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

JUL 21 2022

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: RFI/RI Work 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-2021-05602, Revision 1 Redline, July 2022), Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, and the Revised Implementation Schedule, SEMS Number: 91

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the subject information for your review. The South Carolina Department of Health and Environmental Control's (SCDHEC) and the U. S. Environmental Protection Agency's (EPA) comments on the Revision 0 document were received on May 13, 2022, and April 12, 2022, respectively. In addition, the revised implementation schedule is enclosed and is updated in the Revision 1 Redline Document. The implementation schedule was revised to reflect a shift in dates relative to unit investigation/characterization that is scheduled to begin on or before September 30, 2022. Specifically, the revision is due to the inadvertent omission of the time required to prepare a scoping summary and conduct the required scoping meetings during the development of the original implementation schedule. Following the characterization activities, a Post-Characterization Scoping Meeting is planned for the Spring to discuss the outcome of the characterization and its completeness. In addition, SRS will be submitting a Combined Document (i.e., RFI/RI Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility [CMS/FS]); therefore, a combined Problem Identification and CMS/FS Scoping Meeting will be held to discuss the risk assessment, PTSM, contaminant migration and CMS/FS alternatives review and recommendation prior to submittal of the Combined Document.

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

Comments or questions from your staff may be directed to me at (803) 952-8365, or the DOE Project Manager, Mr. Philip Prater, at (803) 952-9333.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2022.07.19 09:34:32 -04'00'

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

IACD-22-161

Enclosures:
1. RFI/RI Work 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-2021-05602, Revision 1 Redline, July 2022) SEMS Number: 91
2. SRS Responses to SCDHEC Comments on the RCRA Facility Investigation/Remedial Investigation Work 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-2021-05602, Revision 0, February 2022)
3. SRS Responses to USEPA comments on the RCRA Facility Investigation/Remedial Investigation Work 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-2021-05602, Revision 0, February 2022)
4. ECODS L-3, L-Area Rubble Pits (131-1L, 131-4L) L-Area Ash Basin (188-L) OU Implementation Schedule

cc w/o encl:
J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. Stewart, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:
M. McRae, TechLaw, Inc.

SCDHEC Comments Received May 13, 2022

GENERAL COMMENTS

1. For every mention of TAL and TCL in the document, please include metals along with the other analytes.

   Response: Agree

   Based on the comment, the following revisions to the Work Plan will be made:

   Section 3.1.2.2, Paragraph 1:
   "… Samples will be analyzed for the full list of TAL and TCL constituents (Table 5) and radiological indicator parameters (Table 6)…"

   Section 3.1.2.3, Paragraph 1:
   "… Samples will be analyzed for the full list of TAL and TCL constituents (Table 5) and radiological indicator parameters (Table 6)…"

   Section 3.1.6.2, Paragraph 1:
   "… All samples collected at the subunit will be analyzed for the full suite of TAL and /TCL constituents (Table 5), radiological indicators (Table 6), and evaluated for the presence of asbestos-containing material…"

   Section 3.1.6.3, Paragraph 1:
   "… The subunits will be sampled extensively, and all samples will be analyzed for the full suite of TAL and /TCL constituents (Table 5), radiological indicators (Table 6), and evaluated for the presence of asbestos-containing material…"

   Section 3.1.8, Paragraph 1:
   "… Soil samples will be analyzed for the TAL and TCL constituents (Table 5) as well as radiological indicator analyses (Table 6)…"

   Section 5.2, Paragraph 2:
   "All samples will be analyzed for all ~~constituents on the~~ TAL and TCL constituents (Table 5).~~, to include all volatiles, semi-volatiles, pesticides, and PCBs~~…"

   Section 5.3, Paragraph 2:
   "… All samples will be analyzed for all ~~constituents on the~~ TAL and TCL constituents (Table 5).~~, to include all volatiles, semivolatiles, pesticides, and PCBs~~…"

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

SCDHEC Comments Received May 13, 2022

SPECIFIC COMMENTS

1. **Executive Summary, Conclusions and Objectives, page ES-3.** Please include PTSM along with the human health assessment, ecological assessment, and contaminant migration analysis in the data support discussions for 131-1L and 131-4L on this page. Also, revise Sections 3.1.3.2 and 3.1.3.3 accordingly.

   Response: Agree

   The following revisions will be made:

   Executive Summary, Conclusions and Objectives, Page ES-3, LRP 131-1L, First Bullet:
   "• There is no unit-specific data available. Therefore, sampling is proposed to define the nature and extent of contamination in surface and subsurface soils. These data are needed to support the principal threat source material evaluation, human health and ecological risk assessments, and a contaminant migration analysis."

   Executive Summary, Conclusions and Objectives, Page ES-3, LRP 131-4L, First Bullet:
   "• Due to insufficient definitive level data, inconsistent sampling depths, and lack of sampling location spatial reference information, previous sampling at the L-Area Rubble Pit (131-4L) subunit is inadequate for principal threat source material evaluation, human health and ecological risk assessments, and contaminant migration analysis. Therefore, sampling is proposed to define the nature and extent of contamination in surface and subsurface soils consistent with current protocols. These data are needed to support the principal threat source material evaluation, human health and ecological risk assessments, and the contaminant migration analysis for the subunit."

   Section 3.1.3.2, Paragraph 1:
   "There is no unit-specific data available. Therefore, sampling is proposed to define the nature and extent of contamination in surface and subsurface soils. These data are needed to support the PTSM evaluation, HH and ECO risk assessments, and the CM analysis."

   Section 3.1.3.3, Paragraph 1:
   "Due to insufficient definitive level data and discrepancies in the sampling data, ~~inconsistent sampling depths,~~ previous sampling at the LRP 131-4L subunit is inadequate for PTSM evaluation, HH and ECO risk assessments, and a CM analysis. Therefore, sampling is proposed to define the nature and extent of contamination in surface and subsurface soils. These data are needed to support the PTSM evaluation, HH and ECO risk assessments, and the CM analysis for the subunit."

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

2. **Section 2.2.3, LRP 131-4L Subunit, page 14.** Regarding the previous investigation in this subunit, the work plan states, "Sample results corresponding to specific depth intervals and location are not available." Section 3.1.3, LRP 131-4L Subunit, page 25, states that previous sampling at the subunit is inadequate for human health and ecological risk assessment due to inconsistent sampling depths. *Please clarify whether information related to sampling depths in this subunit are not available or if the depths are known but inconsistent.*

   Response: Agree with Clarification

   Sample locations and depths from the 1994 Site Evaluation Report (SER) are shown in Figure 13 of the Work Plan. Spatial references were not available for the samples and therefore, accurate locations could not be determined. Sample depth intervals were not consistent for each location and do not meet the SRS protocols for HH and ECO risk assessments, which require samples from the 0.0 to 0.3 meter (m) (0 to 1 feet [ft]) and 0.3 to 1.2 m (1 to 4 ft) depth intervals. Finally, the sample results presented in the 1994 SER could not confidently be connected to the specific locations or depth intervals. For all of these reasons, the data from the 1994 SER of the LRP 131-4L subunit were considered inadequate for PTSM evaluation, HH and ECO risk assessments, and CM analysis.

   For clarification of the Work Plan text, the following revisions are proposed:

   Section 3.1.3.3, Paragraph 1:
   "Due to insufficient definitive level data and discrepancies in the sampling data, ~~inconsistent sampling depths,~~ previous sampling at the LRP 131-4L subunit is inadequate for PTSM evaluation, HH and ECO risk assessments, and a CM analysis. Therefore, sampling is proposed to define the nature and extent of contamination in surface and subsurface soils. These data are needed to support the PTSM evaluation, HH and ECO risk assessments, and the CM analysis for the subunit."

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

3. **Section 2.3, Operable Unit Strategy, LRP 131-1L Subunit, page 15.** The work plan states that a 1991 soil gas survey at the subunit identified "methane through hexane." What does "through" mean in this context?

   Response: Agree with Clarification

   Methane is a hydrocarbon chain with one carbon. Hexane is a hydrocarbon chain with six carbons. In this case, "methane through hexane" means hydrocarbon chains with one to six carbons, or methane, ethane, propane, butane, pentane, and hexane. The text will be revised for clarity as follows:

Section 2.3, LRP 131-1L Subunit, Paragraph 1:
"…This survey indicated the presence of various volatile hydrocarbons (i.e., methane, ethane, propane, butane, pentane, and ~~through~~ hexane)…"

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

4. **Section 2.3, Operable Unit Strategy for LRP 131-1L and 131-4L Subunits, pages 16 and 17.** These sections state that visual inspections for suspected asbestos-containing material (ACM) will be conducted during soil sampling. If suspect ACM is identified, samples will be submitted for waste analysis. Table 5 and 6, Laboratory Analytical Specifications Tables for TAL/TCL analytes and radiological analytes, pages 85 through 89, provide detailed information regarding lab analytical methods for the referenced analytes. However, no such information is provided for analysis of suspected ACM. If possible, please provide more detail on the type of analysis that will be conducted if suspected ACM is encountered. For example, which specific analytical method will be used, how will results be interpreted to determine if ACM is present, etc.

   Response: Clarification

   The project team discussed with the SRNS asbestos SMEs to get further clarification on the asbestos evaluation. Based on this discussion, there will not be a "waste analysis" performed to confirm asbestos. Alternatively, during sampling activities, workers in the field will be trained for asbestos awareness, which includes training on identification of asbestos-containing material. During drilling activities, workers will be observing for potential asbestos-containing material. If potential asbestos-containing material is found, sampling will be suspended pending the outcome of an evaluation performed by SRNS asbestos SMEs to confirm if the material is asbestos-containing material. Revisions made under USEPA General Comment #3 encompass this comment. No further changes to the document are proposed.

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

5. **Section 3.1.6.2, Develop Decision Rules, LRP 131-1L Subunit, page 27.** This section of the work plan states that no previous investigation data exists for the subunit. Section 2.3, Operable Unit Strategy, LRP 131-1L Subunit, page 15, indicates that a 1991 soil gas survey for volatile organic hydrocarbons was conducted at the subunit. Please clarify.

   Response: Clarification

   This comment was addressed in USEPA Specific Comment #2, including text revisions. No further changes to the document are proposed.

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

6. **Section 3.1.7, Specify the Limits on Decision Errors, page 28.** The last bullet point on the page indicates that the acceptable recovery window for matrix spikes and matrix spike duplicates is generally greater than or equal to 135% or less than 30%. Acceptable MS/MSD recoveries are typically within this range of 30% to 135%, not outside of the range as the text indicates. It appears possible that this could be an error with the use of greater than and less than symbols; however, please clarify whether MS/MSD recoveries are supposed to be within this range, not outside of it.

