



April 4, 2018

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



Re: Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U), CERCLIS Number: 63 (SRNS-RP-2017-00723, Revision 0, February 2018), Early Action Statement of Basis/Proposed Plan Fact Sheet for the D-Area Operable Unit (ERD-EN-2018-0001, February 2018), Scoping Summary for the D-Area Operable Unit (ERD-EN-2007-0046, December 2017) and the Draft Public Notice Information, received February 6, 2018.

Dear Mr. Hennessey:

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/DHEC 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, P.G., Manager  
 Federal Remediation Section  
 Division of Site Assessment, Remediation, Revitalization  
 Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)  
 Travis Fuss, Aiken Environmental Affairs Office (via email)  
 Jon Richards, EPA Region IV  
 Heather Cathcart, BLWM

**South Carolina Department of Health and Environmental Control Comments on:**

Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U), CERCLIS Number: 63 (SRNS-RP-2017-00723, Revision 0, February 2018), Early Action Statement of Basis/Proposed Plan Fact Sheet for the D-Area Operable Unit (ERD-EN-2018-0001, February 2018), Scoping Summary for the D-Area Operable Unit (ERD-EN-2007-0046, December 2017) and the Draft Public Notice Information, received February 6, 2018.

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Specific Comments

Early Action Statement of Basis/Proposed Plan

1. Section I. Introduction and Background, page 1 of 44. This section discusses a time critical removal action for the 488-2D Ash Basin, non-time critical removal actions for the other units, and references the Removal Site Evaluation Reports for the units. Please consider adding a very brief explanation for the type of removal action selected for each unit.
2. Section V. Summary of Site Risks, 488-2D Ash Basin: Summary of Ecological Risk Assessment, page 13 of 44. The first paragraph refers to the removal action as non-time critical and should be corrected to time critical removal action. This correction should also be applied on page 14 of 44 under Summary of Contaminant Fate and Transport.
3. Section V. Summary of Site Risks, 488-4D Ash Basin: Summary of Contaminant Fate and Transport Analysis, page 15 of 44. Please correct of the heading of this subsection to "488-4D Ash Landfill".

Draft Appendix VIII-A, Solid Waste Management Unit Remedy Selection

1. Since there is an existing remedy selection from the first Record of Decision, the current remedy will be combined with it. Please see the language below to be inserted in the existing table.

The D-Area Operable Unit shall be maintained under Land Use Controls by the Permittee as documented in the approved Statement of Basis/Proposed Plan (Rev. 1.1, June 2010) and the first Early Action Record of Decision (Rev. 1.2, July 2011) for the D- Area Operable Unit.

**No action for the 489-D Coal Pile Runoff Basin (Southern 75%) and Land Use Controls 488-1D Ash Basin, 488-2D Ash Basin and 488-4D Ash Landfill shall be maintained by the Permittee as documented in the approved Early Action Statement of Basis/Proposed Plan (Rev. 1, September 2018) and the effective Second Early Action Record of Decision (insert revision number and date).**

Draft Environmental Bulletin

1. Page 2. Please correct the name of the SCDHEC's Aiken office to "SCDHEC, Aiken Environmental Affairs Office".

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Draft Radio Ad

1. Please modify the last sentence of the second paragraph to read "...Aiken Environmental Affairs Office, located at..."