



May 31, 2022

SRNS-J2000-2022-00342

Track Number: 10693

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Reading Room: Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the F-Area Material Storage Building (235-F)

Please make the above documents available to the general public for a minimum of 45 days for public comment beginning on June 2, 2022, and ending on July 17, 2022, after which they may be discarded.

Please acknowledge receipt of the document by email to Dexter.McDaniel@srs.gov. If you have any questions, please call me at (803) 952-7401 or e-mail me at above address.

Sincerely,

Dexter McDaniel
 EC & ACP Records
 730-4B, Room 135

ADMINISTRATIVE RECORD FILE

Reading Room for the

ACTION MEMORANDUM AND RESPONSIVENESS

SUMMARY FOR THE NON-TIME CRITICAL

REMOVAL ACTION FOR THE F-AREA MATERIAL

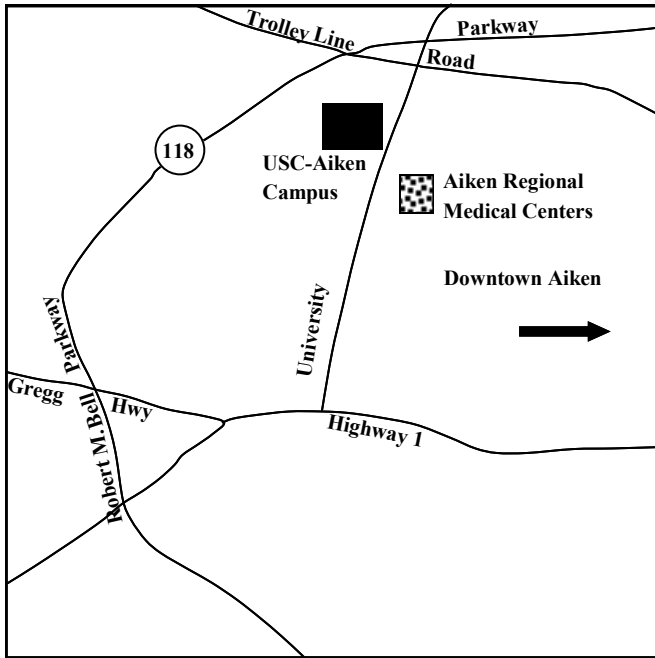
STORAGE BUILDING (235F)

Please make the above document available to the general public for comment for Forty-five days (45) starting on June 2, 2022 and ending on July 17, 2022.

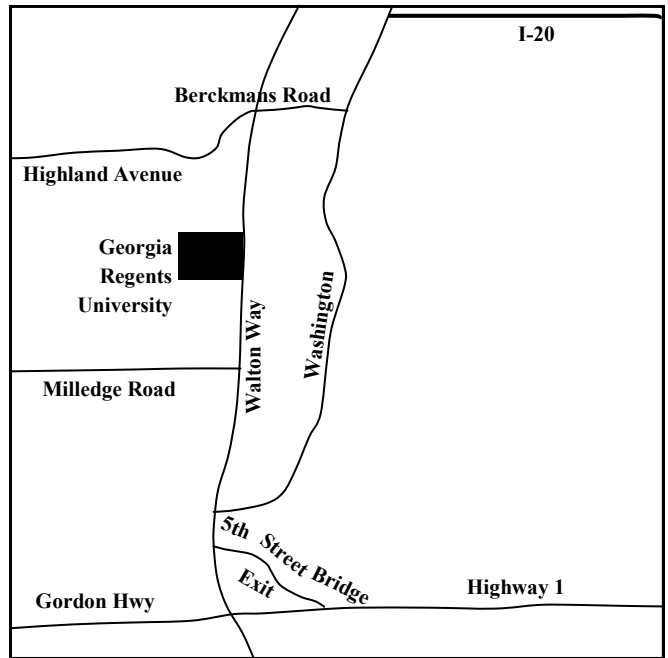
If you have any questions, please contact:

Barbara Smoak
Savannah River Nuclear Solutions, LLC
Savannah River Site
Building 730-1B
Aiken, SC 29808
1-803-952-8060
Barbara.Smoak@srs.gov

