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

JUL 13 2026

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 Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

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

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit (U) (SRNS-RP-2025-01449, Revision 1 Redline, July 2026), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-01448, July 2026) (Redline), Draft Revised Public Notice Information, and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 69

In accordance with the terms of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is submitting the subject information for your review. The *Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit (U)* (SRNS-RP-2025-01449, Revision 0, November 2025) was submitted to the South Carolina Department of Environmental Services (SCDES) and the U. S. Environmental Protection Agency (EPA) on November 10, 2025. The SCDES' and EPA's comments were received on January 8, 2026, and February 12, 2026, respectively. The draft responses to the regulatory comments were submitted for review via email on May 19, 2026. The SCDES accepted the draft responses via email on June 2, 2026. The EPA accepted the draft responses with minor revisions via email on June 3, 2026. The draft responses were revised as requested and the final responses were incorporated into the subject information as applicable.

Please review the enclosures and provide your response within thirty (30) days of receipt. The time and effort that the SCDES and the EPA have given on the subject operable unit are greatly appreciated.

JUL 1 3 2026

Ms. Susan Fulmer
Mr. Jon Richards 2

Comments or questions from you or your staff may be directed to me at (803) 522-6427.

Sincerely,

MATTHEW BAKER

Digitally signed by MATTHEW BAKER
Date: 2026.07.13 10:48:19 -04'00'

Matthew R. Baker
Acting FFA Remedial Project Manager
DOE-Savannah River Operations Office
Remediation, Deactivation, and Decommissioning Division

RDDD-26-156

Enclosures:
1. Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit (U) (SRNS-RP-2025-01449, Revision 1 Redline, July 2026) SEMS Number: 69
2. United States Department of Energy Statement of Basis/Proposed Plan Fact Sheet for the D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (SRNS-RP-2025-01448, July 2026) (Redline) SEMS Number: 69
3. Draft Revised Public Notice Information: Environmental Bulletin and Radio Announcement
4. SRS Responses to SCDES Comments on the Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit (U) (SRNS-RP-2025-01449, Revision 0, November 2025) SEMS Number: 69
5. SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit (U) (SRNS-RP-2025-01449, Revision 0, November 2025) SEMS Number: 69

JUL 13 2026

c w/o encl:
M. Reece, SCDES-Columbia
H. J. Porter, SCDES-Columbia
J. Blalock, SCDES-Columbia
S. French, SCDES-Columbia
R. G. Stewart, SCDES-Columbia
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T. G. Corley, SCDES-Midlands Aiken Environmental Affairs Office
C. L. Robertson, SCDES-Midlands Aiken Environmental Affairs Office
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H. L. Herlong, SCDES-Midlands Aiken Environmental Affairs Office

c w/ encl:
B. Martin, EPA-Region IV
H. H. Cathcart, SCDES-Columbia
M. McRae, TechLaw, Inc.

GENERAL COMMENTS

General Comment #1: It is uncertain whether these determinations are necessary in order to determine the applicability or relevance and appropriateness of the Coal Combustion Residuals (CCR) rule, including the regulations at 40 CFR 257.102(c) or (d) related to closure. On page 20, the Focused Corrective Measures Study/Feasibility Study for D-Area Ash Basins Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U) (hereinafter "FS") describes the DABW as "a forested mixed compositional bottomland wetland that received overflow ash from the D Area ash basins." In Appendix B of the FS, page B-8, section B-1.1 Background, it states "[d]epending on precipitation events, river flood levels, [sic] groundwater table fluctuations, portions of the DABW hold water."

a) Based on the reading of the Proposed Plan and other documents, it appears that the DABW is like a CCR management unit or like a CCR surface impoundment as defined in the Coal Combustion Residuals rule, at 40 CFR 257.53 *Definitions*, or associated with a release from such units. The CCR rule defines CCR management unit as "any area of land on which any noncontainerized accumulation of CCR is received, is placed, or is otherwise management, that is not a regulated CCR unit." The CCR rule defines CCR surface impoundment as "a natural topographic depression, man-made excavation, or diked area, designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR."

b) Alternative A-3 (i.e., excavation and disposal), includes excavation of all ash to an average depth of 5ft, disposal of the ash, and the DABW being contoured with clean fill and topsoil for proper drainage and wetland restoration. See Proposed Plan at 10. For Alternative A-3, portions of the CCR regulations 40 CFR 257.102(c)(1) and (c)(2) appear to be relevant and appropriate.

c) Thus, the proposed plan should include:

    1. A discussion of why a LUCs only remedy is sufficient, given the nature of the DABW in the light of the aforementioned definitions in the CCR regulations that includes ash or CCR disposal in natural depressions and the fact there has been documented releases of COCs into groundwater ; and

    2. A discussion of why "closure by removal of CCR", including certain requirements

of 40 CFR 257.102(c)(1) and (c)(2) should not be relevant and appropriate to Alternative A-3.

Response: Clarification

1. **SRS agrees that the D-Area Ash Basin Wetlands (DABW) is a Coal Combustion Residuals (CCR) management unit as defined in the CCR rule, at 40 CFR 257.53 *Definitions*. SRS believes that the CCR closure requirements are therefore relevant but, due to the sensitive wetland environment, not appropriate to the DABW. The environmental setting would not allow for either ash removal nor construction of a cover system, and would be noncompliant with Clean Water Act regulations. A Land Use Controls (LUCs) only remedy is sufficient because it is an effective Final Action for remote units with sensitive ecological settings that benefit from the avoidance of excavation activities. The final decision for Wetland Area Dunbarton Bay (WADB) left coal ash in place (i.e., LUCs), which has a similar environmental setting to DABW. LUCs will limit human exposure to contaminated ash/soil that pose an unacceptable risk for human receptors. No ecological, principal threat source material, or contaminant migration constituents of concern exist for DABW.**

   Further, SRS did not characterize "documented releases of COCs into groundwater." High levels of turbidity contributed to elevated arsenic results in certain groundwater samples (see Specific Comment #10). As stated in the SB/PP, a contaminant migration (CM) analysis was conducted and completed for the 2002 DEXOU RFI/RI/BRA (WSRC-RP-2001-4162, Revision 1). This analysis concluded that contaminant mobility was not a concern for DABW. Groundwater data collected to support the D-Area Groundwater Operable Unit monitoring and presented in the 2025 DABW FCMS/FS (SRNS-RP-2024-01034, Revision 1) also supports the conclusion that there are no CM RCOCs for DABW.

