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

July 29, 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: Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2025-00808, Revision 1, July 2026) (Redline Pages) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 93

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 Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (SRNS-RP-2025-00808, Revision 0, February 2026) was submitted for South Carolina Department of Environmental Services (SCDES) and the U. S. Environmental Protection Agency (EPA) review on March 4, 2026. SCDES and EPA submitted comments on the Revision 0 report on June 2, 2026, and June 3, 2026, respectively. SRS emailed the draft responses to SCDES and EPA for review on July 7, 2026. EPA and SCDES responded on July 9, 2026, and July 16, 2026, respectively, that the draft responses were acceptable. The SRS' responses were finalized and incorporated into the Revision 1 Redline Pages.

Please review the enclosures and provide your response within thirty (30) days of receipt. The effort and time that the South Carolina Department of Environmental Services and the U. S. Environmental Protection Agency have provided on this operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-6211.

Sincerely,

MATTHEW BAKER Digitally signed by MATTHEW BAKER
Date: 2026.07.29 08:21:27 -04'00'

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

RDDD-26-161

Enclosures:
1. Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2025-00808, Revision 1, July 2026) (Redline Pages) SEMS Number: 93
2. SRS Responses to South Carolina Department of Environmental Services Comments on the Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2025-00808, Revision 0, February 2026) SEMS Number: 93
3. SRS Responses to U. S. Environmental Protection Agency Comments on the Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U) (SRNS-RP-2025-00808, Revision 0, February 2026) SEMS Number: 93

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
M. Mehta, SCDES-Columbia
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
M. McRae, TechLaw, Inc.

SRS Responses to South Carolina Department of Environmental Services Comments on the Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U)
SEMS Number: 93
SRNS-RP-2025-00808, Revision 0, February 2026
Savannah River Site, South Carolina

Comments Received: June 2, 2026

SPECIFIC COMMENTS

1. Section 2.1.2, Soil Sampling, page 11. The second to last sentence of this section states that "arsenic results ranged from 2.0 to 79 mg/kg" when identifying the extent of contaminated media. It appears this range applies to the 2024 sampling effort based on the values listed in Table 2, which shows the lowest arsenic concentration value of 0.98 mg/kg overall. Because this sentence immediately precedes a sentence that refers to all three sampling efforts, it can be confusing and misleading. Please revise to clearly indicate that this range refers to the 2024 sampling effort.

   Response: Agree.

   Section 2.1.2 will be revised as follows:

   "…the cleanup level. The 2024 arsenic results ranged from 2.0 to 79 mg/kg. Table 2 provides the 2019, 2020, and 2024 arsenic results from all sampling locations."

   Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov

2. Section 5.1, Verification of Construction/Remedial Action Completion, page 15. The third item listed in this section states that there were two final walkdown inspections with participation of USEPA and SCDES: one for ECODS N-1 and Ford Building on August 14, 2024, and one for CSSLP on July 16, 2025. The July 16, 2025 walkdown inspection included all three subunits and was the only one involving participation of USEPA and SCDES. Please correct.

   Response: Agree.

   Section 5.1 (3) will be revised as follows:

   "(3) As referenced in Section 5.2, the final walkdown inspection with participation of USEPA and SCDES was performed ~~on August 14, 2024, at ECODS N-1 and Ford Building OU and~~ on July 16, 2025~~,~~ at ECODS N-1, Ford Building OU and CSSLP (Appendix D). No issues were identified."

   Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov

SRS Responses to U.S. Environmental Protection Agency
Comments on the
Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report for the Early Construction and Operational Disposal Site N-1 (NBN), Central Shops Scrap Lumber Pile (631-2G) and Building 690-N, Process Heat Exchanger Repair Facility (aka Ford Building) Operable Unit (U)
SEMS Number: 93
SRNS-RP-2025-00808, Revision 0, February 2026
Savannah River Site, South Carolina

Comments Received: June 3, 2026

GENERAL COMMENT

1. Several events discussed in the text are not included in Table 1 (Chronology of Events). For example, Section 2.1 (Pre-Construction Activities) discusses installation of a drainage ditch, soil sampling from 2019 to 2024, site survey activities performed at the Operable Unit (OU), and preparation of a Storm Water Pollution Prevention Plan (SWPPP) prior to start of the Remedial Action (RA). However, some of these events are not listed in Table 1. Although Table 1 lists surveying at the Central Shops Scrap Lumber Pile (631-2G) (CSSLP) subunit, surveying at the Construction and Operational Disposal Site N-1 (NBN) (ECODS N-1) and Process Heat Exchanger Repair Facility (Ford Building) subunits were also conducted and are not included in Table 1. Also, Table 1 only lists 2024 soil sampling, and does not include the 2019 and 2020 soil sampling events. In addition, Table 1 lists the installation of land use control (LUC) warning signs at ECODS N-1 and the Ford Building as completed on August 14, 2024; however, according to Appendix B (Appendix B RA [Remedial Action] Start Notification Letter) the installation of the warning signs was completed on June 19, 2024. Please revise Table 1 to include the missing events as discussed throughout the text and verify the completion date of the installation of the warning signs.