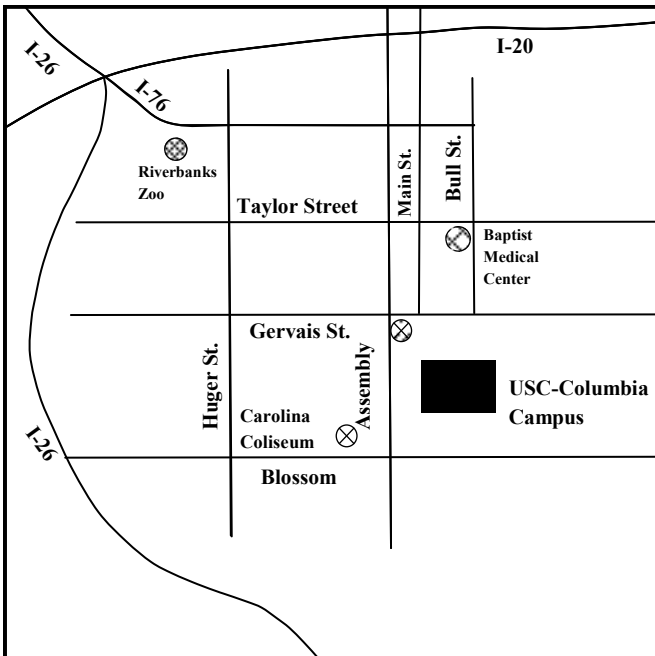
INFORMATION REPOSITORIES



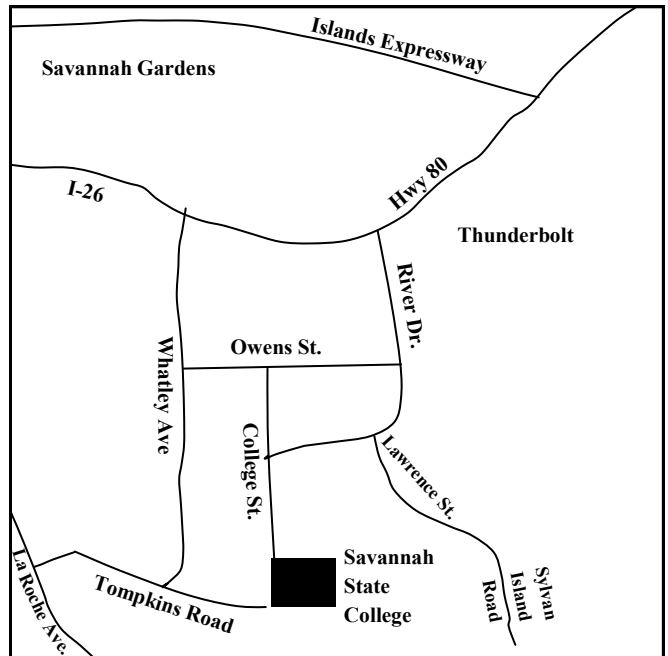
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Catalog Num	Date	Doc Number	Track #	Title	Author	Addressee	Doc Type
+023680	04/05/2022	SRNS-OS-2022-00	10693	THE AUGUSTA CHRONICLE AFFIDAVIT OF PUBLICATION FOR THE SAVANNAH RIVER SITE ENVIRONMENTAL BULLETIN FOR REMOVAL SITE EVALUATION REPORT/ENGINEERING	SRNS		COMMUNITY INVOLVEMENT
+023743	05/31/2022	SRNS-J2000-2022	10693	READING ROOM: ACTION MEMORANDUM AND RESPONSIVENESS SUMMARY FOR THE NON-TIME CRITICAL REMOVAL ACTION FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F)	D. MCDANIEL	READING ROOM	CORRESPONDENCE
+023726	06/01/2022	SRNS-RP-2022-00	10693	THE SAVANNAH RIVER SITE ENVIRONMENTAL BULLETIN FOR ACTION MEMORANDUM AND RESPONSIVENESS SUMMARY ISSUED FOR THE NON-TIME CRITICAL REMOVAL ACTION FOR THE	SRNS		COMMUNITY INVOLVEMENT
+023656	04/05/2022	SRNS-RP-2022-00	10693	THE SAVANNAH RIVER SITE ENVIRONMENTAL BULLETIN FOR REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) FOR THE F-AREA	SRNS		COMMUNITY INVOLVEMENT
+023075	09/01/2020	SRNS-RP-2020-00	10693	REDACTED - SCOPING SUMMARY FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F) (REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS - PROBLEM	SRNS		SUPPORTING DOCUMENT
+018171	03/06/2007	FCP-07-047	10693	DOE SUBMITTAL OF THE STRATEGY AND SCOPE OF WORK TO DECOMMISSION 235-F F-AREA MATERIAL STORAGE FAMS FACILITY USING COMPREHENSIVE ENVIRONMENTAL RESPONSE	H. BELENCAN	D. TAYLOR/D. SIRON	CORRESPONDENCE
+018172	02/01/2007	SDD-2007-00017 REV 0	10693	STRATEGY AND SCOPE OF WORK TO DECOMMISSION 235-F USING CERCLA REMEDIAL PROCESS SDD-2007-00017 REVISION 0 FEBRUARY 2007	SRNS		SUPPORTING DOCUMENT