   Response: Agree

   This was a mistake with the use of "greater than" and "less than" symbols. The text will be revised as follows:

   Section 3.1.7, Paragraph 4, Third Bullet:
   "Percent Recovery from matrix spike duplicates are generally between 30% and 135% ~~≥ 135% or < 30%~~ for accuracy/bias data quality indicator…"

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

7. **Sections 5.2 and 5.3, Sample Design and Rationale, LRP 131-1L and LRP 131-4L, pages 32 and 33.** The proposed sampling intervals for the two subunits omit several intervals of soil. Specifically, no sampling intervals are proposed from 4 to 8 ft, 12 to 14 ft, and tentatively 14 to 16 ft. Please explain the rationale for not sampling at all soil intervals to depth or revise the workplan to include them.

   Response: Agree

   The sampling depths for LRP 131-1L and LRP 131-4L will be revised as suggested. The new depth intervals for the LRP 131-1L subunit will be 0 to 1 ft, 1 to 4 ft, 4 to 8 ft, 8 to 12 ft, and 12 to 16 ft, with a tentative depth of 16 to 20 ft. The new depth intervals for the LRP 131-4L subunit will be 0 to 1 ft, 1 to 4 ft, 4 to 8 ft, and 8 to 12 ft, with a tentative depth of 12 to 16 ft. This results in the following revisions to the Work Plan:

   Executive Summary, Conclusions and Objectives, L-Area Rubble Pit (131-1L), Page ES-4, Second Bullet:
   "Sampling is proposed at 21 locations and at five depth intervals (Figure ES-2). Depth intervals include surface soil (0.0- to 0.3-meters [0- to 1-foot]) and subsurface soil (0.3- to 1.2-meters, 1.2- to 2.4~~-2.4- to 3.0~~-meters, 2.4- to 3.6~~-3.0- to 3.7~~-meters, and 3.6~~4.3~~- to 4.9-meters [1- to 4-feet, 4- to 8- ~~to 10~~-feet, 8-~~10~~- to 12-feet, and 12-~~14~~- to 16-feet]). A tentative subsurface soil depth is proposed at 4.9-~~5.5~~- to 6.1-meters (16-~~18~~- to 20-feet) depth."

Executive Summary, Conclusions and Objectives, L-Area Rubble Pit (131-4L), Page ES-4, Second Bullet:
"Sampling is proposed at 371 locations and four step-out locations at four depth intervals (Figure ES-3). The step-out sampling locations are proposed in the event the presence of buried debris is noted at sampling locations along the periphery of the northwestern side. Depth intervals include surface soil (0.0- to 0.3-meters [0- to 1-foot]) and subsurface soil (0.3- to 1.2-meters, 1.2-1.8- to 2.4-meters, and 2.4-3.0- to 3.6-meters [1- to 4-feet, 4-6- to 8-feet, and 8-10- to 12-feet]). A tentative subsurface soil depth is proposed at 3.6-4.3- to 4.9-meters (12-14- to 16-feet) depth."

Section 4.4.2, Paragraph 1:
"… All soil intervals, including the deep subsurface soils (1.2 to 2.4 to 3.0 m, 2.4 to 3.63.0 to 3.7 m, and 3.64.3 to 4.9 m [4 to 8 to 10 ft, 810 to 12 ft, and 1214 to 16 ft]), will be sampled and evaluated through CM and PTSM screening."

Section 4.4.3, Paragraph 1:
"… All soil intervals, including the deep subsurface soils (1.21.8 to 2.4 m and 2.43.0 to 3.6 m [46 to 8 ft and 810 to 12 ft]), will be sampled and evaluated through CM and PTSM screening."

Section 5.2, Paragraph 1:
"… Depth intervals include surface soil (0.0 to 0.3 m [0 to 1 ft]) and subsurface soil (0.3 to 1.2 m, 1.2 to 2.4 to 3.0 m, 2.4 to 3.6 3.0 to 3.7 m, and 3.6 4.3 to 4.9 m [1 to 4 ft, 4 to 8 to 10 ft, 810 to 12 ft, and 1214 to 16 ft]). A tentative subsurface soil depth is proposed at 4.95.5 to 6.1 m (1618 to 20 ft) depth…"

Section 5.3, Paragraph 1:
"… A total of 371 locations and four step-out locations have been identified for sampling at four depth intervals each, for a total of up to 1624 samples (Figure 25). Sampling at the step-out locations will be conducted if buried debris is noted at locations LAP4L-011 and -032. Due to possible safety concerns with soil stability in proximity to the subsidence area, sampling with a drill rig may not be appropriate. However, an attempt to collect samples with a hand auger will be made at the four locations around the subsidence area to include, at a minimum, surface soil (0.0 to 0.3 m [0 to 1 ft]) and shallow subsurface soil (0.3 to 1.2 m [1 to 4 ft]). Depth intervals for all other locations include surface soil (0.0 to 0.3 m [0 to 1 ft]) and subsurface soil (0.3 to 1.2 m, 1.21.8 to 2.4 m, and 2.43.0 to 3.6 m [1 to 4 ft, 46 to 8 ft, and 810 to 12 ft]). A tentative subsurface soil depth is proposed at 3.64.3 to 4.9 m (1214 to 16 ft) depth…"

Table 4 and Table 9 were revised as shown in Table CR-1 and Table CR-2, respectively. Table 3 was revised as shown below in Table CR-3.

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

8. **Sections 5.2 and 5.3, Sample Design and Rationale, LRP 131-1L and LRP 131-4L, pages 32 and 33.** The proposed soil sampling interval for these two subunits are inconsistent with the previous investigation at ECODS L-3. Table 1, ECODS L-3 Subunit Site Evaluation Sampling Depth Intervals, page 79, indicates that soil sampling intervals for ECODS L-3 were 0 to 1 ft, 1 to 4 ft, 4 to 8 ft, 8 to 12 ft, and 12 to 16 ft (where applicable). If the data collected from ECODS L-3 are considered sufficient to support a BRA and remedial decision, why are similar sampling intervals not proposed for LRP 131-1L and LRP 131-4L?

   Response: Agree

   This comment is resolved by the response to SCDHEC Specific Comment #7. No further changes to the Work Plan are proposed.

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

9. **Preliminary Conceptual Site Model for ECODS L-3 subunit, Figure 21, page 73.** The RCOCs column states that PTSM has yet to be determined. Section 2.2.1 ECODS L-3 Subunit, page 12, second paragraph states that the data screening indicated that there is no PTSM at the ECODS L-3 subunit. Also, several sections of the document state that no additional sampling is required for the ECODS L-3 subunit. Please confirm that the RCOC column in Figure 21 is accurate.

   Response: Clarification

   Although the preliminary data screening table in Appendix C for the ECODS L-3 subunit indicates that there is no PTSM, the CSMs presented in the text of the workplan indicate "TBD" (to be determined) because the evaluation has not been formalized and may change to some degree due to implementation of the RI/BRA protocols and/or updates to the USEPA regional screening level (RSL) thresholds. The RCOC column on the CSM will be revised when the risk assessment process is complete and presented in the BRA document. Therefore, the RCOC column in Figure 21 is accurate and complete given that this project is currently in the work plan stage of the process. No change to the document is proposed.

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

10. **Table 7, Minimum Field Quality Control / Quality Assurance Sampling Requirements, page 90.** This table, as well as sections of the work plan text, indicate that one equipment blank will be collected per 40 samples. Section 7.2, Equipment and Decontamination Procedures, page 37, lists several pieces of equipment that will come in contact with soil samples, including hand auger buckets, stainless steel scoops, stainless steel mixing bowls, and a balance. Since multiple pieces of equipment will be coming in to contact with the samples, it is unclear whether individual equipment blanks will be collected with rinsate from each piece of

equipment, or if rinsate from each piece of equipment will be composited into one field blank per 40 samples. Please clarify how equipment blanks will be collected and confirm that this frequency is consistent to achieve the desired data quality objectives.

Response: Clarification

Equipment blanks, or rinsate blanks, are typically collected one per 40 samples. The equipment blanks are collected from rinsate composited from the sampling equipment following decontamination. The purpose is to verify decontamination is working correctly to remove residual contamination on sampling equipment and to ensure there is no cross-contamination. The Work Plan is not intended to provide the procedures for sample blank collections. No change to the Work Plan is proposed.

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

11. **Table 9, ECODS L-3, LRP 131-1L, and LRP 131-4L OU Sample Matrix, pages 94 through 99.** For LRP 131-4L, the number of proposed samples for each location and their corresponding depths are the same as those listed for LRP 131-1L; according to the proposed sampling strategy for LRP 131-4L discussed in Section 5.3 and throughout the document, there should be one less sample listed per location and at slightly varying subsurface depths than 131-1L. Please correct; also, ensure that the sample numbers listed at the end of this table on page 99 are correct.

    Response: Agree

    Table 9 was revised per changes in previous USEPA General Comment #1. The corrected table is shown as Table CR-2. No further changes to the Work Plan are proposed.

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

Table CR-3. Revised Table 3

Pathway (Media)	Probable Conditions	Exposure Pathway and/or Release Mechanisms	Data Needs and DQOs Including Engineering / Physical Processes	Field Activities Including Removal and Characterization	Parameters	Potential Remedial Action Alternatives
Surface soil, subsurface soil, deep soil	Contamination of surface soil from construction material and burning from deposition of waste material on ground surface and pits Infiltration/ percolation of contamination through surface soils into subsurface soils	Ingestion, inhalation, absorption, and/or direct exposure with soils and/or debris presently buried in the subunit	Define the nature and extent of contamination of the subunit. Full characterization of the subunit.	Collection of surface soils, subsurface, and deep soils from 0 to 1 ft, 1 to 4 ft, 4 to 8 ~~to 10~~ ft, 8~~10~~ to 12 ft, and 12~~14~~ to 16 ft (tentatively 16~~18~~ to 20 ft) 21 Locations: 13 inside the subunit and 8 at subunit boundary	Data validated to SRS electronic VV level, with 10% of the sampling batches validated to the SRS definitive level. Full TCL and TAL suite of analytes; gross alpha and nonvolatile beta. Cr^{+6} analysis if required by elevated Total Cr. Asbestos-containing material visual inspection during field activities.	No Action Land Use Controls Excavation of contaminated soils Cover System with Land Use Controls

USEPA Comments Received April 12, 2022

GENERAL COMMENTS

1. It is uncertain whether the number of proposed soil samples to be collected around the boundary of the LRP 131-4L subunit is adequate to define the nature and extent of contamination. For example, according to Figure 25 (Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-4L Subunit), of the 12 perimeter subunit boundary soil samples proposed, only two sample locations (i.e., LAP4L-009 and LAP4L-010) are proposed along the 100 feet (ft) long southwestern side of the subunit. *Please revise the Work Plan to justify why this should be enough along the southwestern and northwestern sides of the subunit to ensure the extent of contamination is adequately defined.*

   Response: Agree with Clarification

   Sample locations within the LRP 131-4L subunit were chosen using a random, unbiased sampling pattern spaced 6.1 meters (20 feet) apart. The perimeter sample locations were chosen manually to best define the subunit, with more locations placed on the two eastern sides based on topography to capture any potential contaminant migration by surface runoff. However, SRS agrees with the comment and therefore proposes one additional location on the southwestern side (LAP4L-033) and one additional location on the northwestern side (LAP4L-032) of the subunit (Figure CR-1). Location LAP4L-009 was moved to best distribute the locations on the southwestern side. The revised LRP 131-4L sampling locations will ensure the extent of contamination is adequately defined.