2. **As mentioned above, while DABW meets the definition of a CCR management unit, the closure requirements for CCR units are considered relevant but not appropriate, as the environmental setting would not allow for the construction of a cover system (similar to WADB). Additionally, this type of action (as well as excavation) would not be consistent with Clean Water Act regulations. As part of the WADB, the final decision left ash in place within and adjacent to Dunbarton Bay to protect the sensitive wetlands ecosystem.**

The final paragraph of the Applicable or Relevant and Appropriate Requirements section in Section VI. REMEDIAL ACTION OBJECTIVES will be revised as follows:

"No ARARs were identified for the preferred alternative. DABW is a Coal Combustion Residuals (CCR) management unit as defined by 40 CFR 257.53; however, the associated closure requirements were deemed relevant but not appropriate due to the sensitive wetland environment."

The last sentence of the Compliance with ARARs section in Section VIII. EVALUATION OF ALTERNATIVES will be revised as follows:

"There are no ARARs identified for Alternative A-2. DABW is a CCR management unit as defined by 40 CFR 257.53; however, the associated closure requirements were deemed relevant but not appropriate due to the sensitive wetland environment."

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

SPECIFIC COMMENTS

1. Section II, Community Participation, Page 11 of 42: The text should discuss the possibility of having a virtual public meeting. The text states that the lead agency will provide an opportunity for a public meeting during the public comment period; however, it does not mention the possibility of having a virtual meeting as an option or in addition to a face-to-face meeting. The Statement of Basis/Proposed Plan should inform the public of the various options for holding the public meeting. Please revise the Statement of Basis/Proposed Plan to include the possibility of having a virtual meeting as an option or in addition to a face-to-face meeting.

   Response: Agree

   Section II, Community Participation, will be revised as shown below:

   "USDOE will provide an opportunity for a public meeting (face-to-face and/or virtual) during the public comment period if significant interest is expressed."

   Responsible Party: Shelia McFalls, (803) 645-8119, shelia.mcfalls@srs.gov

2. Section III, Operable Unit Background, PDF Page 12 of 42: The fourth paragraph states, "The DEXOU RFI/RI/BRA concluded that there was a risk for exposure of human receptors to coal-related contaminants in surface ash/soil at the DABW subunit…;" however, it is more correct to state that there was no "unacceptable risk from exposure by human receptors." Please revise this statement accordingly.

   Response: Agree

   The fourth paragraph of Section III, Operable Unit Background, will be revised as shown below:

   "The DEXOU RFI/RI/BRA concluded that there was a<u>n unacceptable risk from exposure by human receptors</u>~~risk for exposure of human receptors~~ to coal-related contaminants in surface ash/soil at the DABW subunit, but there were no ecological, PTSM, or CM problems warranting actions."

   Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

3. Section V, Summary of Site Risks, Summary of Human Health Risk Assessment, PDF Page 14 of 42: Although the context of the carcinogenic risk threshold is given in Section XII, Glossary, under Target Risk Range, it would be more appropriate to provide a less technical explanation of the conclusions of the updated human health risk assessment (HHRA), which states that exposure to arsenic and radionuclides, "exceed the 1E-06 risk threshold for the IOU [Integrator Operable Unit]...." The Statement of Basis/Proposed Plan is a document intended to facilitate public involvement in the remedy selection and should be easily understood. As such, the term "Target Risk Range" is not used in the text, so it might be hard to find in the glossary, and the numerical total cumulative risks for the receptors of interest could be provided in a text box so that further information is available should someone desire it. Therefore, please revise this section by simplifying the conclusions of the 2025 updated HHRA and considering moving the description of the numerical carcinogenic risks to a text box.

   Response: Agree

   The final paragraph in the Summary of Human Health Risk Assessment subsection of Section V will be revised as follows:

"…The updated HHRA confirms that arsenic and coal-related radionuclides (i.e., K-40, Th-232, and U-238) exceed the 1E-06 risk threshold for the IOU onsite worker (total cumulative risk [TCR] = 1.7E-04), the industrial worker (TCR = 3.4E-04), and the hypothetical resident (TCR = 5.8E-04), from the 0 to 0.3 m (0 to 1 ft) surface ash/soil interval and are identified as RCOCs. The combined carcinogenic risk associated with the listed contaminants (arsenic, K-40, Th-232, and U-238) results in greater than one excess incidence of cancer in an exposed population of ten thousand (1E-04) for each of the human health scenarios. This risk level indicates that remedial action is warranted to prevent this unacceptable exposure."

Since the numerical carcinogenic risks are included in the final paragraph of the Summary of Human Health Risks, a text box is not warranted.

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

4. SRS Compliance History Section, last complete paragraph, page 3, first paragraph: The document states "[s]election of the remedial alternative that will satisfy the FFA requirements will be made by USDOE, in consultation with USEPA and SCDES." Revise to "Selection of the remedial alternative that will satisfy the FFA requirements will be made jointly by USDOE and USEPA, in consultation with SCDES." Under CERCLA both EPA and the lead agency select the remedial action, unless the parties are unable to reach an agreement. *See* 42 USC § 9604(e)(4)(A) ("Each Interagency agreement under this subsection shall include . . . [a] review of alternative remedial actions and *selection of a remedial action by the head of the relevant department, agency, or instrumentality and the Administrator* or, if unable to reach agreement on selection of a remedial action, selection by the Administrator." (emphasis added)). The NCP also requires that the remedy be selected by EPA and the lead agency. *See* 40 CFR § 300.430(f)(4)(iii) ("The process for selection of a remedial action at a federal facility on the NPL, pursuant to CERCLA section 120, shall entail: (A) Joint selection of remedial action by the head of the relevant department, agency, or instrumentality and EPA . . . .").

