



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

OCT 30 2025

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: Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 1 Redline, October 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, October 2025) (Redline), and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 91

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 *Statement of Basis/Proposed Plan 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* (SRNS-RP-2025-00724, Revision 0, June 2025) and supporting information was submitted to the South Carolina Department of Environmental Services (SCDES) and U.S. Environmental Protection Agency (EPA) for review on June 5, 2025. The EPA's and SCDES' comments were received on July 31, 2025, and August 4, 2025, respectively. The draft responses to the regulatory comments were submitted for review via email on September 15, 2025. The SCDES and EPA accepted the draft responses via email on October 6, 2025, and October 21, 2025, respectively. The responses were finalized and incorporated into the Redline Revision 1 Statement of Basis/Proposed Plan (SB/PP) and Fact Sheet as applicable. In addition, the submittal of a Corrective Measures Implementation Plan/Remedial Action Implementation Plan was removed from the Redline Revision 1 SB/PP as it is not required for the implementation of the preferred remedy (i.e., land use controls). However, a Land Use Control Implementation Plan will be developed and submitted for review by SCDES and EPA.

Please review the enclosures and provide your response within thirty (30) days of receipt. The time and effort that the SCDES and the EPA have given on the subject operable unit are greatly appreciated.

Ms. Susan Fulmer
Mr. Jon Richards

2

OCT 30 2025

Comments or questions from you or your staff may be directed to me at (803) 952-6211 or the DOE Program Manager, April Coffman, at (803) 508-0490.

Sincerely,

**MATTHEW
BAKER**

Digitally signed by
MATTHEW BAKER
Date: 2025.10.30
08:22:33 -04'00'

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

RDDD-26-102

Enclosures:

1. Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 1 Redline, October 2025) SEMS Number: 91
2. United States Department of Energy Statement of Basis/Proposed Plan Fact Sheet for the ECODS L-3, L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) OU (SRNS-RP-2025-00790, October 2025)(Redline) SEMS Number: 91
3. SRS Responses to SCDES Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91
4. SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91

Ms. Susan Fulmer
Mr. Jon Richards

3

OCT 30 2025

cc 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

cc w/ encl:

H. H. Cathcart, SCDES-Columbia
B. Martin, USEPA-Atlanta
M. McRae, TechLaw, Inc.

SRS Responses to SCDES Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 1 of 4

Comments Received August 4, 2025

SPECIFIC COMMENTS

1. **Table 2, Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits, Pages 34-37 of 46:** Table 2 lists several ARARs for the preferred alternatives for the ECODS L-3 and LRP 131-4L subunits; however, the applicability of most of these ARARs is not apparent in Tables 4 and 5 under the A-2 Land Use Controls and B-2 Land Use Controls columns, which are the preferred alternatives for each subunit. It appears only the ARARs for PCBs are addressed as chemical-specific ARARs for the ECODS L-3 subunit. *Please revise these tables accordingly, or else explain why all of the ARARs listed in Table 2 are not addressed under the appropriate preferred alternative columns in Tables 4 and 5.*

Response: Agree.

The Applicable or Relevant and Appropriate Requirements (ARARs) from the Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation/Baseline Risk Assessment/Corrective Measures Study/Feasibility Study document were inadvertently placed in the Statement of Basis/Proposed Plan Table 2 out of order (table rows were not organized correctly). Additionally, the ARARs for all alternatives were incorrectly listed when only the ARARs for preferred alternatives should be included. Table 2 will be revised as shown in attached Table CR-1 to include only the ARARs specific to Alternative A-2 – Land Use Controls (LUCs) for the ECODS L-3 subunit and Alternative B-2 - LUCs for the LRP 131-4L subunit including the addition of the two asbestos related ARARs recommended by USEPA.

Table 4 is correct as presented and shows Alternative A-2 LUCs for the ECODS L-3 subunit meets the chemical-specific ARARs by limiting exposure to the contaminated media through the use of administrative and engineering controls.

The Alternative B-2 Land Use Controls column for the Compliance with ARARs section will be corrected in Table 5 to be consistent with Table 4 as follows:

“No ARARs exist. Meets the requirement by limiting exposure to the contaminated media through the use of administrative and engineering controls.”

Responsible Party: Adam Willey, 803-646-4944, adam.willey@srs.gov

SRS Responses to SCDES Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 2 of 4

Comments Received August 4, 2025

Table CR-1. Revised Table 2 Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits

