REGION 4
ATLANTA, GA 30303

ENVIRONMENTAL COMPLIANCE &

NOV - 5 2026

AREA COMPLETION PROJECTS

November 5, 2026

Mr. Matthew Baker, SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U.S. Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

EPA Comments: Addendum to the Revision 1 Land Use Control Implementation Plan (LUCIP) for the M Area Operable Unit (MAOU) (U) (SRNS-RP-2026-00570, Revision 0, September 2026)
SEMS Number: 92

Dear Mr. Baker,

The U.S. Environmental Protection Agency, Region 4 (EPA), has reviewed the Addendum to Rev 1, LUCIP for M Area, dated 9/30/26. EPA's comments are attached:

If you have any questions or require additional information, please contact me at (404) 431-1340.

Sincerely,

JON RICHARDS Digitally signed by JON RICHARDS Date: 2026.11.05 13:12:01 -05'00'

Jon Richards
FFA Remedial Project Manager
Superfund & Emergency Management Division

ec: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDES

GENERAL COMMENT

1. The LUCIP Addendum should discuss more clearly how the land use controls (LUCs) established for contaminated pipelines were incorporated since it appears that they were not part of the M-Area Operable Unit (MAOU) or M-Area Inactive Process Sewer Line (MIPSL) Operable Unit (OU) remedial actions that included passive soil vapor extraction (PSVE)/LUCs and phased soil vapor extraction enhancement with soil fracturing/LUCs, respectively. Section 1.0, Introduction, states that the media of concern for the MAOU and MIPSL OU is vadose zone soil; however, according to the LUC objectives presented in the second and third bullet items in Section 3.0, Land Use Control Objectives, contaminated media includes pipelines subject to LUCs restricting worker access and preventing unauthorized contact, removal, or excavation. It is noted that in Appendix A, Access Control Warning Signs, Figure A-1, MIPSL Access Control Warning Sign, depicts two signs, one identifying the MIPSL hazards, LUCs, etc., and one sign that is a radiological posting for a controlled area, "Underground Radioactive Material." Also, in Appendix B, Field Inspection Checklist for the MAOU, Field Inspection Checklist for the MAOU, Items #10 and #11 on the checklist address the verification of LUCs for pipelines. *Please revise the LUCIP Addendum to discuss how the LUCs established for contaminated pipelines are incorporated into the addendum.*

SPECIFIC COMMENT

1. **Figure 2, LUC Boundaries for the MAOU and MIPSL OU, Page 8 and Appendix B, Field Inspection Checklist for the MAOU, Page B-3:** The Field Inspection Checklist in Appendix B requires verification that, "there are no unauthorized excavation, digging, or construction activities at Passive Soil Vapor Extraction (PSVE) Sites 313-M, 320-M, 321-M, PSVE Cell, Manholes 2N, 3, 3N, 4, 4A, 5, 5A, 6, 6A, 7, 7A, 8A, 9A, B, and C;" however, Figure 2 does not show Manhole B. Furthermore, Figure 2 includes Manhole 8, which is not included in the Field Inspection Checklist. *Please either revise the LUCIP Addendum to explain why the Field Inspection Checklist does not include Manhole B and Figure 2 does not include Manhole 8 or include Manhole B on Figure 2 and Manhole 8 in the Field Inspection Checklist.*