   The additional sampling locations, as well as the response to Specific Comment #7, result in the following revisions to the Work Plan:

   Executive Summary, L-Area Rubble Pit (131-4L), Page ES-4, Final Bullet:
   "Sampling is proposed at 371 locations and four step-out locations at four depth intervals (Figure ES-3). The step-out sampling locations are proposed in the event the presence of buried debris is noted at sampling locations along the periphery of the northwestern side. Depth intervals include surface soil (0.0- to 0.3-meters [0- to 1-foot]) and subsurface soil (0.3- to 1.2-meters, 1.82- to 2.4-meters, and 2.43.0- to 3.6-meters [1- to 4-feet, 64- to 8-feet, and 108- to 12-feet]). A tentative subsurface soil depth is proposed at 3.64.3- to 4.9-meters (124- to 16-feet) depth."

   Executive Summary, L-Area Rubble Pit (131-4L), Page ES-5, First Bullet:
   "The 371 locations have been identified in and around the subunit include 19 locations within the subunit boundary and 182 locations at the peripheral of the subunit to aid in extent determination."

Figure ES-3, Page ES-9:
Revised as shown in Figure CR-1.

Section 2.3, LRP 131-4L Subunit, Paragraph 2:
"Soil sampling of the subunit is proposed to be done in a random, unbiased sampling pattern spaced 6.1 m (20 ft) apart within the subunit. A total of 371 locations and four step-out locations have been identified for sampling at four depth intervals each, for a total of 1624 samples…"

Section 5.3, Paragraph 1:
"… A total of 371 locations and four step-out locations have been identified for sampling at four depth intervals each, for a total of up to 1624 samples (Figure 25). Sampling at the step-out locations will be conducted if buried debris is noted at locations LAP4L-011 and -032. Due to possible safety concerns with soil stability in proximity to the subsidence area, sampling with a drill rig may not be appropriate. However, an attempt to collect samples with a hand auger will be made at the four locations around the subsidence area to include, at a minimum, surface soil (0.0 to 0.3 m [0 to 1 ft]) and shallow subsurface soil (0.3 to 1.2 m [1 to 4 ft]). Depth intervals for all other locations include surface soil (0.0 to 0.3 m [0 to 1 ft]) and subsurface soil (0.3 to 1.2 m, 1.28 to 2.4 m, and 2.43.0 to 3.6 m [1 to 4 ft, 46 to 8 ft, and 810 to 12 ft]). A tentative subsurface soil depth is proposed at 3.64.3 to 4.9 m (124 to 16 ft) depth…"

Section 5.3, Paragraph 2:
"… 37 locations have been identified in and around ~~The locations identified include 19 locations within the subunit boundary and 182 locations at~~ the subunit boundary to aid in extent determination…"

Figure 25:
Revised as shown in Figure CR-1.

Table 4:
Revised as shown in Table CR-1.

Table 9:
Table CR-2 will replace Table 9 in the Work Plan. The new table has been checked to ensure consistency with the text and ensure all depths are correct.

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

2. It appears the Environmental Protection Agency (EPA) May 2021 regional screening levels (RSLs) were utilized for screening purposes at the Early Construction and Operational Disposal Site (ECODS) L-3 and LRP 131-4L subunits, rather than the more recent November 2021 RSLs. *Please revise the Work Plan to indicate the most recent EPA RSLs will be utilized to support the remedial investigations and risk assessments.*

   Response: Agree with Clarification

   For the purposes of preliminary screening of the ECODS L-3 and L-Area Rubble Pit (131-4L) subunits, the May 2021 RSLs were used as the latest updated values at the time of data evaluation and to support the Scoping Meeting. SRS will continue to use the most updated version of the USEPA RSLs, preliminary remediation goals (PRGs), ecological screening values (ESVs), and maximum contaminant levels (MCLs) for all data evaluations at the time of document preparation. A review of the November 2021 and the May 2022 RSLs confirms that there are no significant changes that would impact the results of the preliminary data screening that is presented in the document. The data will be re-screened using the latest risk-based thresholds that are available for the Problem Identification scoping meeting and the BRA document. The following text change is proposed to clarify this.

   Section 3.1.4, Paragraph 2:
   "The most recent USEPA RSLs/preliminary remediation goals (PRGs), ecological screening values (ESVs), and maximum contaminant levels (MCLs) will be used as basis for acceptance/performance criteria to determine if contaminated media poses a risk to HH or the environment…"

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

3. According to the Work Plan, visual inspections will be performed to determine the presence of both asbestos and/or asbestos containing material during drilling operations at the LRP 131-1L and LRP 131-4L subunits; however, it is unclear how the presence of asbestos only would be determined visually. As such, it appears more likely that visual inspection would be performed to determine the presence of asbestos containing materials. *Please revise the Work Plan to clarify the visual inspections for asbestos and clarify if the visual inspections would be performed to determine the presence of asbestos containing material.*

   Response: Agree

   SRS agrees that visual inspection is for potential asbestos containing material only, not for asbestos. Subject matter experts (SMEs) for asbestos provided input on the direction for sampling in the presence of potential asbestos-containing material. The path forward was determined to be to observe for potential asbestos-containing material while drilling. If potential asbestos-containing material is observed, then the SMEs for asbestos will

evaluate the material to determine if it is asbestos-containing material based on process knowledge. The Work Plan will be revised for clarity to say asbestos-containing material instead of asbestos and to describe this process as follows:

Executive Summary, Conclusions and Objectives, L-Area Rubble Pit (131-1L), Page ES-3, Second Bullet:
"Due to the type of material that was disposed of in the pit, there is a possibility for the unit to contain asbestos-containing material. Therefore, material will be evaluated visually to determine the presence of asbestos-containing material during sampling."

Executive Summary, Conclusions and Objectives, L-Area Rubble Pit (131-4L), Page ES-3, Second Bullet:
"Due to the type of material that was disposed of in the pit, there is a possibility for the unit to contain asbestos-containing material. Therefore, material will be evaluated visually to determine the presence of asbestos-containing material during sampling."

Executive Summary, Conclusions and Objectives, L-Area Rubble Pit (131-1L), Page ES-4, Fourth Bullet:
"… Additionally, visual inspections for asbestos-containing material will be conducted during drilling operations."

Executive Summary, Conclusions and Objectives, L-Area Rubble Pit (131-4L), Page ES-5, Third Bullet:
"… Additionally, visual inspections for asbestos-containing material will be conducted during drilling operations."

Section 2.3, LRP 131-1L Subunit, Paragraph 3:
"In addition to soil sampling, visual inspections for potential asbestos-containing material will be conducted during drilling operations. If potential asbestos-containing material is found, sampling will be suspended pending the outcome of an evaluation ~~waste analysis~~ performed by SRNS asbestos subject matter experts (SMEs). If asbestos-containing material is confirmed, further sampling will be reevaluated based on data needs for additional problems warranting action and response actions."

Section 2.3, LRP 131-4L Subunit, Paragraph 3:
"In addition to soil sampling, visual inspections for potential asbestos-containing material will be conducted during drilling operations. If potential asbestos-containing material is found, sampling will be suspended pending the outcome of an evaluation ~~waste analysis~~ performed by SRNS asbestos SMEs. If asbestos-containing material is confirmed, further sampling will be reevaluated based on data needs for additional problems warranting action and response actions."

Section 3.1.3.2, Paragraph 2:
"Due to the type of material that was disposed of in the pit, there is a possibility for the unit to contain asbestos-containing material. Therefore, during sampling, material will be observed for potential ~~evaluated through visual inspection to determine the presence of~~ asbestos-containing material. If potential ~~suspected~~ asbestos-containing material is observed, an evaluation ~~waste analysis~~ will be performed by SRNS asbestos SMEs for confirmation."

Section 3.1.3.3, Paragraph 2:
"Due to the type of material that was disposed of in the pit, there is a possibility for the unit to contain asbestos-containing material. Therefore, during sampling, material will be observed for potential ~~evaluated through visual inspection to determine the presence of~~ asbestos-containing material. If potential ~~suspected~~ asbestos-containing material is observed, an evaluation ~~waste analysis~~ will be performed by SRNS asbestos SMEs for confirmation."

Section 3.1.6.2, Paragraph 1:
"The purpose of data collection in the LRP 131-1L subunit is to determine the nature and extent of contamination at the LRP 131-1L subunit and determine presence of asbestos-containing material. No previous investigation data exists for the LRP 131-1L subunit. All samples collected at the subunit will be analyzed for the full suite of TAL and ~~/~~TCL constituents (Table 5), radiological indicators (Table 6), and evaluated for the presence of asbestos-containing material. These data are required for BRA and determination of problems warranting action."

Section 3.1.6.3, Paragraph 1:
"The purpose of data collection in the LRP 131-4L subunit is to determine the nature and extent of contamination at the LRP 131-4L subunit and determine presence of asbestos-containing material. The subunit will be sampled extensively, and all samples will be analyzed for the full suite of TAL and ~~/~~TCL constituents (Table 5), radiological indicators (Table 6), and evaluated for the presence of asbestos-containing material. These data are required for BRA and determination of problems warranting action."

Section 3.2, Paragraph 1:
"… Additionally, asbestos-containing material may be present in soil in the LRP 131-1L and LRP 131-4L subunits."