CHEMICAL-SPECIFIC ARARs/TBC			
Chemical	Requirements	Prerequisite	Citation(s)
<i>Asbestos Waste in Place</i>			
Standards for inactive asbestos waste disposal sites	<p>Must comply with one of the following:</p> <ul style="list-style-type: none"> • Either discharge no visible emissions to the outside air from an inactive disposal site subject to this paragraph; or • Cover the asbestos-containing waste material with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area to prevent exposure of the asbestos-containing waste material; or <p>Cover the asbestos-containing waste material with at least 60 centimeters (2 feet) of compacted nonasbestos-containing material, and maintain it to prevent exposure of the asbestos-containing waste</p>	Closure of an area that received asbestos-containing waste materials – relevant and appropriate	40 CFR § 61.151(a) (1)-(3)
Warning signs for disposal site	Display warning signs at all entrances and at intervals of 100m (328 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited.	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – relevant and appropriate	40 CFR § 61.151(b)(1)
	<p>The warning signs must:</p> <ul style="list-style-type: none"> (i) Be posted in such a manner and location that a person can easily read the legend; and (ii) Conform to the requirements for (20"x14") upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and (iii) Display the legend as prescribed in § 61.151(b)(1)(iii) located in the lower panel with letter sizes and styles of visibility at least equal to those specified in § 61.151(b)(1)(iii). 	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – relevant and appropriate	40 CFR § 61.151(b)(1)(i)-(iii)

SRS Responses to SCDES Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 3 of 4

Comments Received August 4, 2025

Table CR-1. Revised Table 2 Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits (cont'd)

Chemical	Requirements	Prerequisite	Citation(s)
Fence for disposal site	Fence the perimeter of the site in a manner adequate to deter access by the general public. NOTE: Access control at SRS boundary meets this requirement to deter the general public		40 CFR § 61.151(b)(2)
Deed notice for asbestos waste disposal site	Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that: <ul style="list-style-type: none"> The land has been used for disposal of asbestos-containing waste material; and The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site required in § 61.154(f) have been filed with the Administrator; and The site is subject to 40 CFR part 61, Subpart M. NOTE: Recordation of deed notice that informs potential purchaser on the waste disposal site is considered a substantive requirement for post-closure. NOTE: SRS complies with the Land Use Control Assurance Plan (WSRC 1999) to ensure these land use restrictions are maintained, including deed restrictions.	Closure of an inactive disposal area that received asbestos containing waste materials – relevant and appropriate	40 CFR § 61.151(e)(1)-(3)
Bulk PCB Waste in Place			
Bulk PCB remediation waste (self-implementing)	Unit meets the low occupancy thresholds and the residual PCB concentrations in the soil will be less than 25 mg/kg. May remain onsite without further conditions (e.g., no fencing or cap requirements).	Bulk PCB remediation waste remaining in a <i>low occupancy area</i> (as defined in 40 C.F.R. § 761.3) at concentrations ≤ 25 mg/kg. – relevant and appropriate	40 C.F.R. § 761.61(a)(4)(i)(B)(1)

SRS Responses to SCDES Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 4 of 4

Comments Received August 4, 2025

Table CR-1. Revised Table 2 Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits (cont'd/end)

Chemical	Requirements	Prerequisite	Citation(s)
Deed restrictions for caps, fences and low occupancy areas	Deed Restrictions	Use of procedures and requirements for a low occupancy area— relevant and appropriate	40 C.F.R. § 761.61(a)(8)
	<p>Within 60 days of completion of cleanup activity shall record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, which will in perpetuity notify any potential purchaser of the property:</p> <p>NOTE: Any deed restriction ARARs will be met though the implementation of the final Land Use Control Implementation Plan at the time of future property transfers.</p>		40 C.F.R. § 761.61(a)(8)(i)(A)
	That land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in 40 C.F.R. § 761.3.		40 C.F.R. § 761.61(a)(8)(i)(A)(1)
	The applicable cleanup levels left at the site, inside the fence, and/or under the cap.		40 C.F.R. § 761.61(a)(8)(i)(A)(3)
LOCATION-SPECIFIC ARARs/TBC			
Location	Requirements	Prerequisite	Citation
<i>NONE IDENTIFIED</i>			
ACTION-SPECIFIC ARARs/TBC			
Action	Requirements	Prerequisite	Citation
<i>NONE IDENTIFIED</i>			

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 1 of 26

Comments Received July 31, 2025

GENERAL COMMENTS

1. Section VI (Remedial Action Objectives) states that no remedial action objectives (RAOs) were developed for L-Area Rubble Pit (LRP) 131-1L subunit since there were no problems warranting action identified, and Section IX (Preferred Alternative) lists “no action” as the preferred remedy for LRP 131-1L; however, Section III (Operable Unit Background) indicates that asbestos and transite, a non-friable asbestos containing material (ACM) were disposed of on the surface of LRP 131-1L. Figure 5, Photos of Rubble on the Surface of LRP 131-1L Subunit shows what appears to be transite that has been crushed and crumbled. Since friable asbestos potentially remains at the surface and poses a risk to human receptors it is unclear whether RAOs should be developed for LRP 131-1L for protection of human health. *Please revise the Statement of Basis/Proposed Plan to re-assess the selected remedy for LRP 131-1L and develop RAOs and prepare the associated detailed cost estimate, or, provide quantitative information demonstrating that the ACM does not pose an unacceptable risk to human receptors.*

Response: Clarification.