+023717	05/19/2022	IACD-22-145	10693	DOE SUBMITTAL OF ACTION MEMORANDUM AND RESPONSIVENESS SUMMARY FOR THE NON-TIME CRITICAL REMOVAL ACTION FOR THE F-AREA MATERIAL STORAGE	J. MCMILLIAN	J. RICHARDS,S. FULMER	CORRESPONDENCE
+023547	01/14/2022	SRNS-OS-2022-00	10693	EPA ADDITIONAL COMMENTS ON THE ON THE REMOVAL SITE EVALUATION REPORT / ENGINEERING EVALUATION / COST ANALYSIS FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F)	J. RICHARDS	B. HENNESSEY	CORRESPONDENCE
+023441	11/08/2021	SRNS-OS-2021-00	10693	EPA COMMENTS ON THE REMOVAL SITE EVALUATION REPORT / ENGINEERING EVALUATION / COST ANALYSIS FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F) (U) SRNS-RP-2021-00001,	J. RICHARDS	B. HENNESSEY	CORRESPONDENCE
+023424	10/25/2021	SRNS-OS-2021-00	10693	SCDHEC COMMENTS ON REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION.COST ANALYSIS FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F) (U)	S. FULMER	B. HENNESSEY	CORRESPONDENCE
+023343	08/26/2021	SRNS-RP-2021-00	10693	REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F) (U) SRNS-RP-2021-00001 REVISION 0	SRNS		REMOVAL ACTION
014616	05/18/2007	014616	10693	EPA COMMENTS ON THE STRATEGY AND SCOPE OF WORK TO DECOMMISSION 235-F, USING CERCLA REMEDIAL PROCESS (U), SDD-2007-00017, REVISION 0, DATED FEBRUARY 2007, SAVANNAH	ROBERT H. POPE	RAY HANNAH	CORRESPONDENCE
+023710	05/11/2022	SRNS-OS-2022-00	10693	EPA CONCURRENCE OF THE RESPONSES TO COMMENT ON THE DRAFT ACTION MEMO FOR THE NON-TIME CRITICAL REMOVAL ACTION FOR THE 235-F [IACD-22-130], FEB 28, 2022	J. RICHARDS	B. HENNESSEY	CORRESPONDENCE
+023709	05/12/2022	SRNS-OS-2022-00	10693	SCDHEC APPROVAL OF THE SAVANNAH RIVER SITE'S RESPONSES TO THE REGULATORY COMMENTS ON THE DRAFT ACTION MEMORANDUM FOR THE NON-TIME CRITICAL REMOVAL ACTION	S. FULMER	B. HENNESSEY	CORRESPONDENCE