Section 5.1, Paragraph 1:
"… The presence/absence of asbestos-containing material at the subunit is also unknown. …"

Section 5.2, Paragraph 3:
"In addition to soil sampling, visual inspections for potential asbestos-containing material will be conducted during drilling operations. If potential ~~suspected~~ asbestos-containing material is found, sampling will be suspended pending the outcome of an evaluation ~~waste analysis~~ performed by SRNS asbestos SMEs. If asbestos-containing material is confirmed, further sampling will be reevaluated based on data needs for additional problems warranting action and response actions. ~~no further sampling will be performed, and the unit path forward will lead to remedy selection to manage assumed hazards.~~"

Section 5.3, Paragraph 3:
"In addition to soil sampling, visual inspections for potential asbestos-containing material will be conducted during drilling operations. If potential ~~suspected~~ asbestos-containing material is found, sampling will be suspended pending the outcome of an evaluation ~~waste analysis~~ performed by SRNS asbestos SMEs. If asbestos-containing material is confirmed, further sampling will be reevaluated based on data needs for additional problems warranting action and response actions. ~~no further sampling will be performed, and the unit path forward will lead to remedy selection to managed assumed hazards.~~"

Section 9.0, Paragraph 1:
"… Should a second phase of characterization for Cr^{+6}, asbestos-containing material, or further nature and extent of contamination be required, then the submittal data for the RFI/RI/BRA/CMS/FS report and subsequent deliverables will be adjusted accordingly…"

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

SPECIFIC COMMENTS

1. **Section 1.2.2, LRP-131-1L Subunit, Page 3 of 100:** The period of operation is not reported for the L-Area Rubble Pit (LRP)-131-1L subunit. *Please revise the text to include the period of operation.*

   Response: Agree with Clarification

   The exact dates of operation for the LRP 131-1L subunit are unknown, as there is no documentation of when the subunit was in operation or when operations were completed. Because LRP 131-1L was used for disposal of construction debris, the dates of operation are likely to be consistent with ECODs L-3 in the early 1950s. The Work Plan will be revised as follows:

   Section 1.2.2, Paragraph 1:
   "The LRP 131-1L subunit is a former waste disposal area reportedly used for various construction debris. <u>There is no documentation for the subunit dates of operation. Based on the presence of construction debris, it is likely the LRP-131-1L was active at the same time as ECODS L-3 in the early 1950s.</u> SRS records indicate that metal, lumber, poles, and concrete were disposed of in the LRP 131-1L subunit…"

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

2. **Section 1.2.2, LRP-131-1L Subunit, Page 3 of 100, and Section 3.1.2.2, LRP 131-1L Subunit, Page 24 of 100:** The statement in each section that no previous characterization has been performed at the LRP 131-1L subunit requires further clarification. For example, Section 1.0 (Introduction) states there is no subunit-specific characterization data for the LRP 131-1L subunit; however, a soil-gas prescreen was performed. Additionally, Section 2.l.2 (LRP 131-1L, Page 10 of 100) indicates a soil-gas survey is the only previous investigation performed at the LRP 131-1L subunit. *Please revise the text in these sections to indicate that although no subunit-specific characterization data is available, a soil-gas survey was performed at the LRP 131-1L subunit.*

   Response: Agree with Clarification

   At the LRP 131-1L subunit, a soil-gas survey was completed as an initial pre-screen which aids in determining the potential for volatile compound contamination. Based on the results, volatile hydrocarbons were found that are consistent with typical landfill degradation. This survey does not provide quantitative characterization data for the subunit. However, SRS agrees that the omission of this survey in later sections is potentially misleading and proposes the following revision:

Section 1.2.2, Paragraph 1:
"…~~No characterization has been performed at the LRP 131-1L subunit~~. An initial soil-gas survey of the LRP 131-1L subunit was performed which indicated the presence of volatile hydrocarbons consistent with typical landfill degradation. No other characterization has been performed at the LRP 131-1L subunit. The LRP 131-1L is in Appendix C of the FFA, *RCRA/CERCLA Units,* for further assessment (FFA 1993)."

Section 3.1.2.2, Paragraph 1:
"~~No characterization has been performed at the LRP 131-1L subunit.~~ An initial soil-gas survey of the LRP 131-1L subunit was performed which indicated the presence of volatile hydrocarbons consistent with typical landfill degradation. No other characterization of the LRP 131-1L subunit has been performed. Full characterization of the entire subunit is required to determine unit-related contamination and problems warranting action…"

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

3. **Section 1.4.1, ECODS L-3 Subunit, Page 4 of 100:** The ECODS L-3 subunit area dimensions provided in the text for the two trenches are not consistent with the dimensions presented on Figure 3 (ECODS L-3 Subunit Boundaries and Site Evaluation Sampling Locations, Page 52 of 100). For example, the text indicates the two trenches located end to are approximately 60 ft wide by 100 ft long. However, based on the scale presented on the figure, the dimension of the two trenches is less than 60 ft wide and greater than 100 ft long. *Please revise the text to address the discrepancy in the dimensions for the two trenches presented between the text and figures*.

Response: Agree

The two trenches were each estimated to be approximately 60 ft wide and 100 ft long in previous documentation based on past aerial photographs and operations at the subunit. This results in a total subunit size of approximately 60 ft wide by 200 ft long, which is depicted as the *ECODS L-3 Waste Unit Boundary* in Figure 3. However, a 2002 ground penetrating radar (GPR) survey, completed as part of the Site Evaluation (SE) effort, determined the trench dimensions to be 50 ft wide by 90 ft long for one trench and 15 ft wide by 90 ft long for the second trench. The boundaries determined by the GPR survey are provided in Figure 3. The Work Plan will be revised for clarity as follows:

Section 1.4.1, Paragraph 1:
"…The waste at ECODS L-3 was buried in two trenches estimated to be ~~, located end to end and~~ approximately (~) 18-meters (m) (60-feet [ft]) wide by 30 m (100 ft) long for a total subunit size of ~18 m (60 ft) wide by 60 m (200 ft) long (Figure 3). A 2002 SE effort determined the trench dimensions were actually ~15 m (50 ft) wide by 27 m (90 ft) long and 4.6 m (15 ft) wide by 27 m (90 ft) long. Sections of the trenches may have been used as a burn pit for combustible waste disposal."

Section 2.1.1, Paragraph 2:
"Based on historical photographs, it is estimated that waste disposed of in the ECODS L-3 subunit was buried in two trenches located end-to-end and each ~18 m (60 ft) wide by 30 m (100 ft) long. The boundaries of the trenches were estimated by the 2002 GPR survey completed, with the size of each trench determined ~~estimated~~ to be ~15 m (50 ft) wide by 27 m (90 ft) long and 4.6 m (15 ft) wide by 27 m (90 ft) long ~~18 m (60 ft) wide by 30 m (100 ft) long~~ (Figure 3). The GPR survey estimated the depth as ~7.3 m (24 ft)…"

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

4. **Section 1.4.1, ECODS L-3 Subunit, Page 4 of 100:** This section does not discuss the subunit used to dispose of material potentially containing asbestos. According to Section 2.3 (Operable Unit Strategy, ECODS L-3 Subunit, Page 15 of 100), it is assumed that asbestos containing material is potentially present in the subunit. *Please revise Section 1.4.1 to state the ECODS L-3 subunit was used to dispose of material potentially containing asbestos*.

   Response: Agree

   Based on experience with ECODS units at the SRS and the dates of operation, there is a potential that the ECODS L-3 subunit could contain asbestos-containing material. The Work Plan will be revised as follows:

   Section 1.4.1, Paragraph 1:
   "…ECODS were used during the construction and early operation of SRS for disposal of construction debris and other waste material. Based on experience at SRS with ECODS units and the dates of operation for the ECODS L-3, it is assumed that asbestos-containing material is potentially present at the ECODS L-3 subunit. The waste at ECODS L-3 was buried in two trenches…"

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

5. **Section 1.4.1, ECODS L-3 Subunit, Page 5 of 100:** The depth of the water table in ft below the ground surface (bgs) is not presented in this section. Consistent with the depths of the water table noted for LRP 131-1L and LRP 131-4L subunits of 15 ft and 25 ft in Sections 1.4.2 and 1.4.3, respectively, *please revise the text in this section to state the depth of the water table in ft bgs encountered at the ECODS L-3 subunit.*

   Response: Agree

   The depth to groundwater was inadvertently left out of this section. The Work Plan will be revised as follows:

Section 1.4.1, Paragraph 3:
"…There is no evidence of stained soil or stressed vegetation within the ECODS L-3 subunit. The depth to groundwater at the ECODS L-3 subunit is ~10.7 m (35 ft) below ground surface (bgs). The nearest wetland to the ECODS L-3 subunit is the extensive wetland areas associated with L Lake, ~0.6 km (0.4 mi) to the south…"

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

6. **Section 1.4.2, LRP 131-1L Subunit, Page 6 of 100:** Section 1.4.2 indicates that asphalt debris and an obvious depression were observed on the ground surface within the subunit during a site visit on December 7, 2021; however, the location of these observations discussed in the text is not depicted on a site map (e.g., Figure 24, Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-1L Subunit). As such, the location of the asphalt debris and ground surface depression relative to the subunit boundaries and proposed sample locations is unclear. *Please revise the Work Plan to address this issue.*

   Response: Agree

   The asphalt debris was observed on the edge of the depression and within the defined boundary of the Rubble Pit. The locations of the observations were not surveyed and therefore exact locations are not able to be provided. However, the relative location and size of the depression, including the asphalt debris, will be added to Figure 7 and Figure 24 of the Work Plan, as shown below in Figure CR-2 and Figure CR-3, respectively.

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

7. **Section 1.4.3, LRP 131-4L Subunit, Page 7 of 100, and Section 2.1.3, LRP 131-1L Subunit, Page 11 of 100:** It is unclear whether the northwestern side of the subunit outside of the orange ball markers was identified as the area of land disturbance, as stated in these sections. For example, based on Figure 25 (Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-4L Subunit), the subunit boundary was expanded towards the northeast. As such, it appears the northeastern side of the subunit boundary was expanded to a total length of 120 ft. *Please revise the text to address the discrepancy so the location of the land disturbance area is clearly documented.*

   Response: Agree with Clarification

   The 1994 Site Evaluation Report (SER) states that the land disturbance outside of the orange ball markers was on the northwestern side of the subunit, and therefore extended the subunit 6.1 meters (20 feet) in that direction. However, there are no detailed figures to confirm which side was extended in the SER. A most recent visit to the site, in preparations for fieldwork, has confirmed the location of the subsidence northwest of Rubble Pit 131-4L. The area was heavily covered with low growing ground cover and

dense bushes obscuring the subsidence's location. Visual inspection noted three (3) distinct depressions with the largest extending to a depth of over 4 ft. Pieces of concrete were visible within the largest of the three depressions. This area has been surveyed and included on the Figure CR-1 in depicting its location relative to the Rubble Pit. As a result, sampling locations are proposed around this area of subsidence. However, due to safety concerns with ground stability and use of a drill rig in close proximity of the subsidence may limit how close a drill rig can be used for collection of samples. At a minimum, sample depths of 0-1 and 1-4 ft will be attempted to be collected via hand auger. Four (4) sampling locations (LAP4L-034 through -037) are proposed. Sampling location LAP4L-012 was moved due to the close proximity of proposed location LAP4L-037. Additionally, because debris was noted at surface and at depth in and around the subsidence area, four (4) step-outs (LAP4L-038 through -041) are proposed in the event debris is noted at locations LAP4L-011 and -032.