The description of waste disposed of at the LRP 131-1L subunit in Section III. *Operable Unit Background* is a generic description from two general sources for construction debris sites at Savannah River Site (SRS). The sources are not specific to the LRP 131-1L subunit and provide minimal detail about the subunit. One source, titled *Waste Sites on the Savannah River Plant* (DuPont 1983b), provides a very brief description of all waste units on the SRS in January 1983. The LRP 131-1L subunit description in this source states the waste was originally placed on the surface. The second source, titled *Departmental Environmental Action Plan Data Sheets* (DuPont 1983a), also supports that waste was placed on the ground surface. This document goes further to describe the LRP 131-1L subunit as “covered and closed.” This description is not consistent with observations of the subunit in the field or the description of the subunit in an early draft Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI)/Remedial Investigation (RI) Work Plan for the LRP 131-1L subunit, prepared in October 1991 (available in the Administrative Record File [ARF] #000339). Based on field observations of the subunit ground surface and drilled core samples, the subunit does not have evidence of being covered. The subunit was cleared of all vegetation prior to the 2023 RFI/RI characterization field work, revealing the ground surface across the entire unit. No evidence of waste was observed following clearing of the subunit, with the exception of two metal T-posts and a small piece of asphalt.

Due to the inconsistency of the historical records and observations of the subunit in the field, the Core Team agreed that visual inspection of the subunit soil cores for the

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 2 of 26

Comments Received July 31, 2025

presence of potential asbestos containing material was warranted during the 2023 RFI/RI characterization. As documented in the 2022 RFI/RI Work Plan, if potential asbestos-containing material was found, sampling would be suspended pending the outcome of an evaluation performed by asbestos subject matter experts. If asbestos-containing material was confirmed, further sampling would be reevaluated based on data needs for additional problems warranting action and response actions. During the 2023 RFI/RI characterization field activities, construction debris was encountered at only one (1) of 21 total soil borings in the 0.3-to-1.2-meter (m) (1 to 4 feet [ft]) interval and appeared to be a railroad tie or other creosote wooden material. No potential asbestos containing material was observed at the surface or in any soil borings for the LRP 131-1L subunit. Therefore, no problems warranting action were identified for asbestos at the LRP 131-1L subunit as documented in the 2024 RFI/RI/Baseline Risk Assessment (BRA)/Corrective Measures Study (CMS)/Feasibility Study (FS) report.

For clarity, the first paragraph of the waste disposal description for the LRP 131-1L subunit in Section III. *Operable Unit Background* will be revised to show that the waste disposal description is a generic description for SRS construction debris sites as follows:

“SRS records indicate that metal, lumber, poles, concrete, brick, tile, asphalt, tires, rubber, scrap metal, fence posts, hard plastics, wallboard, asbestos, glass, batteries, paint cans, drums and transite were typically disposed of at SRS construction debris sites such as the LRP 131-1L subunit (DuPont 1983a and DuPont 1983b).”

In addition, the last paragraph in Section III. *Operable Unit Background* for the LRP 131-1L subunit will be revised to clarify the 2023 RFI/RI field characterization results as follows:

“The LRP 131-1L subunit was characterized in 2022 to support RFI/RI/Baseline Risk Assessment (BRA) of the subunit and for remedial decision making. Based on observation of soil cores during sampling activities, it was determined no waste material was placed below ground surface at the LRP 131-1L subunit. Construction debris was encountered at only one (1) soil boring in the 0.3 to 1.2 m (1 to 4 ft) interval and appeared to be a railroad tie or other creosote wooden material. No potential asbestos containing material was observed in any soil borings. All samples collected in the 2022 characterization”

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

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Page 3 of 26

Comments Received July 31, 2025

2. The sections in the proposed plan do not include all the recommended sections or follow the section order provided in EPA’s guidance on writing proposed plans, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, OSWER 9200 1-23P (hereinafter “EPA Proposed Plan Guidance”). For example, the proposed plan is missing a Site Background section but includes an SRS Compliance History section, which provides some information about site background, but is not specifically required in a proposed plan. There is an OU Background Section, but the Site Characteristics section specified in EPA’s proposed plan guidance is missing. The Community Participation Section is at the beginning of the proposed plan, but in EPA’s Proposed Plan Guidance, that section goes at the end. The section entitled Comparative Analysis of Alternatives should be titled Evaluation of Alternatives instead. The specific comments below are intended to address some aspects of this general comment. *Please address those. Going forward, please ensure that the EPA Proposed Plan Guidance is followed to ensure that PPs written at SRS are consistent with other PPs issues across the DOE complex and at other federal and private Superfund sites.*¹

Response: Clarification.

SRS regulatory document formats are approved by the Core Team (i.e., representatives from USDOE, USEPA, and SCDES) and published in the *EC&ACP Regulatory Document Handbook* (SRNS-RP-2022-00330, Revision 0, June 2023). The SRS Statement of Basis (SB)/Proposed Plan (PP) format was developed to align with the USEPA guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, OSWER Directive 9200.1-23P, July 1999, and includes all the major sections of the PP as recommended in the guidance. The ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP Revision 0 document was prepared in accordance with the approved SRS SB/PP Format (Format F-6 in the *EC&ACP Regulatory Document Handbook*).

