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

JUN 08 2026

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 Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund and Emergency Management Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 1, June 2026) (Redline) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Numbers: 91

In accordance with the terms of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is submitting the subject information for your review. The *Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U)* (SRNS-RP-2025-01295, Revision 0, January 2026) was submitted to the South Carolina Department of Environmental Services (SCDES) and the U. S. Environmental Protection Agency (EPA) on February 5, 2026. The SCDES' and EPA's comments were received on April 6, 2026, and April 7, 2026, respectively. The draft responses to the regulatory comments were submitted for review via email on May 20, 2026. The SCDES stated that the draft responses were acceptable, with one minor editorial comment, via email on June 4, 2026. EPA requested a revision to one response and an additional change to the text via email on June 4, 2026; all other draft responses were acceptable. The final responses, which were revised to address SCDES' and EPA's requested revisions, are enclosed and were incorporated into the Redline Revision 1 pages.

Please review the enclosures and provide your response within thirty (30) days of receipt. The time and effort that the SCDES and the EPA have given on the subject operable unit are greatly appreciated.

JUN 0 8 2026



Comments or questions from you or your staff may be directed to me at (803) 952-6211 or the DOE Program Manager, April Coffman, at (803) 508-0490.

Sincerely,

MATTHEW BAKER

Digitally signed by MATTHEW BAKER
Date: 2026.06.05 09:54:36 -04'00'

Matthew R. Baker
Acting FFA Remedial Project Manager
DOE-Savannah River Operations Office
Remediation, Deactivation, and Decommissioning Division

RDDD-26-149

Enclosures:

1. Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 1, June 2026) (Redline) SEMS Numbers: 91
2. SRS Responses to South Carolina Department of Environmental Services Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026) SEMS Numbers: 91
3. SRS Responses to U. S. Environmental Protection Agency Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026) SEMS Numbers: 91

JUN 0 8 2026



c w/o encl:
M. Reece, SCDES-Columbia
H. J. Porter, SCDES-Columbia
J. Blalock, SCDES-Columbia
S. French, SCDES-Columbia
R. G. Stewart, SCDES-Columbia
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G. O'Quinn, SCDES-Midlands Aiken Environmental Affairs Office
T. G. Corley, SCDES-Midlands Aiken Environmental Affairs Office
C. L. Robertson, SCDES-Midlands Aiken Environmental Affairs Office
E. G. Downing, SCDES-Midlands Aiken Environmental Affairs Office
H. L. Herlong, SCDES-Midlands Aiken Environmental Affairs Office

c w/ encl:
H. H. Cathcart, SCDES-Columbia
B. Martin, USEPA-Atlanta
M. McRae, TechLaw, Inc.

**SRS Responses to SCDES Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 6, 2026**

## SPECIFIC COMMENTS

1. **Description of Selected Remedy, page iii of viii:** The third bullet references the 2023 RCRA Permit Renewal Application, while the first bullet on page 38 of 76 refers to the current RCRA Permit Renewal Application. For clarity, the third bullet should be revised to indicate that the 2023 Permit Renewal is the current application. Additionally, the RCRA Permit defines "Approved Permit Application" as the most recent RCRA Part A Application, Part B Application, and any modifications approved by the Department for the duration of the permit.

   **Response: Agree.**

   **The 3rd bullet in the Description of the Selected Remedy will be modified to add "current" before "2023 RCRA Permit Renewal Application …"**

   **Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

2. **Site and Operable Unit Compliance History, LRP 131-4L Subunit, page 5.** The first two sentences of this section are directly copied from the beginning of the LRP 131-1L Subunit section. Please revise and include the appropriate descriptive information for the LRP 131-4L subunit.

   **Response: Agree.**

   **The 1st two sentences in Section II, Site and Operable Unit Compliance History, Operable Unit Operational and Compliance History, *LRP 131-4L Subunit* will be rewritten as follows:**

   **"The LRP 131-41L subunit is located northeast of the L Area perimeter fence and just north of the rail line ~~in the southern portion of the SRS, east of L Area~~ (Figure 3). ~~The subunit is approximately 9.7 km (6.0 mi) north of the nearest SRS boundary.~~"**

   **Additionally, text will be added for consistency as follows.**

   **Section II, Site and Operable Unit Compliance History, Operable Unit Operational and Compliance History, end of first paragraph:**

   **"… The ECODS L-3, LRP 131-1L, and LRP 131-4L OU is located within an industrial area, and the future land use is reasonably anticipated to remain industrial. The three subunits are located outside of the L Area perimeter fence to the east-northeast."**

   **Section II, Site and Operable Unit Compliance History, Operable Unit Operational and Compliance History, *ECODS L-3 Subunit*, end of second paragraph:**

**SRS Responses to SCDES Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 6, 2026**

**"… The ECODS L-3 subunit is located approximately 518 m (1,700 ft) east of the eastern corner of the L Area perimeter fence and approximately 152 m (500 ft) west of SRS Road C."**

**Section II, Site and Operable Unit Compliance History, Operable Unit Operational and Compliance History, *LRP 131-1L Subunit*, beginning of first paragraph:**

**"The LRP 131-1L subunit is located in the southern portion of the SRS, east of L Area and just outside the L Area perimeter fence (Figure 3). …"**

**Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

3. **Table 2a, Summary of Refined Constituents of Concern and Medium-Specific Exposure Point Concentrations: ECODS L-3 Subunit (Soil), page 57.** The EPC of 0.365 mg/kg listed for Aroclor 1260 in this table is different from the EPC of 0.354 mg/kg stated in the ECODS L-3 Subunit discussion on page 17. It appears that this value is a typographical error based on a previously listed EPC of 0.356 mg/kg in Table C-2 of the approved RFI/RI/BRA/CMS/FS Report. The 0.354 mg/kg value is the same as the one listed in the approved SB/PP and correlates to the calculated risk of 1.48 E-06 listed in the ROD/RAS. Please revise Table 2a to include this EPC for Aroclor 1260.