   Response: Agree.

   The Table 1 activity is listed as "Installation of LUC Warning Signs at ECODS N-1 and Ford Building Subunits and LUC Corner Markers". The installation of the warning signs was completed on June 19, 2024 as noted in Appendix B. However, corner markers installation was completed on August 14, 2024. Therefore, the Completion Date for the two activities listed in Table 1 is correct.

   Table 1 will be revised, as shown on the next page, to include the dates for soil sampling conducted for characterization of the unit in 2019 and 2020, installation of drainage ditch in 2024, site survey activities performed at the operable unit in 2024, preparation of a Storm Water Pollution Prevention Plan (SWPPP) in 2024 and clean backfill verification sampling in 2025.

Table 1. Chronology of Events

Description of Activity	Start Date	Completion Date
Characterization Soil Sampling at CSSLP	**6/19/19**	**7/1/19**
Characterization Soil Sampling at CSSLP	**10/5/20**	**10/13/20**
Approval of the ROD	2/7/24	2/7/24
Approval of the RAIP	2/7/24	2/7/24
Approval of the LUCIP	2/7/24	2/7/24
Remedial Action Start (FFA Milestone 12/16/24)	5/16/24	5/16/24
Installation of LUC Warning Signs at ECODS N-1 and Ford Building Subunits and LUC Corner Markers	5/16/24	8/14/24
Install drainage ditch to drain Impoundment Area	**5/30/24**	**5/30/24**
FAI-51 Walkdown and Final Acceptance at ECODS N-1 and Ford Building Subunits	8/14/24	8/14/24
Arsenic Soil Sampling at CSSLP	6/28/24	7/2/24
Survey of as-built LUC boundaries and warning sign locations at ECODS N-1 and Ford Building	**7/10/24**	**7/25/24**
Preparation of SWPPP	**8/22/24**	**12/10/24**
Initial Site Survey to Delineate Excavation Areas	9/3/24	9/10/24
Clean Backfill Verification Sampling	**1/12/25**	**1/12/25**
Pre-Job Briefing…		

Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov

SPECIFIC COMMENTS

1. Section 1.2, Operable Unit Background, Page 2 to 3: The section does not provide a summary of previous community involvement activities conducted at the OU, as recommended in the *Environmental Compliance and Area Completion Projects Regulatory Document Handbook, Revision 0, June 2023*, updated 2025 (the Environmental Compliance Handbook). *Please revise the text to summarize previous community involvement activities conducted at the OU.*

Response: Agree.

The paragraph shown below will be added to Section 1.2 providing the community involvement activities.

"The ECODS N-1, CSSLP, and Ford Building OU Statement of Basis/Proposed Plan (SRNS-RP-2022-00202, Revision 1, December 2022) 45-day public comment period began on February 16, 2023, and ended on April 2, 2023. No comments were received during the public comment period. After regulatory approval, the ROD (SRNS 2022) was signed by USDOE, SCDES, and USEPA on August 29, 2023, September 20, 2023, and September 22, 2023, respectively. The public was notified of its availability on October 12, 2023. The Remedial Design Fact Sheet (Appendix A of the CMIP/RAIP [SRNS 2023a]) was made available to the public on April 4, 2024 prior to the start of the remedial activities. Public notification occurred through the mailings of the SRS Environmental Bulletin and newspaper publications. These documents and publications are available in the Administrative Record File."

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2. Section 5.0, Verification of Construction/Remedial Action Completion and Final Inspection, Pages 15 and 16: The section does not list the primary RA components with a certification statement on which and how each applicable remedial action objective (RAO) was met or the degree of cleanup or protection as specified in the Record of Decision (ROD). This information needs to be provided for all RAs and for all pathways of exposure described in the conceptual site model (CSM), as recommended in the Environmental Compliance Handbook. *Please revise the section to include such details*.

Response: Agree.

Section 5.1 will be revised, as shown below, to include the primary RA components with a certification statement on which and how each applicable remedial action objective (RAO) was met or the degree of cleanup or protection as specified in the Record of Decision (ROD).

"(2) ~~As detailed in Section 5.2, the~~ The RA ~~is~~was verified as complete, and construction and testing was in accordance with the ROD~~RAO~~ as follows:.

ECODS N-1 - LUCs consisting of institutional controls (i.e., administrative controls) and the installation of warning signs to prevent residential and industrial exposure to asbestos were implemented. Verification was per walkdown as detailed in Section 5.2.

CSSLP - Arsenic contamination in Upland and Impoundment Areas was removed to a depth of one foot and disposed of to prevent residential and industrial exposure to arsenic. Verification was per survey measurements of depth of soil removal and per walkdown as detailed in Section 5.2.

Ford Building - LUCs consisting of institutional controls (i.e., administrative controls) and the installation of warning signs and a concrete cover over the facility remnants to prevent residential and industrial exposure to Co-60 and PCBs were implemented. Verification was per walkdown as detailed in Section 5.2."

Responsible Party: Eric Schiefer, (803) 952-6273, eric.schiefer@srs.gov