¹ Note FFA Section XXII.G.2 which states that, “[r]eview of any document by the EPA and SCDHEC may concern all aspects of the document (including its completeness) and should include, but is not limited to, technical evaluation of any aspect of the document and consistency with CERCLA, the NCP and any pertinent guidance or policy promulgated by the EPA or SCDHEC.” In addition, FFA Section XXXV states, “[t]he Parties agree that work conducted under this Agreement and any subsequently proposed remedial action alternative(s) and subsequent plan(s) for remedial action at the site arising out of this Agreement shall comply with the public participation requirements of CERCLA, including Section 117 of CERCLA, 42 U.S.C. § 9617, the NCP, RCRA (as applicable), all applicable guidance developed by EPA, and all applicable State laws.” Lastly, before the FFA can be terminated, FFA Section XLIX states that, “The notice shall state that, in the opinion of EPA and SCDHEC, the DOE has satisfied all the terms of this Agreement in accordance with the requirements of CERCLA, the NCP, Section 3008(h) of RCRA, 42 U.S.C. § 6928(h), and related guidance, and applicable State laws and that the work performed by DOE was consistent with the agreed-to remedial actions.”

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 4 of 26

Comments Received July 31, 2025

Because most SRS projects are large operable units (OUs) with multiple subunits, the Core Team agreed to modifications from the guidance on how SRS and OU specific information is presented to aid public understanding. Based on previous regulatory comments and agreements, subsections have been added to major sections and the section order adjusted. Provided below is a summary of approved modifications to SRS SB/PP documents.

- Information recommended in the 1999 USEPA guidance for Section A. *Introduction* and Section B. *Site Background* is presented in SRS SB/PP documents in Section I. *Introduction and Background* and Section III. *Operable Unit Background*. Specifically, Section I. is designed to provide the summary level introduction for the SRS and the OU. Section I also includes an *SRS Compliance History* subsection that discusses how the RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) programs are integrated in the SRS Federal Facility Agreement (FFA).
- The OU site characteristics are presented in Section III. *Operable Unit Background* and include the information recommended in the USEPA Guidance for Section C. *Site Characteristics*. For the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP, SRS will ensure the USEPA guidance recommended site characteristic information is included in the revised SB/PP document as appropriate. Please refer to the response to USEPA Specific Comment #10.
- Section VIII. *Evaluation of Alternatives* is a major section of the SB/PP as recommended in the 1999 USEPA guidance, Highlight 3-1. The *Comparative Analysis of Alternatives* is a subsection of Section VIII in the SB/PP document. (Note that the *Evaluation of Alternatives* is a major section in the USEPA recommended Record of Decision [ROD] outline but not the SB/PP document).
- The Core Team agreed to locate the *Community Participation* Section in the upfront Section II rather than the end of the SB/PP document.

These modifications are reflected in the approved SRS SB/PP document format used to develop the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP. SRS acknowledges USEPA's concerns with implementation of the 1999 USEPA guidance in SRS documents, and agrees to address these concerns in the revised ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP to the extent practicable. However, any major changes to the document templates in the *EC&ACP Regulatory Document Handbook* are made at the program level with Core Team participation. Please see the SRS responses to USEPA's

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 5 of 26

Comments Received July 31, 2025

specific comments below for more detail.

No change to the format of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Dena Brett, (803) 953-6031, dena.brett@srs.gov

3. The SB/PP and future ROD will need to be very clear when remedial actions are warranted that the potential risk is justified for federal or state approvals, for example, potential subsurface contamination [ACM], or if the risk to the receptor is less than 10⁻⁴, we will need to discuss in the core team the appropriate language justifying the remedial action [e.g., LUCs] is prompted by the state's lower preference for some type of action if risk is over 10⁻⁶.

Response: Agree.

The Core Team will discuss the appropriate language to justify a response action during OU project scoping when the remedial action is based solely on a residential receptor risk that exceeds 1E-06 but is less than 1E-04. For the ECODS L-3, LRP 131-1L, and LRP 131-4L OU, the potential exposure risk for the residential receptor at the ECODS L-3 subunit and LRP 131-4L subunit is within the 1E-04 to 1E-06 CERCLA risk range. However, asbestos containing material is presumed present in unit soils at both subunits, and USEPA and SCDES agreed during project scoping that a response action such as Land Use Controls (LUCs) is warranted. The problems warranting action for the ECODS L-3 subunit and LRP 131-4L subunit are summarized in Section V. *Summary of Site Risks, Problems Warranting Action.*

No change to the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Dena Brett, (803) 953-6031, dena.brett@srs.gov

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 6 of 26

Comments Received July 31, 2025

SPECIFIC COMMENTS

1. **Section I. Information and Background, Introduction, Page 1 of 46: *Please revise the Introduction section to specifically state the relationship of the RI/FS to the Proposed Plan as EPA's proposed guidance requires.*** Although this information is somewhat included in the SRS Compliance History section, EPA's Proposed Plan guidance requires a more clear and direct statement. See EPA Proposed Plan Guidance at p. 3-2 (stating that in the introduction "[a] clear statement should be made that the Proposed Plan highlights key information from the RI/FS Report. The Plan should refer the reader to the RI/FS Report and the Administrative Record file for more information regarding the remedial action.").