   **Response: Agree.**

   **Table 2a will be corrected using the EPC of 0.354 mg/kg for Aroclor 1260.**

   **Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

SPECIFIC COMMENTS

1. **Specific Comment #1, Executive Summary, Description of the Selected Remedy, p. ii of viii:** In the first paragraph, first sentence, please remove the introductory phrase, "[f]or the ECODS L-3, LRP 131-1L, and LRP 131-4L OU," and begin the sentence, instead, with "The selected remedy." The subunits the ROD covers are already established in the earlier sections and using this phrase may introduce uncertainty.

   **Response: Agree.**

   **The introductory phrase will be revised as suggested with the following:**

   **Declaration for the Record of Decision, *Description of the Selected Remedy*, p. ii of viii:**

   **~~"For the ECODS L-3, LRP 131-1L, and LRP 131-4L OU, t~~The selected remedy for the ECODS L-3 subunit …"**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

2. **Specific Comment #2, Executive Summary, Description of the Selected Remedy, p. ii of viii:** Please add to the end of the second paragraph, the following phrase, "and, therefore, no remedial action is selected for this subunit."

   **Response: Agree.**

   **The sentence will be revised as suggested with the following:**

   **Declaration for the Record of Decision, *Description of the Selected Remedy*, p. ii of viii:**

   **"The LRP 131-1L subunit poses no unacceptable risk based on unlimited exposure and unrestricted land use scenario and, therefore, no remedial action is selected for this subunit."**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

3. **Specific Comment #3, Executive Summary, Description of the Selected Remedy, p. iii of viii:** In the first paragraph, the first sentence states that LUCs will be in effect indefinitely, unless ACM is removed to levels that allow for UU/UE. This statement appears to be inaccurate, since the text seems to indicate that both subunits have a contaminant other than ACM (PCBs for ECODS L-3 and benzo(a)pyrene for LRP 131-4L) that merit LUCs. Please clarify whether the necessity for remedial action LUCs is triggered by PCBs and benzo(a)pyrene for these units. If so, then it appears that the first paragraph, first sentence,

should be revised to include these other remedy-triggering contaminants. If not, then the text describing the unacceptable risk arising from PCBs and benzo(a)pyrene should be revised to clarify this point.

**Response: Clarification.**

**The text in question states that "LUCs for the ECODS L-3 subunit and LRP 131-4L subunit will be in effect indefinitely, unless ACM is removed from the subunits and concentrations of hazardous substances are at levels that allow for unrestricted use and exposure."**

**The second part of the sentence is in reference to the remedy-triggering contaminants, stating that concentrations of hazardous substances must be at levels that allow for unrestricted use and exposure. For clarification, the following will be added to the sentence:**

**Declaration for the Record of Decision, *Description of the Selected Remedy*, p. iii of viii:**

**LUCs for the ECODS L-3 subunit and LRP 131-4L subunit will be in effect indefinitely, unless ACM is removed from the subunits and concentrations of hazardous substances (PCBs at the ECODS L-3 subunit and benzo(a)pyrene at the LRP 131-4L subunit) are at levels that allow for unrestricted use and exposure.**

**Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

4. **Specific Comment #4, Section III. Highlights of Community Participation, at page 7:** The document states, "[p]ublic participation requirements are listed in Sections 113 and 117 of CERCLA (42 USC § 9613[k] and 9617[a])." Please revise to cite "42 U.S.C. §§ 9613(k)(2)(B) and 9617(a)."

   **Response: Agree.**

   **The citation will be revised as suggested. This change is documented in the Revision 1 Redline document.**

   **Responsible Party: Caleb Jones, 803-952-2906, caleb.jones@srs.gov**

5. **Specific Comment #5, Section IX, Description of Alternatives, p. 29 and elsewhere:** The first full paragraph, under *Alternative A-2: Land Use Controls*, appears to include a LUCIP as a land use control, equivalent to warning signs and excavation permit restrictions. First, please remove the LUCIP as a LUC. It is not. It is a CERCLA design document that focuses on development and design of the LUC component of the remedy. This confusion is introduced

by the third sentence in this paragraph (and other places where this approach is repeated). The following text correctly describes the instruments and their relationship, so please replace the existing third sentence here and elsewhere with:

> Specific LUCs to be used in the remedy at ECODS L-3 and LRP 131-4L include warning/no trespassing signs (related to the presence of asbestos), the SRS Site Use/Site Clearance Program, the RCRA Permit Renewal Application, Volume I, Section F.1, and deed restrictions when the property is transferred outside federal ownership.

Please repeat this pattern for Alternative A-3.

**Response: Agree.**

**Text will be revised for clarity using the suggested text in the following locations of the document.**

- **Section IX. Description of Alternatives, Alternative A-2: Land Use Controls**
- **Section IX. Description of Alternatives, Alternative A-3: Soil Cover with Land Use Controls**
- **Section IX. Description of Alternatives, Alternative B-2: Land Use Controls**
- **Section IX. Description of Alternatives, Alternative B-3: Soil Cover with Land Use Controls**
- **Section XI. The Selected Remedy, Detailed Description of the Selected Remedy**

**Revisions are captured in the Revision 1 Redline document.**

**Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

6. **Specific Comment #6, Section X. Comparative Analysis of Alternatives, p. 32, first sentence:** The document cites 40 C.F.R. § 300.430(e)(9), which describes the analysis of the nine criteria that should take place during the feasibility study. Please either replace that citation with 40 C.F.R. § 300.430(f)(5)(i) or cite to both sections, 40 C.F.R. §§ 300.430(e)(9) and (f)(5)(i). The NCP provides in 40 C.F.R. § 300.430(f)(5)(i) that when documenting the remedial action decision in the ROD, "[d]ocumentation shall explain how the evaluation criteria in paragraph (e)(9)(iii) of this section were used to select the remedy."

