



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

JAN 10 2024

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:** Corrective Measures Implementation Plan / Remedial Action Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2023-00535, Revision 1 Redline, January 2024), the Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2023-00536, Revision 1 Redline, January 2024), and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Documents, SEMS Number: 93

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the subject documents for the Lower Three Runs Integrator Operable Unit. The South Carolina Department of Health and Environmental Control's (SCDHEC) approved the Revision 0 documents on November 2, 2023, and the U.S. Environmental Protection Agency's (EPA) provided comments on the Revision 0 documents on November 13, 2023. 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.

Questions from you or your staff may be directed to me at (803) 952-7805.

Sincerely,

**AVERY  
HAMMETT**

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-05'00'

Avery G. Hammett  
FFA Project Manager, DOE-Savannah River  
Remediation and Deactivation & Decommissioning Division

RDDD-24-116

JAN 10 2024

Ms. Susan Fulmer  
Mr. Jon Richards

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Enclosures:

1. Corrective Measures Implementation Plan / Remedial Action Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2023-00535, Revision 1 Redline, January 2024) SEMS Number: 93
2. Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2023-00536, Revision 1 Redline, January 2024) SEMS Number: 93
3. SRS Responses to USEPA Comments on the Corrective Measures Implementation Plan/ Remedial Action Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2023-00535, Revision 0, August 2023) SEMS Number: 93
4. SRS Responses to USEPA Comments on the Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2023-00536, Revision 0, August 2023) SEMS Number: 93

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

**SRS Responses to U.S. Environmental Protection Agency Comments on the  
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**GENERAL COMMENTS**

1. The LUCIP does not specify whether photographic evidence will be submitted along with the field inspection checklist. This evidence should be provided to support the condition of the warning signs in both subunits, the general condition of both subunits, and the condition of the concrete cover in the Ford (690-N) subunit. It is noted the annual inspection checklist presented in Appendix B (Field Inspection Checklist) provides verification that the LUCs are protective; however, no photographs are required to support the field observations. *Please revise the checklist and the text to consider the inclusion of photographic evidence during field inspections.*

**Response: Clarification.**

**The purpose of field inspection checklist to verify the condition of the Operable Unit meets the requirements of the LUCIP. If a deficiency is discovered, the deficiency is documented on the inspection checklist. Because corrective action is taken promptly, photographic evidence is not needed. The inspection checklists are maintained in the Administrative Record File. Photographic evidence of warning sign condition is reported in the Five-Year Remedy Review Report.**

**No change to the document is proposed.**

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

2. There are acronyms and abbreviations used within the text that are not included in the Acronyms and Abbreviations list. For example, Federal Facilities Agreement (FAA) or milligrams per kilogram (mg/kg) are not included. *Please revise the Acronyms and Abbreviations list to include all acronyms used in the text.*

**Response: Agree.**

**The acronym list will be updated to include all acronyms used in the text.**

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

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**SPECIFIC COMMENTS**

1. **Section 2.1, General Description and History of the ECODS N-1, CSSLP, and Ford Building OU, Page 2:** The text indicates that hazardous substances are currently present in the environment at Savannah River Site (SRS); however, the text should present a broader discussion of the specific media and hazardous substances present in the environment at SRS. *Please revise the text to clarify the specific media and hazardous substances that are known to be present within the operable unit (OU).*

**Response: Clarification.**

The text of Section 2.1, 2nd paragraph is a general description for SRS. The specific media and hazardous substances that are known to be present within the OU is described in Section 2.1.1 for ECODS N-1, Section 2.1.2 for CSSLP, and in Section 2.1.3 for the Ford Building slab, and the primary contaminants are presented in Section 2.2.

No change to the document is proposed.

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

2. **Section 2.1, General Description and History of the ECODS N-1, CSSLP, and Ford Building OU, Page 2:** The text indicates the site area consists of relatively flat terrain and references Figure 2 (Location of the ECODS N-1, CSSLP, and Ford Building OU (N Area)); however, Figure 2 includes water table elevation contours and not ground surface elevation contours. Additionally, it is noted that groundwater is not included as part of the OU, and therefore, it is unclear why water table elevation contours are presented in absence of surface elevation contours. *Please revise Figure 2 to include ground surface elevation contours.*

**Response: Agree.**

Figure 2 will be revised to include topographic contours. The revised figure is attached at the end of this document.

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

3. **Section 2.1.1, ECODS N-1 Subunit, Page 3:** It is unclear how it was determined that a portion of the ECODS N-1 pit may have been used as a burn pit. *Please revise the text to explain how this was determined (e.g., historical aerial photograph, document reference).*

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**Response: Agree.**

A review of historical aerial photographs indicates the ECODS N-1 pit may have been used as a burn pit. The text will be revised as follows:

**“ECODS N-1 is one of 25 ECODS at SRS that were used during the construction and early operation of SRS for disposal of construction debris and other non-radioactive waste materials. It is located within the Pen Branch watershed in N Area (Figure 2). Historical aerial photographs revealed that the area where the subunit is located was farmland prior to construction of the SRS (WSRC 2001). ECODS N-1 is 107 meters (m) (350 feet [ft]) long by 15 m (50 ft) wide. Waste disposed of in ECODS N-1 was buried in two trenches, each ~46 m (150 ft) long and located end-to-end (Figure 3). ECODS N-1 was used to dispose of trash and construction debris, some containing asbestos, associated with the construction and operation of N Area. As suggested by historical aerial photographs, a portion of one pit may have been used as a burn pit for disposing of combustible waste.”**