Response: Agree.

The suggested text will be added as a new second paragraph in Section I. *Information and Background, Introduction* as follows:

"The SB/PP highlights key information from the RFI/RI/BRA/Corrective Measures Study (CMS)/ Feasibility Study (FS) for the ECODS L-3, LRP 131-1L, and LRP 131-4L OU (SRNS 2025). Refer to the RFI/RI/BRA/CMS/FS report and the SRS Administrative Record File (ARF) for more information regarding the remedial action."

Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.o'quinn@srs.gov

2. **Section I. Information and Background, Introduction, Page 1 of 46: *Please revise the Introduction section to clarify that it is important to receive public information on all alternatives, not just the preferred alternative.*** See EPA Proposed Plan Guidance at 3-2 (stating that the introduction should include a statement as to the "[i]mportance to the remedy selection process of public input on all alternatives and on the rationale for the Preferred Alternative."). In addition, please direct the public that it can provide "written and oral comments on the proposed plan and the supporting analysis and information located in the information repository, including the RI/FS." 40 CFR 300.430(f)(3)(i)(C).

Response: Agree.

The suggested text will be added to the end of the first paragraph in Section I. *Information and Background, Introduction* as follows:

"The SB/PP provides basic background information, describes the other remedial options considered, and solicits public input on all remedial alternatives and the rationale for the preferred remedial alternative."

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 7 of 26

Comments Received July 31, 2025

Directions for participation in the public comment period and the location of the FFA ARF are provided in Section II. *Community Participation*.

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

- Section I. Information and Background, Introduction, Page 1 of 46, first paragraph:** The Proposed Plan states, “The purpose of this SB/PP is to describe the preferred remedial alternative(s) . . . and to provide for public involvement in the decision-making process.” *Revise this sentence to expressly state that the Proposed Plan is a document that the lead agency is required to issue to fulfill the requirements of CERCLA §117(a) and NCP §300.430(f)(2). In addition, please add to the purposes listed, the purpose of the proposed plan is also to provide basic background information, describe the other remedial options considered, and to solicit public review of and comment on all alternatives described.* See EPA Proposed Plan Guidance at p. 3-1–3-2 (stating “[t]he public should be informed of the function of the Proposed Plan in the remedy selection process, specifically, its purposes are the following: Provide basic background information. Identify the Preferred Alternative for remedial action at a site or operable unit and explain all reasons for the preference. Describe the other remedial options considered. Solicit public review of and comment on all alternatives described. Provide information on how the public can be involved in the remedy selection process.”).

Response: Agree.

Section I. Information and Background, Introduction will be revised to incorporate the suggested text as follows:

“This Statement of Basis/Proposed Plan (SB/PP) is being issued by the United States Department of Energy (USDOE), which functions as the lead agency for Savannah River Site (SRS) remedial activities, with concurrence by the United States Environmental Protection Agency (USEPA) and the South Carolina Department of Environmental Services (SCDES). ~~and The SB/PP is a document that the lead agency is required to issue to fulfills the requirements of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 117(a) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Section 300.430 (f)(2).~~”

Please see the text revision in response to USEPA Specific Comment #2 in regard to the purpose of the proposed plan.

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 8 of 26

Comments Received July 31, 2025

4. **Section I. Information and Background, SRS Compliance History, Page 2 of 46, first paragraph:** After the reference to the RCRA, *please provide the citation 42 U.S.C. Ch. 82 or 42 U.S.C. §§ 6901–6992k.*

Response: Agree.

Section I, *Information and Background, SRS Compliance History* will be revised to incorporate the suggested text as follows:

“SRS manages certain waste materials that are regulated under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901–6992k, a comprehensive law requiring responsible management of hazardous waste.”

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

5. **Section I. Information and Background, SRS Compliance History, Page 2 of 46, second paragraph:** *In the sentence starting with “[i]n accordance with Section 120 of CERCLA,” cite 42 U.S.C. § 9620(e)(2) instead of 42 U.S.C. § 9620.*

Response: Agree.

Section I. *Information and Background, SRS Compliance History* will be revised to incorporate the suggested text as follows:

“In accordance with Section 120 of CERCLA, 42 U.S.C. § 9620(e)(2), USDOE has negotiated a Federal Facility Agreement (FFA) (FFA 1993) with the USEPA and SCDES to coordinate remedial activities at SRS into one comprehensive strategy, which fulfills these dual regulatory requirements.”

