



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

Susan Fulmer, P.G.
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

August 4, 2025

ENVIRONMENTAL COMPLIANCE &

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

AUG - 4 2025

AREA COMPLETION PROJECTS

Re: Statement of Basis/Proposed 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), SEMS Number: 91 (SRNS-RP-2025-00724, Revision 0, June 2025) received June 6, 2025.

Dear Mr. Baker:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/SCDES comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

for **Heather H. Cathcart**
Digitally signed by
Heather H. Cathcart
Date: 2025.08.04
11:50:49 -04'00'

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Gregg O'Quinn, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

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South Carolina Department of Environmental Services Comments on:
Statement of Basis/Proposed 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),
SEMS Number: 91 (SRNS-RP-2025-00724, Revision 0, June 2025) received June 6, 2025.

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Specific Comments

1. Table 2, Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits, pages 34-37. Table 2 lists several ARARs for the preferred alternatives for the ECODS L-3 and LRP 131-4L subunits; however, the applicability of most of these ARARs is not apparent in Tables 4 and 5 under the A-2 Land Use Controls and B-2 Land Use Controls columns, which are the preferred alternatives for each subunit. It appears only the ARARs for PCBs are addressed as chemical-specific ARARs for the ECODS L-3 subunit. Please revise these tables accordingly, or else explain why all of the ARARs listed in Table 2 are not addressed under the appropriate preferred alternative columns in Tables 4 and 5.