Catalog Num	Date	Doc Number	Track #	Title	Author	Addressee	Doc Type
+023664	04/13/2022	IACD-22-141	10693	DOE SUBMITTAL OF SAVANNAH RIVER SITE'S RESPONSES TO THE REGULATORY COMMENTS ON THE DRAFT ACTION MEMORANDUM FOR THE NON-TIME CRITICAL REMOVAL ACTION FOR THE 235-F	B. HENNESSEY	J. RICHARDS,S. FULMER	CORRESPONDENCE
+023637	03/23/2022	SRNS-OS-2022-00	10693	EPA COMMENTS ON THE DRAFT ACTION MEMORANDUM FOR THE NON-TIME CRITICAL REMOVAL ACTION FOR THE 235-F BUILDING (DATED FEBRUARY 2022)	R. POPE	B. HENNESSEY	CORRESPONDENCE
+023635	03/21/2022	SRNS-OS-2022-00	10693	EPA CONCURRENCE OF THE CLEAN COPY OF THE REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) F-AREA MATERIAL STORAGE BUILDING	R. POPE	B. HENNESSEY	CORRESPONDENCE
+023630	03/16/2022	SRNS-OS-2022-00	10693	SCDHEC CONCURRENCE OF THE REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) F-AREA MATERIAL STORAGE BUILDING (235-F)	S. FULMER	B. HENNESSEY	CORRESPONDENCE
+023606	02/28/2022	IACD-22-130	10693	DOE SUBMITTAL OF THE REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) F-AREA MATERIAL STORAGE BUILDING (235-F)	B. HENNESSEY	J. RICHARDS,S. FULMER	CORRESPONDENCE
+023608	02/01/2022	SRNS-RP-2021-00	10693	REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) F-AREA MATERIAL STORAGE BUILDING (235-F) (SRNS-RP-2021-00001, REVISION 1, CLEAN COPY	SRNS		SUPPORTING DOCUMENT
+023607	02/01/2022	SRNS-RP-2021-00	10693	REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) F-AREA MATERIAL STORAGE BUILDING (235-F) (SRNS-RP-2021-00001, REVISION 1, CLEAN COPY	SRNS		SUPPORTING DOCUMENT
+023342	08/26/2021	IACD-21-154	10693	DOE SUBMITTAL LETTER FOR THE REMOVAL SITE EVALUATION REPORT/ENGINEERING EVALUATION/COST ANALYSIS (RSER/EE/CA) F-AREA MATERIAL STORAGE BUILDING (235-F)	B. HENNESSEY	J. RICHARDS; S. FULMER	CORRESPONDENCE
+023344	04/01/2021	SRNS-RP-2020-00	10693	SCOPING SUMMARY FOR THE F-AREA MATERIAL STORAGE BUILDING (235-F) SRNS-RP-2020-00444 FINAL	SRNS		SUPPORTING DOCUMENT
+022414	11/15/2019	IACD-20-113	10693	DOE SUBMITTAL LETTER OF BUILDING 235-F REGULATORY INFORMATION MEETING (OCTOBER 30, 2019) SEMS NUMBER: 88	B. HENNESSEY	J. RICHARDS,S. FULMER	CORRESPONDENCE
+022415	10/30/2019	ERD-EN-2019-004	10693	BUILDING 235-F REGULATORY INFORMATION MEETING (OCTOBER 30, 2019), SEMS NUMBER: 88, ERD-EN-2019-0045	SRS		SUPPORTING DOCUMENT



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

MAY 19 2022

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 Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remedial Project Manager
Superfund Division
U. S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the F-Area Material Storage Building (235-F)

Pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan [40 CFR Section 300.415 and the Savannah River Site (SRS) Federal Facility Agreement (FFA) (Appendix K.1: D&D Facilities to be Decommissioned), the United States Department of Energy (USDOE) prepared a Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for the F-Area Material Storage Building (235-F) (SRNS-RP-2021-00001, Revision 1, February 2022). Elevated levels of plutonium-238 and neptunium-237 contamination within the facility meet the criteria in 40 CFR Section 300.415(b)(2)(i): *Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.* In addition, a risk evaluation for polychlorinated biphenyls (PCBs) and lead, based on maximum detected concentrations in building paint, was conducted to demonstrate that risk from non-radiological hazardous substances is negligible when compared to the primary radiological risk drivers. Risk from exposure to hazardous substances is well bounded by the risk from exposure to plutonium-238 and neptunium-237 in the process areas. The USDOE, United States Environmental Protection Agency (USEPA), and South Carolina Department of Health and Environmental Control (SCDHEC) reached agreement in 2019 that a Non-Time Critical (NTC) removal action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is an appropriate regulatory mechanism to decommission Building 235-F. The regulatory review of the Revision 0 RSER/EE/CA occurred from September 2021 to January 2022.