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

6. **Section I. Information and Background, SRS Compliance History, Page 2 of 46, second column:** A sentence states “[p]ublic participation requirements are listed in . . . Sections 113 and 117 of CERCLA 42 U.S.C. § 9613 and 9617.” *Revise to state “Sections 113 and 117 of CERCLA, 42 U.S.C. §§ 9613(k) and 9617(a)” instead.*

Response: Agree.

Section I. *Information and Background, SRS Compliance History* will be revised to incorporate the suggested text as follows:

“Sections 113 and 117 of CERCLA, 42 U.S.C. § 9613(k) and 9617(a).”

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 9 of 26

Comments Received July 31, 2025

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

7. **Section I. Information and Background, SRS Compliance History, Page 3 of 46, first incomplete paragraph:** *Revise to state that USDOE and EPA will select the remedial alternative in consultation with SCDES. See 42 U.S.C. § 9620(e)(4)(A).*

Response: Clarification.

With respect to releases and threatened releases, USDOE is the owner and operator of the SRS, a Federal facility site, and functions as the lead agency. The USDOE, SCDES and USEPA are Parties to the SRS Federal Facility Agreement (FFA). In accordance with the FFA, Section IV. RCRA/CERCLA Integration, USDOE will address all releases at SRS units listed in FFA Appendix H.1 pursuant to the Memorandum of Agreement, dated April 8, 1985, which recognizes the delegated authority of SCDES. To satisfy CERCLA requirements, USDOE will submit Proposed Plans (PPs) and Records of Decision (RODs) to USEPA and SCDES according to the requirements of Section XV (Proposed Plans/Records of Decision) for units listed in Appendix H.1. SB/PP and ROD documents are approved jointly by the EPA and SCDES as signatories to the FFA.

The USEPA guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, OSWER Directive 9200.1-23P, July 1999, Section 2.2.1 states: “Generally, at Federal facility sites, the EPA and the State are co-regulators and the Federal agency which owns and/or operates the site is the lead agency.” This relationship between the lead agency and regulatory authorities is represented in the SRS FFA.

No change to the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

8. **Section II. Community Participation, Page 3 of 46:** *This section is usually located at the end of the proposed plan. Consider relocating this section to improve document flow. See EPA Proposed Plan Guidance at Highlight 3-1 on p. 3-2 and section 3.3.10 Community participation on p. 3-10.*

Response: Clarification.

Please see the response to USEPA General Comment #2. Because most SRS projects are large OUs with multiple subunits, the Core Team agreed to modifications from the USEPA guidance on how SRS specific information and OU information is presented to aid public understanding. During development of the SRS SB/PP template in 1999-2000

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 10 of 26

Comments Received July 31, 2025

for inclusion in the *EC&ACP Regulatory Document Handbook*, the Core Team agreed to locate the *Community Participation* Section in the upfront Section II rather than the end of the SB/PP document. The location of the *Community Participation* in Section II is reflected in the approved SRS SB/PP format and previously approved SRS SB/PP documents.

No change to the section order of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Dena Brett, (803) 953-6031, dena.brett@srs.gov

9. **Section II. Community Involvement, Page 3 of 46:** *The dates of the public comment period should be specified in the proposed plan.* See EPA Proposed Plan Guidance at p. 3-10.

Response: Clarification.

The public comment period is not scheduled until after the SB/PP document is approved by the regulatory agencies. Therefore, the dates of the public comment period are not known for inclusion in the SB/PP document. However, a final SB/PP fact sheet is prepared for the approved SB/PP, and the public comment period is made available in the fact sheet. The SRS SB/PP Fact Sheet Format (Format F-7) is located in the *EC&ACP Regulatory Document Handbook* (SRNS-RP-2022-00330, Revision 0, June 2023).

No change to the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

10. **Section III (missing). Site Characteristics (missing from proposed plan):** *EPA Proposed Plan Guidance provides that there should be a Site Characteristics section in a proposed plan that describes information including the physical characteristics of the site, geographical or topographical factors that had a major impact on remedy selection, the nature and extent of contamination, the source materials on the site that constitute principal threats, etc.* See EPA Proposed Plan Guidance at 3-3, Recommended Outline and Checklist for a Proposed Plan at 3-14. Some of the information that should go in the Site Characteristics section is scattered elsewhere in the proposed plan like the Introduction and Operational Unit Background Section, but not all the required information is present.

Response: Agree.

Please see the response to USEPA General Comment #2. The ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP follows the SRS SB/PP Format (Format F-6 in the *EC&ACP*

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 11 of 26

Comments Received July 31, 2025

Regulatory Document Handbook). This format was reviewed and approved by the Core Team and is the basis for previously submitted and approved SRS SB/PPs for other SRS OUs. SRS follows the approved template for development of SB/PP documents. The OU site characteristics are presented in Section III. *Operable Unit Background* and includes the information recommended in Section C. *Site Characteristics* of the USEPA guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, OSWER Directive 9200.1-23P, July 1999.