   **Response: Agree.**

   **Reference to 40 C.F.R. § 300.430(f)(5)(i) is most appropriately referenced in the Declaration for the Record of Decision and will be added as follows:**

   **Declaration for the Record of Decision, *Statement of Basis and Purpose*, first sentence of first paragraph:**

   **"This decision document, per 40 Code of Federal Regulation (CFR) 300.430(f)(5)(i), presents the selected remedial action …"**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

7. **Specific Comment #7, The Selected Remedy, page 36.** Consistent with comment #5 above, in the fourth full paragraph, please delete the fifth sentence and replace it with:

   > Specific LUCs to be used in the remedy at ECODS L-3 and LRP 131-4L include warning/no trespassing signs (related to the presence of asbestos), the SRS Site Use/Site Clearance Program, the RCRA Permit Renewal Application, Volume I, Section F.1, and deed restrictions when the property is transferred outside federal ownership.

   **Response: Agree.**

   **See response to USEPA Specific Comment #5.**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

8. **Specific Comment #8, The Selected Remedy, page 37:** The first full paragraph, last two sentences, state that the duration of the LUCs is undetermined, but likely longer than the 30 years assumed for cost. Please rephrase by deleting these last two sentences and adding to the end of the first sentence the phrase, "even though a term of 30 years is used for the limited purpose of cost-estimation." The "duration" is until the remedy is protective of UU/UE, as is stated in the first sentence. The next two sentences introduce confusion.

   **Response: Agree.**

   **The text in Section XI, The Selected Remedy, Detailed Description of the Selected Remedy, 5th paragraph, 1st sentence will be revised as follows:**

   **LUCs will be maintained indefinitely, or until ACM is removed and the concentration of hazardous substances in the media is at such levels to allow for unrestricted use and exposure. For the limited purpose of cost-estimation, t~~T~~he timeframe for LUCs is assumed to be~~for~~ 30 years ~~of duration as a basis for the cost estimate. However, the duration is undetermined and will likely be longer, as asbestos does not degrade over time~~.**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

9. **Specific Comment #9, The Selected Remedy, page 37:** In the second full paragraph, please spell out Land Use Control Implementation Plan before LUCIP is used. Please add to the beginning of the first sentence, "As required in the installation-wide Land Use Control Assurance Plan and described in the EPA LUC Checklist available at https://www.epa.gov/sites/default/files/documents/luc_checklist_oswer_directive_9355_6_12.pdf."

   **Response: Agree.**

   **Preparation of site-specific LUCIP's are required by agreement among USDOE, USEPA, and SCDES in the LUCAP (WSRC-RP-92-1263, Rev. 1.1) to ensure that LUCs required by the numerous remedial decisions on SRS are properly maintained and periodically verified. For preparation of site-specific LUCIPs, SRS follows previous Core Team agreed upon language, in accordance with the latest approved *Environmental Compliance and Area Completion Projects Regulatory Document Handbook* (SRNS-RP-2022-00330, latest revision). For clarification and to correct the defined acronym, the following text revisions will be made:**

   **Section XI, The Selected Remedy, Detailed Description of the Selected Remedy, beginning of fifth full paragraph:**

**"As required in the SRS installation-wide Land Use Control Assurance Plan (LUCAP), and in accordance with the approved *Environmental Compliance and Area Completion Projects Regulatory Document Handbook* (SRNS 2025c), a Land Use Control Implementation Plan (LUCIP) will be prepared by the USDOE that describes …"**

**Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

10. **Specific Comment #10, The Selected Remedy, page 37:** Please delete "Implementation for" in the Subheading "Land Use Control Implementation for ECODS L-3 and LRP 131-4L," and add an "s" after "Control," so that the new subheading reads "Land Use Controls for ECODS L-3 and LRP 131-4L," because the text that follows describes the specific land use controls that are being selected as part of the remedy.

    **Response: Clarification.**

    **This text includes the LUCs, as well as the implementation of the LUCs. For clarity the subheading title will be revised as shown below:**

    **"Land Use Controls ~~Implementation~~ for ECODS L-3 Subunit and LRP 131-4L Subunit and Implementation"**

    **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

11. **Specific Comment #11, The Selected Remedy, page 37:** Please insert the following text, perhaps as a footnote to the Subheading:

    > If other specific LUCs are found to be effective during preparation of the LUCIP, they can, in general, be added to the LUCIP without further revision of this ROD, unless the objective of the LUCs is found to be different than the LUC objectives stated in The Selected Remedy section.

    **Response: Agree.**

    **The following text will be added as the 2nd sentence in Section XI, The Selected Remedy, Detailed Description of the Selected Remedy, 5th paragraph:**

    **"If other specific LUCs are found to be effective during preparation of the LUCIP, they can, in general, be added to the LUCIP without further revision of this ROD, unless the objective of the LUCs is found to be different than the LUC objectives stated in The Selected Remedy section."**

    **Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

12. **Specific Comment #12, The Selected Remedy, page 37:** In the second bullet, please delete the phrase, "Institutional controls (i.e., administrative measures) and use restrictions of on-site workers via", since this bullet should describe the actual LUC, which is the SRS Site Use/Site Clearance Program.

    **Response: Agree.**

    **Text will be revised as suggested.**

    **Section XI, The Selected Remedy, Detailed Description of the Selected Remedy, *Land Use Control Implementation for ECODS L-3 Subunit and LRP 131-4L Subunit*, second bullet:**

    **"~~Institutional controls (i.e., administrative measures) and use restrictions for on-site workers via~~ Tthe SRS Site Use/Site Clearance Program, which requires review of any proposed work on-site if on or in proximity to waste units. …"**

    **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

13. **Specific Comment #13, Statutory Determinations, page 41:** Please remove the reference in the first and fourth lines to LRP 131-1L since no unacceptable risk for UU/UE was found at that subunit, and, thus, LRP 131-1L does not have LUCs as a selected remedy. As with specific comment #1 above, repeating all three subunit names is confusing. Please name only the subunit and its associated remedial alternative number.