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

- 4. Section 4.7, Field Inspection and Maintenance for Land Use Controls, Page 13:** The text indicates that additional inspections may be required under unusual weather or any other condition warranting inspection; however, does not clarify what conditions may constitute an unusual weather event or warrant inspection. The text should clarify what specific conditions, e.g., “X” inches of rain within “X” hours or a hurricane, would require an additional inspection. The text should also specify the person with authority to determine whether additional inspections need be conducted. *Please revise the text to provide specific details on what an unusual weather event may be and state the deciding authority for additional inspections.*

**Response: Agree with clarification.**

**The terminology “unusual weather event or any other condition warranting inspection” is qualitative as determined by the post-closure management organization discretion. Tornadoes, hurricanes, fires, hog rooting, ice storms, high winds, etc. are examples of events that may warrant additional inspections in addition to the regularly scheduled inspections. The text will be revised as follows:**

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**“After remediation, only inspection and maintenance activities will be required by this remedial action. Inspections will be performed annually per the Field Inspection Checklist in Appendix B. Additional inspections may be necessary in the event of unusual weather or any other condition (i.e., fires, tornadoes, hurricanes, seasonal hog rooting, etc.) warranting inspection as determined by the SRS Post-Closure Maintenance Group.”**

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

- 5. Figure 1, Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site, PDF Page 23:** The legend contains various entries denoted using colored polygons; however, it is unclear what each of these entries is representing as it is not described within the title of the figure, legend or in the text. The LUCIP indicates that Fourmile Branch and Pen Branch are watershed boundaries, but it is unclear whether all legend entries describe watershed boundaries. *Please revise the figure legend to clarify this information.*

**Response: Agree.**

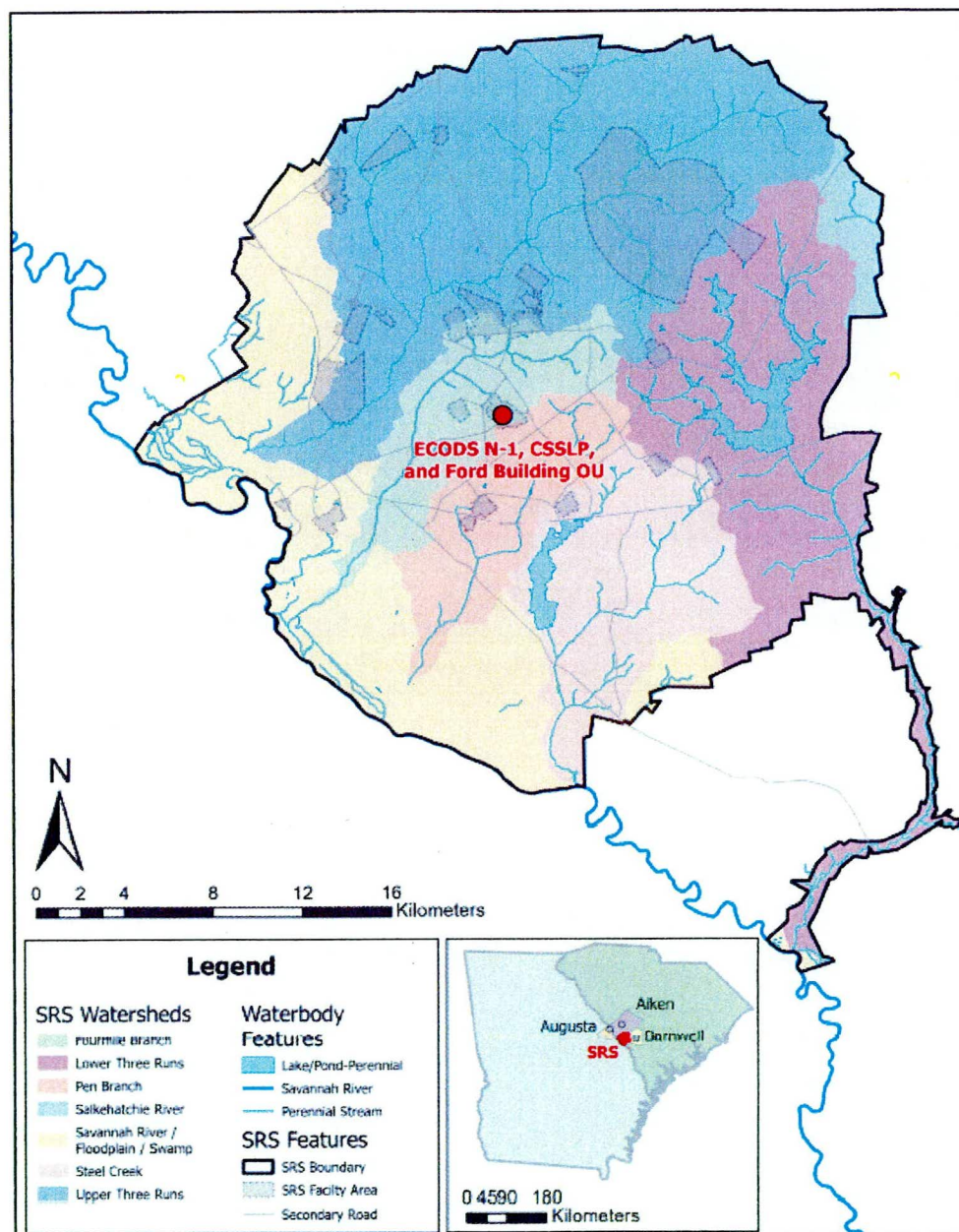
**The legend in Figure 1 will be revised to denote the watershed boundaries as depicted by the colored polygons. The revised figure is attached at the end of this document.**

**Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov**

**SRS Responses to U.S. Environmental Protection Agency Comments on the  
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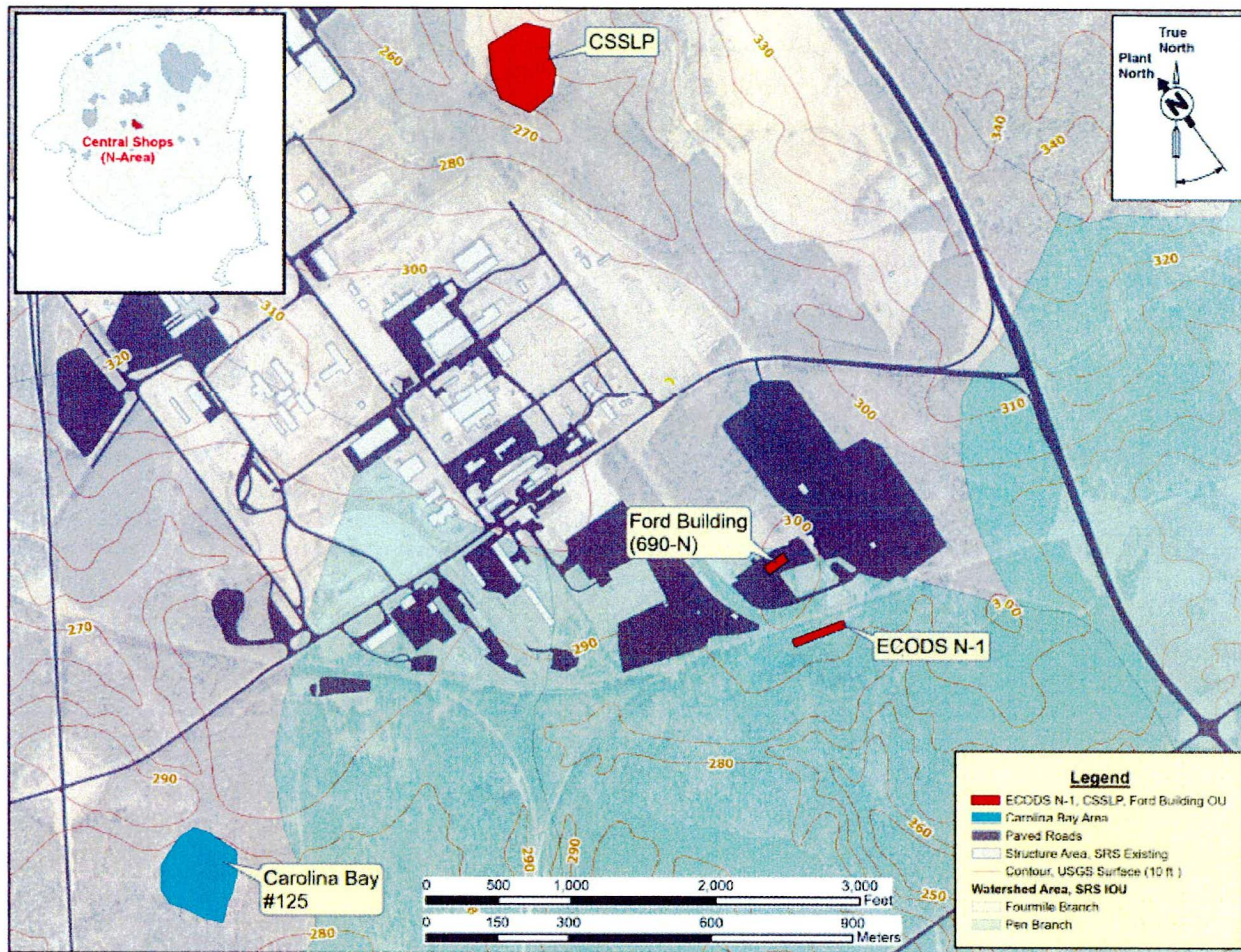
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**Figure 1. Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site**

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**Figure 2. Location of the ECODS N-1, CSSLP, and Ford Building OU (N Area)**

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## GENERAL COMMENT

1. It is unclear whether the sampling described in Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, dated August 2023 (the SAP) will support the remedy objectives of unlimited use/unrestricted exposure (UU/UE) for Central Shops Scrap Lumber Pile (CSSLP). The CMIP/RAIP states, "The selected remedy for CSSLP subunit is excavation (hot spot removal) and disposal of contaminated media, which supports unrestricted land use and will not require LUCs [land use controls], annual site inspections, or five-year remedy reviews. This remedy will eliminate exposure of contaminated media to human receptors. This remedy includes excavating contaminated media exceeding the arsenic cleanup level (8.2 mg/kg [milligrams per kilogram]) down to 1 ft [foot] below ground surface (bgs), disposing of the contaminated media off-site, and backfilling with clean soil to grade;" however, it is unclear whether the sampling proposed in the SAP supports these objectives. The proposed sampling in the SAP is based on hotspot areas defined from historical sampling results and there is no discussion of step-outs beyond the boundary of the proposed limit of excavation (LOE), should contamination at the proposed transect locations exceed the cleanup level. Also, according to Figure B4, Pre-Excavation Sampling Locations to Refine the LOE, the extent of contamination to the south and west of the excavation boundary areas shown on the figure are not defined and it is unclear whether step-out sampling will be required. Additionally, is it unclear if confirmation sampling will be required post-excavation to ensure the ROD remedy objectives were met where the excavation boundaries are not defined. *Please revise the SAP to clarify whether step-out locations will occur past the proposed LOE, if required, and whether post-excavation confirmation sampling will occur to ensure no contaminants are left in place above UU/UE levels.*

### **Response: Clarification.**

**Per Section 4.1 of the SAP, a maximum LOE was established as part of the baseline condition for the remedial decision. To refine the lateral LOE in order to reduce the unnecessary expense of excavating clean soil, step-out sampling will be conducted, starting from the maximum LOE boundary and moving inward towards the previously identified hot spot sample. Step-out locations outside of the LOE are not planned, as the maximum area of contamination is already defined by the LOE boundary from previous characterization efforts or proximity to the waste unit boundaries. As a result**

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of the pre-characterization sampling strategy, post-excavation confirmation sampling will not be required because the identified contaminated soil will have been removed. Excavation of soil above the cleanup level in the 0-1 ft interval with placement of clean fill eliminates the direct exposure pathway, and post-excavation confirmation sampling is not required.