Response: Agree.

The final paragraph of Section I, Introduction and Background, SRS Compliance History, will be revised as follows:

". . . The final remedial decision under RCRA will be in the form of a final permit

modification, which is made by SCDES. Selection of the remedial alternative that will satisfy the FFA requirements will be made jointly by USDOE and USEPA, in consultation with ~~USEPA and~~ SCDES. It is important to note that the final action(s) may . . .”

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

5. Community Participation Section: Please include the name and contact information for the local Community Advisory Group at SRS (i.e. the “Savanna River Site Citizens Advisory Board”, https://cab.srs.gov/srs-cab.html, 1-800-249-8155, srscitizensadvisoryboard@srs.gov) in the Community Participation Section. *See* A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, OSWER 9200.1-23P, July 1999 (herein after “ROD Guidance”), at 3-10 (“The following public participation information should be included in the Proposed Plan: . . . [n]ame and contact number of local Community Advisory Group (CAG), if applicable.”).

Response: Agree.

Section II, Community Participation, will be revised as shown below, and CAB will be added to the List of Acronyms and Abbreviations.

“The SRS Citizens Advisory Board (CAB) is a stakeholder group that provides the USDOE advice, information, and recommendations on issues affecting the Environmental Management program at SRS. The contact information for the SRS CAB is listed below.

Savannah River Site Citizens Advisory Board
https://cab.srs.gov/srs-cab.html
1-800-249-8155
srscitizensadvisoryboard@srs.gov

The public will be notified of the public comment period through mailings of the SRS Environmental Bulletin, a newsletter…”

Responsible Party: Shelia McFalls, (803) 645-8119, shelia.mcfalls@srs.gov

6. Operable Unit Background Section, page 4, first full paragraph, second sentence: The

document states "[t]hese powerhouses were located in each industrial/administrative area of the SRS with coal ash (coal combustion products) products as a waste as a result of boiler operations." Please revise to use the regulatory term CCR or "coal ash waste" because coal ash is not a "coal combustion product" but rather is a solid waste. *See* 40 CFR 257.53 ("Coal combustion residuals (CCR) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers."). Please revise accordingly and replace "coal combustion products" with "coal ash waste" or CCR.

Response: Agree

To avoid confusion, the second sentence of the first paragraph in Section III, Operable Unit Background, will be revised as such:

"[t]hese powerhouses were located in each industrial/administrative area of the SRS with coal ash waste generated~~(coal combustion products)produced as a waste~~ as a result of boiler operations (i.e., coal combustion)."

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

7. Operable Unit Background Section, page 5, second full paragraph, second sentence: The document states that "[w]hile other coal ash and coal fines OUs have the potential for beneficial reuse of contaminated ash material, the Core Team agreed that LUCs was the more likely remedial alternative for the DABW due to the wetland/floodplain environment." Please explain why the wetland/floodplain environment required that LUCs be the remedial action for the DABW considering that it appears to qualify as a CCR surface impoundment in a manner that a member of the public would understand.

Response: Clarification

Refer to General Comment #1 for a discussion of DABW in relation to the CCR surface impoundment regulations. SRS agrees that the CCR closure requirements are relevant but not appropriate to the DABW.

DABW supports a recovered ecological community that is reflective of a typical

southeastern floodplain forest. As indicated in the *Proposed Core Team Remedial Actions and Regulatory Strategy for Remaining SRS Ash/Coal Fines Waste Units (U) (SRNS-RP-2022-00205, Revision 1),* LUCs are an effective Final Action for remote units with sensitive ecological settings that would benefit from avoidance of excavation activities. There are no Principal Threat Source Material (PTSM) or CM risks associated with leaving the coal ash waste in place at DABW, and the coal ash waste does not pose an unacceptable risk to ecological receptors. LUCs are well established at SRS and would be protective of the IOU Onsite Worker and the environment. The 5-year remedy review process will ensure LUCs remain protective. A similar decision left ash in place (LUCs) within and adjacent to Dunbarton Bay (Wetland Area at Dunbarton Bay) to protect the sensitive wetland ecosystem and human health.

No change to the document is proposed.

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

8. Operable Unit Background Section, page 4, first full paragraph, second sentence: The PP states that "[w]hile other coal ash and coal fines OUs have the potential for beneficial reuse of contaminated ash material, the Core Team agreed that LUCs was the more likely remedial alternative for the DABW due to the wetland/floodplain environment." Please revise to use the regulatory term CCR or "coal ash waste" because coal ash is not a "material" but rather a solid waste. *See* 40 CFR 257.53 ("Coal combustion residuals (CCR) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers."). Please revise accordingly and make conforming changes throughout the document such that "ash material" is replaced with "coal ash waste" or CCR.

Response: Agree

The 6th paragraph of Section III, Operable Unit Background, will be revised as follows:

"[w]hile other coal ash and coal fines OUs have the potential for beneficial ~~r~~reuse of ~~contaminated ash material~~ coal ash waste, the Core Team agreed that LUCs was the more likely remedial alternative for the DABW due to the wetland/floodplain environment."

There are no other references to "ash material" within the document.

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

9. Summary of Site Risks, page 14: The opening paragraph introduces the term "refined constituents of concern [RCOCs]." This term is not used in CERCLA, the NCP, or EPA guidance. Please include a footnote that describes how this term relates to the term "Contaminant of Concern" used in Superfund cleanups. *See* EPA RI-FS guidance, *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*, EPA OSWER 9355.3-01, October 1988, and EPA ROD guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, EPA OSWER 9200.1-2P, July 1999, for discussions of how contaminants of concern are identified and used in the remedial process. Going forward and to avoid confusion, ORC recommends that the SRS remedial process use terms that have been developed in EPA guidance documents or ensure that the remedial documents contain an explanation that cross-references the CERCLA term.

