNS Generator Certification Official assisted with waste shipment procedures.

After tree clearing, erosion and sediment control features were placed. Stormwater management during excavation ensured that all runoff within the limits of disturbance remained within the CSSLP subunit. The existing Surface Water Impoundment Area was used to capture runoff, following BMPs outlined in the SWPPP. At the outlet ditch entrance, a rock check dam was constructed using stone (rip rap and #57 stone) (Figure 19). The construction entrance was constructed using a geotextile fabric and stone (Figure 20). Hay bales and silt fences were installed at the discharge end of the Surface Water Impoundment Area drainage ditch (Figure 21). All stormwater was retained within either the EAs or the Surface Water Impoundment Area. Prior to excavating EA 3, the Surface Water Impoundment Area was drained via pumping and discharged using BMPs (i.e., hay bales and silt fencing) to prevent sediment migrations.

The EAs were excavated using a track mounted excavator to remove a minimum of one foot depth of soil (Figure 22). The contaminated soil and root balls were placed in dump trucks and shipped from CSSLP to Three Rivers Landfill. A total of 7 truckloads of root balls and 172 truckloads of soil were shipped, which equates to approximately 1420 cubic meters (m^3) (1860 cubic yards [yd^3]) of soil for an average excavation depth of 0.35 m (1.15 ft) over the excavated areas (Table 5). Excavation in the EAs was considered complete after 3 points in each EA were surveyed to verify a minimum of one foot was

removed (Figures 23, 24 and 25). See Appendix C, Figures C-2, C-3, C-4 and C-5. for topographical surveys for each EA.

The EAs were backfilled with 22.9 cm (9 in) of clean common fill and 7.62 cm (3 in) of topsoil (Figure 26). The total backfill volume was approximately 1470 m^3 (1920 yd^3) (Table 5). All backfill and topsoil was sampled and analyzed in accordance with the SRS Fill and Cover Material Verification Protocol prior to placement (WSRC 2003). See Table 3 for clean soil sampling verification results. After completion of the backfilling activities at each EA, the as-built elevations were surveyed by SRNS to verify and document that the final grade of the EAs were restored to approximately the original contours (Figures 27 and 28). See Appendix C, Figure C-6 for topographical surveys after final grading.

All EAs, disturbed areas, and stockpile areas were stabilized via hydroseeding (Figures 29, 30 and 31) within 14 days of final grading per project specifications.

Following completion of excavation activities, equipment that came in contact with the contaminated soil within CSSLP was broom cleaned and radiologically screened/cleared by SRNS personnel in accordance with approved radiological control operations procedures, using standard radiological survey instrumentation. The survey results showed that the equipment met the radiological release criteria for total and removable contamination, as defined in Table 2-2 of the SRNS 5Q, Radiological Control Manual. After demobilization, SRNS performed a final acceptance inspection (FAI) to ensure the safe end state after completion of the subcontractor scope. The erosion rills were filled and graded with stone. The hydroseeded areas were watered until the vegetative cover was established. Final stabilization was achieved by an even distribution of perennial vegetative cover with a minimum density of 70% (Figures 32, 33, 34, and 35). The SRS Operator of Daily Site Activities and the Professional Engineer responsible for the SWPPP accepted the coverage and the SWPPP was closed. For aerial views of CSSLP see Figures 36 and 37.

3.0 DEVIATIONS FROM ORIGINAL DESIGN

The construction of the remedial action at the ECODS N-1, CSSLP, and Ford Building OU was completed in accordance with the approved ROD (SRNS 2022). No changes deviating from the established acceptance criteria were needed during project execution (Table 6).

4.0 VERIFICATION SAMPLING, TESTING AND ANALYSIS, PERFORMANCE STANDARDS, AND CONSTRUCTION QUALITY CONTROL

To ensure the performance requirements and standards were achieved, project team personnel comprised of SRNS Engineering, Project Management, Safety, and Subcontract Technical Representatives performed routine monitoring/surveillance activities. A Quality Assurance Project Plan was not required for this project as the subcontractor performed the work activities utilizing approved site implementation procedures, work instructions, and the subcontractor's Quality Assurance Manual. SRNS Engineering performed routine field oversight.

4.1 Construction and Quality Control

Three construction milestones were used at CSSLP to verify excavation, backfilling, and vegetative coverage met the project requirements.

- After completion of the excavation activities at each EA and prior to backfilling, a hold point was required for the SRNS Site Survey organization to survey the as-excavated elevations to document the depth of excavation prior to backfilling.
- Prior to placement, the backfill material was sampled and analyzed to verify compliance with SRS Fill and Cover Material Verification Protocol (WSRC 2003) per the CMIP/RAIP (SRNS 2023a).
- After completion of the backfilling activities at each EA, a hold point was required for SRNS Site Survey to survey the as-built elevations to document the final grade of the EAs.

- After completion of the hydroseeding the SWPPP remained open until 70% vegetative coverage was achieved.

5.0 VERIFICATION OF CONSTRUCTION/REMEDIAL ACTION COMPLETION AND FINAL INSPECTION

5.1 Verification of Construction/Remedial Action Completion

(1) As detailed in Section 4.1, the construction activities required for the RA have met the acceptance criteria established in the approved CMIP/RAIP.

(2) The RA was verified as complete, and construction and testing was in accordance with the ROD as follows:

- ECODS N-1 - LUCs consisting of institutional controls (i.e., administrative controls) and the installation of warning signs to prevent residential and industrial exposure to asbestos were implemented. Verification was per walkdown as detailed in Section 5.2.

- CSSLP - Arsenic contamination in Upland and Impoundment Areas was removed to a depth of one foot and disposed of to prevent residential and industrial exposure to arsenic. Verification was per survey measurements of depth of soil removal and per walkdown as detailed in Section 5.2.

- Ford Building - LUCs consisting of institutional controls (i.e., administrative controls) and the installation of warning signs and a concrete cover over the facility remnants to prevent residential and industrial exposure to Co-60 and PCBs were implemented. Verification was per walkdown as detailed in Section 5.2.

(3) As referenced in Section 5.2, the final walkdown inspection with participation of USEPA and SCDES was performed on July 16, 2025 at ECODS N-1, Ford Building OU and CSSLP (Appendix D). No issues were identified.

5.2 Final Inspection for Acceptance of OU Closure

For the ECODS N-1 and Ford Building subunits, the FAI-51 final walkdown inspection with participation of SRNS personnel was performed on August 14, 2024, to verify field work completion of the installation of the LUC signs at both the Ford Building subunit (4 signs) and the ECODS N-1 subunit (5 signs). The walkdown included the observation of the survey corners (rebar) for both these units. These survey markers represent the coordinates that define the corners of the LUC boundaries.

For the CSSLP subunit the FAI-51 final walkdown inspection with participation of SRNS and the subcontractor, CTI, was performed on April 30, 2025.

A Core Team acceptance walkdown (USEPA, SCDES, USDOE) was held on July 16, 2025, to inspect the three subunits by drone videos and still photos. A summary and a list of participants of the inspection are provided in Appendix D.

6.0 AS-BUILT DOCUMENTATION

6.1 As-Built Drawings

The ECODS N-1 and the Ford Building subunits' as-built drawing documenting the coordinates of both the sign locations and the boundary corners are included in Figure 10.

The CSSLP subunit as-built drawings documents the original, excavated and final grade contours and are included in Appendix C.

6.2 Well Modifications

Not applicable.

7.0 POST-PCR/CMIR/RACR ACTIVITIES AND LAND USE CONTROLS

The RA for the CSSLP is complete and supports unrestricted land use. Therefore, the CSSLP subunit does not require LUCs. The RAs for the ECODS N-1 and Ford Building

subunits contain hazardous substances which will require LUCs. As per the approved Land Use Control Implementation Plan (LUCIP) (SRNS 2023b) the post-closure activities will involve annual inspections and maintenance. Inspection procedures for the ECODS N-1 and Ford Building subunits have been developed and implemented in FY25. Annual inspections will be performed to ensure that signs are in place and are legible and there is no unauthorized excavation, digging, or construction activities within the LUC boundaries. The Ford Building concrete cover will be inspected for excessive deterioration and cracking. The inspection results will be reported in the Five-Year Remedy Review Reports. A photograph of a typical warning sign is provided in Figures 12 and 13 of this PCR/CMIR/RACR. Inspection criteria are listed in the Field Inspection Checklist in Appendix B of the LUCIP (SRNS 2023b).

7.1 Five-Year Remedy Review

Section 300.430(f)(4)(ii) of the National Oil and Hazardous Substances Contingency Plan requires that a five-year remedy review be performed if hazardous substances, pollutants, or contaminants above levels that allow for unlimited use and unrestricted exposure remain in the OU (USEPA 2025). The Core Team - SCDES, USEPA, and USDOE - have determined that a five-year review of the remedy for the ECODS N-1 and Ford Building subunits will be performed to ensure that the remedy continues to provide adequate protection of human health and the environment.

8.0 PROJECT COSTS

Table 7 compares actual remediation costs to estimated project costs in the ROD (SRNS 2022). Total capital costs did not exceed the -30% or +50% criteria requiring discussion. Operations and Maintenance (O&M) costs started in 2025 and will be incurred annually until concentrations of hazardous substances are at levels that allow for unrestricted use and exposure. O&M costs will be compared to the ROD estimated costs in the Five-Year Remedy Review Reports.

9.0 REFERENCES

FFA, 1993. *Federal Facility Agreement for the Savannah River Site*, Administrative Docket No. 89-05-FF (Effective Date: August 16, 1993)

SCDES, 2025, *Bureau of Land and Waste Management Hazardous and Mixed Waste Management Permit*, SC1 890 008 989 (Effective Date: October 27, 2025)

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SRNS, 2022. *Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U),* SRNS-RP-2022-01284, Rev. 1, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC

SRNS, 2023a. *Corrective Measures Implementation Plan/ Remedial Action Implementation Plan for the Early Construction and Operational Disposal Site N-1*

(NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U)), SRNS-RP-2023-00535, Rev. 1, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC

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USEPA, 2025. *National Oil and Hazardous Substances Pollution Contingency Plan*, Title 40, Chapter I, Subchapter J Part 300, Office of Superfund Remediation and Technology Innovation, U.S. Environmental Protection Agency, Washington, D.C.

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WSRC, 2003. *Savannah River Site Fill and Cover Material Verification Protocol (U),* ERTEC-2003-00012, Revision 0, Westinghouse Savannah River Company, Savannah River Site, Aiken, SC