No change to the document is proposed.

Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov

#### SPECIFIC COMMENTS

1. **Section 2.1.1, Design Strategy for LUCS, Page 9:** The text indicates proposed warning sign placement can be viewed in the Land Use Control Implementation Plan (LUCIP); however, it is noted that Figures 4 (ECODS N-1 Approximate Area of Land Use Control Boundary) and Figure 6 (Ford Building Approximate Area of Land Use Control Boundary) also contain this information and should also be referenced. *Please revise the text to also indicate that the placement of warning signs is presented in Figures 4 and 6.*

Response: Agree.

The text of the CMIR/RAIP will be revised to include references to Figures 4 and 6 as follows:

“The RA at ECODS N-1 and Ford Building subunits will require LUCs. The design strategy for the LUCs includes the development of a Land Use Control Implementation Plan (LUCIP) (SRNS 2023) and the placement of access control warning signs. The construction and placement of the signs will be performed by Savannah River Nuclear Solutions (SRNS) personnel or by a subcontractor. Planned locations of the signs are provided in ~~the LUCIP~~ Figures 4 and 6. The design for the signs will adhere to design standards that are typical of access control warning signs placed at other OUs as identified in Attachment 1.”

Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov

2. **Section 2.5, Design Criteria, Pages 12 and 13:** It is unclear whether any re-vegetation efforts will be conducted if it is determined a Storm Water Pollution Prevention Plan

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(SWPPP) is not required. The text indicates re-vegetation will occur, as necessary, if a SWPPP is developed; however, it is unclear whether any revegetation will be conducted if a SWPPP is not required. *Please revise the text to clarify whether revegetation activities will occur if the SWPPP is not required.*

**Response: Agree.**

**The text of the CMIP/RAIP will be revised to clarify that revegetation activities will occur whether or not a SWPPP is developed as follows:**

**“Site restoration includes contouring the site to the original grade, backfilling to the original grade with 8 inches of common backfill and 4 inches of topsoil, applying fertilizer, lime, and establishing vegetation with seed or sod and mulch as necessary ~~to close the SWPPP if developed.~~ The backfill will be sampled and analyzed to verify compliance with SRS Fill and Cover Material Verification Protocol (WSRC 2003).”**

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

3. **Section 3, Permitting Requirements, Page 13:** It is unclear whether there are any permitting requirements pertaining to the pre-excavation sampling. The text states, “A SRS [Savannah River Site] Site Use/Site Clearance Permit will be required for the placement of signage at the ECODS N-1 and Ford Building subunits and for excavation and disposal of contaminated soil and sediment at the CSSLP subunit;” however, the text does not clarify whether permits are required for the pre-excavation activities. *Please revise the text to clarify whether a permit is required for pre-excavation activities.*

**Response: Agree.**

**The text will be revised as follows:**

**“A SRS Site Use/Site Clearance Permit will be required for the placement of signage at the ECODS N-1 and Ford Building subunits and for the pre-excavation, excavation, and disposal activities ~~of contaminated soil and sediment~~ at the CSSLP subunit...”**

**Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov**

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4. **Section 4.4, Waste Disposal and Transport, Page 15:** The text indicates Waste Lock 770, or similar approved SRS drying agent may be used to remove free water prior to disposal; however, the text does not clarify whether Waste Lock 770 was previously successfully applied at SRS. Also, a safety data sheet (SDS) for Waste Lock should be provided for review to verify it meets performance standards and to use in the qualification of an alternative if needed. *Please revise the CMIP/RAIP to include examples of other areas at SRS where soils with free water were successfully treated with Waste Lock 770 prior to disposal and provide a SDS for the Waste Lock.*

**Response: Clarification.**

**Waste Lock 770 was most recently used and deemed successful during a waste removal remediation at the Lower Three Runs Integrator Operable Unit. The use of drying agents is a standard construction practice, and Waste Lock 770 or a similar drying agent will be used at the CSSLP if free water is present. Safety Data Sheets for the drying agent will be provided in the work packages that are kept onsite during the duration of the job.**

**No change to the document is proposed.**

**Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov**

5. **Figure 2, Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site, PDF Page 30 and Appendix B, Figure B1, Location of N Area Within SRS, PDF Page 72:** The figures should clarify that watershed boundaries are depicted. The figures appear to be depicting various watershed boundaries at SRS; however, no explanation is provided in the title, legend, or as informational text. *Please revise the figures to indicate that watershed boundaries are depicted.*

**Response: Agree.**

**The legend in Figure 2 and Figure B1 will be revised to indicate the watershed boundaries as depicted by the colored polygons. The revised figures are included at the end of this document.**

**Responsible Party: Justin Steadman, (803)952-7346, justin.steadman@srs.gov**

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6. **Figure 8, Post-ROD Schedule, PDF Page 36:** The Post-ROD schedule includes the Issuance of the Record of Decision, planned for December 12, 2023; however, it appears the ROD was issued in 2022. *Please revise the figure to address this discrepancy.*

**Response: Clarification.**

The ROD was issued on October 12, 2023, not December 12, 2023, as originally indicated in Figure 8. The text in Figure 8 will be revised to indicate the correct date.

**Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov**

7. **Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, PDF Page 75:** It is unclear why the SAP does not use consistent units of measurement. For example, previous sampling results are presented on Figures B3 and B4 in micrograms per kilogram (ug/kg); however, the remainder of the SAP uses milligrams per kilogram (mg/kg). *For clarity, please revise the SAP to use consistent units of measurement.*

**Response: Agree.**

Figures B3 and B4 will be revised to include concentrations in mg/kg. Figure 5, CSSLP Subunit Hotspot Removal Locations, within the CMIP/RAIP portion of the document will also be revised to include the consistent units. The revised figures are included at the end of this document.

**Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov**

8. **Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, Section 6.2, Investigative-Derived Waste, Page B-19:** The text does not sufficiently discuss investigative-derived waste (IDW), including types of IDW generation and management. Although it is noted an IDW management plan will be prepared for this project, the text at a minimum should discuss the expected IDW generation and proposed management procedures. *Please revise the text to include this information.*

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**Response: Clarification.**

**In accordance with the approved SAP document format, the types of IDW generation and management detail are normally not presented in the SAP. Instead, the details of the IDW management plan are included in the assisted hazards analysis review, conducted prior to remedial action start.**

**No change to the document is proposed.**

**Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov**

- 9. Appendix B, Sampling and Analysis Plan (SAP) for Pre-Excavation for the ECODS N-1, CSSLP, and Ford Building OU, Figure B4, Pre-Excavation Sampling Locations to Refine the LOE, PDF Page 75:** The figure should include the arsenic result for each historical soil location that provides the basis for the proposed sampling locations. Additionally, the figure should label each proposed sample location with the sample identification and the legend should be revised accordingly for accuracy. *Please revise the figure to include the requested changes.*

**Response: Agree with Clarification.**

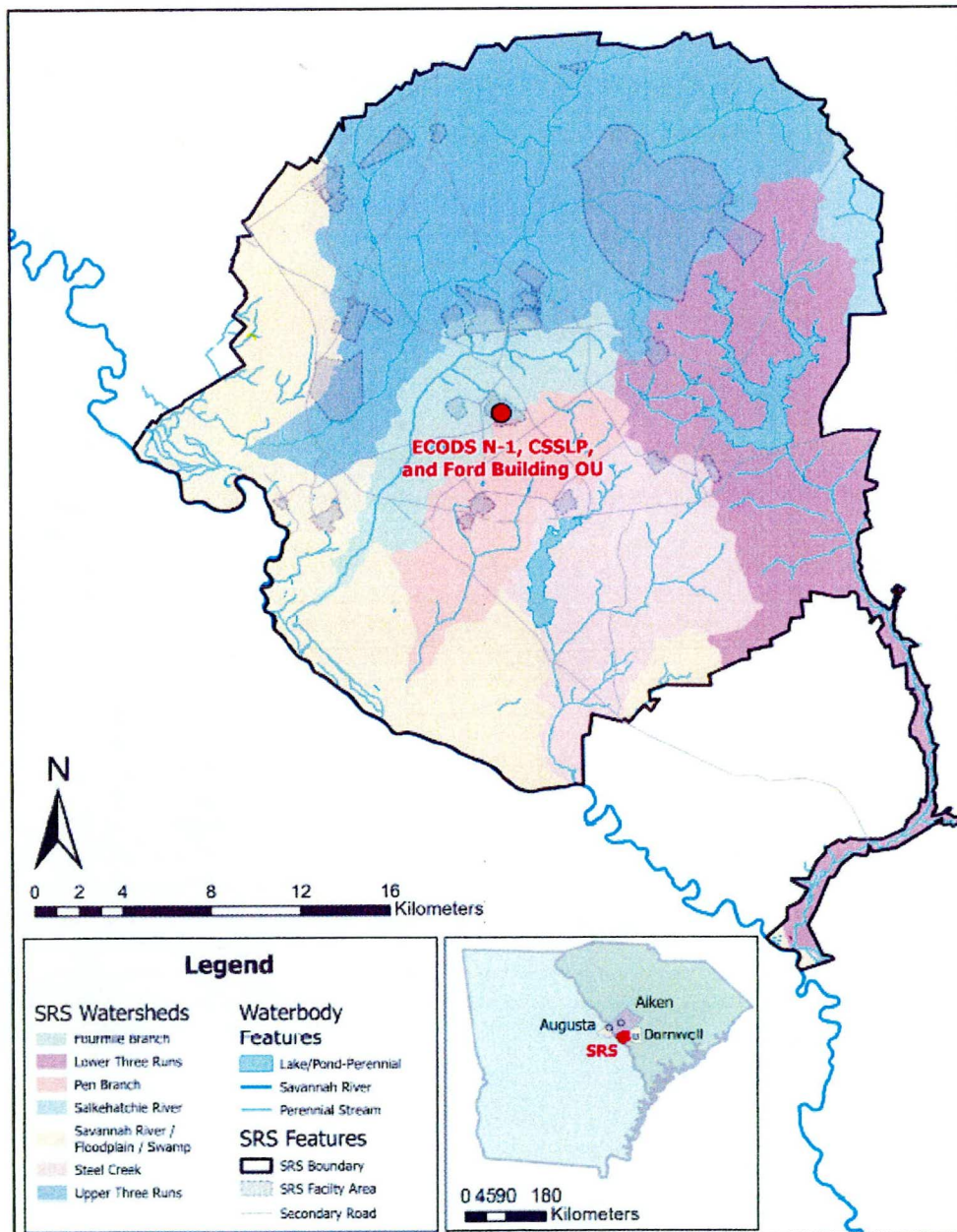
**The legend indicates the range of arsenic concentrations at the historical soil locations. This range defines which location are above or below the cleanup level (e.g., SRS background 95<sup>th</sup> %tile). The cleanup level is the basis for the proposed sampling locations; therefore, including the individual concentrations of each historical sample is not needed to refine the LOE. Figure B4 will be updated to include labels for the proposed sample locations. Figure 5, CSSLP Subunit Hotspot Removal Locations, within the CMIP/RAIP portion of the document will also be revised to include the proposed sample location labels. The revised figures are included at the end of this document.**

