



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

**JAN 31 2018**

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  
Acting 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:** Savannah River Site's Responses to the Regulatory Comments on the Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2018 (Print Date: 11/03/2017)

In accordance with the terms of Section XIX.C of the Federal Facility Agreement (FFA) for the Savannah River Site (SRS), the U.S. Department of Energy (DOE) is submitting the responses to the regulatory comments on the FFA Revision 0 Appendix E, Long-Term Projections for Fiscal Year (FY) 2018 (Print Date: 11/03/2017) for your review. The South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on the Revision 0 Appendix E for FY2018 in their letter dated December 21, 2017. The U.S. Environmental Protection Agency (EPA) approved the Revision 0 Appendix E for FY2018 in their letter dated January 4, 2018.

Based on the responses to the SCDHEC's comments, a Revision 1 Appendix E for FY2018 is not required to be submitted. However, upon approval of the responses, an update to the Revision 0 Appendix E for FY2018 will be developed for inclusion in the FFA. This updated Revision 0 Appendix E will reflect the agreements reached after the High-Level Waste Tank milestone suspension discussion as reflected in the *Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestones* (see FFA Appendix L).

Ms. Susan B. Fulmer  
Mr. Jon Richards

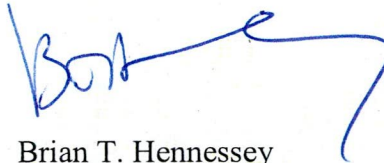
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Please review the enclosure and provide your comments or approval within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject appendix are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,



Brian T. Hennessey  
SRS Remedial Project Manager  
Infrastructure and Area Completion Division

IACD-18-126

Enclosure:

Savannah River Site's Responses to the South Carolina Department of Health and Environmental Control's Comments on Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2018 (Print Date: 11/03/17)

cc:

R. Campbell, EPA – Atlanta  
R. H. Pope, EPA - Atlanta  
D. Scaturro, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. D. Wilson, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
T. R. Fuss, SCDHEC – Aiken Environmental Affairs Office

cc w/encl:

D. Lloyd, EPA-Atlanta  
J. Tufts, EPA-Atlanta

**Savannah River Site's Responses to the  
South Carolina Department of Health & Environmental Control Comment on:  
Federal Facility Agreement**  
Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2018 (Print Date: 11/03/17)  
dated November 14, 2017 and received November 15, 2017

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Comments Received: December 21, 2017

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## General Comments

1. The schedule outlined in Appendix E contains a completion date of 2065 due to continuing missions at the Savannah River Site (SRS); however, the latter years of the schedule continue to contain a significant volume of work to be completed to meet this commitment. The Department is concerned that extending the Area Completion activities out jeopardizes the goals established in the Comprehensive Cleanup Plan and Letter of Support, as well as the overall accelerated cleanup vision for the SRS. The extremely heavy ramping up of work scheduled for the end of the SRS lifecycle may not be achievable from a budget or personnel perspective.

**Response to General Comment #1: See response to General Comment #2.**

2. The Department remains concerned about the overall meager amount of work requiring review by FFA staff during the upcoming years due to pushing work out into future years. Every effort should be made to move work forward in the cleanup schedule, particularly Appendix E.1 and E.2, to continue the momentum gained by accelerated cleanup efforts and to maintain a stable work effort for staff in the upcoming years.

**Response to General Comment #2: To continue protection of human health and the environment, the U. S. Department of Energy (DOE) will continue to evaluate early execution of cleanup work. DOE wants to keep the efficiencies that have been gained through the Area Completion approach. Therefore, smaller projects that can be potentially performed ahead of final area completion will be identified for discussion with the U. S. Environmental Protection Agency and South Carolina Department of Health and Environmental Control. As stated in the November 2017 *Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestones*, two removal actions are scheduled for D-Area Groundwater Operable Unit to accelerate the cleanup in this area. The milestones for these two removal actions will be added as an update to the Revision 0 Appendix E for Fiscal Year 2018, as applicable, since the milestones were approved as part of the signed Suspension Agreement. The dates for the two removal actions are listed below. These dates will be added to Appendices E.1 and E.2, as applicable, annually.**

### **D-Area Groundwater Operable Unit**

- D-Area Groundwater Operable Unit Revision 0 Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) Submittal – 07/31/2018
- D-Area Groundwater Operable Unit Action Memorandum Submittal – 01/31/2019
- D-Area Groundwater Operable Unit Removal Action Start – 01/31/2020

**Savannah River Site's Responses to the  
South Carolina Department of Health & Environmental Control Comment on:  
Federal Facility Agreement  
Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2018 (Print Date: 11/03/17)  
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**D-Area Coal Storage Area (484-17D) in Support of D-Area Groundwater Operable Unit**

- D-Area Coal Storage Area (484-17D) in Support of D-Area Groundwater Operable Unit Revision 0 Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) Submittal – 09/30/2018
- D-Area Coal Storage Area (484-17D) in Support of D-Area Groundwater Operable Unit Action Memorandum Submittal – 03/31/2019
- D-Area Coal Storage Area (484-17D) in Support of D-Area Groundwater Operable Unit Removal Action Start – 04/30/2020

**Specific Comments**

1. The Department has reviewed the provided implementation schedule for the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), and Stormwater Outfall A-013 (NBN) Operable Unit and agrees with not placing the Revision 1.2 Interim Action Statement of Basin/Proposed plan on Appendix E.2 (FY2020).

**Response to Specific Comment #1: Thank you. The Savannah River Site will review the implementation schedule for the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), and Stormwater Outfall A-013 (NBN) Operable Unit and will add Revision 0 milestones to Appendices E.1 and E.2, as applicable, annually.**