The SRS received comments from the SCDHEC and USEPA on October 25, 2021 and November 8, 2021, respectively. SRS received additional comments from the USEPA on January 13, 2022. SRS responses to the USEPA and SCDHEC comments were incorporated into the Revision 1 RSER/EE/CA, and the document was made available for public review and comment from April 5, 2022 through May 4, 2022. No comments were received on the Revision 1 RSER/EE/CA during the 30-day public comment period; therefore, a separate Responsiveness Summary is not required or enclosed with this letter. A notice to the public will be

MAY 19 2022

Ms. Susan Fulmer
Mr. Jon Richards

2

made through an Environmental Bulletin and will be made part of the SRS Administrative Record File/Information Repository File (ARF/IRF).

Building 235-F is a windowless, two-story, reinforced-concrete structure located in F Area near the center of SRS. The building is approximately 68 meters (222 feet) long, 33 meters (109 feet) wide, and 8.5 meters (28 feet) high. Building 235-F was constructed in the 1950s as part of the original SRS project and used for a variety of missions, primarily processing, storage, and distribution of radioactive materials in support of SRS and the USDOE complex. Building 235-F and support facilities are currently in a reduced surveillance and maintenance state and are undergoing deactivation activities and preparations for decommissioning. Building 235-F is designated a Hazard Category 2 non-reactor nuclear facility according to DOE STD-1027-92 due to the radiological contamination within the building, consisting primarily of neptunium-237 in the Actinide Billet Line and plutonium-238 in the Plutonium Fuel Form Facility, Old Metallurgical Laboratory, and the Plutonium Experimental Facility.

Two additional structures exterior to Building 235-F are also included in the scope of this NTC removal action. They include an abandoned capped stack (293-F) located on the east side of the building and an underground storage tank connected by a pipe trench on the north side of the building. The underground storage tank previously contained radionuclide contamination (plutonium and tritium) and hazardous waste constituents (cadmium and chromium). The tank was emptied in 1991 by pumping out the liquid and sludge and cleaned by scraping and mopping the walls and bottom of the tank and flushing the tank. The tank inlet pipe has been capped.

A human health risk assessment and fate and transport modeling were conducted for contamination that will remain in the building following deactivation. Potential exposure to residual radiological contamination exceeds the hypothetical future industrial worker risk threshold of one excess cancer in an exposed population of one million (risk greater than 1E-06) and principal threat source material levels that exceed the risk threshold of one excess cancer in an exposed population of one thousand (risk greater than 1E-03). In addition, residual radiological contamination has the potential to leach to groundwater at levels that would exceed maximum contaminant levels in groundwater. Therefore, the objectives of the NTC removal action are to protect human health and the environment as follows:

- Prevent exposure of the hypothetical future industrial worker to radiological contaminants present in Building 235-F that exceed 1E-06 risk thresholds (including principal threat source material); and
- Prevent the migration of radionuclide contamination from Building 235-F to groundwater at concentrations that exceed maximum contaminant levels to the extent practicable.

Four removal action alternatives were evaluated in the RSER/EE/CA including a no action alternative (representing the Building 235-F deactivated state), two in-situ decommissioning alternatives, and a complete building removal alternative. Based on the evaluation in this RSER/EE/CA, the lead agency's preferred NTC removal action alternative for Building 235-F is Alternative A-2, In-situ Decommissioning of First and Second Level Process Areas/Engineered Roof. This alternative involves the grouting of the first and second level process areas, the installation of an engineered roof (sloped concrete reinforced roof slab with integral crystalline waterproofing) designed to last 1,000 years, grouting/capping of the underground storage tank, and permanent sealing of the abandoned capped stack (293-F). Some non-process areas

MAY 19 2022

Ms. Susan Fulmer
Mr. Jon Richards

3

will also be grouted either because they contain contaminated equipment or ventilation ducts, or to eliminate void spaces directly above or below process areas that will be grouted. Alternative A-2 does not preclude grouting other locations exterior to the process areas if deemed necessary for engineering practicability by the detailed design.