Response: Clarification.

The RCOC term will be added to the glossary of the SB/PP as shown below:

"Refined Constituents of Concern (RCOCs): Constituents of Concern (COC) that have been carried forward following the refinement process (SRNS 2023) and likely warrant a response action."

Within the SRS remedial process, the term refined constituent of concern (RCOC) is a related but separate concept from contaminant or constituent of concern (COC). Its use has been outlined in a process defined in the EC&ACP Regulatory Document Handbook (SRNS-RP-2022-00330), specifically the *Constituents of Concern (COC) Refinement Process (Protocol COC-1),* which was agreed to by USDOE, USEPA, and SCDES. After COCs are identified, they are subsequently refined using an uncertainty evaluation for each COC. This process involves identifying and selecting COCs which have a reasonable likelihood of being released, are consistent with the conceptual site model, and pose an adverse hazard or risk to human health or the environment. COCs that are carried forward following the refinement process are designated as RCOCs, and are those contaminants related to the waste unit to be evaluated as part of the remedy alternatives analysis.

As requested by USEPA in their email dated June 4, 2026, text will be added to the Record of Decision to clarify the definition of RCOC and its use at SRS.

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

10. Summary of Fate and Transport Analysis, page 15: The PP states, "[a]s documented in the DABW FCMS/FS, review of the groundwater monitoring data from the seven wells at DABW supports the conclusions of the DEXOU RFI/RI/BRA that ash located in the DABW wetland/floodplain is not a CM concern to groundwater." Table 2 of the FS on page 80 indicates that during 6 monitoring years groundwater sample results exceeded the MCL for arsenic and they did so two years for beryllium. The FS only states on page 29 that these samples had high turbidity values, but there is no explanation of why high turbidity values would negate the finding that a sample exceeded the MCL for a COC. Please reconcile the statements in these two documents. Please clarify why elevated levels of contaminants in the groundwater which appears to be related to the D-Area Ash Basin Wetlands would not require excavation or some other remedy that is protective of leaching COCs into groundwater. A LUCs only remedy is not capable of addressing leaching of COCs into groundwater.

Response: Clarification

As stated in the SB/PP, a CM analysis was conducted and completed for the 2002 DEXOU RFI/RI/BRA (WSRC-RP-2001-4162). This analysis concluded that contaminant mobility was not a concern for the DABW. This conclusion was carried through for the DABW FCMS/FS and complemented with groundwater data collected to support the D-Area Groundwater Operable Unit monitoring (WSRC-RP-2003-4150, Revision 1). Table 2 of the DABW FCMS/FS (SRNS-RP-2024-01034, Revision 1) presents maximum results from 2003 to 2023 for ash related metal constituents (arsenic, barium, beryllium, and uranium) of all samples collected from seven shallow groundwater monitoring wells within the DABW. From 2008 to 2023, all groundwater results for arsenic, barium, beryllium, and uranium at the monitoring wells that exceeded respective MCLs also had high turbidity measurements (>140 Nephelometric Turbidity Units [NTU]). High turbidity measurements indicate the sample contains suspended solids, soil and/or sediment from the subsurface, which are often naturally high in metal constituents. Laboratory analytical methods for detection of metals in groundwater samples use acid preservation and/or acid digestion of the sample, which releases metals within natural soil and/or sediment to the dissolved phase. This results in elevated analytical results for

metals. Therefore, metal results in groundwater samples with high turbidity are often biased high and should not be used to indicate leaching of constituents of concern (COCs) into groundwater. For samples with turbidity measurements that are below 15 NTU (>15 NTU is considered elevated), all metal results are consistently below respective MCLs. This data supports the DEXOU RFI/RI/BRA CM analysis conclusion that there are no CM RCOCs for the DABW.

No change to the document is proposed.

Responsible Party: Adam Willey, (803) 646-4944, Adam.Willey@srs.gov

11. Remedial Action Objectives Section, fourth paragraph, page 16: The PP states that the RAO identified for the DABW is to "[p]revent the IOU onsite worker from exposure to contaminants in surface ash/soil and concentrations exceeding 1E-06 or SRS background levels." The use of the word "and" appears incorrect. A suggested revision is: "Prevent the IOU onsite worker from exposure to contaminants in surface ash/soil at concentrations exceeding 1E-06 or SRS background levels." Also, as mentioned in the comment above, an RAO related to protection of groundwater seems appropriate considering documented releases of COCs into groundwater that resulted in concentrations above MCLs.

Response: Clarification

The final paragraph of Section VI, Remedial Action Objectives, will be revised as follows:

"Prevent the IOU onsite worker from exposure to contaminants in surface ash/soil ~~and~~<u>at</u> concentrations exceeding 1E-06 or SRS background levels."

An RAO related to the protection of groundwater is not appropriate, as there are not documented releases of COCs into groundwater. Please refer to the response to Specific Comment #10 for further explanation.

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

12. Summary of Remedial Alternatives, page 17: The preferred alternative should be identified at the beginning of the summary of remedial alternatives section. *See* ROD Guidance at 3-5 ("The alternatives that is recommended as the Preferred Alternative should be identified as such at the beginning of this [Summary of Remedial Alternatives] section.").

Response: Clarification.

Although the 1991 USEPA guidance recommends that the preferred alternative be identified at the beginning of the *Summary of Remedial Alternatives* section, SRS believes this placement before Section VIII. *Evaluation of Alternatives* is premature and could potentially bias selection of the preferred alternative. For this reason, the preferred alternative is identified in Section IX. *Preferred Alternative* after the evaluation of alternatives in accordance with the SRS SB/PP Format (Protocol F-6 in the EC&ACP Regulatory Document Handbook [SRNS-RP-2022-00330], Revision 0, June 2023, updated December 2025 {corrected}]*).*

No change to the document is proposed.

