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

November 6, 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: Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2026-00391, Revision 1, November 2026) (Clean Copy and Redline Pages) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Numbers: 91

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 *Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U)* (SRNS-RP-2026-00391, Revision 0, July 2026) was submitted to the South Carolina Department of Environmental Services (SCDES) and the U. S. Environmental Protection Agency (EPA) on July 22, 2026. The SCDES' approval and EPA's comments were received on September 17, 2026. The draft responses to the regulatory comments were submitted for review via email on October 27, 2026. The EPA and SCDES stated that the draft responses were acceptable, via email on October 28, 2026, and November 4, 2026, respectively. The final responses were incorporated into the Revision 1 Clean copy and Redline pages.

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.

Comments or questions from you or your staff may be directed to me at (803) 952-6211 or the DOE Program Manager, April Coffman, at (803) 508-0490.

Sincerely,

MATTHEW BAKER

Digitally signed by MATTHEW BAKER
Date: 2026.11.06 10:02:56 -05'00'

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

RDDD-27-107

Enclosures:
1. Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2026-00391, Revision 1, November 2026) (Clean Copy) SEMS Numbers: 91
2. Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2026-00391, Revision 1, November 2026) (Redline Pages) SEMS Numbers: 91
3. SRS Responses to the U. S. Environmental Protection Agency Comments on the Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2026-00391, Revision 0, July 2026) SEMS Numbers: 91

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
M. Mehta, SCDES-Columbia
G. O'Quinn, SCDES-Midlands Aiken Environmental Affairs Office
T. G. Corley, SCDES-Midlands Aiken Environmental Affairs Office
C. L. Robertson, SCDES-Midlands Aiken Environmental Affairs Office
E. G. Downing, SCDES-Midlands Aiken Environmental Affairs Office
H. L. Herlong, SCDES-Midlands Aiken Environmental Affairs Office

c w/ encl:
H. H. Cathcart, SCDES-Columbia
B. Martin, USEPA-Atlanta
M. McRae, TechLaw, Inc.

GENERAL COMMENT

1. The LUCIP does not specify whether photographic evidence will be submitted along with the field inspection checklist to support the observations of LUC protectiveness. This photographic documentation should be provided to support the field observations on the condition of the access roads, warning signs and that no unauthorized activity occurred within the LUC boundary in both subunits. It is noted the annual inspection checklist presented in Appendix B (Field Inspection Checklist) provides verification that the land use controls (LUCs) are protective; however, no photographs are required to support the field observations of LUC protectiveness. Please revise the checklist and the text to consider the inclusion of photographic documentation taken during field inspections.

   Response: Clarification.

   Per Manual C3, Procedure ER-SOP-019, maintenance items are recorded on the checklist map which is included in the field inspection checklist. As part of the SRS Five-Year Remedy Review process, Environmental Compliance and Area Completion Projects (EC&ACP) personnel conduct a field walkdown for each OU that is discussed in that year's Remedy Review Report. These walkdowns include taking current photographs of the OU. The Five-Year Remedy Review Reports include historical and current photographs, including the signs and other items (such as subsidence, cracks in the cover) as needed. Additionally, EC&ACP and Operations and Maintenance Organization personnel discuss whether any issues were discovered during the required field inspections. The findings recorded on the field inspection checklists for each OU conducted within the five-year time frame are discussed in the Remedy Review Report. EC&ACP and USDOE personnel also complete field walkdowns of each OU before submitting the Revision 0 Remedy Review Report. Furthermore, drone footage of the OUs are viewed by the regulators during the field walkdown Microsoft Team meetings that occur before the submittal of the regulatory comments on the Revision 0 Five-Year Remedy Review Report. No change to the document is proposed.

   Responsible Party: Sadika O'Quinn, (803) 270-3452, sadika.oquinn@srs.gov

SPECIFIC COMMENT

1. **Section 2.1, General Description and History of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU, Page 2 of 24:** The text indicates the site area consists of relatively flat terrain and references Figure 2 (Location of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU (L Area); however, Figure 2 does not include ground surface elevation contours. Please revise Figure 2 to include ground surface elevation contours.

   Response: Agree.

   The figure will be updated with topographic contour lines. Satellite imagery will be removed from the figure to make topography contours legible. The revised figure is shown as Figure CR-1 at the end of these responses.

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

MINOR COMMENTS

1. **Section 2.1.2, LRP 131-1L Subunit, Page 4 of 24 and Section 4.3, Site Use Program, Page 12 of 24:** Page 4 cites "(SRNS 2025a)" and Page 12 cites "(SRNS 2024)"; however, there are no corresponding references in Section 5.0 (References) for these citations. According to Section 5.0, it appears that "(SRNS 2025a)" should be "(SRNS 2025)" and "(SRNS 2024)" should be "(SRS 2024)". Please revise the in-text citations accordingly.

