SC DEPARTMENT of ENVIRONMENTAL SERVICES

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

ENVIRONMENTAL COMPLIANCE &
APR – 6 2026
SRNS-OS-2026-00125
AREA COMPLETION PROJECTS

April 6, 2026

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

Re: Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U), SEMS Number: 91 (SRNS-RP-2025-01295, Revision 0, January 2026) received February 6, 2026.

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,

for Heather H. Cathcart
Digitally signed by Heather H. Cathcart
Date: 2026.04.06 13:47:06 -04'00'

**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:**

Record of Decision Remedial Alternative Selection for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U), SEMS Number: 91 (SRNS-RP-2025-01295, Revision 0, January 2026) received February 6, 2026.



Specific Comments

1. Description of Selected Remedy, page iii of viii: The third bullet references the 2023 RCRA Permit Renewal Application, while the first bullet on page 38 of 76 refers to the current RCRA Permit Renewal Application. For clarity, the third bullet should be revised to indicate that the 2023 Permit Renewal is the current application. Additionally, the RCRA Permit defines "Approved Permit Application" as the most recent RCRA Part A Application, Part B Application, and any modifications approved by the Department for the duration of the permit.

2. Site and Operable Unit Compliance History, LRP 131-4L Subunit, page 5. The first two sentences of this section are directly copied from the beginning of the LRP 131-1L Subunit section. Please revise and include the appropriate descriptive information for the LRP 131-4L subunit.

3. Table 2a, Summary of Refined Constituents of Concern and Medium-Specific Exposure Point Concentrations: ECODS L-3 Subunit (Soil), page 57. The EPC of 0.365 mg/kg listed for Aroclor 1260 in this table is different from the EPC of 0.354 mg/kg stated in the ECODS L-3 Subunit discussion on page 17. It appears that this value is a typographical error based on a previously listed EPC of 0.356 mg/kg in Table C-2 of the approved RFI/RI/BRA/CMS/FS Report. The 0.354 mg/kg value is the same as the one listed in the approved SB/PP and correlates to the calculated risk of 1.48 E-06 listed in the ROD/RAS. Please revise Table 2a to include this EPC for Aroclor 1260.