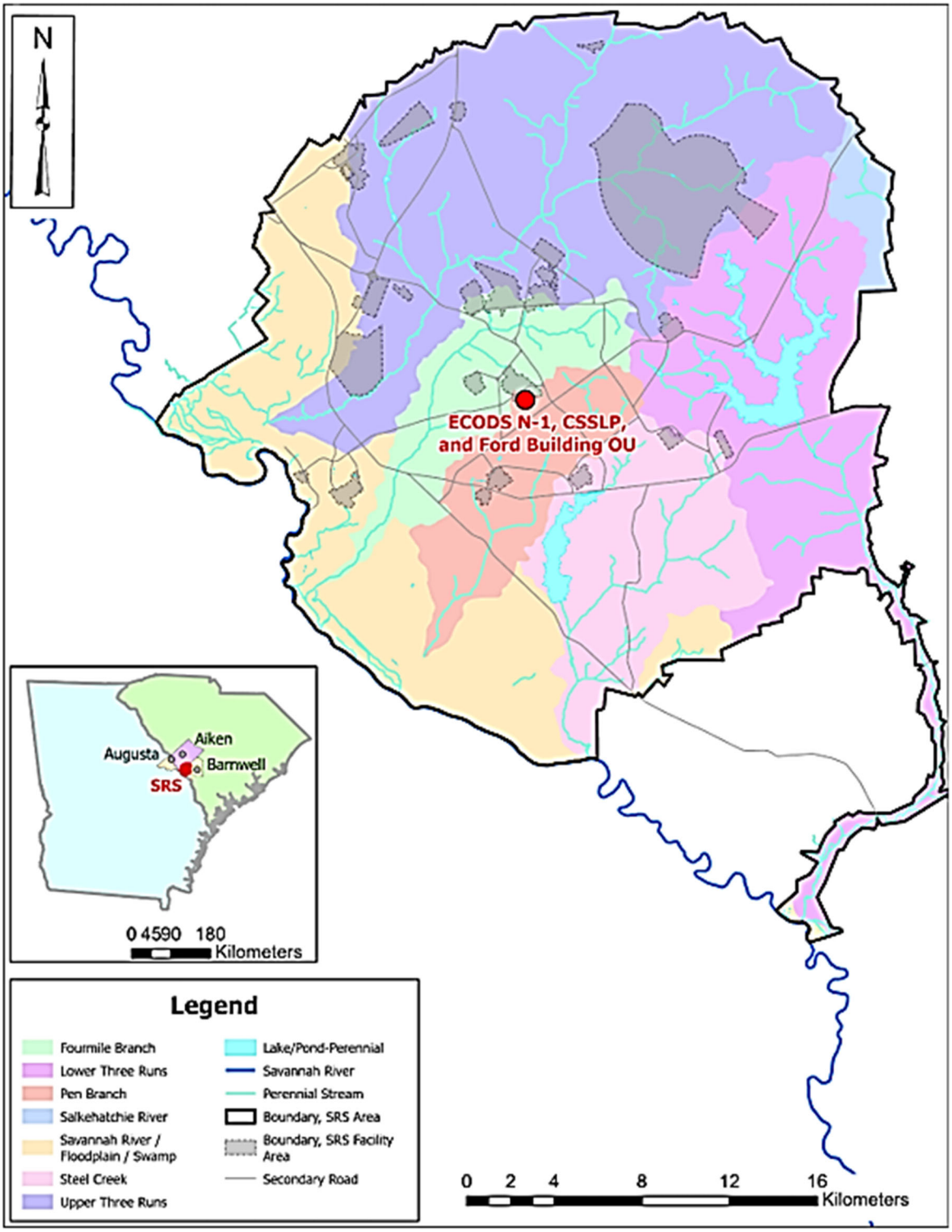


Figure 1. Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site

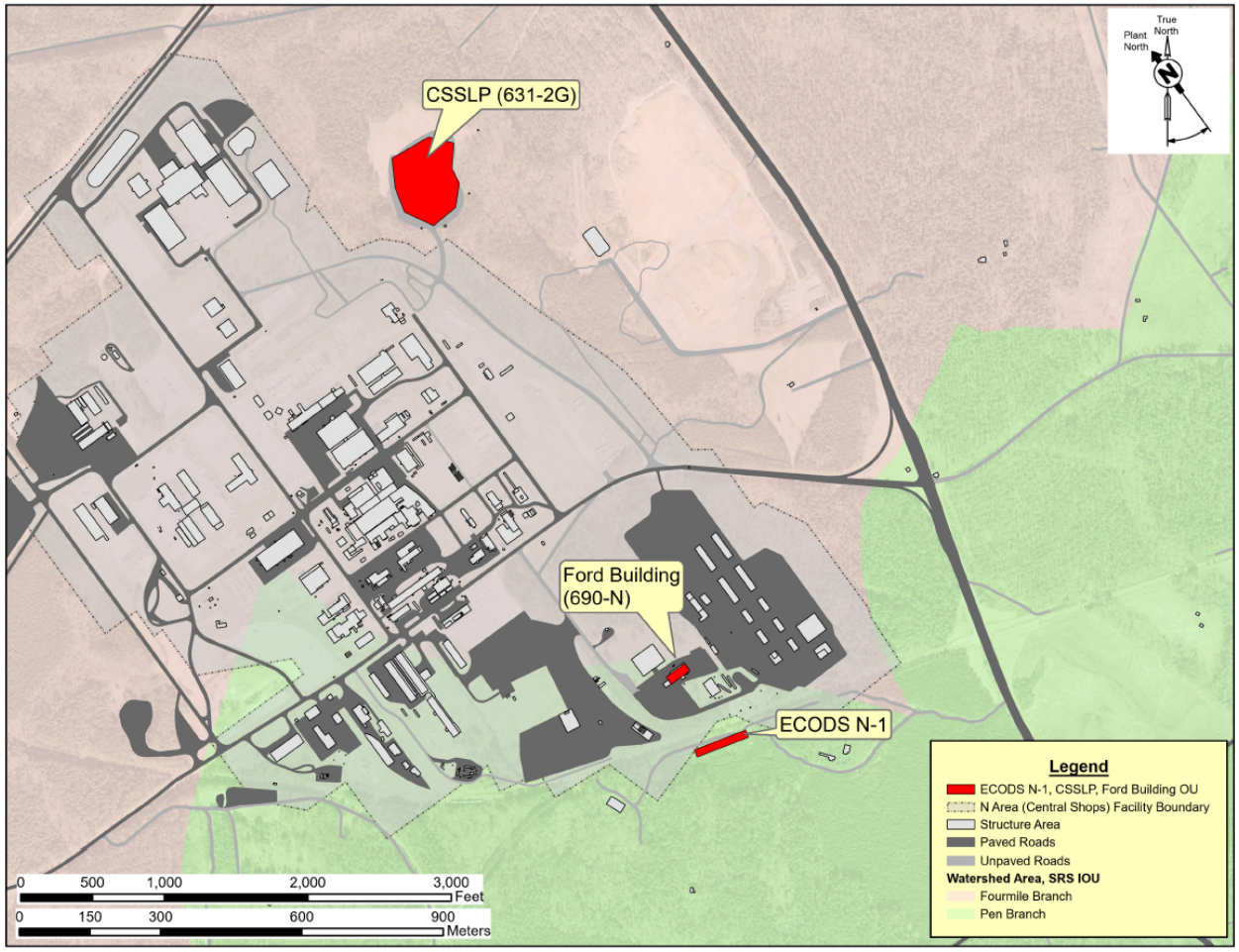


Figure 2. Location of the ECODS N-1, CSSLP, and Ford Building OU (N Area)

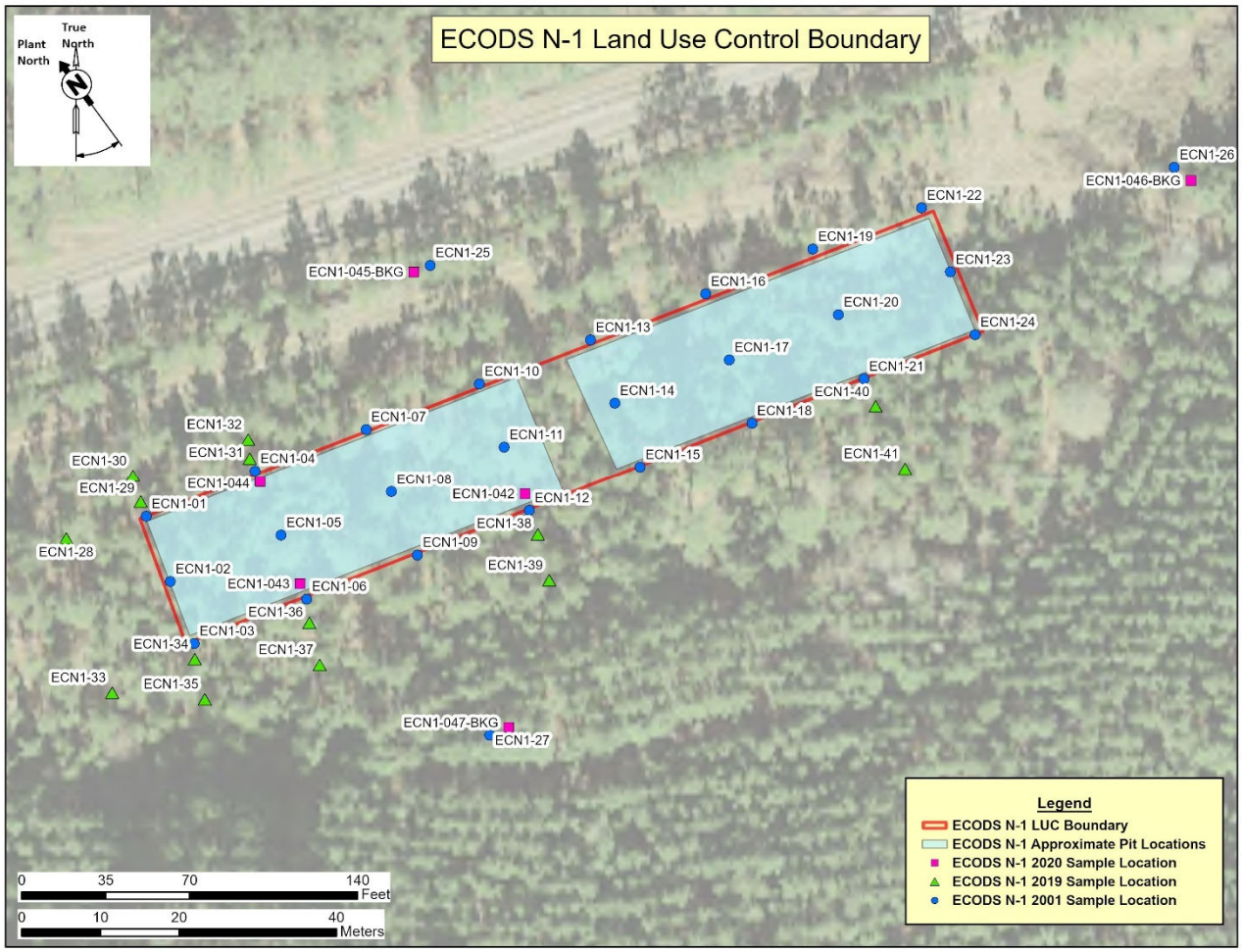


Figure 3. ECODS N-1 Land Use Control Boundary

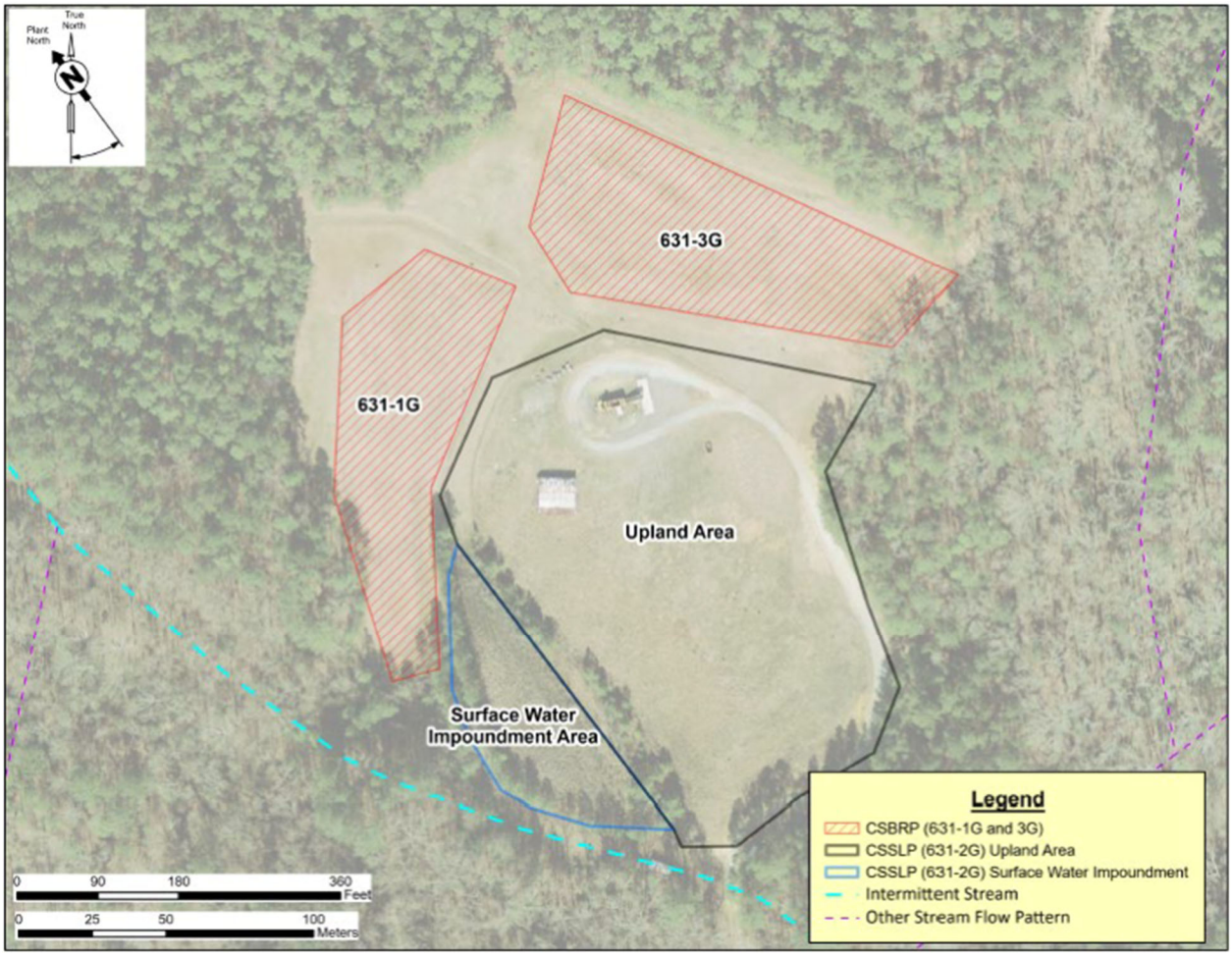


Figure 4. Location of the Upland Area and Surface Water Impoundment Area at the CSSLP