The USEPA guidance recommended outline and checklist provides four topics under Section C. *Site Characteristics*. These topics and their locations within the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP document and/or their applicability to the OU are provided below:

- **Geographical or topographical factors that had a major impact on remedy selection (e.g., resources affected or threatened by site contamination such as current or potential drinking water sources or wetlands).**
 - **Section III. *Operable Unit Background* provides the geographical and/or topographical factors that had a major impact on remedy selection in SRS SB/PP documents. For the ECODS L-3, LRP 131-1L, and LRP 131-4L OU, the information identified where groundwater is addressed (L-Area Southern Groundwater OU) and described the watershed that the OU has the potential of impacting (i.e., Steel Creek Watershed). Impact to resources did not have a major influence on remedy selection for the ECODS L-3, LRP 131-1L, and LRP 131-4L OU subunits and therefore the brief descriptions above are adequate for this OU.**
- **Nature and extent of contamination (i.e., vertical and lateral extent of contamination areas).**
 - **The extent of contamination for each subunit is described in Section III. *Operable Unit Background* and in Figure 3, Figure 4, and Figure 6 for the three subunits. The extent of contamination for the LRP 131-4L subunit as presented to the Core Team in the April 2025 scoping is not well described in the Revision 0 ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP document. Therefore, the second to last paragraph of Section III. *Operable Unit Background, LRP 131-4L Subunit* will be revised as follows:**

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91
Savannah River Site, Aiken, South Carolina

Page 12 of 26

Comments Received July 31, 2025

“... All data were validated to definitive level. The extent of contamination was conservatively estimated by extending the waste unit boundary to a ditch feature northwest of the subunit (Figure 6). This feature incises the ground surface ~0.9-1.2 m (3-4 ft) below ground surface and shows no evidence of buried waste present. This feature acts as a maximum subunit boundary in lieu of confirmatory borings to define the extent of buried waste.”

- The nature of contamination is described for each subunit in Section III. *Operable Unit Background* and in Section V. *Summary of Site Risks*.
- A site map that shows location of roads, buildings, drinking water wells and other characteristics that are important to understand why the remedial objectives and Preferred Alternative are appropriate for the site.
 - A site map of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU is provided in Figure 2. Maps of the specific subunits are provided in Figure 3, Figure 4, and Figure 6. There were no important characteristics to be shown on the maps for why the remedial objectives and Preferred Alternatives for each subunit were determined. Remedial objectives and Preferred Alternatives for each subunit were determined based on the human health risk assessments and applicable or relevant and appropriate requirements (ARAR) compliance for the ECODS L-3 subunit and the LRP 131-4L subunit.
- Materials constituting principal threats (e.g., location, volume and nature of mobile/high-toxicity/high-concentration source material).
 - Section V. *Summary of Site Risks, Principal Threat Source Material (PTSM) Evaluations* states that no principal threat source material (PTSM) refined constituents of concern were identified for any subunits of the ECODS L-3, LRP 131-1L, LRP 131-4L OU. Therefore, this recommended Site Characteristic is not applicable for the OU.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

11. **Section III. Operable Unit Background, ECODS L-3 Subunit, Page 4 of 46, column 2, last paragraph:** The document states “[a]ll samples were analyzed for the complete list of Target Analyte List (TAL) and Target Compound List (TCL) constituents and the data was validated to definitive level.” What does “definitive level” mean? Is it a term of art? ***Consider providing***

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 13 of 26

Comments Received July 31, 2025

a definition for the term definitive level or using a more general wording. See, e.g., EPA Proposed Plan Guidance at 3-5 (explaining that in the summary of remedial alternatives, for example, “[t]echnology terms used to describe remedy components that are likely to be unfamiliar to the public, . . . should be explained in the remedial description or glossary. Where possible, use general terms to describe cleanup technologies . . .”).

Response: Agree.

SRS agrees that the term “definitive level data” is not defined or a commonly known term for the public. Definitive level data meets the quality assurance and quality control requirements as outlined in the SRS *Area Completion Projects Programmatic Quality Assurance Project Plan for Environmental Data Collection and Management (ERD-AG-2005-00001, Revision 5, April 2012 [ARF-018290])* for remedial decision making.

The definition for “Definitive Level Data” will be included in Section XII. *Glossary* as follows:

“Definitive Level Data: Analytical data of known quality, concentration, and level of uncertainty. The levels of quality and uncertainty of the analytical data are consistent with the requirements for the decision to be made. Required for final decision-making.”

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

12. **Section III. Operable Unit Background, ECODS L-3 Subunit, Page 4 of 46, column 2, last paragraph:** The document states “[b]ased on the site evaluation report (SER) and in accordance with Section 300.420(b)(1)(I) of the NCP” There is a typo in the citation. *Revise to cite either Section 300.420(b)(1) or Section 300.420(b)(1)(i) of the NCP.*

Response: Agree.

