



Susan Fulmer, P.G.
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
ENVIRONMENTAL COMPLIANCE &

December 9, 2025

Mr. Matthew R. Baker, Acting FFA Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

DEC - 9 2025

AREA COMPLETION PROJECTS

Re: Remedial Investigation Report with Baseline Risk Assessment for the Automotive Repair Shop (716-A) Operable Unit (U), SEMS Number: 62 (SRNS-RP-2025-00719, Revision 0, September 2025) received September 12, 2025.

Dear Mr. Baker:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/SCDES comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer Digitally signed by Susan B. Fulmer
Date: 2025.12.09 10:43:40 -05'00'

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

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Gregg O'Quinn, BRLS - Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

South Carolina Department of Environmental Services Comments on:
Remedial Investigation Report with Baseline Risk Assessment for the Automotive Repair Shop
(716-A) Operable Unit (U), SEMS Number: 62 (SRNS-RP-2025-00719, Revision 0, September 2025)
received September 12, 2025.

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Specific Comments

1. Section 1.3.1, Previous Actions, pages 1-4 and 1-5 and Section 7.0, References, page 7-1. There are some discrepancies/omissions of references between these two sections. The first paragraph of Section 1.3.1 mentions the FDE and DPFR for the Automotive Repair Shop, but no references to these documents are provided here. Section 7.0 lists a reference for the DPFR, but not for the FDE. Additionally, the second paragraph lists "WSRC 2005b" as a reference for the post-decommissioning final verification survey. This reference is not listed in Section 7.0. Finally, the last paragraph of Section 1.3.1 lists "SRNS 2024" as a reference to the approved RI Work Plan for the Automotive Repair Shop; however, Section 7.0 lists the reference to this document as "SRNS 2023a." Please correct these discrepancies.
2. Section 6.0, Implementation Schedule, page 6-1. Please clarify if the last two deliverable items listed in the implementation schedule would be necessary with a "No Further Action" determination for this operable unit.
3. Appendix A, Investigation Data/Data Summary Tables, Tables A.2-1 and A.2-2. The 95% UCL values listed for most of the analytes in both of these tables differ from each other. It should be noted that the Contaminant Fate and Transport Modeling discussed in Appendix B uses the 95% UCL values listed in Table A.2-2. Please explain this discrepancy, and the reasoning for using the values listed in Table A.2-2 as opposed to those listed in Table A.2-1.
4. Appendix B, Contaminant Fate and Transport Modeling, Section B.2.1, Background. The last sentence of this section discusses the use of VZCOMML as the method of completion for the CM analysis, but the following reference does not appear to exist or has not been cited properly. Please clarify the reference in question; and if one is determined to be needed, include it in Section 7.0 with the other references.