    **Response: Clarification.**

    **The formal project name (ECODS L-3, LRP 131-1L, and LRP 131-4L OU) is included in the text. However, the text will be revised as follows:**

    **"Based on the RFI/RI/BRA/CMS/FS (SRNS 2025a), the ECODS L-3, LRP 131-1L, and LRP 131-4L OU poses a threat to human health at the ECODS L-3 subunit and the LRP 131-4L subunit. No response action is required at the LRP 131-1L subunit."**

    **Responsible Party: Sadika O'Quinn, (803)952-6697, sadika.oquinn@srs.gov**

14. **Specific Comment #14, Statutory Determinations, page 42:** The second full paragraph, last sentence, states, "The statutory preference for treatment as a principal element of the remedy is not applicable as no PTSM RCOCs were identified at the OU." This statement mischaracterizes the statutory preference for treatment as a principal element of the remedy. This preference is not "triggered" by the presence of principal threat source material or principal threat waste; rather the statutory preference for treatment applies even where there is

low-level waste. As stated in EPA guidance, A Guide to Principal Threat and Low Level Threat Waste, 9380.3-06FS, November 1991, at page 3:

> The "Statutory Determinations" section should discuss how the selected remedy satisfies the statutory preference stated in CERCLA § 121 to select remedial actions "in which treatment which permanently and significantly reduces the volume, toxicity or mobility or the hazardous substances, pollutants, and contaminants is a principal element." In evaluating this statutory preference, the site manager needs to decide whether treatment selected in the ROD constitutes treatment as a major component of the remedy for that site. Remedies which involve treatment of principal threat wastes likely will satisfy the statutory preference for treatment as a principal element, although this will not necessarily be true in all cases (e.g., when principal threat wastes that are treated represent only a small fraction of the wastes managed through containment). Ground water treatment remedies also may satisfy the statutory preference, even though contaminated ground water is not considered a principal threat waste and even though principal threat source material may not be treated.

Further, the guidance directs that a ROD should include in this section "a discussion of how the statutory preference for treatment as a principal element is satisfied or explain why it is not satisfied, stating reasons in terms of the nine evaluation criteria." Accordingly, please revise this sentence to state, "Treatment is not a principal element of the Selected Remedy for ECODS L-3 and LRP 131-4L because land use controls provide protection of human health and the environment while providing the best balance of tradeoffs regarding treatment with respect to implementability, long-term effectiveness, and permanence at a reasonable cost."

**Response: Agree.**

**The last sentence in the last paragraph of Section XII, Statutory Determinations, will be rewritten as follows:**

**"Treatment is not ~~The statutory preference for treatment as~~ a principal element of the remedy for the ECODS L-3 subunit and LRP 131-4L subunit because LUCs provide protection of human health and the environment while providing the best balance of tradeoffs regarding treatment with respect to implementability, long-term effectiveness, and permanence at a reasonable cost~~is not applicable as no PTSM RCOCs were identified at the OU~~."**

**Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

15. **Specific Comment #15, Table 5. Cleanup Levels for ECODS L-3, LRP 131-1L, and LRP 131-4L OU, p. 60.** Please remove LRP 131-1L since no action was selected for this subunit.

    **Response: Agree.**

    **The formal project name (ECODS L-3, LRP 131-1L, and LRP 131-4L OU) was used for the table caption. To improve clarity, the caption will be revised as suggested.**

    **Responsible Party: Sadika O'Quinn, (803)952-6697, sadika.oquinn@srs.gov**

16. **Specific Comment #16, Table 5. Cleanup Levels for ECODS L-3, LRP 131-1L, and LRP 131-4L OU, p. 60:** The Toxic Substances Control Act (TSCA), in provision 40 C.F.R. § 761.3, defines a low occupancy area as "any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: less than 840 hours (an average of 16.8 hours per week) for non-porous surfaces and less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste." Table 6 cites to 40 C.F.R. § 761.61(a)(4)(i)(B), which contains the cleanup level for bulk PCB remediation waste in low occupancy areas. Table 5, however, includes risk-based cleanup levels for PCBs. 40 C.F.R. § 761.61(c) addresses risk-based cleanup and disposal approval, but this provision is not cited in the ARARs in Table 6. Table 5 also includes cleanup levels based on residential land use, which is inconsistent with the definition of low occupancy area under TSCA identified in the ARAR cited in Table 6, which is provided above.

    - Please clarify whether you mean to designate a residential use risk-based cleanup level and/or the "high occupancy" TSCA self-implementing level for the two subunits for which a LUC-only remedy was selected.
    - Will the LUCs achieve either cleanup level? If not, please identify the cleanup level that the remedy will achieve and/or preserve.

    In addition, Table 5 is inconsistent with the citation to the "low occupancy" level at 40 CFR 761.76(a)(4)(B)(1), in Table 6

    **Response: Agree.**

    **The PCB TSCA related ARARs are relevant and/or appropriate only to the ECODS L-3 subunit. The selected remedy aligns with previous applications of PCB ARARs. Discussions with EPA Region 4 TSCA Coordinators concerning the ECODS L-3 subunit, on June 5, 2024, (Attachment CR-1; SRNS-J2210-2026-00055) confirmed that bulk PCB remediation waste low occupancy cleanup levels (≤25 ppm) under 40 CFR 761.61(a) are considered relevant and appropriate under CERCLA for self-implementing cleanup. Additionally, EPA concurred that no additional documentation would be required under**

**a risk-based cleanup (40 CFR 761.61(c)). The combined RFI/RI/BRA/CMS/FS document meets the equivalent of the risk-based approval request and therefore, no separate documentation is required.**

**The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤25 ppm. Since the highest detected value of PCBs at the ECODS L-3 subunit was 5.63 ppm, no further action would be required under TSCA using this cleanup and disposal option. Low occupancy is maintained by implementing LUCs.**

**For the ECODS L-3 subunit, the high occupancy area cleanup level of ≤1 ppm was considered in the RI/FS for screening purposes; it was not intended that the high occupancy area remediation and disposal requirements would be applied to remedial alternatives.**

**Instead, SRS selected the risk-based approach under 40 CFR 761.61(c) to ensure adequate protection of human health and the environment from potential PCB exposures. EPA Region 4 TSCA Coordinators concurred that the documentation requirements for the risk-based approach are equivalently satisfied by the CERCLA risk assessment documentation.**

**As stated, under TSCA, if the low occupancy self-implementing cleanup approach is applied, no action would be required for the level of PCBs present. However, based on the results of the baseline risk assessment in which PCBs exceeded the resident human health 10-6 risk threshold, PCBs were retained as a refined constituent of concern at the ECODS L-3 subunit.**

**Tables 5 and 6 will be revised to reflect these changes as shown in Table CR-1 and Table CR-2, respectively.**

**Responsible Party: Bette Ross, (803) 679-7153, bette.ross@srs.gov**

17. **Specific Comment #17, Table 6. ARARs for the Selected Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits, p. 61:** The ARARs in Table 6 appear to be action-specific ARARs, not chemical-specific ARARs as the Table sub header on page 61 states.