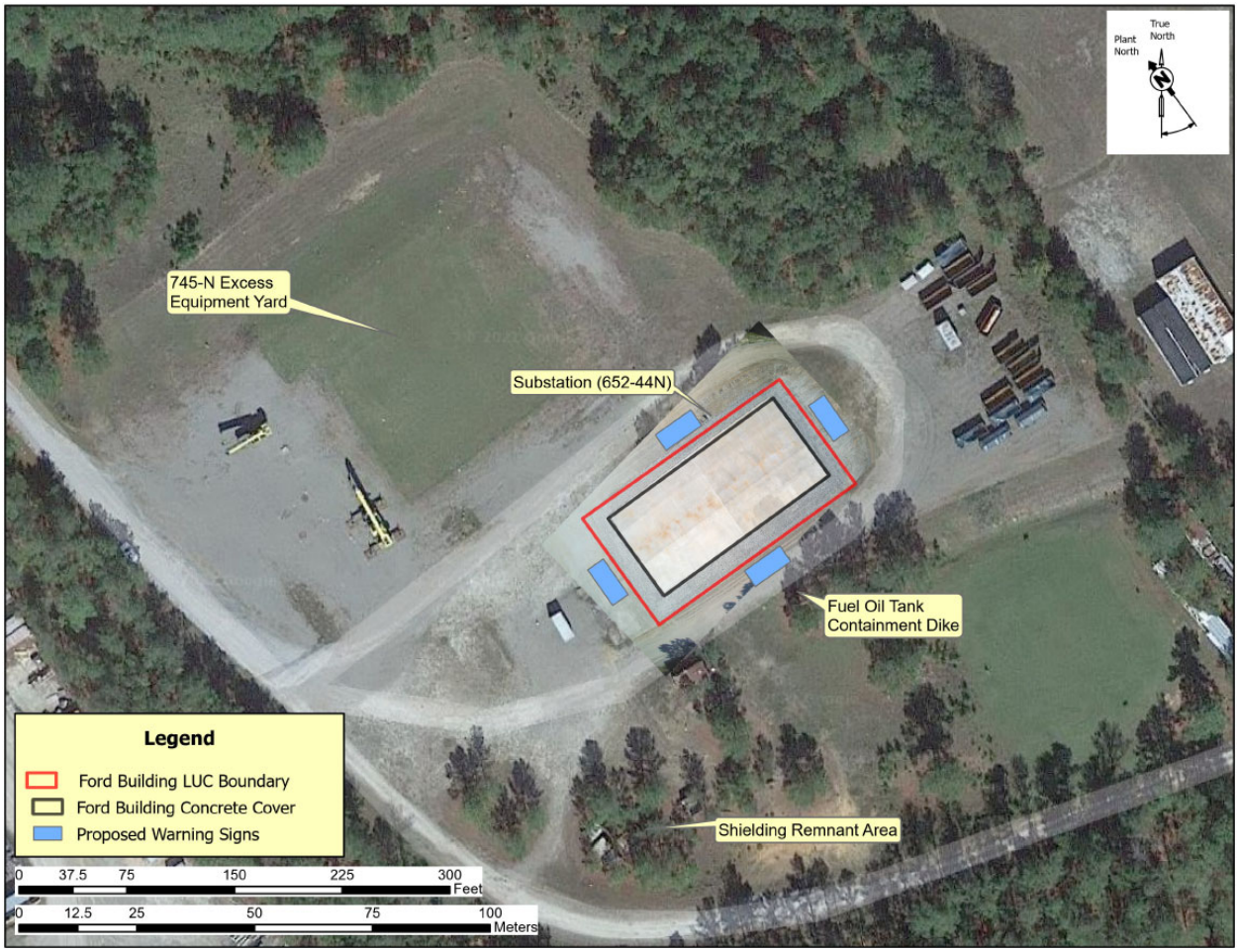


Figure 5. Ford Building Ancillary Equipment



Figure 6. Concrete Pad at Ford Building Subunit (2025)

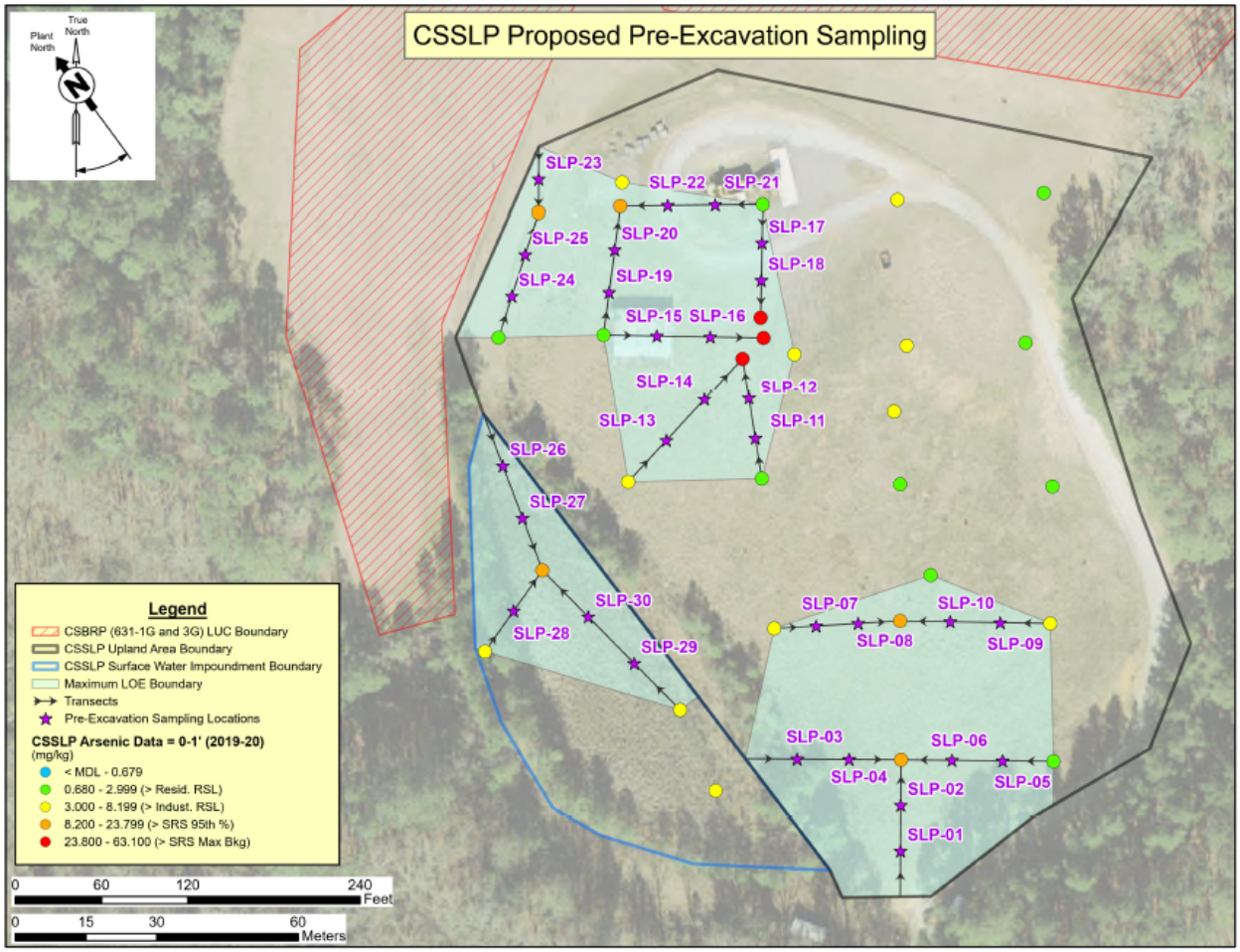


Figure 7. Pre-Excavation Sampling Locations to Refine the LOE

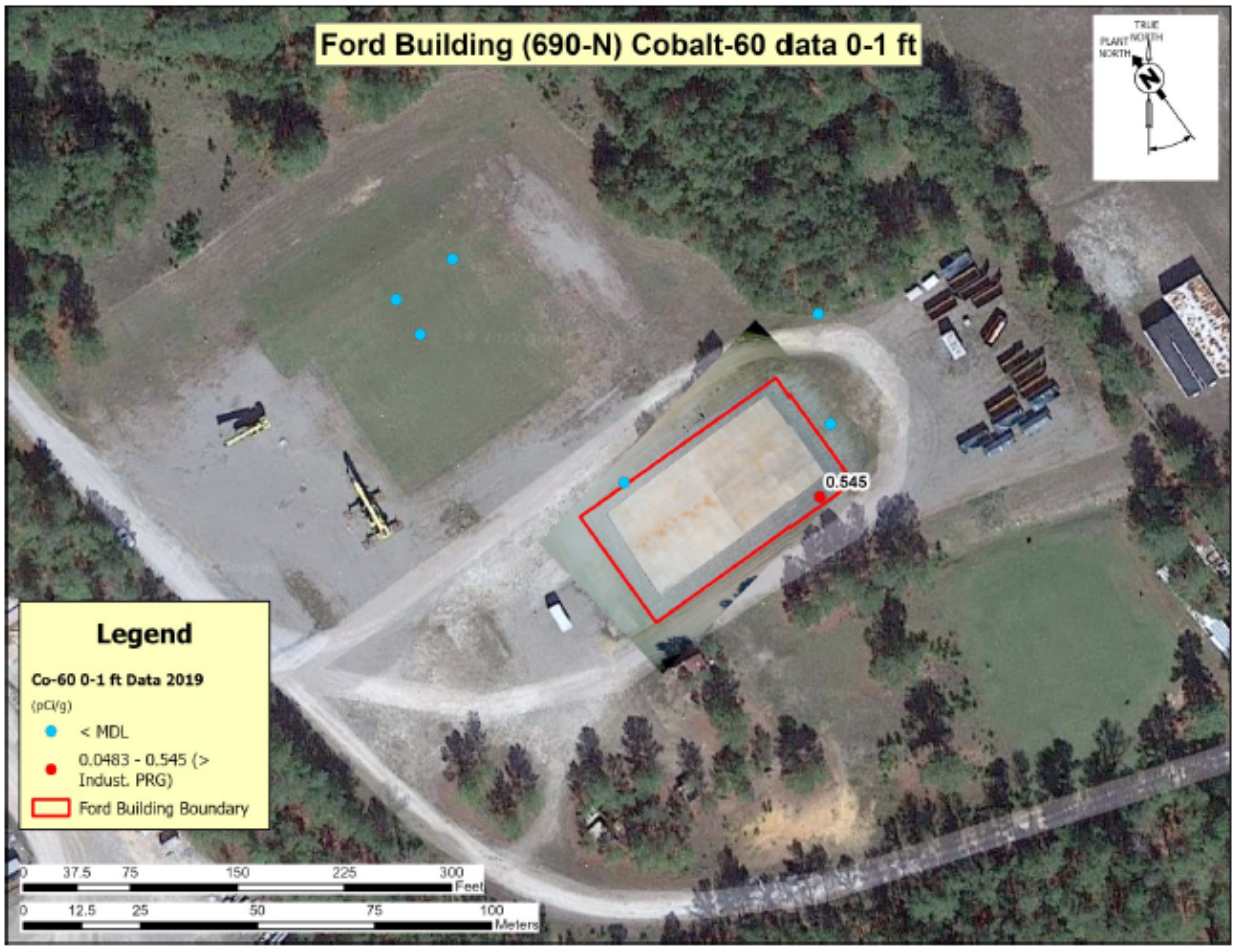
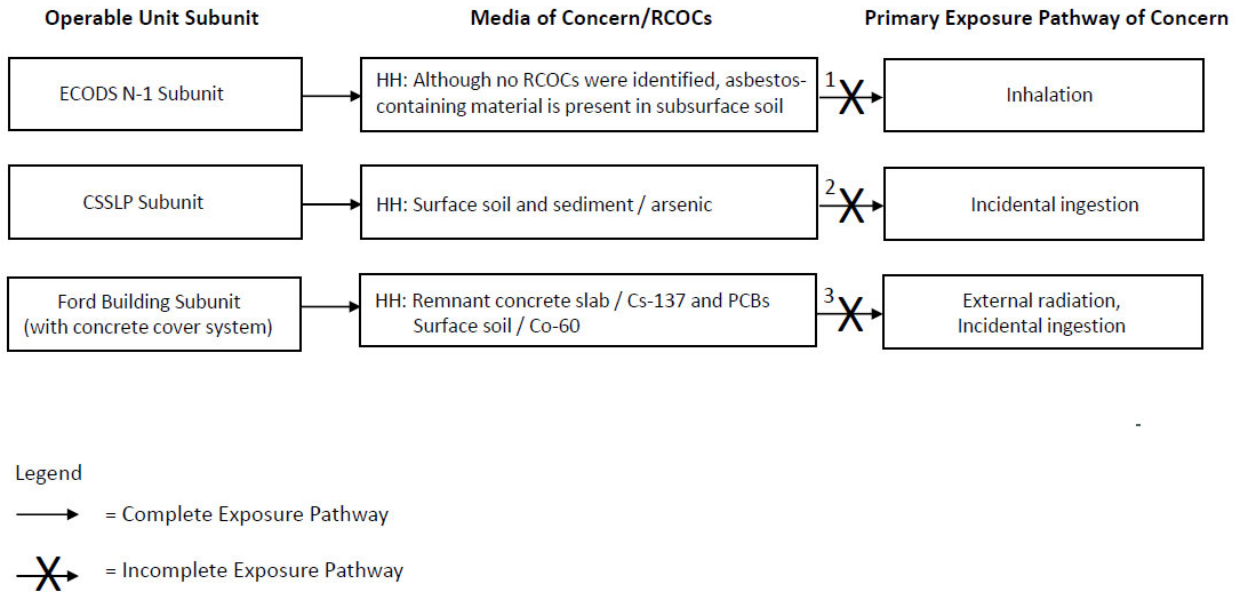


