



**SC DEPARTMENT of  
ENVIRONMENTAL  
SERVICES**

**Susan B. Fulmer, P.G.**  
**Bureau of Land and Waste Management**  
2600 Bull Street  
Columbia, SC 29201

December 16, 2024

## ENVIRONMENTAL COMPLIANCE &

Ms. Avery Hammett, 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

**DEC 16 2024**

SRNS-OS-2024-00519

## AREA COMPLETION PROJECTS

Re: Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2025 (Print Date: 10/24/2024) dated November 13, 2024 and received November 14, 2024.

Dear Ms. Hammett:

The South Carolina Department of Environmental Services ("Department") has completed its review of the above referenced Appendix E to the Savannah River Site (SRS) Federal Facility Agreement (FFA).

The positive work completed under the SRS FFA has made this one of the most successful agreements within the Department of Energy complex. 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 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. Further, the Department encourages the Savannah River Operations Office to seek appropriate funding levels to fully implement Appendix E and accelerate the schedule where possible.

In addition to the concerns noted in this cover letter, the Department requests the attached comments be addressed in the Revision 1 of FY2025 Appendix E document.

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

Sincerely,

**Susan B. Fulmer** Digitally signed by Susan B. Fulmer  
Date: 2024.12.16 13:53:47 -05'00'

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

**cc: C. L. Bergren, SRNS-ACP (Signed Original)**  
**Jon Richards, EPA Region IV**  
**Myra Reece, SCDES**  
**Juli Blalock, SCDES - BLWM**  
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**R. Gary Stewart, SCDES - BLWM**  
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**Travis Fuss, SCDES - BRLS**

**South Carolina Department of Environmental Services Comments on:  
Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2025  
(Print Date: 10/24/2024) dated November 13, 2024 and received November 14, 2024.**

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**Specific Comments**

1. The cover letter states that the Lower Three Runs (LTR) Watershed was deleted from Appendix E.3 since the Field Start, Record of Decision Issuance, and Remedial Action Start milestones for LTR Integrator Operable Unit (IOU) have been achieved. The Department disagrees with the complete deletion of the LTR watershed from Appendix E.3. It is agreed that all milestones for the LTR IOU have been met and should be deleted from Appendix E.3; however, it is preferred that the LTR Watershed notation remain with a footnote explaining that all milestones have been met. As each watershed completes the milestones listed in Appendix E.3, a record of the watershed must remain. In the future, this record of the six completed watersheds demonstrating that all continuing sources have been remediated and all milestones have been met will then be incorporated in the final Record of Decision for the Savannah River Site.