Another walkdown of the northeastern side of Rubble Pit 131-4L was also completed. This area includes a natural surface drainage as indicated by surface topography. Surface debris was noted to the northeast, outside of the orange ball markers. The presence of the debris outside the boundary of the Rubble Pit could be attributed to earth moving activities when covering the Pit with a shallow soil cover. There was no evidence of material buried in this area. However, the proposed sampling locations presented in the RFI/RI Work Plan will remain to determine nature and extent as well as evaluate the presence of additional debris at depth beyond the boundary of the unit in this area.

To clarify this discrepancy, the Work Plan will be revised as follows:

Section 1.4.3, Paragraph 1:
"…Orange ball markers were placed to designate the subunit boundaries, an area ~30.5 m by 30.5 m (100 ft by 100 ft). However, during the 1994 SE evaluation, the subunit size was questioned due to land disturbance on the northwestern side of the subunit, outside of the orange ball markers. This was confirmed in a recent walkdown of the area. Based on survey of the area, the subsidence area is ~12.2 m (40 ft) from the original pit boundary. Within the subsidence area, three depressed areas were noted. One of the depressed areas represents the largest surface expression with a depth greater than 1.2 m (4 ft). Debris was noted in and around this depression. Therefore, the size of the subunit is considered ~~SER considered the LRP 131-4L subunit~~ to be ~42.7~~36.6~~ m by 30.5 m (14~~2~~0 ft by 100 ft) to include the disturbed land. Observations of debris on the northeastern side of the subunit, outside of the orange ball markers, were made during multiple site visits in 2022. …"

Section 2.1.3, Paragraph 2:
"…The subunit boundaries were not able to be definitively determined from the GPR survey. Recent site visits noted the location of the area of subsidence northwest of the pit boundary along with the presence of debris on the surface and within the area of

subsidence. Additionally, debris was noted on the surface to an area northeast of the subunit, outside of the orange ball markers. ~~The survey also indicated soil disturbance to the northwest,~~ T~~t~~herefore, the size of the subunit may be larger than the original subunit boundaries and will be ~~were~~ expanded ~~to include this area~~ for sampling…"

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

8. **Section 1.4.3, LRP 131-4L Subunit, Page 7 of 100, and Section 3.1.5.3, LRP 131-4L Subunit, Page 26 of 100:** The dimensions discussed in these sections for the subunit boundary of 120 ft by 100 ft expanded to include the land disturbance area identified during the 1994 site evaluation are not consistent with the dimensions presented on the site figure. For example, according to Figure 12 (LRP 131-4L Subunit Boundaries and Topography), the subunit boundary appears to be 100 ft by 100 ft and square shaped and does not include the land disturbance area. *Please revise the Work Plan to address this discrepancy.*

   Response: Agree

   Figure 12 was revised as shown in Figure CR-4.

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

9. **Section 1.4.3, LRP 131-4L Subunit, Page 7 of 100:** The location of the blacktop and asphalt debris observed on the ground surface and discussed in the text is not depicted on a site map (e.g., Figure 25, Proposed RFI/RI Work Plan Sampling Locations for the LRP 131-4L Subunit). As such, the location of the blacktop and asphalt debris relative to the subunit boundaries and proposed sample locations is unclear. *Please revise the Work Plan to address this issue*.

   Response: Clarification

   The debris that was observed in the field at LRP 131-4L was observed in multiple locations scattered throughout the subunit. As a result, the proposed sampling approach includes sampling locations within and beyond the defined area of the unit boundary as indicated by the addition of sampling locations to the northeast of the unit. Figure CR-1 indicates the area where surficial material was noted on surface northeast of the unit. Without accurate spatial reference for the observations, depicting the numerous locations of debris would not be accurate. No further change to Figure 25 is recommended.

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

10. **Section 7.2, Equipment and Decontamination Procedures, Page 38 of 100, and Section 7.7, Investigation Derived Waste, Page 42 of 100:** It is unclear whether the investigation derived waste (IDW) management plan will be incorporated or attached to the Work Plan to ensure proper implementation during the remedial investigation. For example, Section 7.2 states, "Decontamination of field sampling equipment will be done in accordance to the 3Q1 Manual Procedure 9016, Section 5.4. The Disposal of IDW will follow the job-specific waste management plan." In addition, Section 7.7 states, "IDW will be managed according to the site-specific IDW management plan developed for the project." *Please revise the Work Plan to ensure proper implementation of the IDW management plan during the remedial investigation*.

    Response: Agree with Clarification

    Investigation Derived Waste (IDW) generated as part of characterization activities must have an approved site-specific IDW management plan prepared in accordance with the *Savannah River Site Investigation-Derived Waste Management Plan* (WSRC 2007b). The site-specific IDW plan is developed as part of work control planning and is typically not included in the Work Plan. To clarify this discrepancy, reference to the *Savannah River Site Investigation-Derived Waste Management Plan* (WSRC 2007b) will be included in the Work Plan as follows:

    Section 7.0, Paragraph 1:
    "…Additional implementing documents such as the environmental evaluation checklist, automated hazard analysis, radiological work instructions, and site-specific health and safety plans and IDW plans are internal to SRS, and detail day-to-day sampling operations and safety requirements."

    Section 7.2, Paragraph 1:
    "…Decontamination of field sampling equipment will be done in accordance to the 3Q1 Manual Procedure 9016, Section 5.4. Disposal of IDW will follow the job-specific waste management plan developed in accordance with the *Savannah River Site Investigation-Derived Waste Management Plan* (WSRC 2007b)."

    Section 7.7, Paragraph 1:
    "Per the *Savannah River Site Investigation-Derived Waste Management Plan* (WSRC 2007b), IDW will be managed according to the site-specific IDW management plan developed for the project."

    Section 10.0 References:
    "WSRC, 2007b. *Savannah River Site Investigation-Derived Waste Management Plan*, WSRC-RP-1994-1227, Revision 9, October 2007, with the latest revision of Appendices A through C, Washington Savannah River Company, LLC, Savannah River Site, Aiken, SC."