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

13. Preferred Alternative, page 21: The first full paragraph, sixth sentence, notes that the LUCIP will be "considered incorporated by reference into the DABW ROD." Note that the EPA LUC checklist (*Sample Federal Facility Land Use Control ROD Checklist with Suggested Language (LUC Checklist),* EPA OSWER 9355.6-12) recommends specific text (at the time of the ROD) that states,

    > A LUC Remedial Design will be prepared as the land use component of the Remedial Design. Within 90 days of ROD signature, the [federal agency] shall prepare and submit to EPA for review and approval a LUC remedial design that shall contain implementation and maintenance actions, including periodic inspections." Another option is to refer to the enforceable schedule in the IAG for the RD or RAWP.

    To be consistent with the LUC Checklist and with what should be stated in the following ROD, please revise this part of the sentence in the PP to state that the LUCIP ". . . is the land use component of a remedial design and is considered the LUC Remedial Design report, establishing LUC implementation and maintenance requirements enforceable under CERCLA."

Response: Agree.

SRS will revise the sixth sentence of the sixth paragraph of Section IX, Preferred Alternative, as follows:

"Upon final approval, the LUCIP will be appended to the LUCAP and is ~~considered incorporated by reference into the DABW ROD,~~ the land use component of a remedial design and is considered the LUC Remedial Design Report, establishing LUC implementation and maintenance requirements enforceable under CERCLA."

Responsible Party: Shelia McFalls, (803) 645-8119, shelia.mcfalls@srs.gov

MINOR COMMENTS

1. Minor Comment #1, Preferred Alternative Section, page 20, first paragraph: The PP states, "[a] comparative alternative analysis, provided in Table 4 for the DABW, was developed to quantitatively evaluation the alternatives as they relate . . . ." Should it be "evaluate" instead of "evaluation" in this sentence?

   Response: Agree

   The first paragraph of Section IX, Preferred Alternative, will be revised as follows:

   "A comparative alternative analysis, provided in Table 4 for the DABW, was developed to quantitively evaluate~~ion~~ the alternatives as they relate to the CERCLA criteria."

   Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

   ADDITIONAL REVISIONS

1. **As requested by the USEPA in the Beneficial Use of Select Coal Ash and Coal Fines OUs and D-Area Ash Basin Wetlands General Comment Discussion held on 04/20/2026, the legend label for the DABW boundary in Figures 2, 4, and 6 will be renamed from "D Area Ash Basin" to "D-Area Ash Basin Wetlands" to accurately reflect the correct unit name and wetland environment. The revised figures are included below.**