Figure 8. Cobalt-60 Data for Soil Media (0 to 0.3 m [0 to 1 ft]) at the Ford Building



HH – Human health

1. Alternative A-2, LUCs - prevents exposure to asbestos containing materials buried at depth.
2. Alternative B-4, Excavation (Hot Spot Removal) and Disposal - prevents exposure to arsenic in surface soil and sediment; qualifies for unrestricted land use (no LUCs)
3. Alternative C-2, LUCs - prevents exposure to Cs-137 and PCBs on remnant concrete slab and Co-60 in surface soil

Figure 9. ECODS N-1, CSSLP, and Ford Building OU Post-Remedial Action Conceptual Site Model

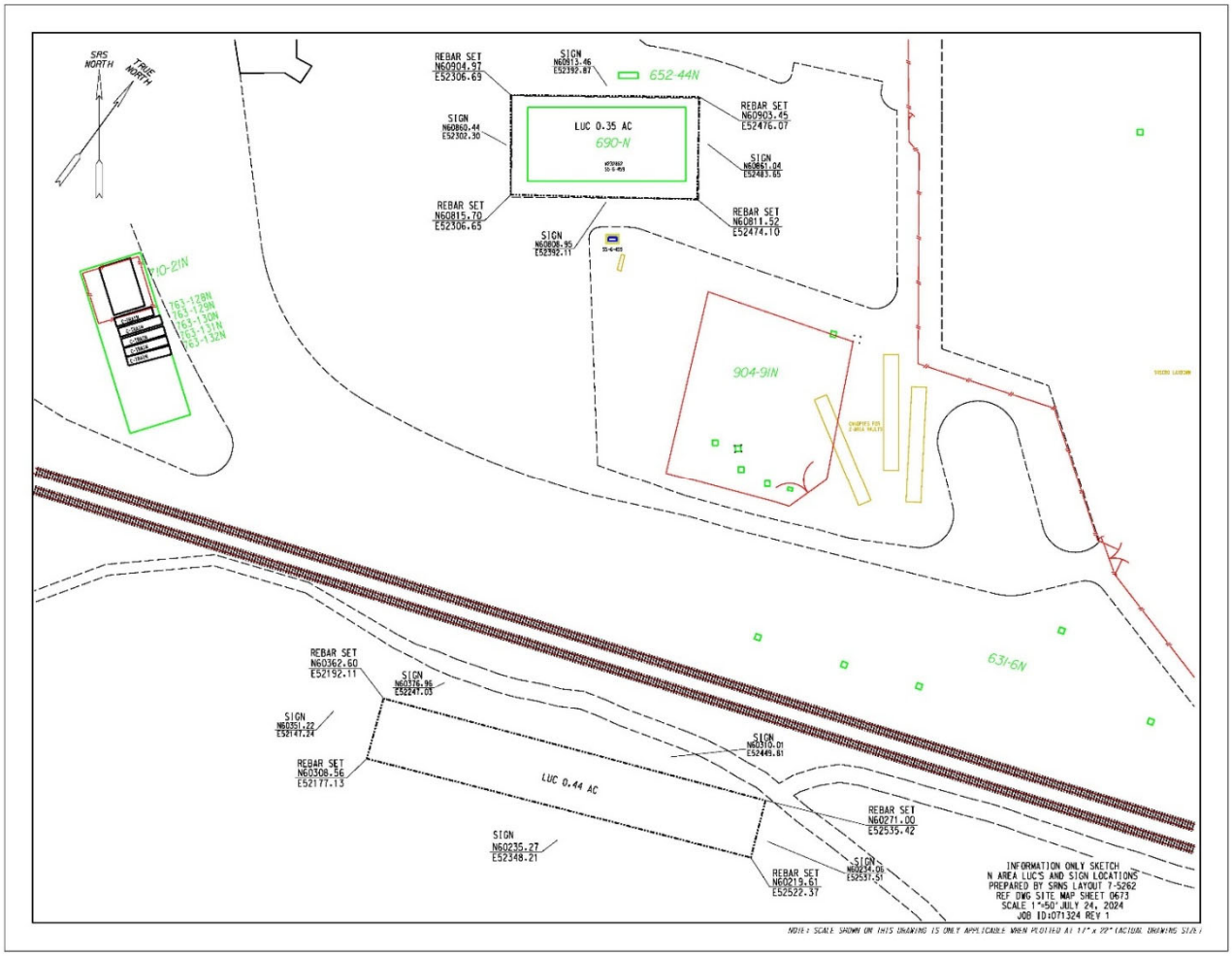


Figure 10. Location of Access Warning Signs and Corner LUC Boundary at ECODS N-1 and Ford Building Subunits

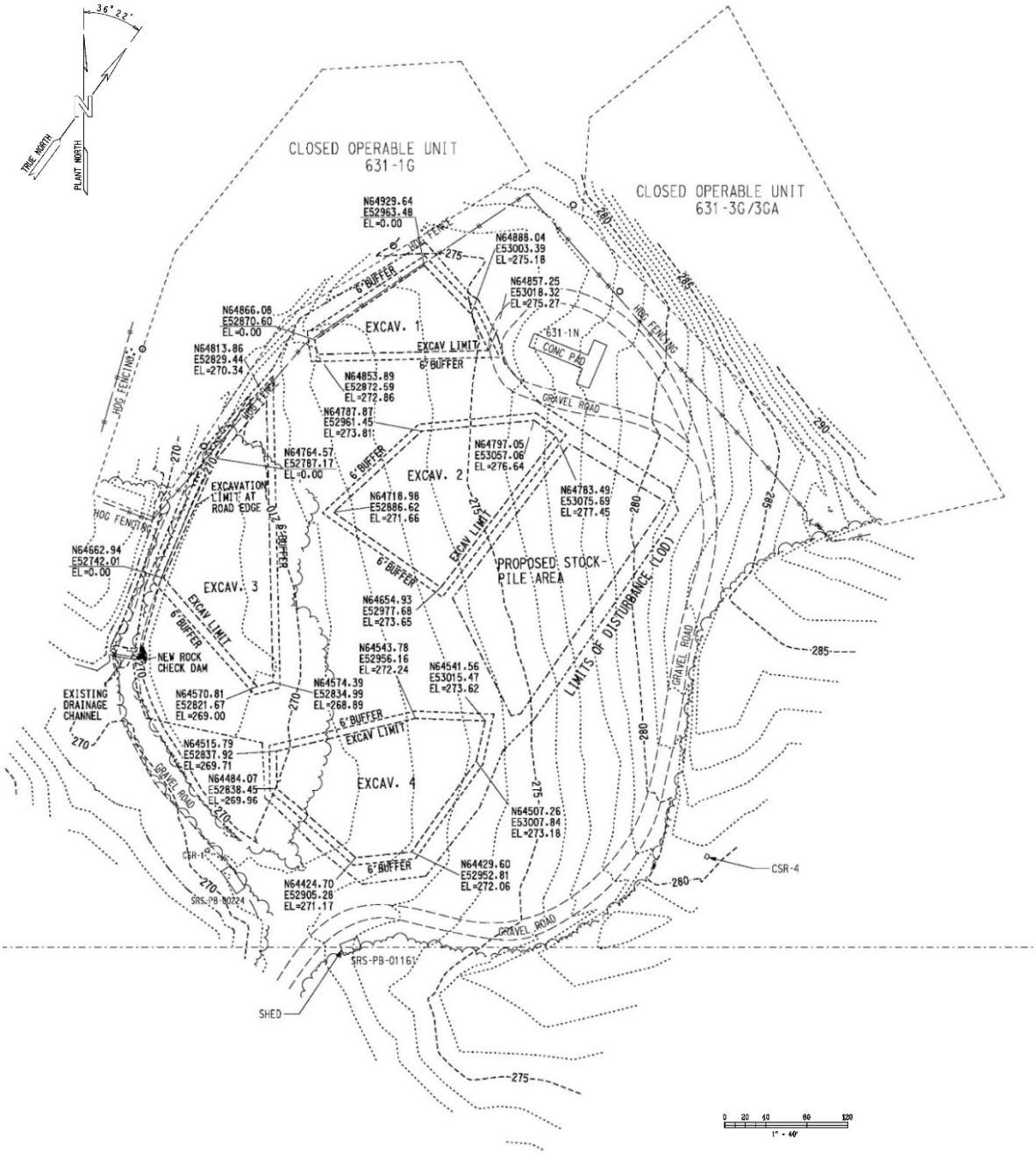


Figure 11. Location of CSSLP Excavation Areas 1, 2, 3, and 4



Figure 12. Access Warning Sign at ECODS N-1 Subunit



Figure 13. Access Warning Sign at Ford Building Subunit



Figure 14. Caterpillar Incorporated (CAT) Excavator 323 with Bucket and Dump Truck



Figure 15. Skid Steer (CAT 255)



Figure 16. Bulldozer (CAT D3)



Figure 17. Turbo Turf Hydroseeder



Figure 18. Tree Clearing at CSSLP Upland Area



Figure 19. BMP Installation: Rock Check Dam at CSSLP Surface Water Impoundment Area



Figure 20. BMP Installation: Construction Entrance at CSSLP



Figure 21. BMP Installation: Silt Fencing and Hay Bales at CSSLP Surface Water Impoundment Area



Figure 22. Excavation Work at CSSLP Excavation Area 2



Figure 23. Completed Excavation at CSSLP Excavation Area 1



Figure 24. Completed Excavation at CSSLP Excavation Area 2



Figure 25. Completed Excavation at CSSLP Excavation Area 3



Figure 26. Backfilling Work at CSSLP Excavation Area 3



Figure 27. Completed Backfilling Work at CSSLP Excavation Area 3



Figure 28. Completed Backfilling Work at CSSLP Excavation Area 4



Figure 29. Completed Hydroseeding Work at CSSLP Excavation Area 1



Figure 30. Completed Hydroseeding Work at CSSLP Excavation Area 2



Figure 31. Hydroseeding Work at CSSLP Excavation Area 4



Figure 32. CSSLP Final Stabilization at Excavation Area 1 (6/25/25)



Figure 33. CSSLP Final Stabilization at Excavation Area 2 (6/25/25)



Figure 34. CSSLP Final Stabilization at Excavation Area 3 (6/25/25)

Note: Excavation Area 3 is within the Surface Water Impoundment Area.



