



May 2, 2019

Mr. Brian T. Hennessey, SRS Remedial Project Manager  
Infrastructure and Area Completion Division  
U. S. Department of Energy  
Savannah River Operations Office  
Post Office Box A  
Aiken, South Carolina 29802



Re: <sup>Action Memo 5-6-2019</sup> Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U), SEMS Number: 63 (SRNS-RP-2018-01091, Revision 0, January 2019) received March 7, 2019.

Dear Mr. Hennessey:

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/DHEC 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, P.G., Manager  
Federal Remediation Section  
Division of Site Assessment, Remediation, Revitalization  
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)  
Travis Fuss, Aiken Environmental Affairs Office (via email)  
Jon Richards, EPA Region IV  
Heather Cathcart, BLWM

**South Carolina Department of Health and Environmental Control Comments on:**  
Removal <sup>Action Items - 6-2019</sup> Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U),  
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General Comments

1. The clean copy document and appendices need to be stamped and signed by an engineer in South Carolina to certify the closure certification in accordance with the Solid Waste Regulations.
2. Please provide a hard copy of Appendix Q.8 for our files. The hard copy of the appendices did not include Appendix Q.8, just the cover page.
3. Section 1.2, last sentence, page 4; Section 2.7.3, 2nd paragraph, page 25; Section 2.7.5, 1st sentence, page 26; and Section 2.8, Table 8, page 35. Only ash-laden soils from the 488-1D "South" Inlet Basin were consolidated into the eastern end of the 488-1D Ash Basin and ash from the 488-1D "North" Inlet Basin was dispositioned at Three Rivers landfill. However, excavation, haul, and placement of ash from the inlet basins was not addressed as above in the document.

Specific Comments

1. Section 4.3.2, 488-1D Ash Basin (including inlet basins) and Area East of the 488-4D Ash Landfill, page 42. The last sentence of this section indicates that the *Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins* recommended land use controls preventing unrestricted land use be implemented at 488-1D and Area East of 488-4D. The recommendation for unrestricted land use for the inlet basins in this report should be included with this statement as well, since the inlet basins are included in the title for this section.
2. Section 1.5, Table 1, page 7. Based on SRS weekly site visit reports by the STR, the excavation, haul, and placement of ash-contaminated soils from both inlet basin was completed in August, 2018, which is different with the completion data of inlet basins in Table 1. Please clarify.
3. Section 2.3, 1st paragraph, page 11. Please add inlet basins in the major construction segment of 488-1D Ash Basin as "488-1D Ash Basin (including inlet basins)".
4. Section 2.4.7, 2nd paragraph, page 15. Please include all segments in the confirmatory sampling activity as below: "Following removal of ash material from the area east of the 488-4D Ash Landfill, the western end of the 488-1D Ash Basin, Inlet Basins, and the 489-D CPRB, SRNS performed confirmatory sampling."
5. Section 2.5.3, 3rd sentence, page 20. The following text, "in Section 4.3.1", needs to be replaced by "in Section 4.3.2".

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6. Section 2.7, page 23. Please add inlet basins in the section title as "488-1D Ash Basin (including inlet basins)".
  7. Section 4.3.2, page 41. Please include the 8 samples that were collected from the 488-1D Inlet Basins in accordance with the Field Sampling Plan for the D-Area 488-1D Inlet Basins (SRNS 2014). A total of 29 samples were evaluated to demonstrate that the ash has been successfully removed from the areas of excavation.