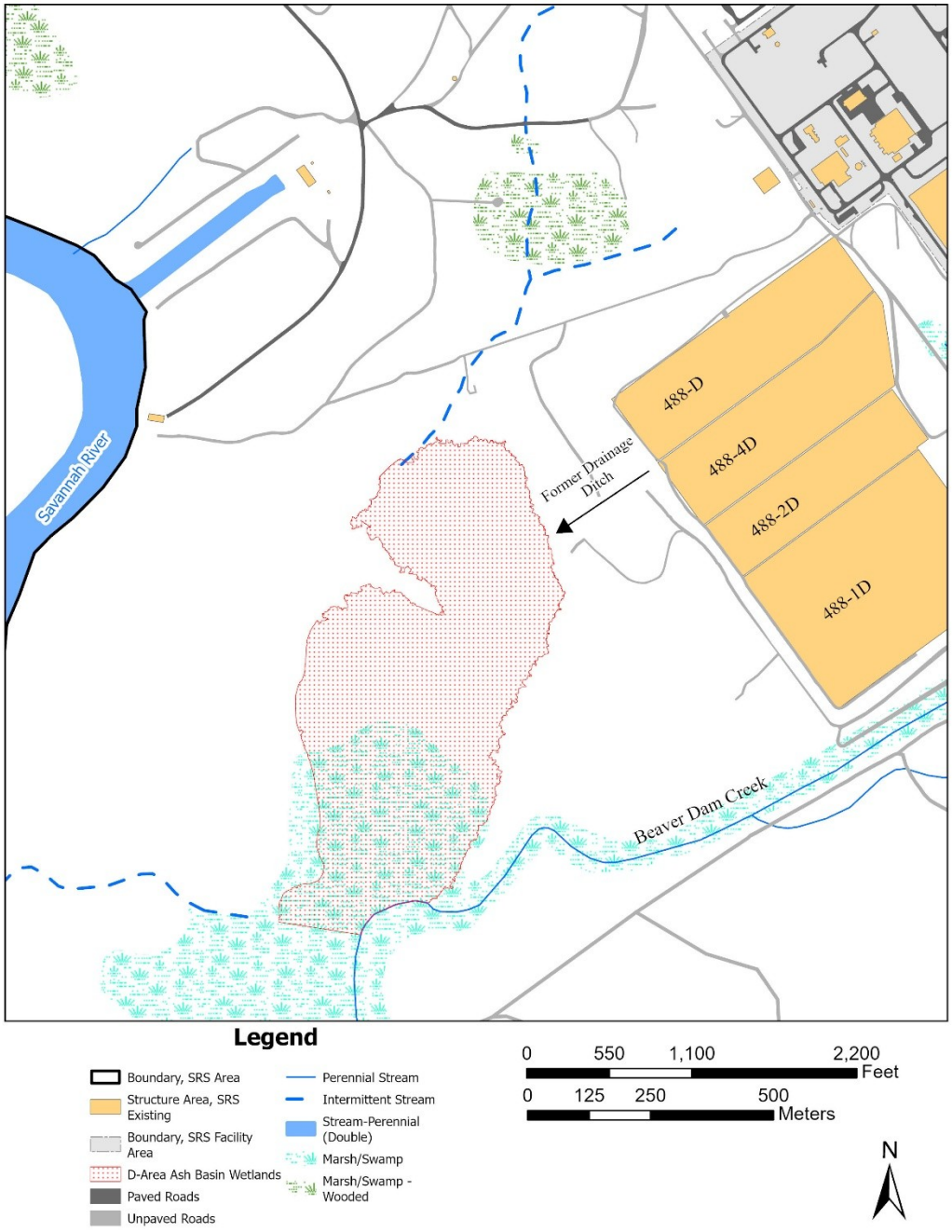


Figure 2. Layout of the D-Area Ash Basin Wetlands

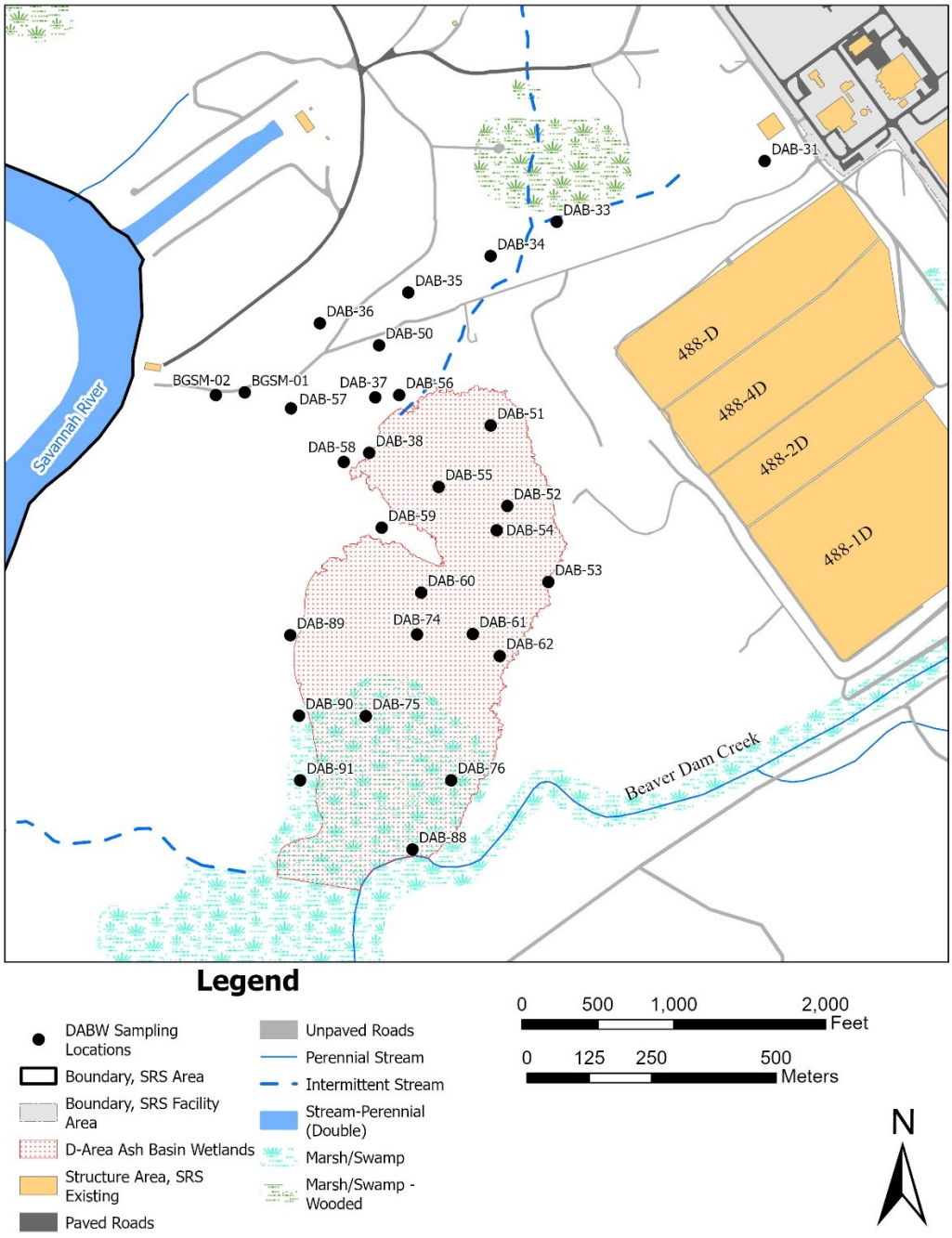


Figure 4. D-Area Ash Basin Wetlands Sampling Locations

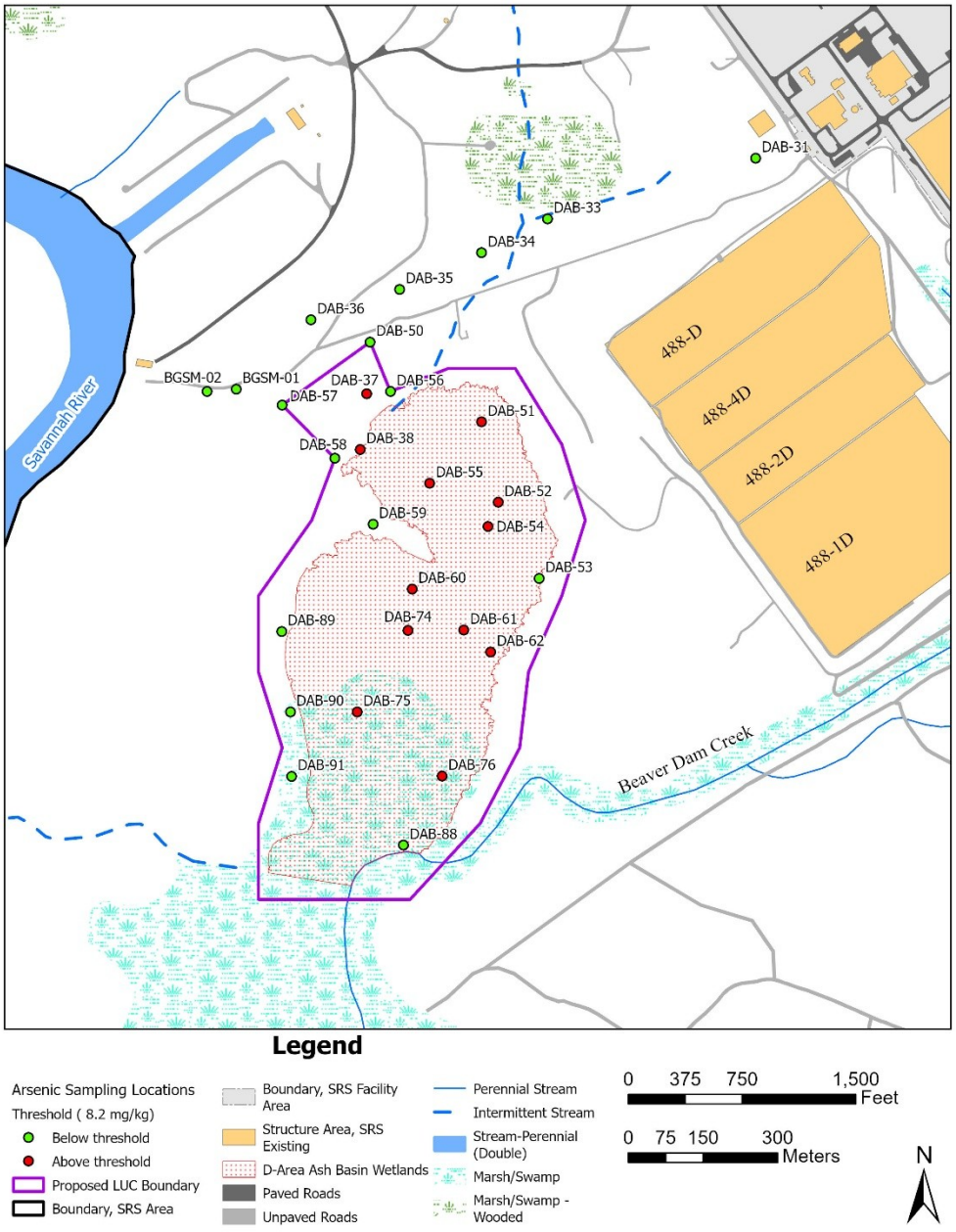


Figure 6. Proposed Land Use Control Boundary for the D-Area Ash Basin Wetlands Based on Ash Extent (represented by Arsenic and background cleanup level of 8.2 mg/kg)

SRS Responses to South Carolina Department of Environmental Services
Comments on the
Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U)
SEMS Number: 69, SRNS-RP-2025-01449, Revision 0, November 2025
Savannah River Site, Aiken, South Carolina

Comments received: January 8, 2026

General Comments

1. As a note, the RCRA Federal Facilities Section maintains the draft permits/modifications in the Columbia Office and no longer maintains a copy in the Aiken office. One may be provided to the Aiken Office, if requested. Please make a note of these changes for future documents.

   Response: Agree

   The text in Section II, Community Participation, will be revised as follows:

   "The RCRA ARF for SCDES is available for review by the public at the following locations:

   The South Carolina Department of
   Environmental Services
   Bureau of Land and Waste Management
   2600 Bull Street
   Columbia, South Carolina 29201
   (803) 898-2000

   ~~**The South Carolina Department of**~~
   ~~**Environmental Services**~~
   ~~**Aiken Environmental Affairs Office**~~
   ~~**206 Beaufort Street, Northeast**~~
   ~~**Aiken, South Carolina 29801**~~
   ~~**(803) 642-1637**~~**"**

   Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

Specific Comments

1. Section IX, Preferred Alternative, page 13 of 30. The first full paragraph in the second column appears to be instructive text not meant to be included in the SB/PP.

   Response: Agree

   Section IX, Preferred Alternative, will be revised to delete the instructive text as follows:

"Approval by USEPA and SCDES is required for any modification or termination of the LUCs.

