



December 21, 2017



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: Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2018  
(Print Date: 11/03/17) dated November 14, 2017 and received November 15, 2017.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced Appendix E to the Savannah River Site (SRS) Federal Facility Agreement (FFA). The Department has repeatedly stated over the years that we expect every effort to be made to maintain a productive and stable work load as we strive to achieve the accelerated cleanup envisioned in the development and implementation of the FFA. Though we are aware of the effects of budget shortfalls and continuing missions at SRS on the ability to schedule work in many areas of the site, we remain disappointed in the lack of new work proposed in Appendix E.2 (for FY2020). While we are aware that ongoing missions will delay completion of cleanup to 2065, the Department continues to expect every effort will be made to maintain progress at the site in a timely manner that is protective of human health and the environment.


The positive work completed under the SRS FFA has made this one of the most successful agreements within the Department of Energy complex. In order to maintain this success, the Department requests an evaluation be completed in the upcoming year to identify any projects that can be incorporated into the E.1 and E.2 timeframes.

In addition to the concerns addressed in this cover letter, the Department would like the attached comments to be addressed in the Revision 1 of FY2018 Appendix E document.

Mr. Hennessey  
Page 2

If you have any questions, please contact me at (803) 898-4331.

Sincerely,



Susan B. Fulmer, P.G., Manager  
Federal Remediation Section  
Division of Site Assessment, Remediation, and Revitalization  
Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)  
Jon Richards, EPA Region IV  
Myra Reece, Environmental Affairs  
Shelly Wilson, Environmental Affairs  
Daphne Neel, SCDHEC-BLWM  
Don Siron, SCDHEC-BLWM  
G. Ken Taylor, SCDHEC-BLWM  
Travis Fuss, Midlands EQC Region – Aiken  
Heather Cathcart, SCDHEC-BLWM

**South Carolina Department of Health & Environmental Control Comment on:**

## Federal Facility Agreement

Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2018 (Print Date: 11/03/17)  
dated November 14, 2017 and received November 15, 2017.

Page 1 of 1

---

General Comments

1. The schedule outlined in Appendix E contains a completion date of 2065 due to continuing missions at the Savannah River Site (SRS); however, the latter years of the schedule continue to contain a significant volume of work to be completed to meet this commitment. The Department is concerned that extending the Area Completion activities out jeopardizes the goals established in the Comprehensive Cleanup Plan and Letter of Support, as well as the overall accelerated cleanup vision for the SRS. The extremely heavy ramping up of work scheduled for the end of the SRS lifecycle may not be achievable from a budget or personnel perspective.
2. The Department remains concerned about the overall meager amount of work requiring review by FFA staff during the upcoming years due to pushing work out into future years. Every effort should be made to move work forward in the cleanup schedule, particularly Appendix E.1 and E.2, to continue the momentum gained by accelerated cleanup efforts and to maintain a stable work effort for staff in the upcoming years.

Specific Comments

1. The Department has reviewed the provided implementation schedule for the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), and Stormwater Outfall A-013 (NBN) Operable Unit and agrees with not placing the Revision 1.2 Interim Action Statement of Basin/Proposed plan on Appendix E.2 (FY2020).