**Responsible Party: Justin Steadman, (803) 952-7346, justin.steadman@srs.gov**

**SRS Responses to U.S. Environmental Protection Agency Comments on the Corrective Measures Implementation Plan/Remedial Action Implementation Plan for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G), and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U), Savannah River Site Aiken, SC, SEMS Number: 93 (SRNS-RP-2023-00535, Revision 0, August 2023)**

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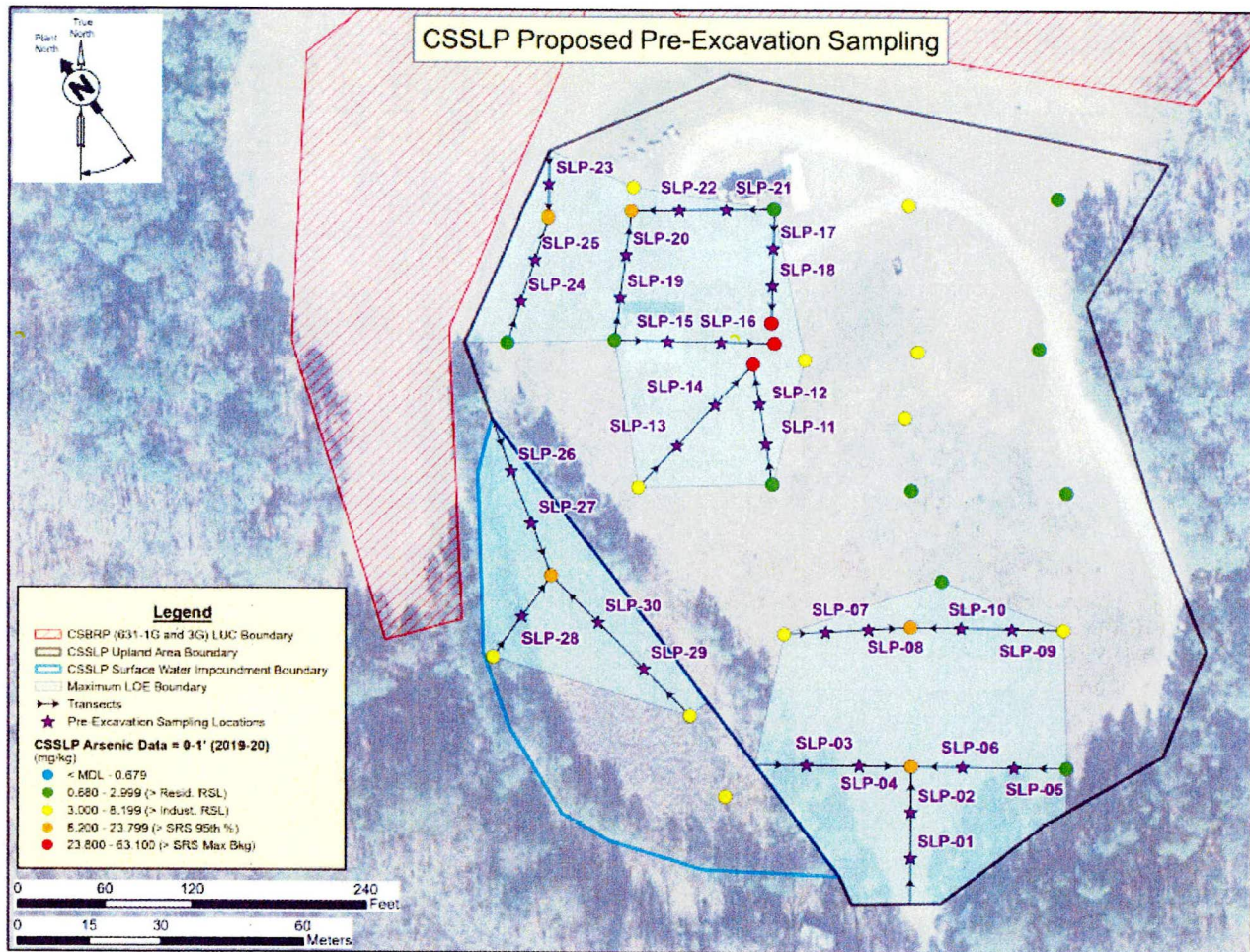


**Figure 2. Location of the ECODS N-1, CSSLP, and Ford Building OU at the Savannah River Site**

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**Figure 5. CSSLP Subunit Hotspot Removal Locations**

