



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

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

January 2, 2025

Ms. Avery G. Hammett, SRS 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

JAN 2 2025

AREA COMPLETION PROJECTS

Re: Focused Early Action Corrective Measures Study/Feasibility Study in Support of Beneficial Reuse of Select Coal Ash and Coal Fines at the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), and L-Area Ash Basin (188-L) Operable Units, SEMS Numbers: 61, 62, 88, 90, & 91 (SRNS-RP-2024-00222, Revision 0, October 2024) received October 9, 2024.

Dear Ms. Hammett:

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,

Susan B. Fulmer Digitally signed by Susan B. Fulmer
Date: 2025.01.02 14:56:02 -05'00'

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

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

South Carolina Department of Environmental Services Comments on:

Focused Early Action Corrective Measures Study/Feasibility Study in Support of Beneficial Reuse of Select Coal Ash and Coal Fines at the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), and L-Area Ash Basin (188-L) Operable Units, SEMS Numbers: 61, 62, 88, 90, & 91
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Page 1 of 1

Specific Comments

1. Section 3.1.2, Alternative A-2: LUCs with Beneficial Reuse, page 3-2. The middle paragraph on this page addressing Phase 2 implementation activities should include confirmation sampling upon completion of excavation activities, as this activity is also listed in the cost estimates for this alternative at each OU.
2. Table 5, Summary of the Remaining Coal Ash and Coal Fines Operable Units Cleanup Levels, page 5-52 and Table F-1, Human Health Risk-Based Preliminary Remedial Goals for the Remaining Coal Ash and Coal Fines OUs, page F-7. These tables do not include the PRG for Ra-226, which is a HH RCOC for the A-Area Ash Pile. Also, Section F-4 of Appendix F does not include mention of Ra-226. Please revise these tables and Appendix F to include this HH RCOC.