Figure 35. CSSLP Final Stabilization at Excavation Area 4 (6/25/25)



Figure 36. Aerial View of CSSLP Final Stabilization at Excavation Areas 1 and 2 (6/20/25)

Excavation Area 1 upper middle of photo
Excavation Area 2 center of photo



Figure 37. Aerial View of CSSLP Final Stabilization at Excavation Areas 3 and 4 (6/20/25)

Excavation Area 3 ponded section (within the Surface Water Impoundment Area)
Excavation Area 4 on left side

Table 1. Chronology of Events

Description of Activity	Start Date	Completion Date
Characterization Soil Sampling at CSSLP	6/19/19	7/1/19
Characterization Soil Sampling at CSSLP	10/5/20	10/13/20
Approval of the ROD	2/7/24	2/7/24
Approval of the RAIP	2/7/24	2/7/24
Approval of the LUCIP	2/7/24	2/7/24
Remedial Action Start (FFA Milestone 12/16/24)	5/16/24	5/16/24
Installation of LUC Warning Signs at ECODS N-1 and Ford Building Subunits and LUC Corner Markers	5/16/24	8/14/24
Install drainage ditch to drain Impoundment Area	5/30/24	5/30/24
FAI-51 Walkdown and Final Acceptance at ECODS N-1 and Ford Building Subunits	8/14/24	8/14/24
Arsenic Soil Sampling at CSSLP	6/28/24	7/2/24
Survey of as-built LUC boundaries and warning sign locations at ECODS N-1 and Ford Building	7/10/24	7/25/24
Preparation of SWPPP	8/22/24	12/10/24
Initial Site Survey to delineate excavation areas	9/3/24	9/10/24
Clean Backfill Verification Sampling	1/12/25	1/12/25
Pre-Job Briefing for CSSLP	3/12/25	3/12/25
Mobilize Equipment and Personnel, Establish Barricades	3/13/25	3/25/25
BMP Installation	3/17/25	3/20/25
SCDES approval letter for land disturbing activities	3/21/25	3/21/25
Clearing and Grubbing	3/24/25	3/25/25
Excavate and Haul Contaminated Soil and Rootballs	3/25/25	4/16/25
Survey Verification of Excavation Depths	4/3/25	4/21/25
Load, Haul and Place Fill and Topsoil	4/8/25	4/23/25
Install BMPs at Discharge End of Drainage Ditch/Dewater Surface Water Impoundment Area	4/14/25	4/14/25
Hydroseeding	4/16/25	4/29/25
Remove BMPs and Fill Drainage Ditch with Stone	4/24/25	4/24/25
Survey Verification of Final Site Contours.	4/23/25	4/23/25
Finish Grade, Site Stabilization, and Restoration	4/21/25	4/29/25
Mechanical Completion	N/A	4/28/25
Equipment demobilization and excess material removal.	4/28/25	4/29/25
FAI-51 Walkdown and Final Acceptance	N/A	4/30/25

Table 1. Chronology of Events (*continued/end*)

Description of Activity	Start Date	Completion Date
SWPPP Closed and Notice of Termination Signed	6/25/25	6/25/25
Acceptance walkdown by the regulators.	7/16/25	7/16/25
Submit Rev. 0, PCR/CMIR/RACR (FFA Milestone 3/16/26)	3/16/26	TBD

Table 2. CSSLP Soil Analytical Results

Soil Sample	Date	Depth (ft-bgs)	Arsenic Result	Unit	UTM East	UTM North
CSSLP-001	6/26/2019	0 - 1	2.70	mg/kg	439254.6866	3679846.429
CSSLP-002	6/24/2019	0 - 1	3.11	mg/kg	439223.6266	3679844.969
CSSLP-003	6/19/2019	0 - 1	2.98	mg/kg	439195.0667	3679844.009
CSSLP-004	6/19/2019	0 - 1	11.80	mg/kg	439164.8268	3679843.679
CSSLP-005	6/19/2019	0 - 1	18.70	mg/kg	439147.4869	3679842.428
CSSLP-006	6/26/2019	0 - 1	1.03	mg/kg	439139.0167	3679816.048
CSSLP-007	6/26/2019	0 - 1	2.75	mg/kg	439161.2866	3679816.648
CSSLP-008	6/26/2019	0 - 1	35.00	mg/kg	439195.2465	3679815.999
CSSLP-009	6/24/2019	0 - 1	4.19	mg/kg	439225.6264	3679814.389
CSSLP-010	6/24/2019	0 - 1	2.54	mg/kg	439250.8363	3679814.989
CSSLP-011	6/25/2019	0 - 1	0.98	mg/kg	439256.5361	3679784.299
CSSLP-012	6/25/2019	0 - 1	2.96	mg/kg	439224.2162	3679784.748
CSSLP-013	6/24/2019	0 - 1	2.12	mg/kg	439194.8463	3679785.968
CSSLP-014	6/25/2019	0 - 1	7.84	mg/kg	439166.5164	3679785.268
CSSLP-015	7/1/2019	0 - 1	5.81	mg/kg	439197.486	3679754.208
CSSLP-016	7/1/2019	0 - 1	12.70	mg/kg	439224.216	3679755.828
CSSLP-017	6/25/2019	0 - 1	5.15	mg/kg	439256.0659	3679755.278
CSSLP-018	6/26/2019	0 - 1	1.90	mg/kg	439256.7556	3679726.088
CSSLP-019	7/1/2019	0 - 1	9.01	mg/kg	439224.4158	3679726.448
CSSLP-020-SED	10/12/2020	0 - 1	8.59	mg/kg	439148.2963	3679766.538
CSSLP-021-SED	10/12/2020	0 - 1	6.26	mg/kg	439136.1362	3679749.348
CSSLP-022-SED	10/13/2020	0 - 1	4.12	mg/kg	439177.536	3679736.978
CSSLP-023-SED	10/12/2020	0 - 1	4.79	mg/kg	439185.0758	3679719.918
CSSLP-024-BKG	10/5/2020	0 - 1	3.16	mg/kg	439336.3565	3679881.07
CSSLP-025-BKG	10/5/2020	0 - 1	1.00	mg/kg	439345.547	3679947.41
CSSLP-026-BKG	10/5/2020	0 - 1	2.98	mg/kg	439314.4375	3679996.87
CSSLP-027	10/6/2020	0 - 1	3.77	mg/kg	439165.2469	3679848.669
CSSLP-028	10/7/2020	0 - 1	35.70	mg/kg	439194.6066	3679820.299
CSSLP-029	10/7/2020	0 - 1	3.30	mg/kg	439222.9363	3679800.169
CSSLP-030	10/7/2020	0 - 1	1.27	mg/kg	439230.686	3679765.518
CSSLP-031	10/6/2020	0 - 1	63.10	mg/kg	439190.7765	3679811.598
CSSLP-032	10/6/2020	0 - 1	3.83	mg/kg	439201.8065	3679812.559
CSSLP24-001	6/28/2024	0 - 1	2.80	mg/kg	439224.2949	3679707.123
CSSLP24-002	6/28/2024	0 - 1	4.20	mg/kg	439224.3553	3679716.786
CSSLP24-003	6/28/2024	0 - 1	13.00	mg/kg	439202.3757	3679726.586
CSSLP24-004	6/28/2024	0 - 1	3.60	mg/kg	439213.397	3679726.517
CSSLP24-005	6/28/2024	0 - 1	2.20	mg/kg	439245.9752	3679726.208
CSSLP24-006	6/28/2024	0 - 1	3.60	mg/kg	439235.1963	3679726.328
CSSLP24-007	6/28/2024	0 - 1	4.40	mg/kg	439206.3969	3679754.749
CSSLP24-008	6/28/2024	0 - 1	4.30	mg/kg	439215.3047	3679755.288
CSSLP24-009	6/28/2024	0 - 1	3.80	mg/kg	439245.448	3679755.462
CSSLP24-010	6/28/2024	0 - 1	3.70	mg/kg	439234.8335	3679755.645

Table 2. CSSLP Soil Analytical Results (*continued/end*)

CSSLP24-011	6/28/2024	0 - 1	24.00	mg/kg	439193.4895	3679794.511
CSSLP24-012	6/28/2024	0 - 1	79.00	mg/kg	439192.1335	3679803.055
CSSLP24-013	6/28/2024	0 - 1	45.00	mg/kg	439174.6019	3679794.044
CSSLP24-014	6/28/2024	0 - 1	60.00	mg/kg	439182.6911	3679802.822
CSSLP24-015	6/28/2024	0 - 1	2.60	mg/kg	439172.6077	3679816.432
CSSLP24-016	6/28/2024	0 - 1	72.00	mg/kg	439183.9252	3679816.216
CSSLP24-017	6/28/2024	0 - 1	4.40	mg/kg	439194.9138	3679836.107
CSSLP24-018	6/28/2024	0 - 1	50.00	mg/kg	439194.7601	3679828.201
CSSLP24-019	7/2/2024	0 - 1	3.70	mg/kg	439162.4662	3679825.657
CSSLP24-020	7/2/2024	0 - 1	3.90	mg/kg	439163.6469	3679834.669
CSSLP24-021	7/2/2024	0 - 1	2.00	mg/kg	439184.9878	3679843.898
CSSLP24-022	7/2/2024	0 - 1	8.10	mg/kg	439174.9063	3679843.788
CSSLP24-023	7/2/2024	0 - 1	3.10	mg/kg	439147.5303	3679849.335
CSSLP24-024	7/2/2024	0 - 1	41.00	mg/kg	439141.8402	3679824.842
CSSLP24-025	7/2/2024	0 - 1	12.00	mg/kg	439144.6636	3679833.635
CSSLP24-026	7/2/2024	0 - 1	20.00	mg/kg	439139.9277	3679788.639
CSSLP24-027	7/2/2024	0 - 1	16.00	mg/kg	439144.1129	3679777.586
CSSLP24-029	7/2/2024	0 - 1	68.00	mg/kg	439167.7899	3679746.831
CSSLP24-030	7/2/2024	0 - 1	37.00	mg/kg	439158.0426	3679756.685

Table 3 CSSLP Clean Backfill Analytical Results

Soil Sample	Date	CHEMICAL_NAME	Result	Unit
BBPS-Comp-B	12 Jan 2025	ACETONE	0.00353	mg/kg
BBPS-Comp-C	12 Jan 2025	ACETONE	0.0166	mg/kg
BBPS-Comp-A	12 Jan 2025	ALUMINUM	3690	mg/kg
BBPS-Comp-B	12 Jan 2025	ALUMINUM	3760	mg/kg
BBPS-Comp-C	12 Jan 2025	ALUMINUM	3750	mg/kg
BBPS-Comp-D	12 Jan 2025	ALUMINUM	6570	mg/kg
BBPS-Comp-D	12 Jan 2025	ANTIMONY	0.383	mg/kg
BBPS-Comp-A	12 Jan 2025	ARSENIC	0.681	mg/kg
BBPS-Comp-B	12 Jan 2025	ARSENIC	0.436	mg/kg
BBPS-Comp-C	12 Jan 2025	ARSENIC	0.587	mg/kg
BBPS-Comp-D	12 Jan 2025	ARSENIC	1.31	mg/kg
BBPS-Comp-A	12 Jan 2025	BARIUM	11.3	mg/kg
BBPS-Comp-B	12 Jan 2025	BARIUM	12.1	mg/kg
BBPS-Comp-C	12 Jan 2025	BARIUM	10.9	mg/kg
BBPS-Comp-D	12 Jan 2025	BARIUM	18.5	mg/kg
BBPS-Comp-A	12 Jan 2025	BERYLLIUM	0.0938	mg/kg
BBPS-Comp-B	12 Jan 2025	BERYLLIUM	0.0935	mg/kg
BBPS-Comp-C	12 Jan 2025	BERYLLIUM	0.0895	mg/kg
BBPS-Comp-D	12 Jan 2025	BERYLLIUM	0.161	mg/kg
BBPS-Comp-C	12 Jan 2025	BIS(2-ETHYLHEXYL)PHTHALATE (DEHP)	0.0262	mg/kg
BBPS-Comp-D	12 Jan 2025	BIS(2-ETHYLHEXYL)PHTHALATE (DEHP)	0.0194	mg/kg
BBPS-Comp-D	12 Jan 2025	CADMIUM	0.0279	mg/kg
BBPS-Comp-A	12 Jan 2025	CALCIUM	32.5	mg/kg
BBPS-Comp-B	12 Jan 2025	CALCIUM	24.8	mg/kg
BBPS-Comp-C	12 Jan 2025	CALCIUM	136	mg/kg
BBPS-Comp-D	12 Jan 2025	CALCIUM	400	mg/kg
BBPS-Comp-A	12 Jan 2025	CHROMIUM	3.11	mg/kg
BBPS-Comp-B	12 Jan 2025	CHROMIUM	2.67	mg/kg
BBPS-Comp-C	12 Jan 2025	CHROMIUM	2.54	mg/kg
BBPS-Comp-D	12 Jan 2025	CHROMIUM	6.18	mg/kg
BBPS-Comp-A	12 Jan 2025	COBALT	0.676	mg/kg
BBPS-Comp-B	12 Jan 2025	COBALT	0.557	mg/kg
BBPS-Comp-C	12 Jan 2025	COBALT	0.623	mg/kg
BBPS-Comp-D	12 Jan 2025	COBALT	1.02	mg/kg
BBPS-Comp-A	12 Jan 2025	COPPER	1.78	mg/kg
BBPS-Comp-B	12 Jan 2025	COPPER	1.15	mg/kg
BBPS-Comp-C	12 Jan 2025	COPPER	1.35	mg/kg
BBPS-Comp-D	12 Jan 2025	COPPER	3.6	mg/kg
BBPS-Comp-D	12 Jan 2025	DDE	0.000637	mg/kg
BBPS-Comp-C	12 Jan 2025	DI-N-BUTYL PHTHALATE	0.0108	mg/kg
BBPS-Comp-A	12 Jan 2025	GROSS ALPHA	1.92	pCi/g
BBPS-Comp-B	12 Jan 2025	GROSS ALPHA	2.03	pCi/g
BBPS-Comp-C	12 Jan 2025	GROSS ALPHA	4.23	pCi/g