   Response: Agree.

   The references will be updated as suggested above.

   Responsible Party: Sadika O'Quinn, (803) 270-3452, sadika.oquinn@srs.gov

2. **Section 2.2, Nature and Extent of Contamination, Page 6 of 24:** The abbreviation "RCOCs" is used for the first time in the first bullet; however, it is not defined. Please revise the text to define "RCOCs" upon the first use.

   Response: Agree.

   The acronym "RCOC" will be defined where it first appears in Section 2.2.

   Responsible Party: Sadika O'Quinn, (803) 270-3452, sadika.oquinn@srs.gov

3. **Section 2.3, Remedial Actions Selected, Page 7 of 24:** The last sentence of the first bullet appears to be an incomplete sentence. Please revise the text to complete the sentence.

   Response: Agree.

   The 1st bullet in Section 2.3 will be rewritten as follows and is consistent with the ROD:

   "Warning signs posted at the ECODS L-3 and LRP 131-4L subunits around the waste unit boundaries/areas~~. The number and location of warning signs were based on size of the subunits and access points to the subunits. O~~, <u>including o</u>perations and maintenance of the signage.

   Responsible Party: Sadika O'Quinn, (803) 270-3452, sadika.oquinn@srs.gov

4. **Figure 5, ECODS L-3, LRP 131-1L, and 131-4L OU Generic Conceptual Site Model after Completion of Final Remedial Action, Page 22 of 24:** The abbreviations "RCOC" and "PCBs" are not defined in the legend. Please include these abbreviations and their definitions in the legend.

   Response: Agree.

   The acronyms, "RCOC" and "PCBs" will be added to the legend in Figure 5. The updated figure is shown at the end of these responses as Figure CR-2.

   Responsible Party: Sadika O'Quinn, (803) 270-3452, sadika.oquinn@srs.gov

5. **Table 1, Land Use Controls for ECODS L-3 and 131-4L Subunits, Page 23 of 24:** There appears to be a typographical error in item 2. Specifically, item 2 states, "A. Land Use", which appears to be incomplete. Additionally, the footnotes b, c, d, e, and g in the Type of Control column for 1, 2, 3, 4 and 6 are shown lower case and not upper case superscript at the end of each listed control. Please revise these typographical errors accordingly.

   Response: Agree.

   The footnotes in the rows corresponding with 1 through 6 will be shown as superscript. The footnotes remain lower case for consistency with the footnotes at the bottom of the table. Additionally, the "A. Land Use" is correct. If groundwater had been included, it would have been listed as "B" under Property record restrictions. For clarity, an "A." will be added to Column B (Purpose of Control) in front of "Restrict use of property by imposing restrictions."