**Response: Agree.**

**ARARs listed in Table 6 will be moved to the appropriate category as suggested. The revised table is shown as Table CR-2 below.**

**Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.oquinn@srs.gov**

18. **Specific Comment #18, Table 6. ARARs for the Selected Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits, p. 61:** There appears to be an inconsistency among the ARARs. On page 62, in the first entry in Table 6 under the sub heading "Bulk PCB Waste in Place," the document cites to 40 C.F.R. § 761.61(a)(4)(i)(B)(1), which contains the self-implementing procedures for on-site cleanup and disposal of PCB remediation waste for *low occupancy* areas where the PCB concentrations are ≤25 ppm. The provision also indicates that such waste may remain at a cleanup site at such concentrations (≤25 ppm) without a fence, signs, or a cap. *Compare* 40 C.F.R. § 761.61(a)(4)(i)(B)(1) with 40 C.F.R. §§ 761.61(a)(4)(i)(B)(2) and (3). In contrast, the other PCB ARARs cite to requirements in 40 CFR 761.61(a)(8), which are warranted only where the PCB contamination levels are above 25 ppm. Please clarify and revise according to the following.
    - Is the bulk PCB waste at the ECODS L-3 Subunit present in a concentration under ≤25 ppm? If so, for the reason stated above, the additional PCB related ARARs included in Table 6 on page 62 regarding deed restrictions for caps, fences and low occupancy areas that cite 40 C.F.R. § 761.61(a)(8) are not required and should be removed. (This would appear to be supported by the LUC-only and no action nature of the remedies for the three subunits in this ROD.)
    - Is the bulk PCB waste at the ECODS L-3 Subunit is >25 ppm and ≤50 ppm or >25 ppm and ≤100 ppm? If so, then a fence or a fence and a cap would be required per 40 C.F.R. §§ 761.61(a)(4)(i)(B)(2) or (3) and the ARARs included in Table 6 would need to be more comprehensive.

**Response: Clarification.**

**Please see response to Comment 16. The PCB contamination is below ≤25 ppm. The 40 CFR 761.61(a)(8) requirements will be removed from Table 6.**

**Responsible Party: Bette Ross, (803) 679-7153, bette.ross@srs.gov**

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

## MINOR COMMENTS

1. **Minor Comment #1, Declaration, Description of the Selected Remedy, page iii:** Consider combining the first bullet point into one sentence, as it now contains two incomplete sentences. A suggested revision is: "[w]arning signs posted at the ECODS L-3 and LRP 131-4L subunits around the waste unit boundaries/areas, including operations and maintenance of the signage."

   **Response: Agree.**

   **The 1st bullet in Declaration, Description of the Selected Remedy will be revised as follows:**

   - **"… waste unit boundaries/area, including o~~O~~perations and maintenance of the signage."**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

2. **Minor Comment #2, Section II Site And Operable Unit Compliance History, Subsection Operable Unit and Compliance History, LRP 131-4L Subunit, Page 7, end of first incomplete paragraph:** The document states, "[t]his feature acts as a maximum subunit boundary in leu [sic] of confirmatory borings to define the exact extent of buried waste." Should "leu" be replaced by "lieu"?

   **Response: Agree.**

   **The word "leu" will be replaced with "lieu" as suggested.**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

3. **Minor Comment #3: On page 31, Alternative B-3, third sentence:** The document states "[t]his alternative would also require LUCs through the use of warning and no trespassing signs, excavation permit restrictions, a LUCIP, and deed restrictions would be put into place to preclude activities that could cause exposure to contaminated media exceeding acceptable risk levels in the even [sic] the property were to be transferred out of federal ownership." Should it be "acceptable risk levels in the event the property . . ." rather than "in the even."

   **Response: Clarification.**

   **The sentence referenced in the above comment was deleted per the response to USEPA Specific Comment #5.**

   **Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

## Additional Comment (Received via email on 06/04/2026)

**Comment: ECODS L-3 Subunit Remedial Action Objective (RAO) Removal**

- Prevent exposure of human receptors to ACM that is likely present in unit soils if exposed.
- Prevent exposure of a future resident to Aroclor 1254 and Aroclor 1260 in surface soils at levels exceeding 1E-06 risk and an HQ of 1.
- ~~Prevent exposure of human receptors to Aroclor 1254 and Aroclor 1260 in surface soils at levels exceeding Applicable, or Relevant and Appropriate Requirement (ARAR) threshold of 1 mg/kg.~~

Upon further review EPA has a revision that will affect the Remedial Action Objectives (RAOs) for the ECODS L-3 Subunit. We recommend removing the TSCA ARAR RAO, *"Prevent exposure of human receptors to Aroclor 1254 and Aroclor 1260 in surface soils at levels exceeding Applicable, or Relevant and Appropriate Requirement (ARAR) threshold of 1 mg/kg*." It is not needed due to 1.) Low occupancy and 2.) Levels below 25mg/kg.

| ***Bulk PCB Waste in Place*** | | | |
|---|---|---|---|
| Bulk PCB remediation waste (self-implementing) | Unit meets the low occupancy thresholds and the residual PCB concentrations in the soil will be less than 25 mg/kg.<br><br>May remain onsite without further conditions (e.g., no fencing or cap requirements). | Bulk PCB remediation waste remaining in a *low occupancy area* (as defined in 40 C.F.R. § 761.3) at concentrations ≤ 25 mg/kg. – **relevant and appropriate** | 40 C.F.R. § 761.61(a)(4)(i)(B)(1) |

We agree that the Asbestos-Containing Material (ACM) is the driver or basis for taking action for this subunit. We want to ensure consistency in our justification as other sites in our Region.