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

USEPA Comments Received April 12, 2022

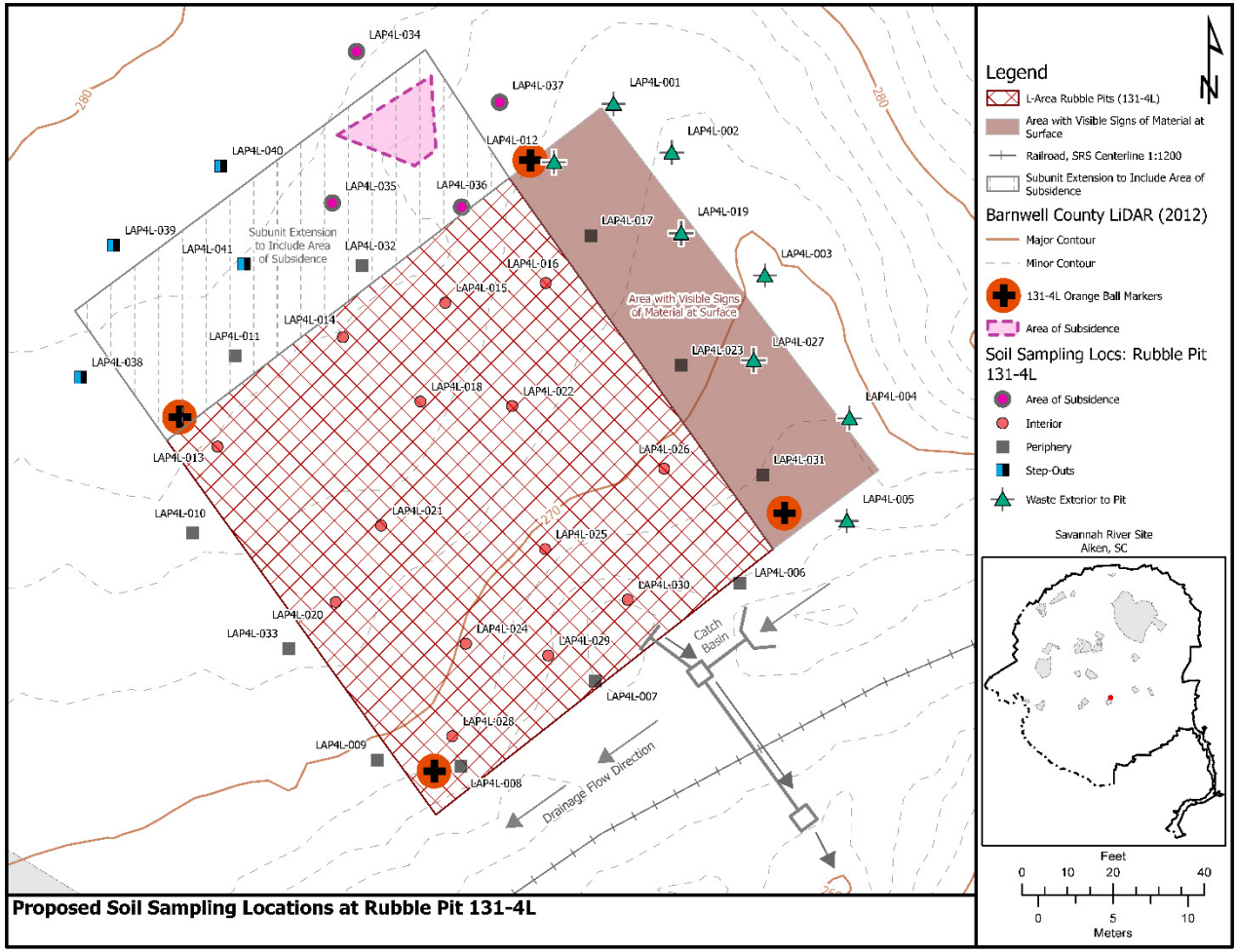


Figure CR-1. Revised Figure ES-3 and Figure 25

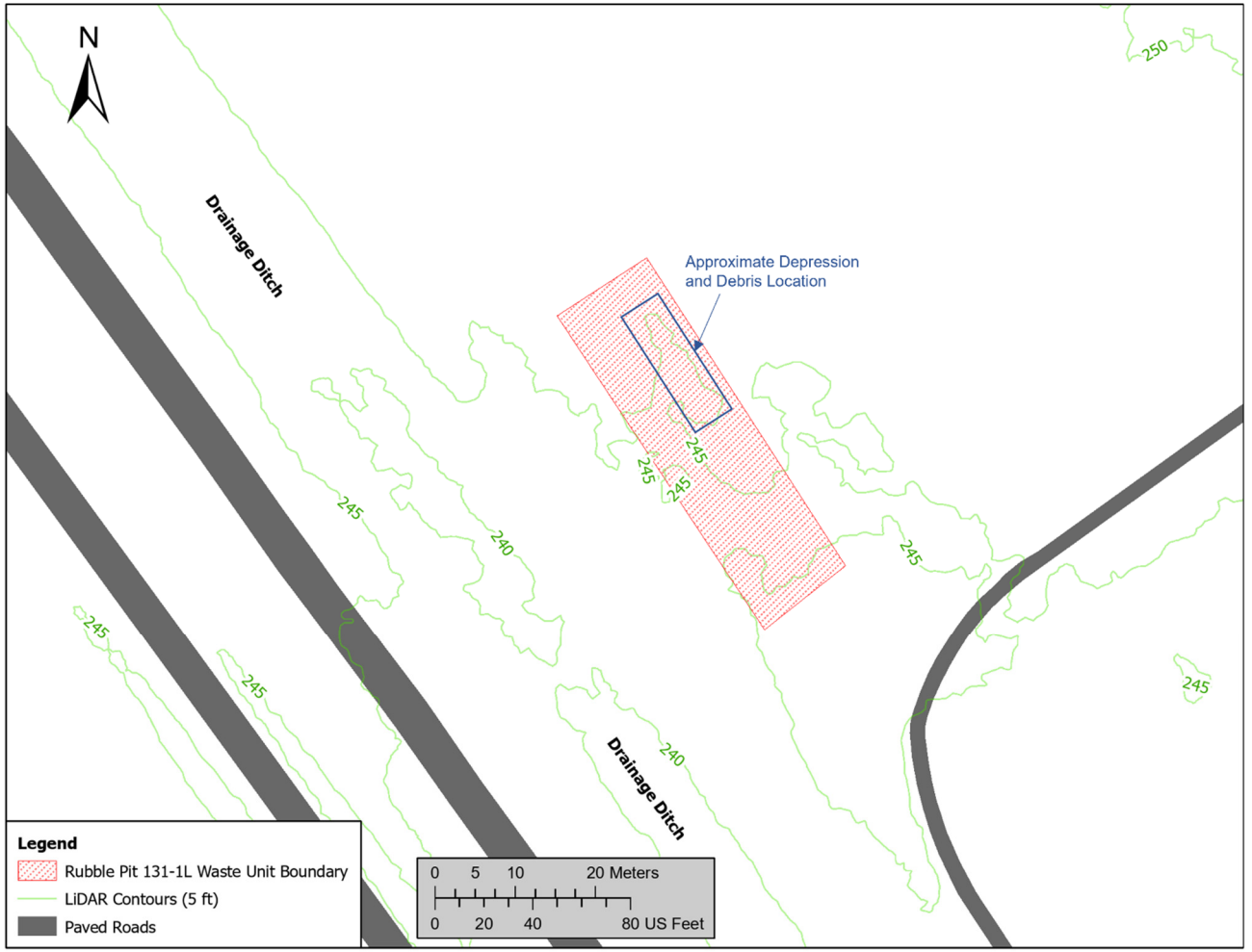


Figure CR-2. Revised LRP 131-1L Subunit Location to be updated for Figure 7

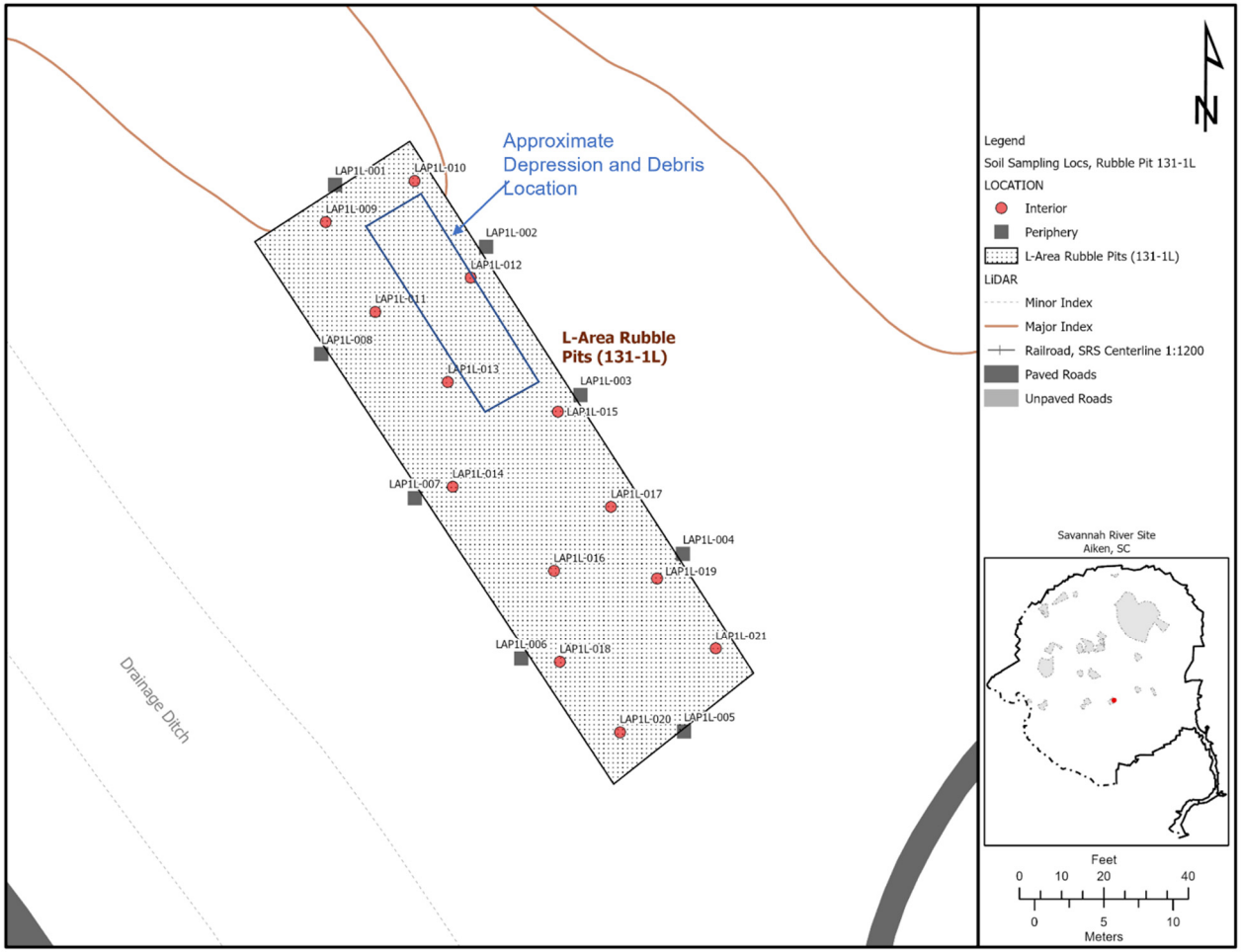


Figure CR-3. Revised Figure 24

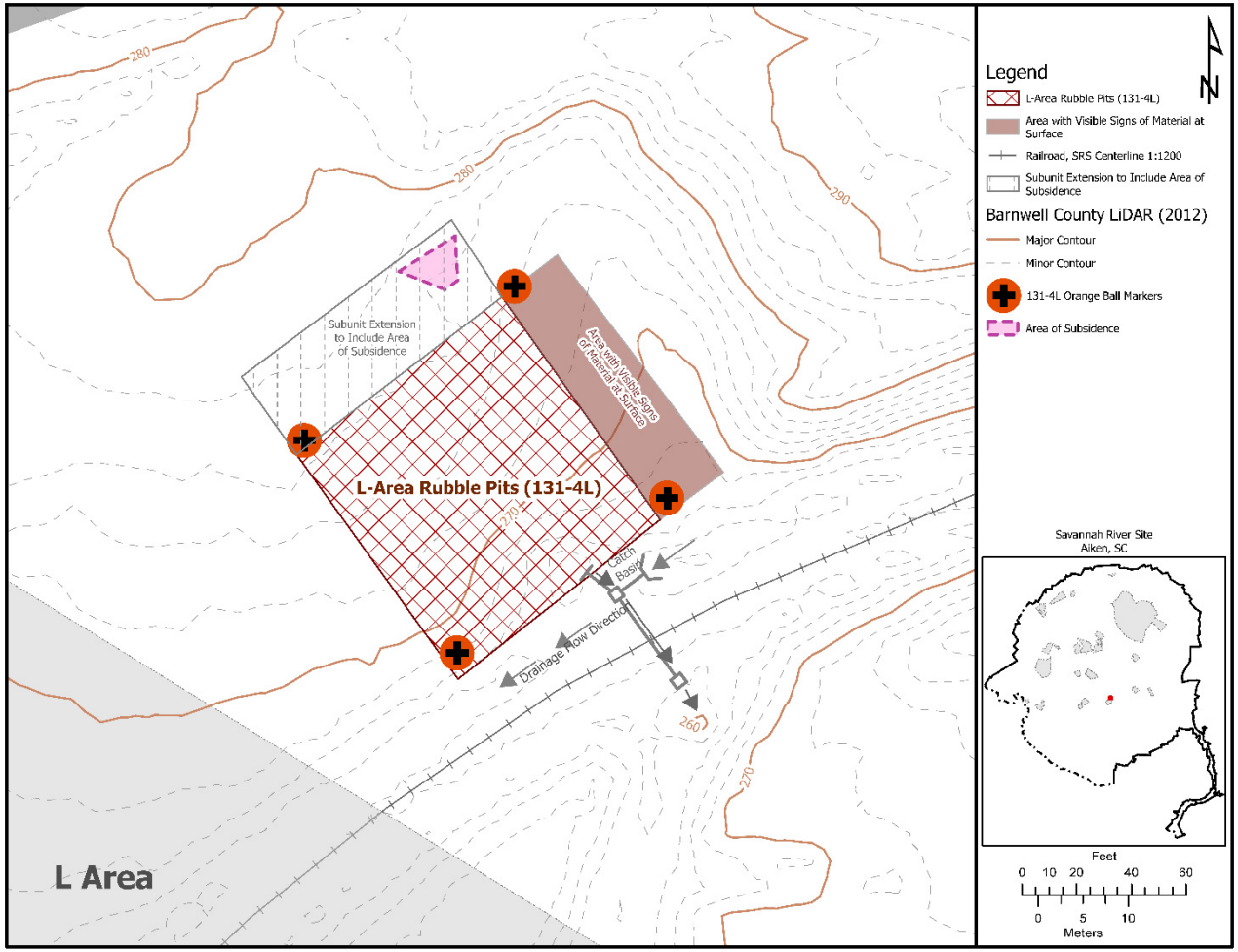


Figure CR-4. Revised Figure 12

Table CR-1. Revised Table 4

Pathway (Media)	Probable Conditions	Exposure Pathway and/or Release Mechanisms	Data Needs and DQOs Including Engineering / Physical Processes	Field Activities Including Removal and Characterization	Parameters	Potential Remedial Action Alternatives
Surface soil, subsurface soil, deep soil	Contamination of surface soil from construction material and burning from deposition of waste material on ground surface and pits Infiltration/ percolation of contamination through surface soils into subsurface soils	Ingestion, inhalation, absorption, and/or direct exposure with soils and/or debris presently buried in the subunit	Define the nature and extent of contamination of the subunit. Full characterization of the subunit.	Collection of surface soils, subsurface, and deep soils from 0 to 1 ft, 1 to 4 ft, 4~~6~~ to 8 ft, and 8~~10~~ to 12 ft (tentatively 12~~14~~ to 16 ft) 37~~31~~ Locations and 4 Step-outs~~: 19 inside the subunit and 12 at subunit boundary~~	Data validated to SRS electronic VV level, with 10% of the sampling batches validated to the SRS definitive level. Full TCL and TAL suite of analytes; gross alpha and nonvolatile beta. Cr^{+6} analysis if required by elevated Total Cr. Asbestos-containing material visual inspection during field activities.	No Action Land Use Controls Excavation of contaminated soils Cover System with Land Use Controls

