



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

ARF-023871

SEP 15 2022

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: Savannah River Site's Responses to the Regulatory Comments on the Preferred Remedial Action and Regulatory Strategy for Remaining Savannah River Site's Coal Ash and Coal Fines Operable Units (U) (IACD-22-166, Dated July 21, 2022)

The U. S. Department of Energy is submitting the subject comment responses for your review and approval. The U. S. Environmental Protection Agency (EPA) approved the ash strategy letter (IACD-22-166, dated July 21, 2022) on August 11, 2022, and the South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on the letter on August 25, 2022. The comment responses, once approved, are part of the *Preferred Remedial Action and Regulatory Strategy for Remaining Savannah River Site's Coal Ash and Coal Fines Operable Units* by incorporation and the ash strategy is thereby approved. Please review these responses and provide your approval by September 23, 2022. The time and effort that the SCDHEC and the EPA have given on the subject strategy are greatly appreciated.

Sincerely,

Brian T. Hennessey

Digitally signed by Brian T.
Hennessey
Date: 2022.09.15 12:16:30 -04'00'

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

IACD-22-180

SEP 15 2022

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosure:

Savannah River Site's Responses to South Carolina Department of Health and Environmental Control Comments on the Preferred Remedial Action and Regulatory Strategy for Remaining Savannah River Site's Coal Ash and Coal Fines Operable Units (U) (IACD-22-166, Dated July 21, 2022)

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. N. 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
R. H. Pope, EPA-Atlanta

cc w/ encl:

M. McRae, TechLaw, Inc.

**SRS Responses to SCDHEC Comments on the
Preferred Remedial Action Regulatory Strategy for Remaining Savannah River Site's Coal Ash
and Coal Fines Operable Units (U) (IACD-22-166) dated July 21, 2022
and received July 22, 2022.**

Comments Received: August 25, 2022

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Specific Comments

1. The Confirmation Sampling and Analysis Plan for Coal and/or Ash Removal at the Savannah River Site (U) (SRNS-RP-2013-00332, Revision 1.1, July 2014) received July 30, 2014, should be referenced in this Regulatory Strategy document and confirmed that it will still be used in conjunction with site-specific closure plans.

Response: Agree w/clarification:

The Confirmation Sampling and Analysis Plan for Coal and/or Ash Removal at the Savannah River Site (U) (SRNS-RP-2013-00332, Revision 1.1, July 2014) received July 30, 2014, will be used in conjunction with site-specific closure plans (i.e. Remedial Action Implementation Plan) for each of the beneficial reuse units at the time of its final closure. These comment responses will be placed into the Administrative Record File (ARF) for the applicable ash waste units where confirmation of removal of ash and/or coal to approved levels is relevant. The ARF record serves as the record for future reference and documents the commitment. No change to the Regulatory Strategy letter (IACD-22-166) is proposed.

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

2. Ash units which received sluiced ash, and coal pile runoff basins (if not alternatively covered by BOW's stormwater program), are wastewater units and are, therefore, subject to Industrial Wastewater closure criteria. Please make sure the appropriate ARARs for this closure criteria are listed in the closure documents. The applicable waste units are A-Area Coal Pile Runoff Basin (788-3A), D-Area Ash Overflow, D-Area Ash Basin Wetlands, K-Area Ash Basin (188-K), L-Area Ash Basin (188-L), Wetland Area at Dunbarton Bay (Phase II), H-Area Ash Basin (288-H), and H-Area Coal Pile Runoff Basin (289-H).

Response. Agree.

All substantive ARARs are a required component of the remedy as documented in the remedial decision documents. IWT regulations will be considered during the evaluation of ARARs for the future remedial decisions for these units. The appropriate ARARs will be listed in the closure documents.

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov

**SRS Responses to SCDHEC Comments on the
Preferred Remedial Action Regulatory Strategy for Remaining Savannah River Site's Coal Ash
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3. Plan A on page 9 of the presentation mentions using ash and coal fines as lower backfill under a final closure cap. It should be noted that the Performance Assessments (PA) for the Tank Farms and Saltstone Disposal Facility (SDF) do not discuss specific backfill material, nor do the Closure Cap Concept documents referenced in the PAs. The cap concept documents do not specify material but give more general design criteria to be met at each level. There is one brief mention in the SDF PA of clayey sands for the lower backfill and one mention of mixing some bentonite with the backfill in a cap concept document; but all PAs state materials will be selected closer to actual closure. This would require a revision to each PA.

Response: Agree w/clarification:

Performance Assessments are required by DOE Order and will be revised if necessary to reflect the placement of ash within any of the disposal facilities. In addition, the design requirements for the placement of the ash will be defined as part of the final Class 3 Solid Waste Landfill closure plan. Any ash placed into these facilities will be required to meet the design standards.

Responsible Party: J. Scott Kirk, (803) 557-9328, james.kirk@srs.gov

4. The document and presentation should clearly state that if beneficial reuse of the ash within FAL 288-F does not occur, then the closure plan will be updated to provide a Class 3 cap over the landfill and submitted to SCDHEC for review and approval.

Response: Agree w/clarification:

If beneficial reuse of the 288-F ash does not occur, then a revised solid waste landfill permit closure plan will be submitted for approval to ensure the final cover system complies with SCDHEC regulations and/or the other CERCLA ARARs at that time.

Responsible Party: Joseph Burch, (803) 952-6660, joseph.burch@srs.gov