**Response: Agree.**

**The following revisions will be made in response to the comment.**

**Section VIII, Remedial Action Objectives and Remedial Goals, Remedial Action Objectives, ECODS L-3 Subunit:**

- **"Prevent exposure of human receptors to ACM that is likely present in unit soils if exposed.**

- **Prevent exposure of a future resident to Aroclor 1254 and Aroclor 1260 in surface soils at levels exceeding 1E-06 risk and an HQ of 1.**

- ~~**Prevent exposure of human receptors to Aroclor 1254 and Aroclor 1260 in surface soils at levels exceeding Applicable, or Relevant and Appropriate Requirement (ARAR) threshold of 1 mg/kg.**~~**"**

**Section VIII, Remedial Action Objectives and Remedial Goals, Cleanup Levels, fourth paragraph:**

**"Figures 8 and 9 are maps of the HH RCOC locations at the ECODS L-3 subunit that exceeded the RSL ~~and/or ARAR~~ for a future resident scenario for Aroclor 1254 and Aroclor 1260, respectively. …"**

**Figure 8 was revised to remove reference to the Aroclor 1254 high occupancy ARAR threshold, the revised figure is shown in Figure CR-1.**

**Figure 9 was revised to remove reference to the Aroclor 1260 high occupancy ARAR threshold, the revised figure is shown in Figure CR-2.**

**Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov**

# SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina



## Comments Received April 7, 2026

## Attachment CR-1. Email Correspondence Between SRS and USEPA on June 5, 2024 (SRNS-J2210-2026-00055)

SRNS-J2210-2026-00055

BETTE ROSS (Affiliate) Digitally signed by BETTE ROSS (Affiliate) Date: 2026.05.07 13:32:50 -04'00'

**From:** Bette Ross
**To:** Crosby-Vega, Terri; Bennett, James
**Cc:** Justin Steadman; Mark Amidon; Caleb Jones; Lance Cramer
**Subject:** Summary of June 5, 2024 Meeting on ECODS L-3
**Date:** Thursday, June 6, 2024 11:31:00 AM
**Attachments:** image001.png
ECODS L-3 PCB Briefing.pdf

Good morning,

Thank you for taking the time to discuss this unit yesterday. I have summarized the meeting below and SRNS will proceed as agreed. Please let me know if I missed or misunderstood anything that was discussed.

Bette

**Summary of June 5, 2024 Meeting with EPA PCB Coordinator re: ECODS L-3**
**Attendees:**

| SRNS: | EPA: |
|---|---|
| Mark Amidon | James Bennett |
| Lance Cramer | Terri Crosby-Vega |
| Caleb Jones | |
| Bette Ross | |
| Justin Steadman | |

**Meeting Summary:**
SRNS discussed the attached presentation with EPA.

EPA was hesitant to concur with the assertion that waste disposal in the unit occurred before 4/18/1978. They did not disagree that the unit was used for waste disposal from November 1953 to June 1954 but would require more detailed information before agreement. Because SRNS was retaining PCBs as a contaminant of concern under CERCLA, their concurrence is not required at this time.

EPA concurs with the bulk PCB remediation waste low occupancy cleanup levels (≤25 ppm) under 40 CFR 761.61(a) as relevant and appropriate under CERCLA (self-implementing cleanup). EPA further concurs that no additional documentation would be required under a risk-based cleanup ((40 CFR 761.61(c)). The combined RFI/RI/BRA/CMS/FS document meets the equivalent of the risk-based approval request; no separate TSCA documentation is required. EPA-FFA is lead on agency review/approval.

**Bette H. Ross** (she/her)
**Savannah River Nuclear Solutions, LLC**
Environmental Compliance & Area Completion Projects