~~**The Preferred Alternative can change in response to public comment or new information obtained before the remedial action is implemented at the individual subunits. Provide a descriptive paragraph that thoroughly details the logic behind selecting the preferred alternative. This should compare the preferred alternative to each of the other alternatives and point out the most decisive considerations for making the selection. The argument should be convincing and not leave questions as to why some other alternative was not preferred.**~~**"**

Responsible Party: Maggie Dercole, (803) 952-5797, maggie.dercole@srs.gov

2. Draft Environmental Bulletin, page 4. Please remove the Midlands Environmental Affairs Office address and phone number from the list of locations where copies of the draft permit modification are available.

Response: Agree

The Draft Environmental Bulletin will be revised to remove the text as follows:

"Copies of the draft RCRA permit modification are available for review at SCDES during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following location~~s~~:

SCDES
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
Phone: (803) 898-2000

~~**SCDES**~~
~~**Midlands Aiken Environmental Affairs Office**~~
~~**206 Beaufort St., N.E.**~~
~~**Aiken, SC 29801**~~
~~**Phone: (803) 642-1637**~~**"**

Responsible Party: Shelia McFalls, (803) 645-8119, shelia.mcfalls@srs.gov

3. Draft Radio Announcement, page.7. Please revise the third sentence in the first paragraph to state: "The South Carolina Department of Environmental Services (S-C-D-E-S) also released a draft hazardous waste permit modification for the remedy; the draft is available at S-C-D-E-S's Columbia Office."

Response: Agree

The Draft Radio Announcement will be updated as follows:

"The South Carolina Department of Environmental Services (S-C-D-E-S) also released a draft hazardous and mixed waste permit modification for the remedy.~~;~~ ~~t~~The draft is available for review during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at S-C-D-E-S's Bureau of Land and Waste Management Office, 2600 Bull Street, in Columbia, telephone (803) 898-0255 ~~Midland Aiken Environmental Affairs Office~~. The public is invited to review and comment on the proposed remedy."