Table 3 CSSLP Clean Backfill Analytical Results (*continued/end*)

Soil Sample	Date	CHEMICAL_NAME	Result	Unit
BBPS-Comp-D	12 Jan 2025	GROSS ALPHA	3.45	pCi/g
BBPS-Comp-A	12 Jan 2025	IRON	3670	mg/kg
BBPS-Comp-B	12 Jan 2025	IRON	2490	mg/kg
BBPS-Comp-C	12 Jan 2025	IRON	2430	mg/kg
BBPS-Comp-D	12 Jan 2025	IRON	5570	mg/kg
BBPS-Comp-A	12 Jan 2025	LEAD	1.59	mg/kg
BBPS-Comp-B	12 Jan 2025	LEAD	1.21	mg/kg
BBPS-Comp-C	12 Jan 2025	LEAD	2.01	mg/kg
BBPS-Comp-D	12 Jan 2025	LEAD	4.46	mg/kg
BBPS-Comp-A	12 Jan 2025	MAGNESIUM	129	mg/kg
BBPS-Comp-B	12 Jan 2025	MAGNESIUM	140	mg/kg
BBPS-Comp-C	12 Jan 2025	MAGNESIUM	168	mg/kg
BBPS-Comp-D	12 Jan 2025	MAGNESIUM	440	mg/kg
BBPS-Comp-A	12 Jan 2025	MANGANESE	19.1	mg/kg
BBPS-Comp-B	12 Jan 2025	MANGANESE	14	mg/kg
BBPS-Comp-C	12 Jan 2025	MANGANESE	24	mg/kg
BBPS-Comp-D	12 Jan 2025	MANGANESE	86.8	mg/kg
BBPS-Comp-C	12 Jan 2025	MERCURY	0.0108	mg/kg
BBPS-Comp-D	12 Jan 2025	MERCURY	0.0177	mg/kg
BBPS-Comp-A	12 Jan 2025	NICKEL	1.47	mg/kg
BBPS-Comp-B	12 Jan 2025	NICKEL	1.54	mg/kg
BBPS-Comp-C	12 Jan 2025	NICKEL	1.49	mg/kg
BBPS-Comp-D	12 Jan 2025	NICKEL	2.62	mg/kg
BBPS-Comp-A	12 Jan 2025	NONVOLATILE BETA	2.25	pCi/g
BBPS-Comp-B	12 Jan 2025	NONVOLATILE BETA	2.08	pCi/g
BBPS-Comp-C	12 Jan 2025	NONVOLATILE BETA	3.05	pCi/g
BBPS-Comp-D	12 Jan 2025	NONVOLATILE BETA	3.16	pCi/g
BBPS-Comp-A	12 Jan 2025	POTASSIUM	92.7	mg/kg
BBPS-Comp-B	12 Jan 2025	POTASSIUM	82.5	mg/kg
BBPS-Comp-C	12 Jan 2025	POTASSIUM	95.7	mg/kg
BBPS-Comp-D	12 Jan 2025	POTASSIUM	353	mg/kg
BBPS-Comp-A	12 Jan 2025	TOLUENE	0.000575	mg/kg
BBPS-Comp-B	12 Jan 2025	TOLUENE	0.000493	mg/kg
BBPS-Comp-C	12 Jan 2025	TOLUENE	0.000628	mg/kg
BBPS-Comp-D	12 Jan 2025	TOLUENE	0.00231	mg/kg
BBPS-Comp-A	12 Jan 2025	VANADIUM	8.57	mg/kg
BBPS-Comp-B	12 Jan 2025	VANADIUM	5.16	mg/kg
BBPS-Comp-C	12 Jan 2025	VANADIUM	4.89	mg/kg
BBPS-Comp-D	12 Jan 2025	VANADIUM	13.9	mg/kg
BBPS-Comp-A	12 Jan 2025	ZINC	4.2	mg/kg
BBPS-Comp-B	12 Jan 2025	ZINC	4.15	mg/kg
BBPS-Comp-C	12 Jan 2025	ZINC	4.96	mg/kg
BBPS-Comp-D	12 Jan 2025	ZINC	12.9	mg/kg

Table 4. Equipment Types and Activities

General Equipment Type	Equipment Use
Excavator (CAT 323) w/Bucket	Used to excavate soil.
Excavator (CAT 323) w/Thumb	Used to excavate soil.
Bulldozer (CAT D3)	General grading, stone placement.
Turbo Turf Tank Trailer	Used to spray hydroseed and water.
Skid Steer (CAT 255)	Used to lay stone.
Ledwell Water Truck / United Rentals	Used to inhibit dust and water grass.
Pickup Trucks	General site operations.
Dump Trucks (Driven by Turnkey Trucking and Hubbard Trucking)	Delivery of stone, backfill, topsoil, contaminated soil and rootballs.

Table 5. Approximate Quantities of Excavated Soil and Backfill

Description	Truckloads	Quantity
Contaminated Soil Excavated	172	1860 yd^3 (4017 tons)
Root Balls Removed	7	75 yd^3 (88.5 tons)
Common Fill Backfill	103	1100 yd^3
Topsoil	76	820 yd^3
Total Waste Containers	3	3 roll offs

Table 6. Summary of Design Changes

Item	Change	Reason
1	None.	None.

Table 7. Project Cost Comparison

ECODS N-1 Project Cost Comparison			
	ROD Estimated Cost ($K)	**Incurred Cost ($K)**	**Delta Cost (%)**
ECODS N-1 Capital Cost	27	24.4	-10%
ECODS N-1 Present Worth O&M Costs	244	TBD*	N/A
ECODS N-1 Total Estimated Costs	271	TBD*	N/A

CSSLP Project Cost Comparison			
	ROD Estimated Cost ($K)	**Incurred Cost ($K)**	**Delta Cost (%)**
CSSLP Capital Cost	889	1,013	10%
CSSLP Present Worth O&M Costs	11	TBD*	N/A
CSSLP Total Estimated Costs	900	TBD*	N/A

Ford Building Project Cost Comparison			
	ROD Estimated Cost ($K)	**Incurred Cost ($K)**	**Delta Cost (%)**
Ford Building Capital Cost	27	24.4	-10%
Ford Building Present Worth O&M Costs	650	TBD*	N/A
Ford Building Total Estimated Costs	677	TBD*	N/A

*- TBD – to be determined. O&M costs will be incurred in the future and will be tracked by the 5-Year Remedy Review Reports.

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APPENDIX A Fact Sheet

Fact Sheet

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FACT SHEET

Remedial Action Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit

Location

The Early Construction and Operational Disposal Site (ECODS) N-1 (NBN), Central Shops Scrap Lumber Pile (CSSLP)(631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building Operable Unit is listed as a Resource Conservation and Recovery Act 3004(u) Solid Waste Management Unit / Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) unit in Appendix C of the Federal Facility Agreement for the Savannah River Site (SRS). These three subunits are located in three distinct locations within and near N Area (Central Shops) in an area of relatively flat terrain. Groundwater is not part of the OU and will be addressed under the Central Shops Groundwater OU.

History

ECODS N-1 is one of 25 ECODS at SRS that were used during the construction and early operation of SRS for disposal of construction debris and other non-radioactive waste materials. It is located within the Pen Branch watershed.

The CSSLP subunit is segregated into two areas, the Upland Area (~1.3 hectares (ha) [3.3 acres (ac)]) and the Surface Water Impoundment Area (~0.41 ha [1.02 ac]). The Upland Area was cleared in 1951 and used for equipment laydown, rubble storage, and for burning construction-related material of various unknown types and wood, which may have included treated lumber and creosote-treated wood.

The Ford Building was constructed in the 1950s to test Ford Company-manufactured motor control packages for control rod drive mechanisms before they were installed in the SRS reactors. In 2021, the building structure was demolished to its slab, and an engineered concrete cover system was installed over the entire concrete remnant slab area extending out 0.3 m (1 ft) from the building edge.

Remedial Action

The selected remedy for the ECODS N-1 subunit is Land Use Controls (LUCs) to prevent human exposure to asbestos that is present in subsurface soils. This remedy was selected at the ECODS N-1 subunit due to the overall protection and effectiveness of the remedy.

The selected remedy for CSSLP subunit is excavation (hot spot removal) and disposal of arsenic-contaminated surface soil and sediment to support unrestricted land use; it will not require land use controls, annual site inspections, or five-year remedy reviews. This remedy will eliminate exposure of contaminated media to human receptors. This remedy includes excavating contaminated media exceeding the arsenic cleanup level (8.2 mg/kg) down to 1 ft below ground surface, disposing of the contaminated media off-site, and backfilling with clean soil to grade.

The selected remedy for the Ford Building subunit is LUCs to prevent human exposure to Cs-137 and polychlorinated biphenyls on the Ford Building remnant concrete slab and Co-60 in surface soils underlying a portion of the gravel apron surrounding the slab. This remedy was selected at the Ford Building subunit due to the short half-life (~5.3 years) of Co-60. The risks to the industrial worker will be below 1E-06 within 20 years, thereby eliminating any long-term requirements other than LUCs for the concrete cover that currently exists over the original remnant slab.

LUCs for the ECODS N-1 and Ford Building subunits will be in effect until concentrations of hazardous substances are at levels that will allow for unrestricted use.

APPENDIX B RA Start Notification Letter

RA Start Notification Letter

USDOE submitted the Notification of the Remedial Action Start Date for the Early Construction and Operational Disposal Site (ECODS) N-1 (NBN), Central Shops Scrap Lumber Pile (CSSLP) (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit, Superfund Enterprise Management System Number: 93 (RDDD-24-145, dated June 26, 2024) to SCDHEC and EPA. The notification stated that the remedial action start was met on **May 16, 2024**, ahead of the FFA milestone date of December 16, 2024. SRS personnel worked with the U. S. Forest Service to begin emptying the shallow stormwater impoundment at the CSSLP via constructed drainage channels reinforced with BMPs. In addition, the installation of the access control warning signs in accordance with the LUCIP (SRNS-RP-2023-00536, Revision 1, January 2024) was completed on June 19, 2024, at the ECODS N-1 (NBN) and Ford Building Subunits.