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

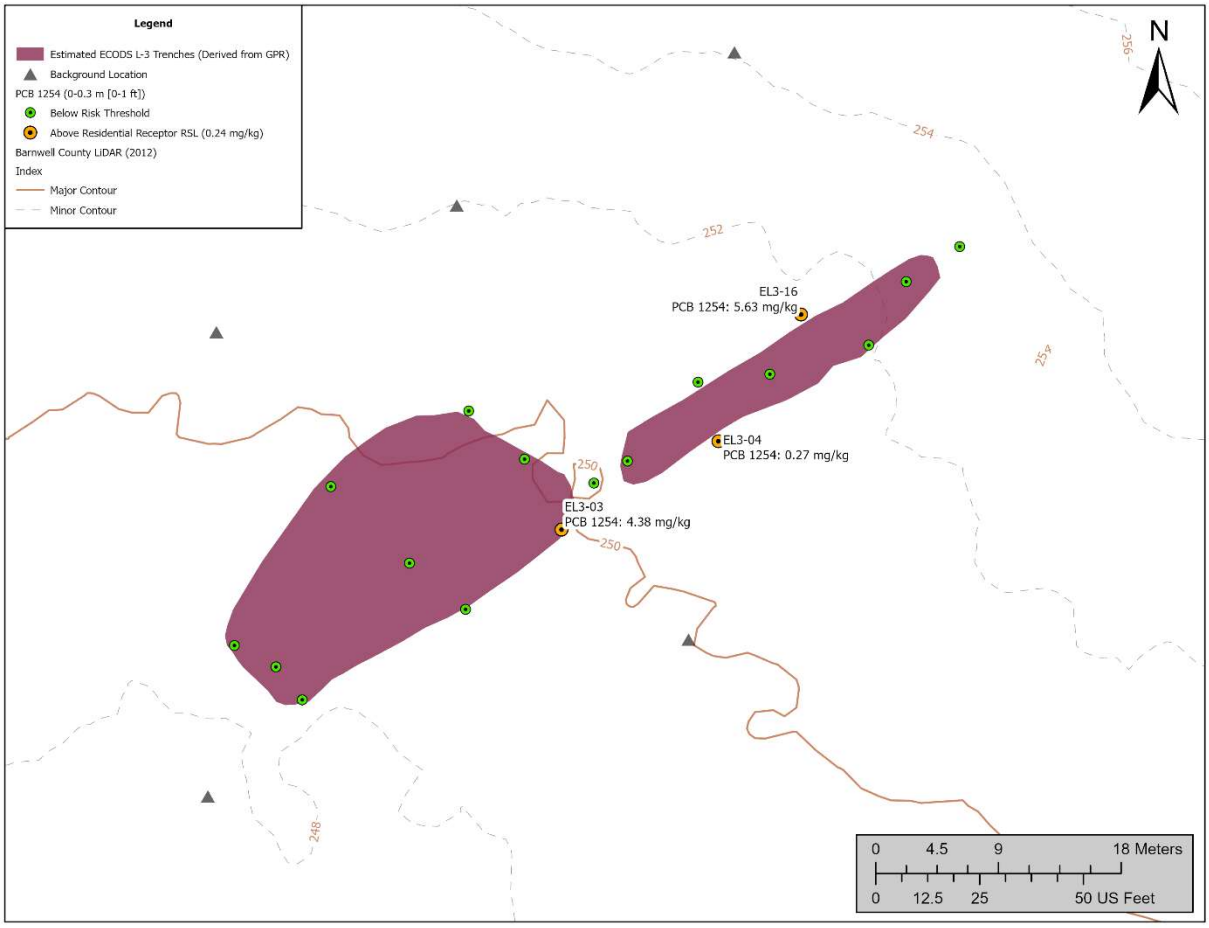



**Figure CR-1. Revised Figure 8 to Remove High Occupancy PCB ARAR**

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

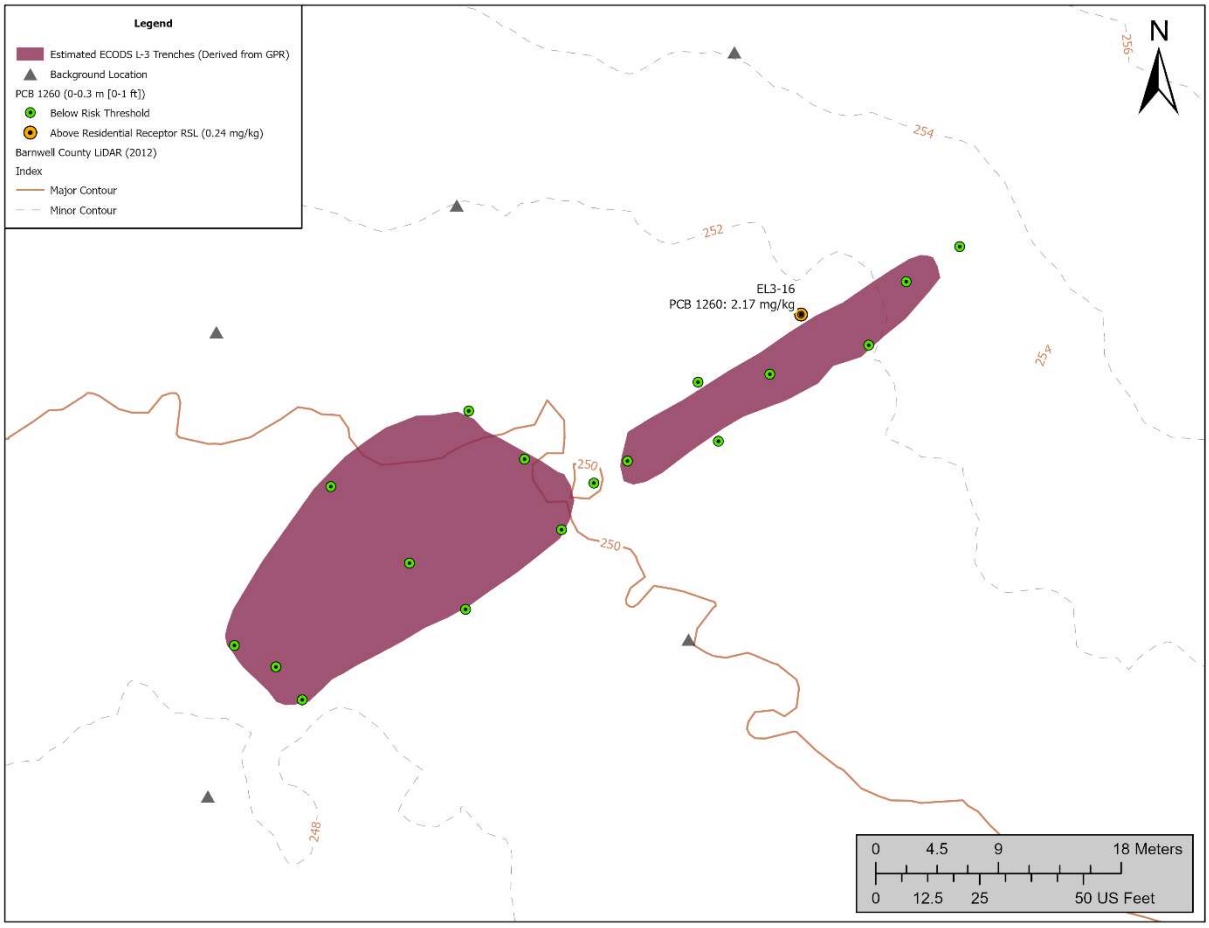



**Figure CR-2. Revised Figure 9 to Remove High Occupancy PCB ARAR**

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91 Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