   Responsible Party: Sadika O'Quinn, (803) 270-3452, sadika.oquinn@srs.gov

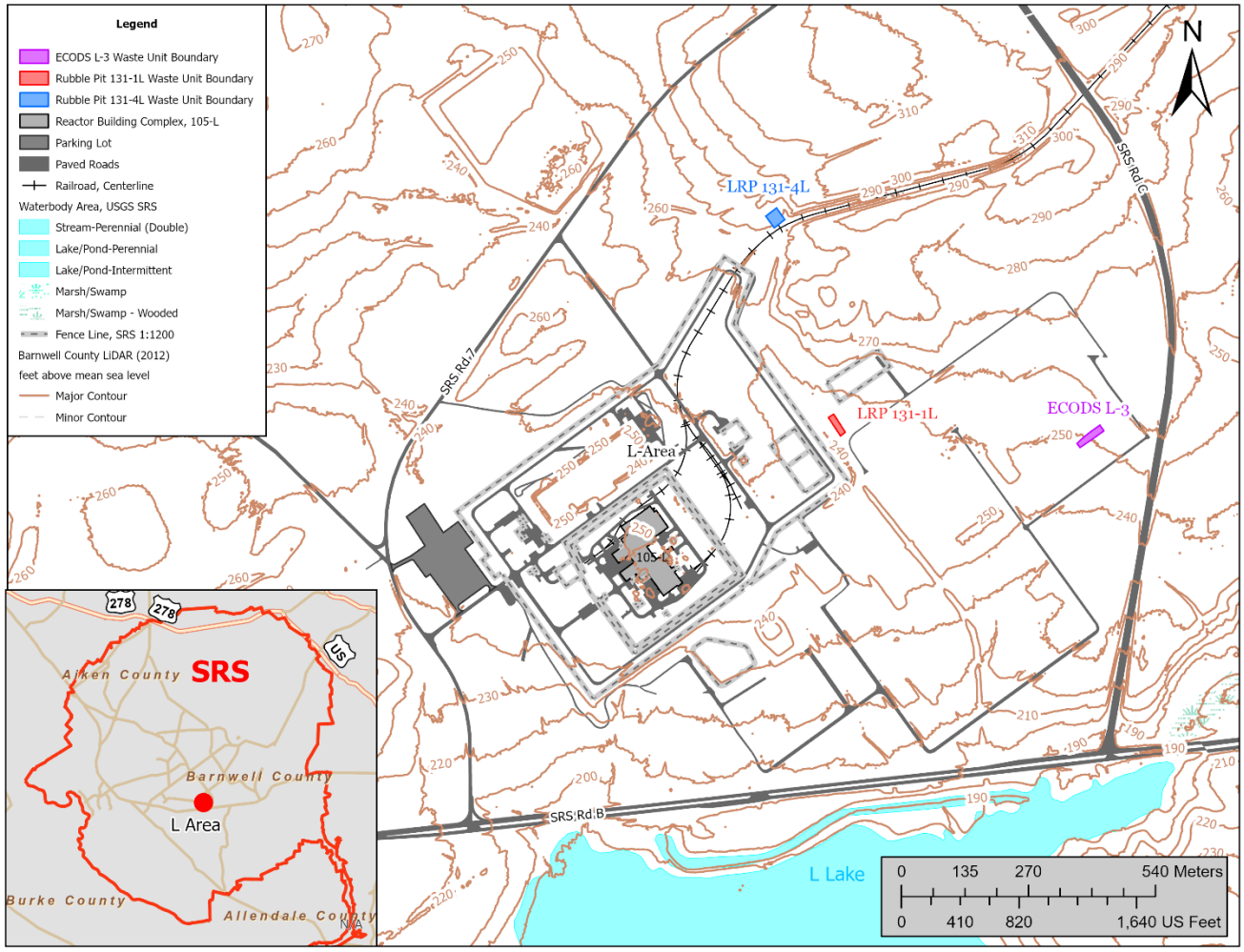
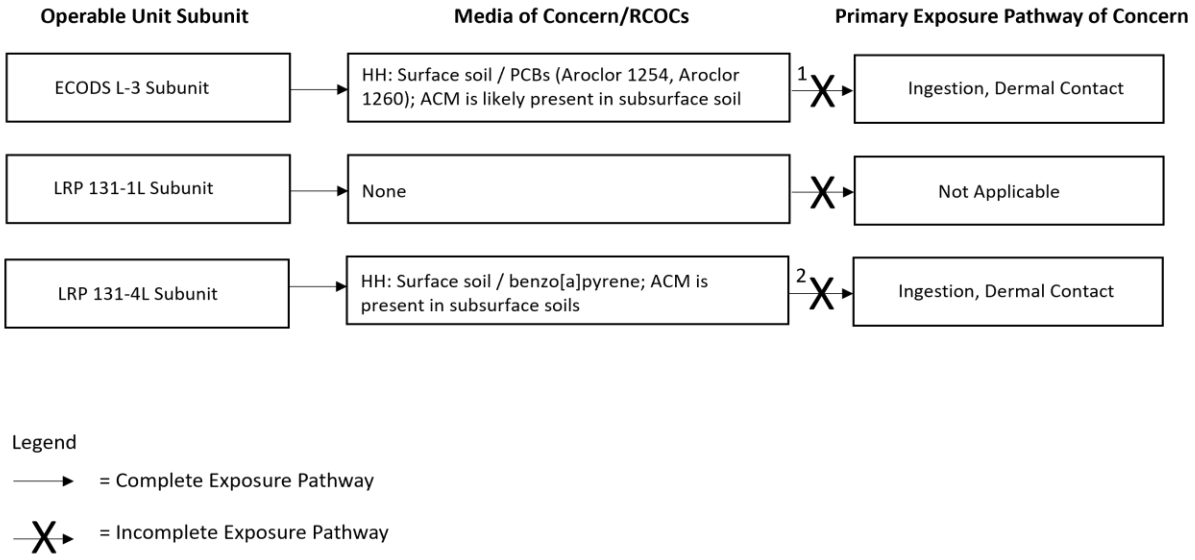


Figure CR-1. Revised ECODS L-3, LRP 131-1L, and LRP 131-4L OU Location Map



HH – Human health
ACM – Asbestos Containing Material
PCBs – Polychlorinated Biphenyls
RCOCs – Refined Constituents of Concerns

1. Alternative A-2, LUCs, prevents exposure of PCBs and ACM that is likely present in unit soils.
2. Alternative B-2, LUCs, prevents exposure to benzo[a]pyrene and ACM that is likely present in unit soils.

Figure CR-2. Revised ECODS L-3, LRP 131-1L, and 131-4L OU Generic Conceptual Site Model after Completion of Final Remedial Action