Alternative A-2 meets the effectiveness criteria by grouting of the process areas and sealing the doors and penetrations along the exterior walls of Building 235-F to prevent exposure to radioactive and hazardous contamination contained within the building. Entombing the contamination within the building and grouting the underground storage tank will prevent release of contamination. Constructing a sloped reinforced concrete roof on Building 235-F will prevent rainwater infiltration and delay contaminant transport to groundwater. PCBs may be present in sealants and paints in a non-liquid form and will remain inside the building. The in-situ entombment described within this action will prevent direct contact of any receptors to the PCBs and mitigate the risk of any leaching to the groundwater through multiple layers of concrete and approximately 50 feet of soil. The technical, environmental, and waste-specific information contained within the RSER/EE/CA indicate that this alternative will not pose an unreasonable risk or injury to health or the environment as required by 40 CFR 761.62(c).

Administratively, this alternative provides the most flexibility in implementation because it is possible to grout one area at a time should a phased approach to implementing the NTC removal action be needed due to funding or resource limitations. Building 235-F is situated within the industrial F Area which contains multiple other facilities and units yet to be addressed. Land use in F Area is reasonably assumed to remain industrial. In the future, a final CERCLA remedial decision for F Area will include a baseline risk assessment that considers all facilities and actual and potential releases in the area. Land use controls implemented as part of a future decision for F Area will include the permanently decommissioned Building 235-F. The preferred NTC removal alternative is expected to comply with the applicable or relevant and appropriate requirements (ARARs) identified by the USDOE and USEPA Region 4 in the RSER/EE/CA, Appendix C—Potential ARARS and To Be Considered (TBC) Criteria for Building 235-F.

Upon conclusion of the NTC removal action, a completion report (e.g., Removal Action Report) that summarizes the work and describes the end-state condition of Building 235-F will be prepared and submitted to USEPA and SCDHEC to document the completion of the removal action, and placed in the SRS ARF/IRF. Questions from you or your staff may be directed to me at (803) 952-6371 or Brian Hennessey, SRS FFA Program Manager, at (803) 952-8365.

Sincerely,

Jimmy E. McMillian

Digitally signed by Jimmy E.
McMillian

Date: 2022.05.18 12:39:39 -04'00'

Jimmy McMillian, Assistant Manager
Infrastructure and Environmental Stewardship
U. S. Department of Energy
Savannah River Operations Office

IACD-22-145

MAY 19 2022

Ms. Susan Fulmer
Mr. John Richards

4

cc:

J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
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Division Director/Manager Name - Level 4 (Print) <i>Ross Fanning</i>		Division Director/Manager - Level 4 (Signature) <i>Ross Fanning</i>	

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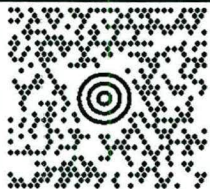
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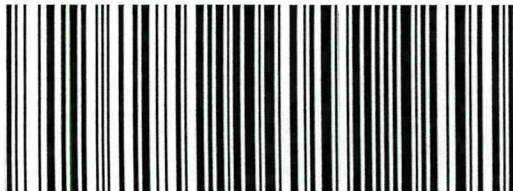
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Name/Company LaTasha P. Denard Asa H. Gordon Library Savannah State University		Street Address 2200 Tompkins Road	
Phone Number 912-358-4325	City Savannah	State GA	Zip 31404
I certify that overnight delivery of _____ <small>Reading Room: Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the F-Area Material Storage Building (235-F)</small> _____ <small>(Title of Document or Description of Material)</small> is necessary to comply with mission objectives and that no other method of forwarding is available or feasible to meet the required delivery deadline. This is Official Business material.			
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APPROVALS			
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Division Director/Manager Name - Level 4 (Print) <i>Ross Fanning</i>		Division Director/Manager - Level 4 (Signature) <i>Ross Fanning</i>	

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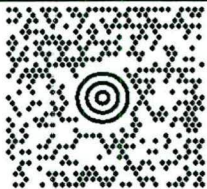
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2200 TOMPKINS RD
SAVANNAH GA 31404-5235