Responsible Party: Shelia McFalls, (803) 645-8119, shelia.mcfalls@srs.gov

DRAFT REVISED ENVIRONMENTAL BULLETIN

Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit Available for Public Comment

The United States Department of Energy (DOE) will release a Statement of Basis/Proposed Plan (SB/PP) for the D-Area Ash Basin Wetlands (no building number [NBN]) for the Savannah River and Floodplain Swamp Integrator Operable Units (IOU) on Month Day, Year, describing the preferred remedial approach for this Operable Unit (OU) at the Savannah River Site (SRS). The South Carolina Department of Environmental Services (SCDES) will also release a draft Resource Conservation and Recovery Act (RCRA) permit modification for the proposed remedial action for this OU. These documents will be available for public review and copying at the locations listed below. The forty-five (45) day public comment period is scheduled for Month Day, Year, to Month Day, Year.

The SB/PP was completed to meet the terms of the Comprehensive Environmental Response, Compensation, and Liability Act, a law governing the investigation and cleanup of waste units. DOE has worked with the United States Environmental Protection Agency-Region 4 (EPA) and the SCDES to ensure the remedial approach is consistent with all applicable environmental requirements. DOE, EPA, and SCDES have reviewed the risks associated with this unit and have evaluated the cleanup alternatives presented in this plan.

The D-Area Ash Basin Wetlands (NBN) is located downgradient of D Area. It is a forested mixed compositional bottomland wetland that received overflow ash from the D-Area Ash Basins via an upgradient drainage ditch. The D-Area Ash Basin Wetlands ash depositional area has an estimated area of 90 acres with an estimated volume of 739,000 cubic yards of ash. Remedial action is needed at this unit because arsenic and coal-related radionuclides (potassium-40, thorium-232, and uranium-238) are present in surface ash/soils that may pose a threat to human health and the environment. Groundwater will be addressed as part of the D-Area Groundwater OU characterization and cleanup decisions.

The proposed remedy for the OU is Land Use Controls (LUCs) to prevent human exposure to arsenic and coal-related radionuclides present in surface ash/soils that pose an unacceptable risk to the onsite worker. LUCs include posting and maintenance of warning signs and the establishment of administrative and worker access controls to effectively reduce exposure of contaminated media to human receptors. General public access to the site is limited to site workers. This remedy does not support unrestricted land use and will require five-year remedy reviews.

Comments on the SB/PP and the draft RCRA permit are requested by Month Day, Year. Upon completion of the public comment period, a Responsiveness Summary that addresses public comments will be prepared. The Responsiveness Summary will be made available with the Record of Decision and the final RCRA permit modification and will be sent to each person who submits comments.

DRAFT REVISED ENVIRONMENTAL BULLETIN

Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit Available for Public Comment

To aid in the review of the SB/PP, a SB/PP Fact Sheet for the OU was prepared.

Copies of the SB/PP and the Fact Sheet are available in the Administrative Record. The Administrative Record is available in the information repositories listed below:

US Department of Energy
Public Reading Room
Gregg-Graniteville Library
University of South Carolina – Aiken
471 University Parkway
Aiken, South Carolina 29801
(803) 641-3456

Thomas Cooper Library
Government Information and Maps Department
University of South Carolina
1322 Greene Street
Columbia, South Carolina 29208
(803) 777-4841

Hard copies of the SB/PP and Fact Sheet are available at the following locations:

Reese Library
Government Information Department
Augusta University
2500 Walton Way
Augusta, Georgia 30904
(706) 737-1744

Asa H. Gordon Library
Savannah State University
2200 Tompkins Road
Savannah, Georgia 31404
(912) 358-4324

The SB/PP and Fact Sheet are available electronically at the following address:
~~http://www.srs.gov/general/programs/soil/pub/pubinv.html~~https://public.srs.gov/missions-and-programs/environmental-stewardship/public-involvement-2/

Copies of the draft RCRA permit modification are available for review at SCDES during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following location~~s~~:

SCDES
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
Phone: (803) 898-2000

~~SCDES~~
~~Midlands Aiken Environmental Affairs Office~~
~~206 Beaufort St., N.E.~~
~~Aiken, SC 29801~~
~~Phone: (803) 642-1637~~

DRAFT REVISED ENVIRONMENTAL BULLETIN

Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of Savannah River and Floodplain Swamp Integrator Operable Unit Available for Public Comment

If there is interest in discussing the recommended remedial approach, a public hearing may be requested. Comments on the SB/PP should be sent to Barbara Smoak. Comments on the draft RCRA permit modification or requests for a public hearing should be sent to Kent Krieg. For additional information or to request a public meeting contact:

Barbara Smoak
Savannah River Nuclear Solutions, LLC
Savannah River Site
Building 703-43A
Aiken, SC 29808
(803) 952-8060
barbara.smoak@srs.gov

SCDES
Attn: Kent Krieg, Director
Division of Waste Management
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
(803) 898-0255
kent.krieg@des.sc.gov

DRAFT REVISED RADIO ANNOUNCEMENT

ANNOUNCER:

The U. S. Department of Energy (D-O-E) released a Statement of Basis / Proposed Plan on Month Day, Year for the D-Area Ash Basin Wetlands Operable Unit at the Savannah River Site (S-R-S). The proposed remedy consists of Land Use Controls. The South Carolina Department of Environmental Services (S-C-D-E-S) also released a draft hazardous and mixed waste permit modification for the remedy.~~;~~ ~~t~~The draft is available for review during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at S-C-D-E-S's Bureau of Land and Waste Management Office, 2600 Bull Street, in Columbia, telephone (803) 898-0255 ~~Midland Aiken Environmental Affairs Office~~. The public is invited to review and comment on the proposed remedy.

This document is available at the D-O-E Public Reading Rooms at the University of South Carolina – Aiken, Augusta University, the University of South Carolina – Columbia, Savannah State University, and is available on the S-R-S webpage, https://public.srs.gov, under Environmental Stewardship.

Written comments and requests for a public hearing must be received no later than Month Day, Year by Kent Krieg of S-C-D-E-S at kent.krieg@des.sc.gov or Barbara Smoak of S-R-S at barbara.smoak@srs.gov.