ARF-024596

Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

JUN 2 6 2024

Ms. Susan B. Fulmer, P. G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Notification of the Remedial Action Start Date for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit, SEMS Number: 93

In accordance with the terms of the Federal Facility Agreement (FFA), the U. S. Department of Energy is notifying the South Carolina Department of Health and Environmental Control (SCDHEC) and the U. S. Environmental Protection Agency (EPA) of the Remedial Action Start Date for the Early Construction and Operational Disposal Site (ECODS) N-1 (NBN), Central Shops Scrap Lumber Pile(CSSLP) (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit. The remedial action start was met on May 16, 2024, ahead of the FFA milestone date of December 16, 2024. Savannah River Site personnel worked with U. S. Forest Service to begin emptying the shallow stormwater impoundment at the CSSLP via constructed drainage channels reinforced with best management practices. This will allow the topsoil layer to begin drying so that samples can be obtained per the approved Sampling and Analysis Plan (Appendix B of the Corrective Measures Implementation Plan/Remedial Action Implementation Plan [SRNS-RP-2023-00535, Revision 1, January 2024]). The intent of the samples is to delineate the actual excavation boundary that will be necessary to remove the top 1 foot of soil. Soil sampling is expected to be completed summer 2024 with the actual soil removal occurring in Fiscal Year 2025. In addition, the installation of the access control warning signs in accordance with the Land Use Control Implementation Plan (SRNS-RP-2023-00536, Revision 1, January 2024) was completed on June 19, 2024, at the ECODS N-1 (NBN) and Ford Building.

Page 1 of 2

ARF-024596

JUN 2 6 2024

Ms. Susan B. Fulmer
Mr. Jon Richards 2

The effort and time that the SCDHEC and EPA have given on the subject operable unit are greatly appreciated. Questions from you or your staff may be directed to me at (803) 952-7805, or the DOE Operable Unit Program Manager, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

AVERY HAMMETT
Digitally signed by AVERY HAMMETT
Date: 2024.06.25 15:19:53 -04'00'

Avery G. Hammett
FFA Project Manager, DOE-Savannah River
Remediation and Deactivation & Decommissioning Division

RDDD-24-145

cc
J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
R. G. Stewart, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. N. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
M. McRae, TechLaw, Inc.

Page 2 of 2

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APPENDIX C As-Built Drawings

As-Built Drawings

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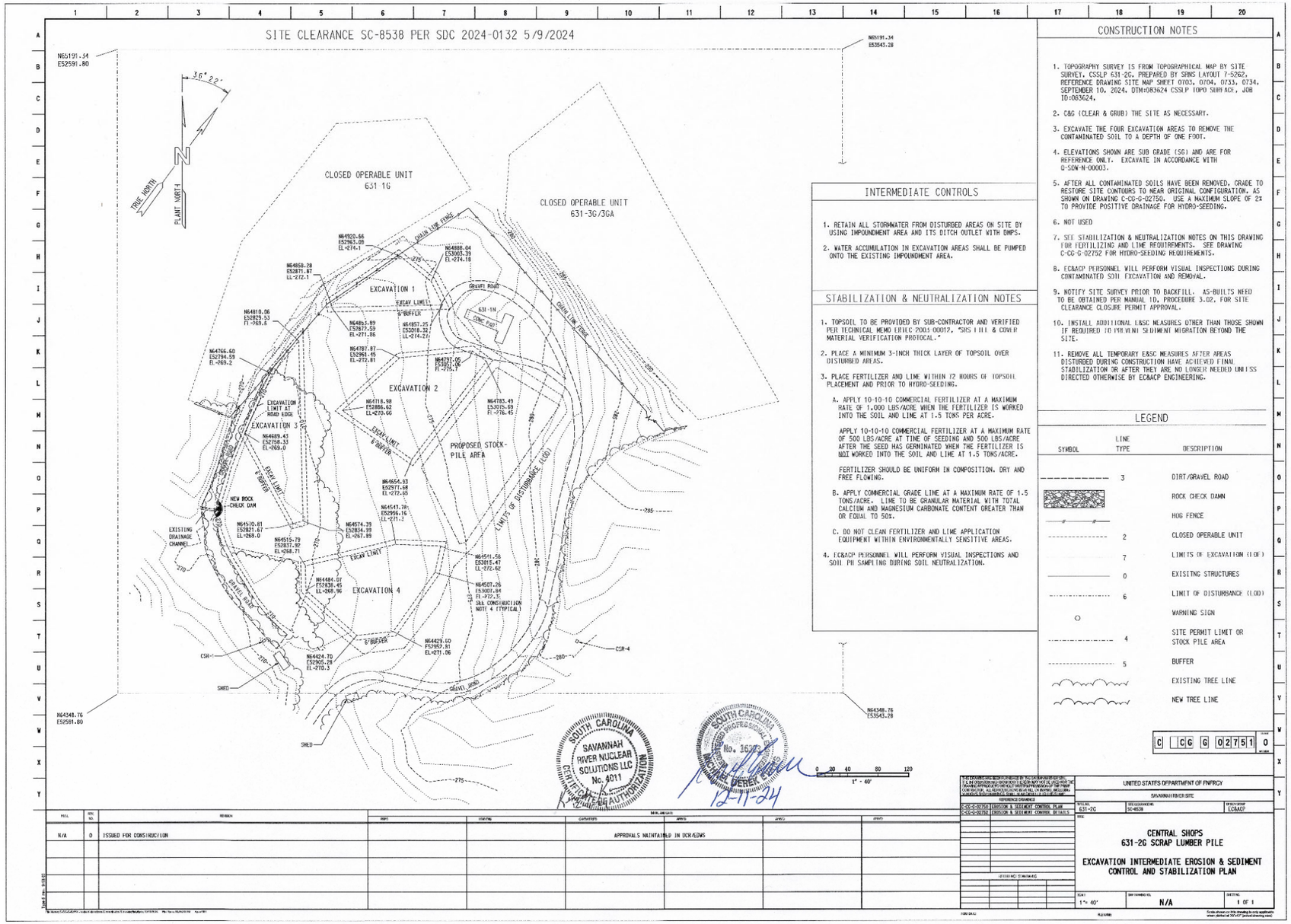


Figure C-1 CSSLP Pre-Remedial Action Topographical Survey and Excavation Area (EA) Locations

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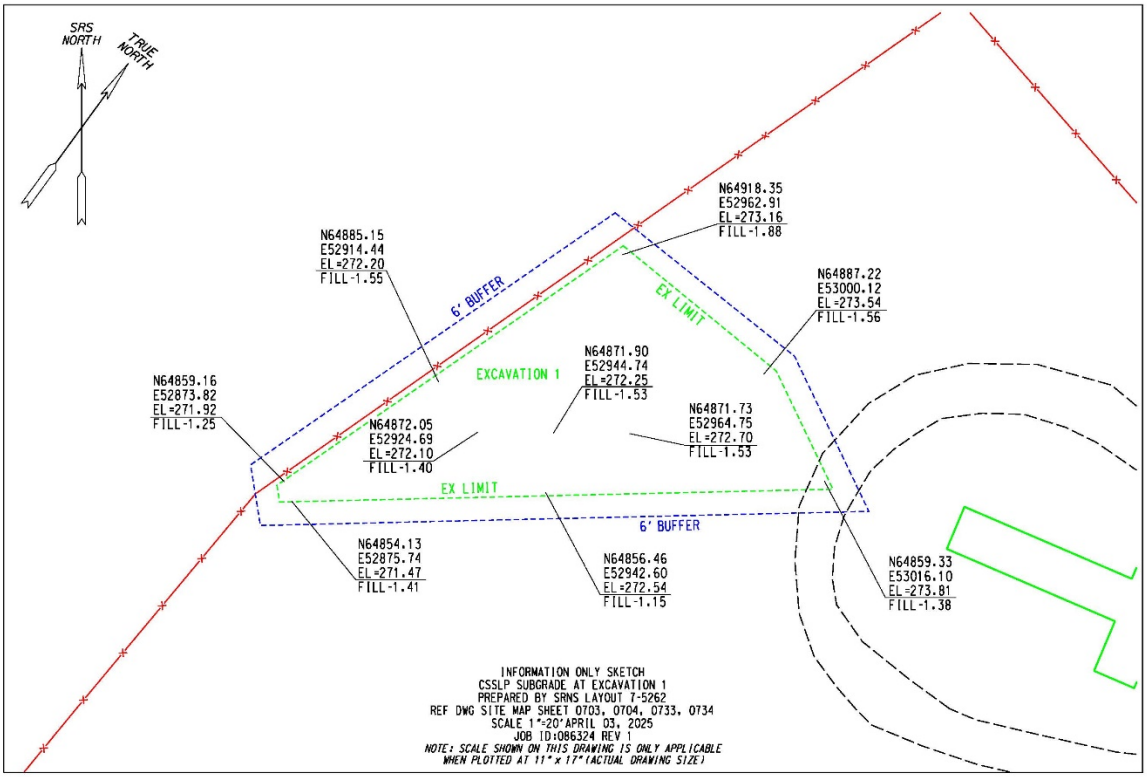


