



December 19, 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

ENVIRONMENTAL COMPLIANCE &

JAN - 8 2020

AREA COMPLETION PROJECTS

Re: Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2020
(Print Date: 10/30/2019) dated November 15, 2019 and received November 19, 2019.

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 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 FY2020 Appendix E document.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan B. Fulmer", is written over a light blue horizontal line.

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

Mr. Hennessey
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cc: C. L. Bergren, SRNS-ACP (Signed Original)
Jon Richards, EPA Region IV
Myra Reece, Environmental Affairs
Henry Porter, SCDHEC-BLWM
Don Siron, SCDHEC-BLWM
G. Ken Taylor, SCDHEC-BLWM
Travis Fuss, Aiken Environmental Affairs Office
Heather Cathcart, SCDHEC-BLWM

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.

Specific Comments

1. In the cover letter, it is stated that DOE plans to delay milestones associated with the A-Area Ash Pile (788-A) and A-Area Coal Pile Runoff Basin (788-3A) for three years. During this time, DOE plans to consider, evaluate, and discuss ash disposal options with EPA and SCDHEC. A detailed reason should be provided as to why these actions will take three years, including a proposed timeline for discussions with SCDHEC and EPA.
2. Appendix E.3, F-Area Operable Unit, page E.3-6. The subunit, Spill on 06/01/59 of <1 CI of Segregated Solvent from 211-F (NBN) (Final Action), has a Field Start of September 2022. As this unit is not part of the Early Action for the F-Area Operable Unit, the date should be changed to September 2035.