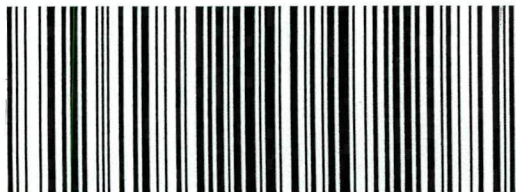
GA 314 8-04



UPS NEXT DAY AIR

TRACKING #: 1Z ASE 795 25 9905 5318

1



BILLING: P/P

Reference # 1: 07YXBPMDOC



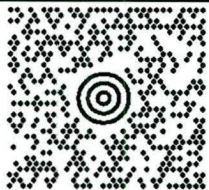
KSTANLEY
803-557-4974
SAVANNAH RIVER NUCLEAR SOLUTIO
BLDG 731-1N RM 113
AIKEN SC 29808

0.2 LBS LTR

1 OF 1

SHIP TO:

MS. MELISSA JOHNSON
7067371744
AUGUSTA UNIVERSITY
REESES LIBRARY GOVT. SECTION
2500 WALTON WAY
AUGUSTA GA 30904-4562



GA 309 0-01



UPS NEXT DAY AIR

TRACKING #: 1Z A5E 795 25 9660 2535

1



BILLING: P/P



TM

Express Mail/Overnight Delivery Service Request

This form must accompany material to the mailroom.

To: Mail Room Personnel / Building 731-1N		Date 05/26/2022	
United Parcel Service (UPS)			
Service Required <input type="radio"/> AM Next Morning Before 10:30 <input checked="" type="radio"/> Next Business Day <input type="radio"/> 2nd Business Day <input type="radio"/> Saturday Delivery*			
Sender's Name (Print) Dexter McDaniel	Address 730-4B	Phone No. 2-7401	Speed Chart Code 07YXBPMDOC
Delivery Option*			
<input checked="" type="checkbox"/> Delivery Confirmation		<input type="checkbox"/> Signature Required	
Declared Value of this Shipment is \$ <u>N/A</u>			
Security Classification			
<input checked="" type="radio"/> Unclassified		<input type="radio"/> Official Use Only	
<input type="radio"/> UCNI		<input type="radio"/> Classified	
Destination Information			
Name/Company Ms. Susie O'Connor Gregg-Graniteville Library University of South Carolina Aiken		Street Address 650 Trolley Line Road	
Phone Number 803-641-3261	City Graniteville	State SC	Zip 29829
<p>I certify that overnight delivery of</p> <p>Reading Room: Action Memorandum and Responsiveness Summary for the Non-Time Critical Removal Action for the F-Area Material Storage Building (235-F)</p> <p style="text-align: center;">(Title of Document or Description of Material)</p> <p>is necessary to comply with mission objectives and that no other method of forwarding is available or feasible to meet the required delivery deadline. This is Official Business material.</p>			
<p>NOTE: All <u>Classified Material</u> must be taken to the Classified Operations Group in 773-A. All <u>International Shipments</u> must be approved by Export Control located in Building 703-45A prior to shipping.</p>			
APPROVALS			
COG Clerk Receiving Request (Print) <i>If Applicable</i>		COG Clerk Receiving Request (Signature) <i>If Applicable</i>	
Division Director/Manager Name - Level 4 (Print) <i>Ross Fanning</i>		Division Director/Manager - Level 4 (Signature) <i>Ross Fanning</i>	

* Denotes Additional Fee Applies

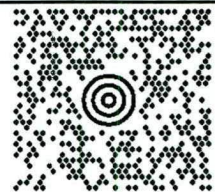
KSTANLEY
803-557-4974
SAVANNAH RIVER NUCLEAR SOLUTIO
BLDG 731-1N RM 113
AIKEN SC 29808

0.2 LBS LTR

1 OF 1

SHIP TO:

MS. SUSIE O'CONNOR
8036413261
UNIVERSITY OF SOUTH CAROLINA AIKEN
GREGG-GRANITEVILL LIBRARY
650 TROLLEY LINE ROAD
AIKEN SC 29801-6389



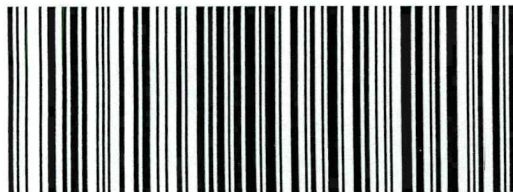
SC 298 0-01



UPS NEXT DAY AIR

TRACKING #: 1Z A5E 795 25 9527 9325

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BILLING: P/P

Reference # 1: 07YBPMDOC