Figure C-2 CSSLP One Foot Minimum Excavation EA-1 Topographical Survey

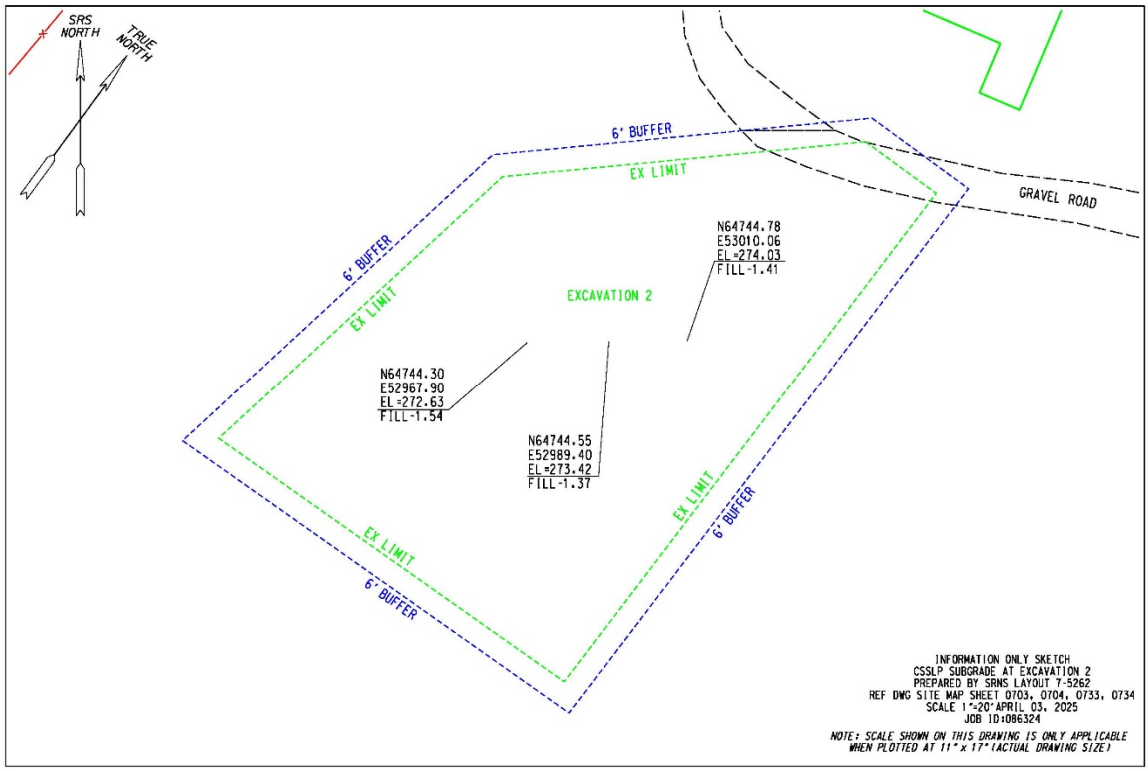


Figure C-3 CSSLP One Foot Minimum Excavation EA-2 Topographical Survey

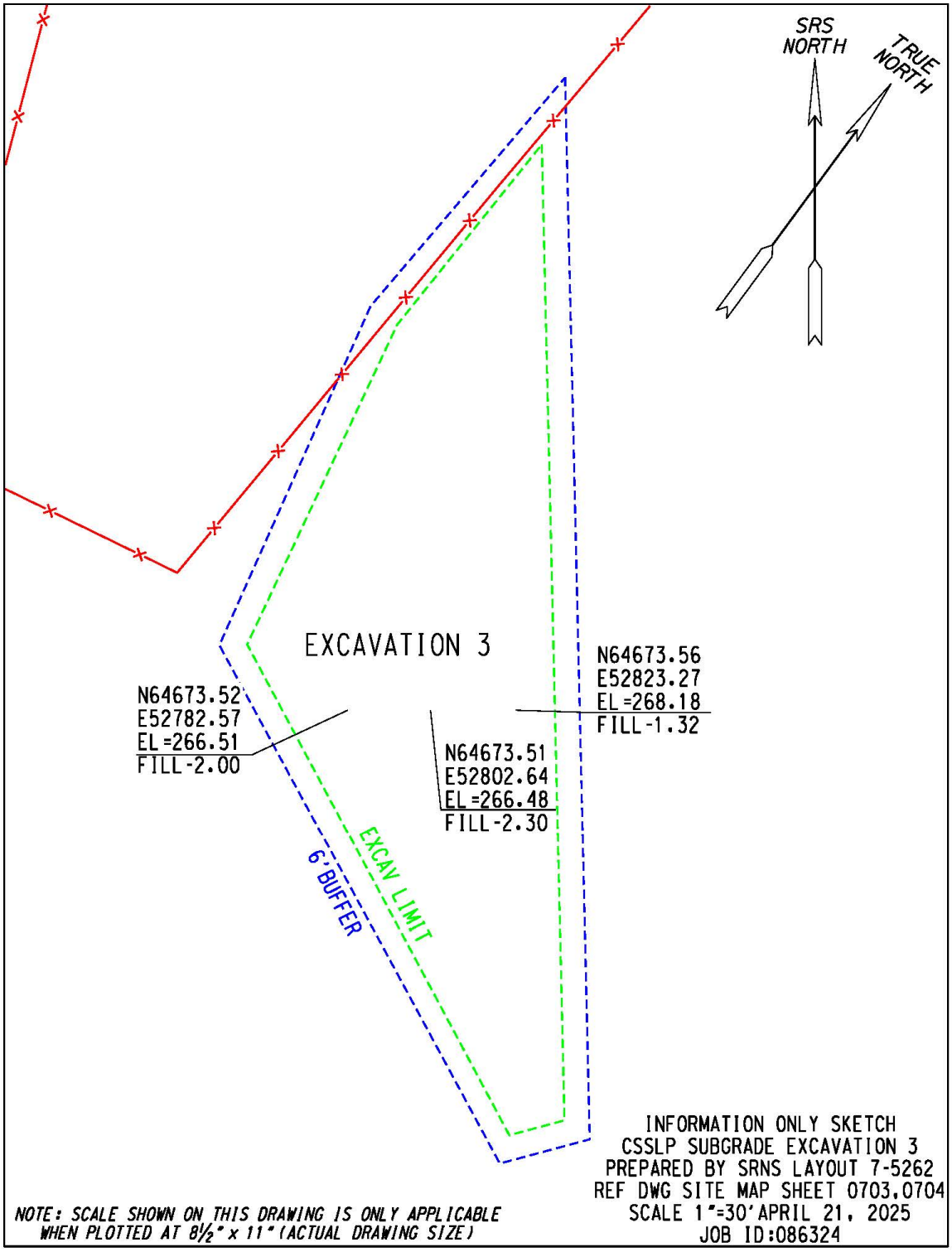


Figure C-4 CSSLP One Foot Minimum Excavation EA-3 Topographical Survey

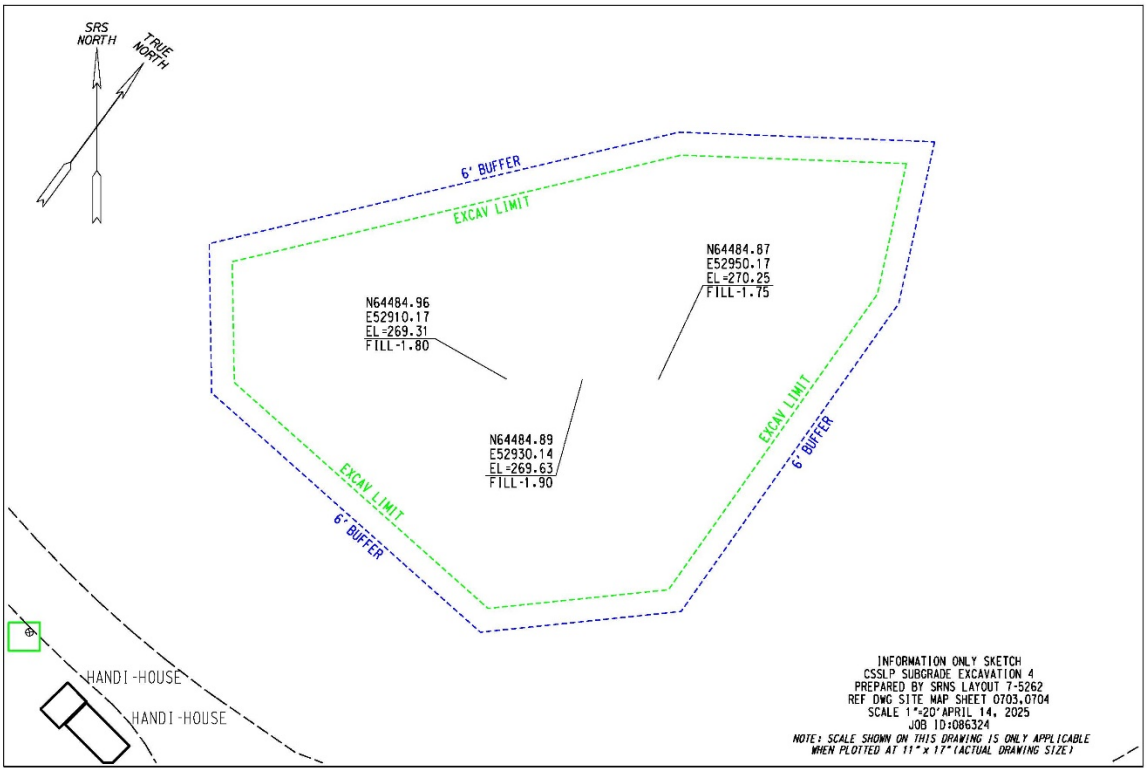


Figure C-5 CSSLP One Foot Minimum Excavation EA-4 Topographical Survey

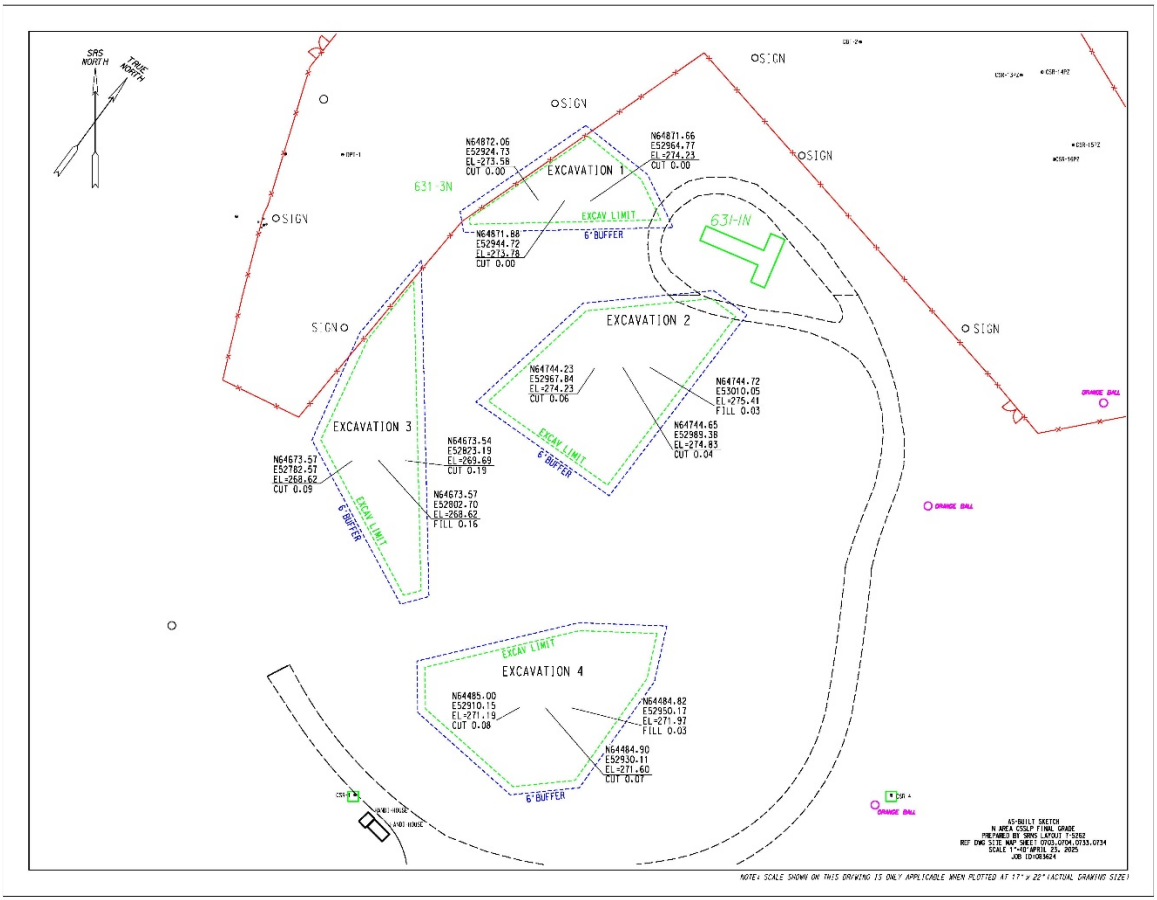


Figure C-6 CSSLP Post-Remedial Action Topographical Survey

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APPENDIX D Post-Remedial Action Regulatory Field Visit

Early Construction and Operational Disposal Site (ECODS) N-1 (NBN), Central Shops Scrap Lumber Pile (CSSLP) (631-2G), and Building. 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (OU) Post-Remedial Action Regulatory Field Visit

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ARF-025063

Caleb Jones

From: Caleb Jones
Sent: Thursday, July 17, 2025 4:02 PM
To: Jon Richards; Heather Cathcart
Cc: Susan B. Fulmer; joseph.martina@des.sc.gov; Sarah Steeple; Duke Taylor; MORROW, KAREN D; BAKER, MATTHEW R; Chris Bergren; Kelsey Holcomb; Joseph Burch; Shelia Mcfalls; Thelesia Oliver; J Ross; Terry Killeen; Justin Steadman; Manuel Terronez; Eric Schiefer; Erin Mccormick; Dena Brett; Amy Meyer; Katie Davis; Ryan Mcdaniel; Timothy02 West; Brian Hanshew; Larry Mullikin; Donald Sahm; Harold Rodgers; Gregory N. O'Quinn; Crystal L. Robertson; Tabatha G. Corley; Emma G. Downing ; Hannah Herlong ; Mac McRae ; Caleb Jones
Subject: Early Construction and Operational Disposal Site (ECODS) N-1 (NBN), Central Shops Scrap Lumber Pile (CSSLP) (631-2G), and Building. 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (OU) Post-Remedial Action Regulatory Field Visit

SRNS-J2000-2025-00478

Purpose of Meeting and Field Visit

On July 16, 2025, U. S. Department of Energy (DOE), South Carolina Department of Environmental Services (SCDES), U. S. Environmental Protection Agency (EPA), and Savannah River Nuclear Solutions, LLC (SRNS) personnel met at the SCDES Aiken Office to view drone footage and to discuss the completion of the remedial actions at the subject OU. ECODS N-1 and Building 690-N require land use controls. No additional actions are required at CSSLP after excavation (hot spot removal) and disposal of contaminated media.

The meeting participants also completed a field visit and further discussed the completion of the remedial actions as described in the following documents:

- *Corrective Measures Implementation Plan / Remedial Action Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U)* (SRNS-RP-2023-00535, Revision 1, January 2024), and
- *Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U)* (SRNS-RP-2023-00536, Revision 1, January 2024).

Based on the meeting and field visit, the Core Team (DOE, EPA, and SCDES) agreed that all construction activities have been completed and there are no outstanding issues remaining with respect to the remedial actions at the OU. Final documentation of the construction activities will be provided in the Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report that is scheduled for submittal in Fiscal Year 2026. This email serves as supporting documentation in confirming project completion.

Meeting Participants

Susan Fulmer (SCDES)	Matthew Baker (DOE)
Heather Cathcart (SCDES)	Jon Richards (EPA)
Joseph Martina (SCDES)	Joseph Burch (SRNS)
Sarah Steeple (SCDES)	Donald Sahm (SRNS)*
Duke Taylor (SCDES)	Harold Rodgers (SRNS)*
Emma Downing (SCDES)	

*field visit only

Caleb Jones | EC&ACP
SRNS, LLC | 730-4B, Rm 3135
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1 of 1

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