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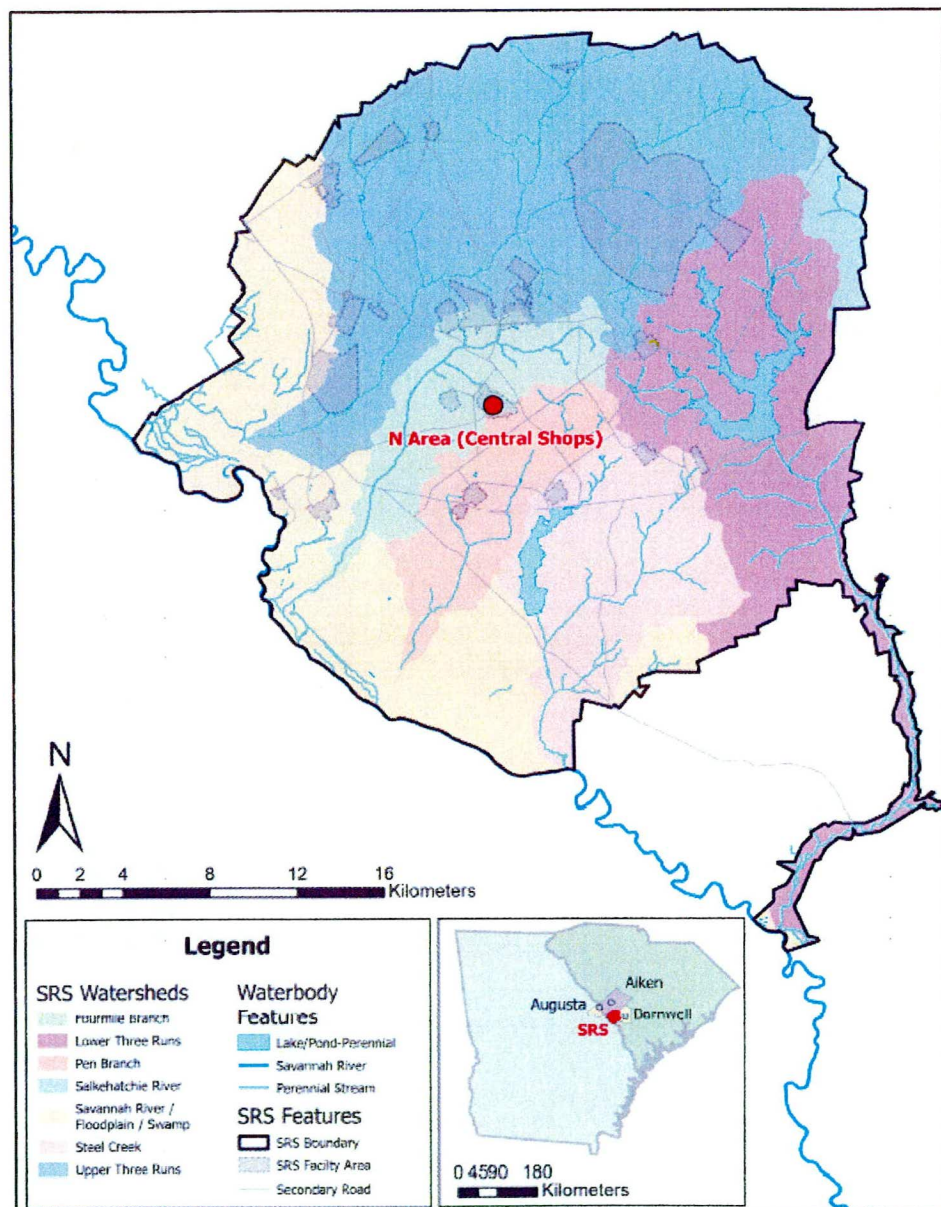