Table CR-2. Revised Table 9

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-1L	LAP1L-001	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-001	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-001	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-001	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-001	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-001	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-002	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-002	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-002	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-002	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-002	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-002	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-003	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-003	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-003	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-003	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-003	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-003	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-004	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-004	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-004	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-004	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-004	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-004	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-005	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-005	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-005	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-005	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-005	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-005	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-006	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-006	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-006	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-006	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-006	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-006	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-007	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-007	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-007	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-007	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-007	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-007	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-008	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-008	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-008	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-008	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-008	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-1L	LAP1L-008	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-1L	LAP1L-009	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-1L	LAP1L-009	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-009	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-009	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-009	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-009	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-010	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-010	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-010	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-010	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-010	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-010	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-011	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-011	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-011	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-011	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-011	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-011	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-012	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-012	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-012	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-012	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-012	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-012	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-013	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-013	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-013	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-013	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-013	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-013	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-014	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-014	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-014	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-014	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-014	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-014	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-015	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-015	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-015	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-1L	LAP1L-015	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-015	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-015	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-016	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-016	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-016	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-016	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-016	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-016	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-017	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-017	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-017	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-017	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-017	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-017	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-018	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-018	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-018	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-018	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-018	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-018	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-019	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-019	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-019	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-019	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-019	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-019	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-020	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-020	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-020	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-020	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-020	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-020	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-1L	LAP1L-021	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-021	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-021	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-021	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-1L	LAP1L-021	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-1L	LAP1L-021	16	20	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-001	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-001	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-001	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-001	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-001	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-002	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-002	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-002	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-002	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-002	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-003	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-003	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-003	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-003	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-003	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-004	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-004	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-004	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-004	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-004	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-005	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-005	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-005	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-005	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-005	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-006	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-006	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-006	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-006	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-006	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-007	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-007	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-007	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-007	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-007	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-008	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-008	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-008	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-008	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-008	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-009	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-009	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-009	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-009	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-009	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-010	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-010	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-010	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-010	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-4L	LAP4L-010	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-011	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-011	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-011	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-011	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-011	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-012	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-012	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-012	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-012	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-012	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-013	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-013	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-013	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-013	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-013	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-014	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-014	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-014	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-014	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-014	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-015	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-015	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-015	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-015	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-015	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-016	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-016	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-016	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-016	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-016	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-017	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-017	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-017	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-017	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-017	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-018	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-018	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-018	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-018	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-018	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-019	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-4L	LAP4L-019	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-019	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-019	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-019	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-020	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-020	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-020	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-020	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-020	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-021	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-021	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-021	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-021	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-021	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-022	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-022	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-022	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-022	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-022	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-023	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-023	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-023	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-023	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-023	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-024	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-024	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-024	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-024	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-024	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-025	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-025	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-025	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-025	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-025	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-026	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-026	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-026	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-026	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-026	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-027	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-4L	LAP4L-027	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-027	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-027	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit
REG	LRP 131-4L	LAP4L-027	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Waste Northeast of Pit; Tentative Depth
REG	LRP 131-4L	LAP4L-028	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-028	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-028	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-028	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-028	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-029	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-029	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-029	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-029	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-029	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-030	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-030	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-030	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-030	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location
REG	LRP 131-4L	LAP4L-030	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Interior Subunit Location; Tentative Depth
REG	LRP 131-4L	LAP4L-031	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-031	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-031	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-031	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-031	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-032	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-032	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-032	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-032	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-032	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-033	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-033	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-033	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-033	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location
REG	LRP 131-4L	LAP4L-033	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Peripheral Location; Tentative Depth
REG	LRP 131-4L	LAP4L-034	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-034	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-034	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-034	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-034	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]; Tentative Depth
REG	LRP 131-4L	LAP4L-035	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-035	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-035	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-035	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-035	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]; Tentative Depth

Table CR-2. Revised Table 9 *(Continued)*

Sample Type[1]	ECODS L-3, LRP 131-1L, LRP 131-4L OU Subunits	Station	Top Depth *(ft bgs)*	Bottom Depth *(ft bgs)*	Media	Sample Method	Analyses[2]	Comments
REG	LRP 131-4L	LAP4L-036	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-036	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-036	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-036	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-036	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]; Tentative Depth
REG	LRP 131-4L	LAP4L-037	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-037	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-037	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-037	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]
REG	LRP 131-4L	LAP4L-037	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Area of Subsidence[3]; Tentative Depth
REG	LRP 131-4L	LAP4L-038	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-038	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-038	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-038	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-038	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]; Tentative Depth
REG	LRP 131-4L	LAP4L-039	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-039	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-039	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-039	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-039	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]; Tentative Depth
REG	LRP 131-4L	LAP4L-040	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-040	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-040	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-040	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-040	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]; Tentative Depth
REG	LRP 131-4L	LAP4L-041	0	1	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-041	1	4	Soil	Hand Auger	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-041	4	8	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-041	8	12	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]
REG	LRP 131-4L	LAP4L-041	12	16	Soil	Rotosonic (or equivalent)	TCL, TAL, Radiological Indicators	Step-Out Location[4]; Tentative Depth

1. Field Duplicates (FD), Equipment/Rinsate Blanks (RB) and Split Samples (SPL) are not shown but will be produced during work planning stage. Trip Blanks (TB) are not shown but will be sent with each shipment of VOCs. Table 7 summarizes the number of Quality Control/Quality Assurance (QC/QA) samples needed.

2. If the gross alpha result exceeds 20 pCi/g for a soil sample, then the Alpha spectroscopy radionuclides in Table 6 will also be analyzed for that sample. If the nonvolatile beta result exceeds 50 pCi/g for a soil sample, then the gamma spectroscopy radionuclides and individual beta analyses in Table 6 will also be analyzed for that sample.

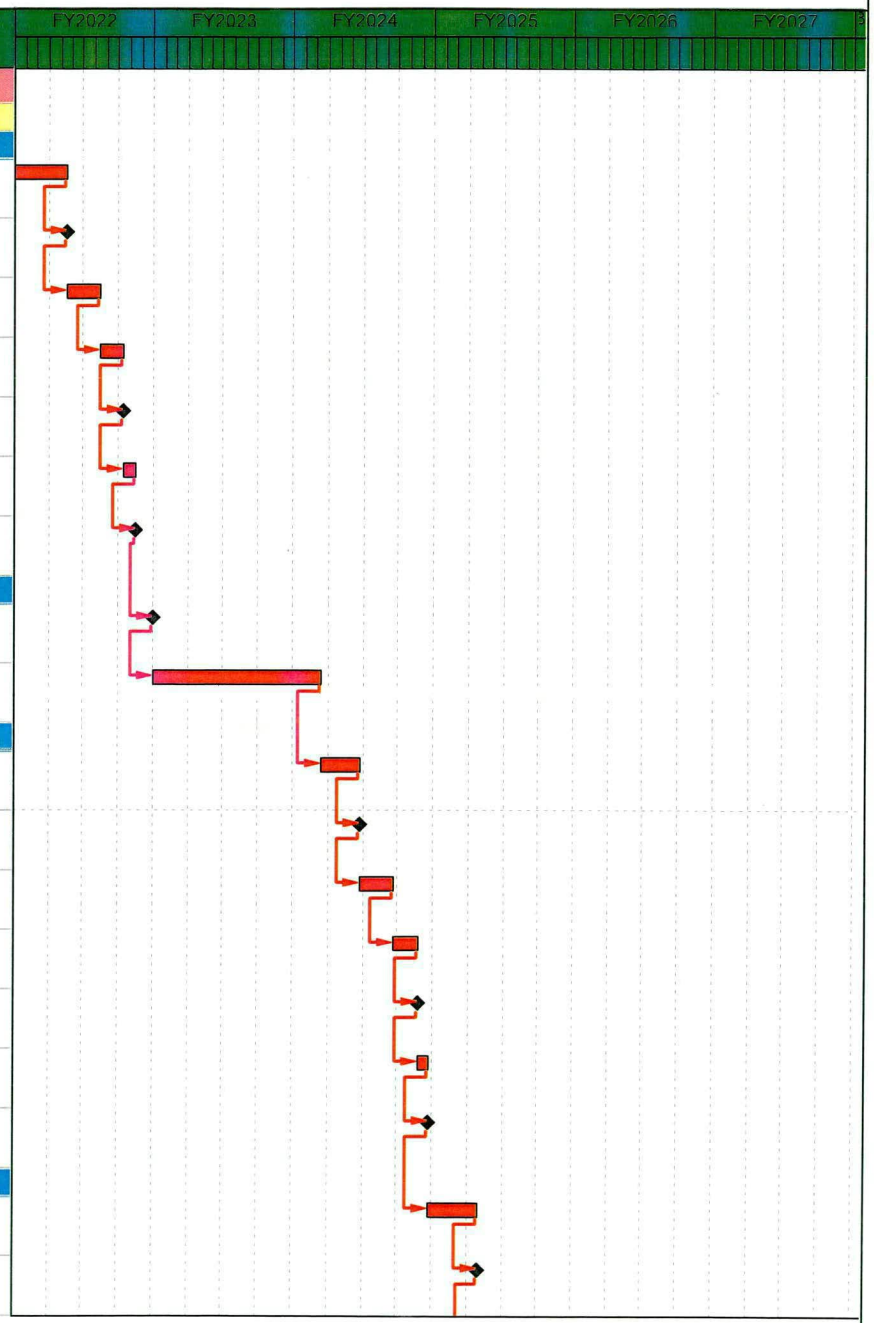
3. Due to possible safety concerns with soil stability in proximity to the subsidence area, sampling with a drill rig may not be appropriate. However, an attempt to collect samples with a hand auger will be made at the four locations around the subsidence area to include, at a minimum, surface soil (0.0 to 0.3 m [0 to 1 ft]) and shallow subsurface soil (0.3 to 1.2 m [1 to 4 ft]).