## Table CR-1. Revised Cleanup Levels for the ECODS L-3, LRP 131-1L, and LRP 131-4L OU (Table 5)

| Media | HH RCOC | Units | Resident PRG[1] | ARAR PRG[2] | SRS Background 2X Average Concentration | SRS Background 95th percentile[3] | SRS Background Maximum[3] | Final Cleanup Level[4] |
|---|---|---|---|---|---|---|---|---|
| **ECODS L-3 Subunit** | | | | | | | | |
| Soil | Aroclor 1254 | mg/kg | *0.24* | 25.0 | NA[5] | NA[5] | NA[5] | **0.24** |
| | Aroclor 1260 | mg/kg | *0.24* | 25.0 | NA[5] | NA[5] | NA[5] | **0.24** |
| **LRP 131-4L Subunit** | | | | | | | | |
| Soil | Benzo(a)pyrene | mg/kg | *0.12* | N/A[6] | 0.025 | 0.036 | 0.008 | **0.12** |

**Key:**
1 – Resident PRGs are identified at risk = 1E-06 from Appendix F of the RFI/RI/BRA/CMS/FS (SRSN 2025a). A cleanup level for asbestos at the ECODS L-3 and LRP 131-4L subunits is not presented in the table because risk-based thresholds are not available at the USEPA RSL website.
2 – For comparison purposes, the PCB TSCA ARAR threshold for low-occupancy is presented for Aroclor 1254 and Aroclor 1260.
3 – SRS background concentrations from Background Soils Statistical Summary Report for the Savannah River Site (WSRC 2006), Appendix B-2 (all depths interval).
4 – Final Cleanup Level is the most restrictive (i.e., residential) risk-based concentration. If the risk-based PRG is less than SRS background, then the SRS Background 95th percentile is identified as the Final Cleanup Level. Source of the Final Cleanup Level is identified in italics.
5 – Not available; SRS background concentrations not available for PCBs.
6 – Not applicable; not identified as an ARAR RCOC.

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91**
**Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

**Table CR-2. Revised ARARs for the Selected Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits (Table 6)**

| **CHEMICAL-SPECIFIC ARARs/TBC** | | | |
|---|---|---|---|
| **Chemical** | **Requirements** | **Prerequisite** | **Citation(s)** |
| ***Bulk PCB Waste in Place*** | | | |
| Bulk PCB remediation waste (self-implementing) | Unit meets the low occupancy thresholds and the residual PCB concentrations in the soil will be less than 25 mg/kg.<br><br>May remain onsite without further conditions (e.g., no fencing or cap requirements). | Bulk PCB remediation waste remaining in a *low occupancy area* (as defined in 40 C.F.R. § 761.3) at concentrations ≤ 25 mg/kg. – **relevant and appropriate** | 40 C.F.R. § 761.61(a)(4)(i)(B) |
| **LOCATION-SPECIFIC ARARs/TBC** | | | |
| **Location** | **Requirements** | **Prerequisite** | **Citation** |
| ***NONE IDENTIFIED*** | | | |
| **ACTION-SPECIFIC ARARs/TBC** | | | |
| **Action** | **Requirements** | **Prerequisite** | **Citation(s)** |
| ***Asbestos Waste in Place*** | | | |
| Standards for inactive asbestos waste disposal sites | Must comply with one of the following:<br>• Either discharge no visible emissions to the outside air from an inactive disposal site subject to this paragraph; or<br>• Cover the asbestos-containing waste material with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area to prevent exposure of the asbestos-containing waste material; or<br>Cover the asbestos-containing waste material with at least 60 centimeters (2 feet) of compacted nonasbestos-containing material, and maintain it to prevent exposure of the asbestos-containing waste | Closure of an area that received asbestos-containing waste materials – **relevant and appropriate** | 40 CFR § 61.151(a) (1)-(3) |

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91**
**Savannah River Site, Aiken, South Carolina**



**Comments Received April 7, 2026**

| Chemical | Requirements | Prerequisite | Citation(s) |
|---|---|---|---|
| | ***Asbestos Waste in Place*** | | |
| Warning signs for disposal site | Display warning signs at all entrances and at intervals of 100m (328 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited. | Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – **relevant and appropriate** | 40 CFR § 61.151(b)(1) |
| | The warning signs must:<br>(i) Be posted in such a manner and location that a person can easily read the legend; and<br>(ii) Conform to the requirements for (20"x14") upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and<br>Display the legend as prescribed in § 61.151(b)(1)(iii) located in the lower panel with letter sizes and styles of visibility at least equal to those specified in § 61.151(b)(1)(iii). | Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – **relevant and appropriate** | 40 CFR § 61.151(b)(1)(i)-(iii) |
| Fence for disposal site | Fence the perimeter of the site in a manner adequate to deter access by the general public.<br><br>NOTE: Access control at SRS boundary meets this requirement to deter the general public | | 40 CFR § 61.151(b)(2) |

**SRS Responses to USEPA Comments on the Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2025-01295, Revision 0, January 2026), SEMS Number: 91**
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| Chemical | Requirements | Prerequisite | Citation(s) |
|---|---|---|---|
| ***Asbestos Waste in Place*** | | | |
| Deed notice for asbestos waste disposal site | Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that:<br>• The land has been used for disposal of asbestos-containing waste material; and<br>• The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site required in § 61.154(f) have been filed with the Administrator; and<br>• The site is subject to 40 CFR part 61, Subpart M.<br><br>NOTE: Recordation of deed notice that informs potential purchaser on the waste disposal site is considered a substantive requirement for post-closure.<br>NOTE: SRS complies with the Land Use Control Assurance Plan (WSRC 1999) to ensure these land use restrictions are maintained, including deed restrictions. | Closure of an inactive disposal area that received asbestos containing waste materials – **relevant and appropriate** | 40 CFR § 61.151(e)(1)-(3) |
| ***Bulk PCB Waste in Place*** | | | |
| Bulk PCB remediation waste (risk-based) | EPA will issue a written decision on each application for a risk-based sampling, disposal, or storage method for PCB bulk remediation wastes. EPA will approve such an application if it finds that the method will not pose an unreasonable risk of injury to health or the environment. NOTE: Appropriate information required in an application can be provided in a CERCLA document (e.g., EE/CA, Action Memo, FS, PP, or ROD) that is approved or issued by EPA. | Sampling, storage, and/or disposal of PCB bulk remediation waste (as defined in 40 CFR 761.3) – **applicable** | 40 C.F.R. § 761.61(c) |

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