Figure B1. Location of N Area within SRS

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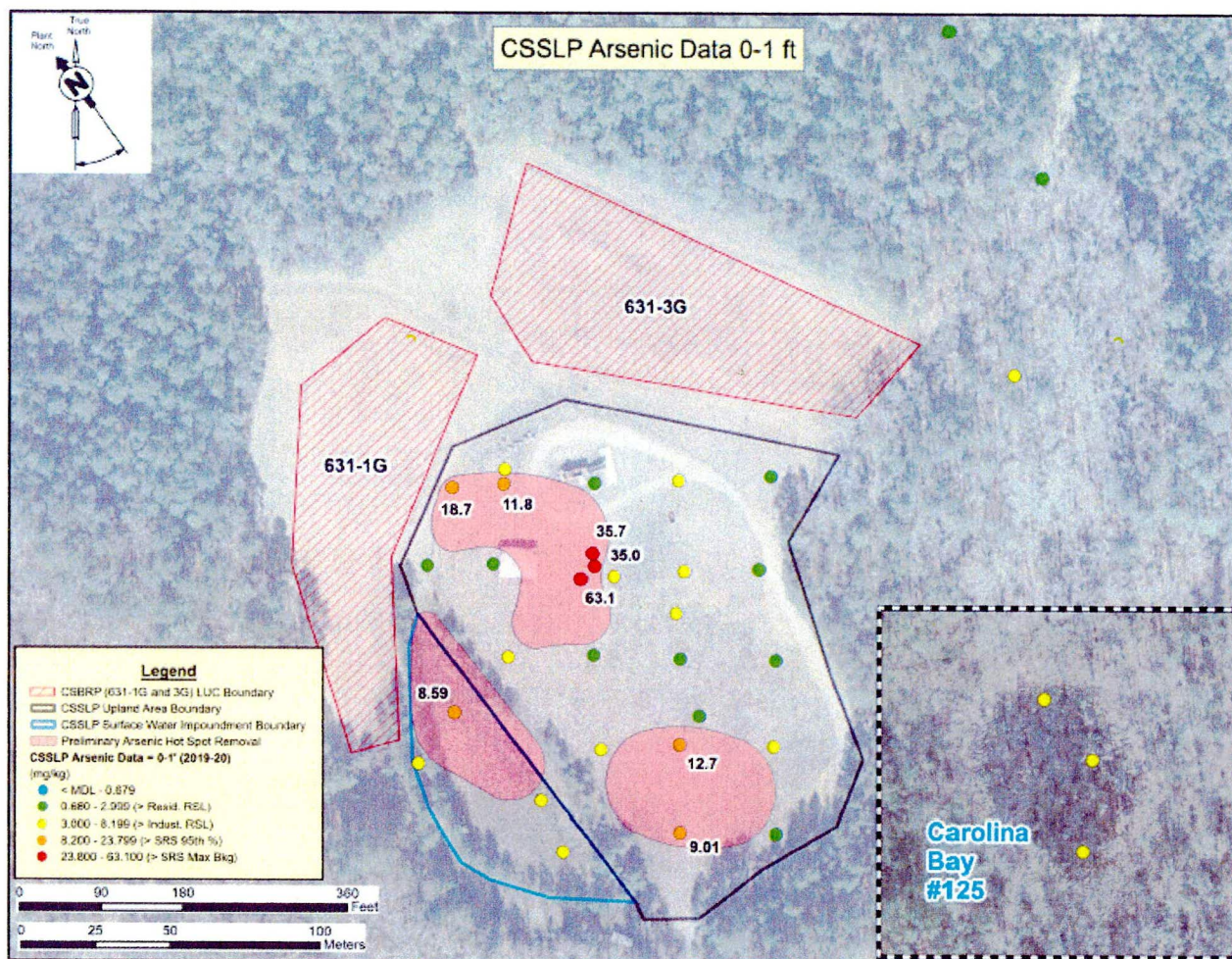
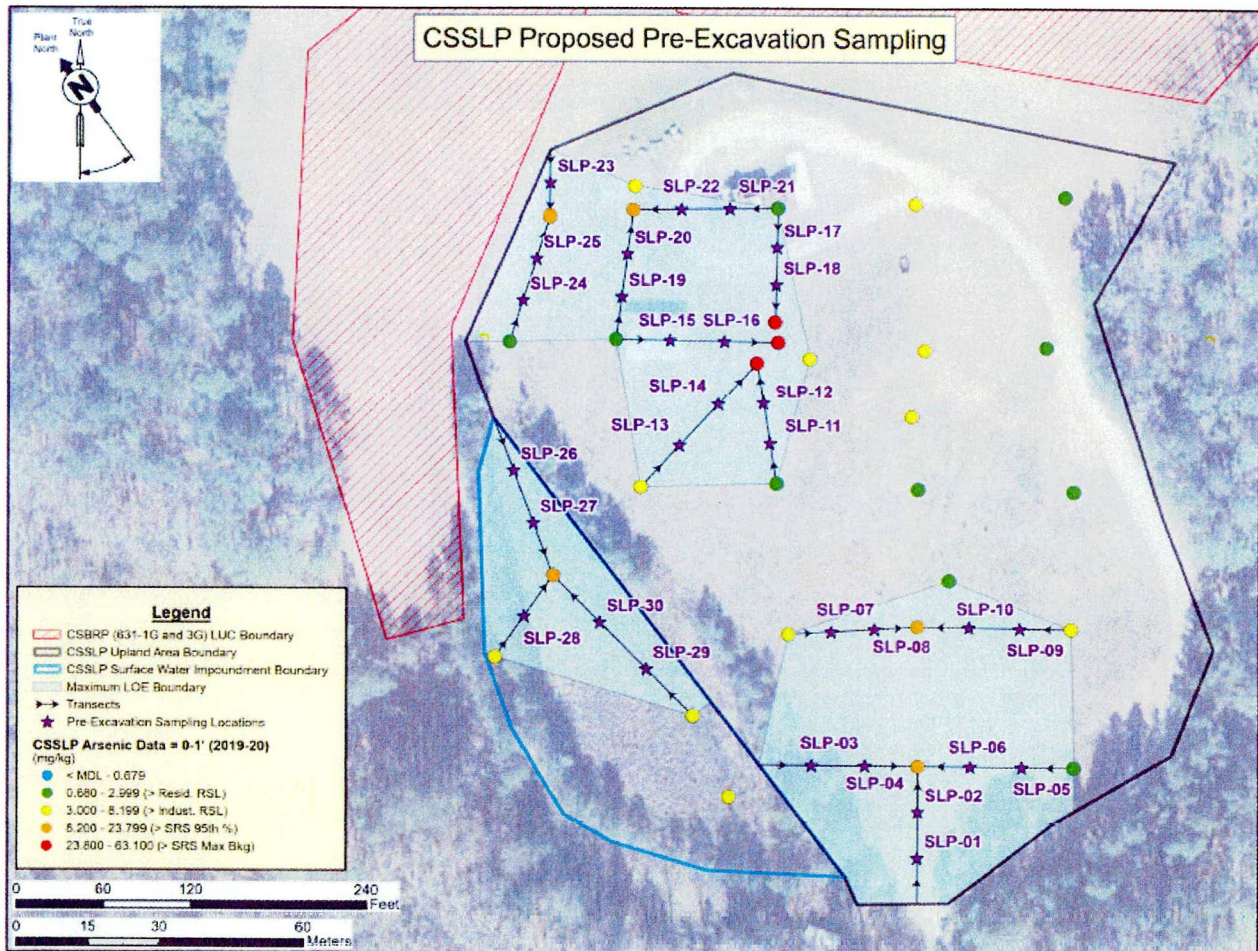


Figure B3. Previous Arsenic Results at the CSSLP and Preliminary Hot Spot Removal Areas

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**Figure B4. Pre-Excavation Sampling Locations to Refine the LOE**