4. Sampling at the step-out locations will be conducted if buried debris is noted at locations LAP4L-011 and -032.

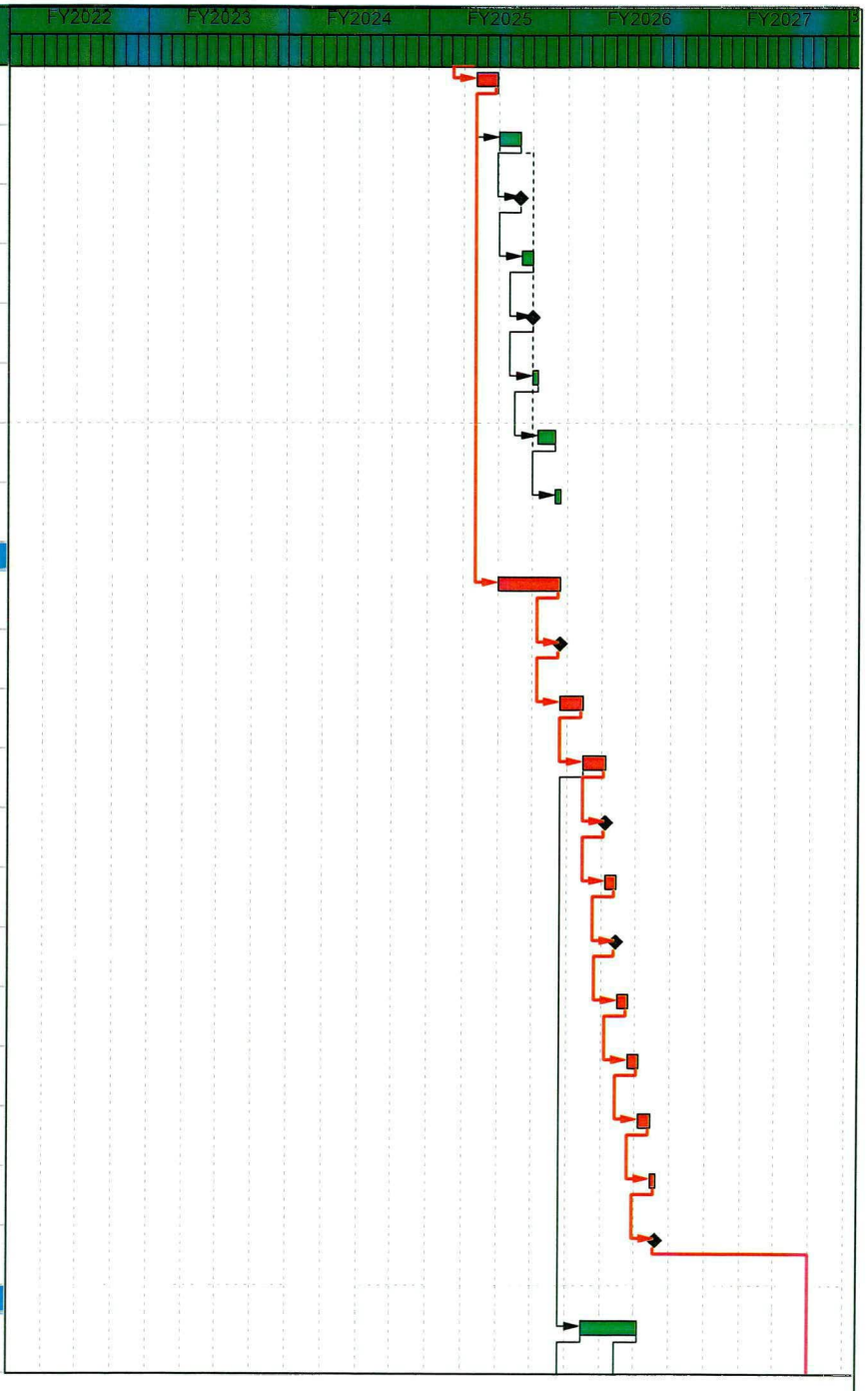
ft bgs - feet below ground surface
TCL - Target Compound List
TAL - Target Analyte List
REG - regular sample

Subunit	Number of REG Samples	Minimum Number of QC/QA Samples				Total Number of Samples
		FD	RB	SPL	TB	
LRP 131-1L	126	7	4	7	21	165
LRP 131-4L	205	11	6	11	31	264

Activity Name	OD	Start	Finish
Steel Creek	1175d	20-Sep-2021	27-Aug-2027
ECODS L-3, L-Area Rubble Pits (131-1L, 131-4L)	1175d	20-Sep-2021	27-Aug-2027
1-Workplan Development	178d	20-Sep-2021	13-Aug-2022
SRS Develop Workplan (Rev.0)	80d	20-Sep-2021	15-Feb-2022
SRS Submit Workplan (Rev.0) to EPA/SCDHEC	0d		15-Feb-2022
EPA/SCDHEC Review Workplan Rev 0	87d	16-Feb-2022	13-May-2022
SRS Incorporate EPA/SCDHEC Comments-Workplan	60d	14-May-2022	12-Jul-2022
SRS Submit Workplan (Rev.1) to EPA/SCDHEC	0d		12-Jul-2022
EPA/SCDHEC Final Review/Approval-Workplan	32d	13-Jul-2022	13-Aug-2022
Approval of RFI/RI Workplan-Workplan	0d		13-Aug-2022
2-Characterization	440d	30-Sep-2022	13-Dec-2023
Field Start	0d	30-Sep-2022	
Characterization and Scoping	440d	30-Sep-2022	13-Dec-2023
3-Combined RFI/RI/BRA/CMS/FS	283d	14-Dec-2023	21-Sep-2024
SRS Prepare Combined Document	100d	14-Dec-2023	22-Mar-2024
SRS Submit Combined Document (Rev.0) to EPA/SCDHEC	0d		22-Mar-2024
EPA/SCDHEC Review of Combined Document (Rev.0)	91d	23-Mar-2024	21-Jun-2024
SRS Incorporate EPA/SCDHEC Comments	62d	22-Jun-2024	22-Aug-2024
Submit Combined Document (Rev.1) to EPA/SCDHEC	0d		22-Aug-2024
EPA/SCDHEC Final Review/Approval	30d	23-Aug-2024	21-Sep-2024
Approval of Combined Document	0d		21-Sep-2024
4-Statement of Basis/Proposed Plan (SB/PP)	193d	23-Sep-2024	11-Sep-2025
SRS Prepare SB/PP (Rev.0)	70d	23-Sep-2024	30-Jan-2025
SRS Submit SB/PP (Rev.0) to EPA/SCDHEC	0d		30-Jan-2025



Activity Name	OD	Start	Finish
EPA/SCDHEC Review of SB/PP (Rev.0)	60d	31-Jan-2025	31-Mar-2025
SRS Incorporate EPA/SCDHEC Comments	60d	01-Apr-2025	30-May-2025
SRS Submit SB/PP (Rev.1) to EPA/SCDHEC	0d		30-May-2025
EPA/SCDHEC Final Review/Approval	30d	31-May-2025	29-Jun-2025
Approval of SB/PP	0d		29-Jun-2025
Notification of SB/PP Public Comment	14d	30-Jun-2025	13-Jul-2025
Public Comment Period	45d	14-Jul-2025	27-Aug-2025
Develop Responsiveness Summary	15d	28-Aug-2025	11-Sep-2025
5-ROD	227d	01-Apr-2025	24-May-2026
SRS Develop ROD (Rev.0)	91d	01-Apr-2025	11-Sep-2025
SRS Submit ROD (Rev.0) to EPA/SCDHEC	0d		11-Sep-2025
EPA/SCDHEC Review of ROD (Rev.0)	60d	12-Sep-2025	10-Nov-2025
SRS Incorporate EPA/SCDHEC Comments	60d	11-Nov-2025	09-Jan-2026
Submit ROD (Rev.1) to EPA/SCDHEC	0d		09-Jan-2026
EPA/SCDHEC Final Review/Approval	30d	10-Jan-2026	08-Feb-2026
Approval of ROD	0d		08-Feb-2026
DOE Obtain Signature on ROD	30d	09-Feb-2026	10-Mar-2026
SCDHEC Obtain Signature on ROD	30d	11-Mar-2026	09-Apr-2026
EPA Obtain Signature on ROD	30d	10-Apr-2026	09-May-2026
Prepare Public Notice	15d	10-May-2026	24-May-2026
Issue ROD	0d		24-May-2026
6-CMI/RAIP	176d	11-Nov-2025	03-Oct-2026
SRS Develop CMI/RAIP (Rev.0)	76d	11-Nov-2025	06-Apr-2026



ECODS L-3, L-Area Rubble Pits (131-1L, 131-4L) L-Area Ash Basin (188-L) OU Implementation Schedule

21-Jun-2022

Activity Name	OD	Start	Finish
SRS Submit CMI/RAIP (Rev.0) to EPA/SCDHEC	0d		06-Apr-2026
EPA/SCDHEC Review of (CMI/RAIP Rev.0)	90d	07-Apr-2026	05-Jul-2026
SRS Incorporate EPA/SCDHEC Comments	60d	06-Jul-2026	03-Sep-2026
SRS Submit CMI/RAIP (Rev.1) to EPA/SCDHEC	0d		03-Sep-2026
EPA/SCDHEC Final Review/Approval	30d	04-Sep-2026	03-Oct-2026
Approval of CMI/RAIP	0d		03-Oct-2026
7-LUCIP	176d	11-Nov-2025	03-Oct-2026
SRS Develop LUCIP	76d	11-Nov-2025	06-Apr-2026
SRS Submit LUCIP (Rev.0) to EPA/SCDHEC	0d		06-Apr-2026
EPA/SCDHEC Review of (LUCIP Rev.0)	90d	07-Apr-2026	05-Jul-2026
SRS Incorporate EPA/SCDHEC Comments	60d	06-Jul-2026	03-Sep-2026
SRS Submit LUCIP (Rev.1) to EPA/SCDHEC	0d		03-Sep-2026
EPA/SCDHEC Final Review/Approval	30d	04-Sep-2026	03-Oct-2026
Approval of LUCIP	0d		03-Oct-2026
8-RA Start	0d	27-Aug-2027	27-Aug-2027
RA Start	0d	27-Aug-2027