Section III, *Operable Unit Background, ECODS L-3 Subunit* will be revised to incorporate the suggested text as follows:

“...and in accordance with Section 300.420(b)(1)(**h**) of the NCP...”

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

13. **Section III. Operable Unit Background, LRP 131-4L Subunit, Page 6 of 46, second complete paragraph:** The second sentence of the second complete paragraph begins with “[b]ased on the SER, in accordance with 300.420(b)(1)(I) of the NCP” There is a typo in

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 14 of 26

Comments Received July 31, 2025

the citation. *Revise to cite either Section 300.420(b)(1) or Section 300.420(b)(1)(i) of the NCP.*

Response: Agree.

Section III, *Operable Unit Background, LRP 131-4L Subunit* will be revised to incorporate the suggested text as follows:

“...in accordance with Section 300.420(b)(1)(i) of the NCP...”

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

14. **Section IV. Scope and Role of Operable Unit or Response Action, Page 7 of 46: *The information in the subsections ECODS L-3 Subunit, LRP 131-1L Subunit, and LRP 131-4L Subunit should go in the Summary of Site Risks and Summary of Remedial Alternatives sections, not in the Scope and Role of Operable Unit or Response Action section.*** The discussion of the refined constituents of concern and future land uses of the sites should be placed in the Summary of Site Risks section. See EPA Proposed Plan Guidance at p. 3-4 and proposed plan checklist at 3-15 (noting that key information from the baseline risk assessment that should be covered in the proposed plan, Summary of Site Risks section includes land use and groundwater use assumptions and major chemicals of concern in each medium).

Response: Agree.

Section IV. *Scope and Role of the Operable Unit or Response Action* will be revised to remove the discussion of the refined constituents of concern and future land uses of the sites and placed in Section V. *Summary of Site Risks* as warranted.

The following text will be added to Section V. *Summary of Site Risks*, 1st paragraph, as the 2nd sentence, “RCOCs are identified as those constituents that warrant a response action.”

The last paragraph of Section V. *Summary of Site Risks, Summary of Human Health Risk Assessment*, will be rewritten as, “HH RCOCs were identified for the future resident scenario at the ECODS L-3 subunit and the LRP 131-4L subunit. PCBs in surface soil at ECODS L-3 were determined to be a potential threat to HH (hypothetical resident). Additionally, ACM is likely present in the ECODS L-3 subunit soil and, therefore, presents a potential risk to human receptors should exposure occur. Benzo(a)pyrene was determined to be a potential threat to HH (hypothetical resident) within surface soil at the LRP 131-4L subunit. Additionally, presumed ACM was identified in LRP 131-4L subunit soil and therefore, presents a potential risk to human receptors should exposure”

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 15 of 26

Comments Received July 31, 2025

occur. No HH RCOCs were identified for the future resident scenario at the LRP 131-1L subunit, and no HH RCOCs were identified for the future industrial worker scenario at any of the three subunits.”

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

15. **Section IV. Scope and Role of Operable Unit or Response Action, Page 7 of 46:** The document discusses the preferred alternative for the remedy, i.e. no action or LUCS, in this section. ***This identification of the preferred alternative should be placed in the Summary of Remedial Alternatives Section rather than the Scope and Role of Operable Unit or Response Action section.*** See EPA Proposed Plan Guidance at p. 3-5 (discussing the Summary of Remedial Alternatives section and stating that “[t]he alternative that is recommended as the preferred alternative should be identified as such at the beginning of this section”).

Response: Clarification.

The text referred to in the comment was removed from Section IV. ***Scope and Role of Operable Unit or Response Action*** in response to USEPA Specific Comment #14. Although the 1991 USEPA guidance recommends that the preferred alternative be identified at the beginning of the ***Summary of Remedial Alternatives*** section, SRS believes this placement before Section VIII. ***Evaluation of Alternatives*** is premature and could potentially bias selection of the preferred alternative. For this reason, the preferred alternative is identified in Section IX. ***Preferred Alternative*** after the evaluation of alternatives in accordance with the SRS SB/PP Format (Format F-6 in the ***EC&ACP Regulatory Document Handbook***).

No change to the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

16. **Section V. Summary of Site Risks, Problems Warranting Action, ECODS L-3 Subunit, Page 9 of 46, third bullet:** The document states “PCBs are present in surface soil (0 to 0.3 m [0 to 1 ft]) that exceed the Toxic Substance Control Act Applicable or Relevant and Appropriate Requirements threshold of 1 mg/kg for high occupancy (i.e., unrestricted land use).” ***Provide a citation to 40 CFR § 761.61(a)(4)(i)(A) of the TSCA, which is the source of this cleanup level.*** In addition, it may be useful to use the examples of “high occupancy” and “low occupancy” used in the TSCA regulations, so that public knows that the distinction between these uses is more than just “residential” versus “industrial.” For instance, at 40 CFR 761.3, “high occupancy” contains the following text: “Examples could include a residence, school, day care center, sleeping quarters, a single or multiple occupancy 40 hours per week

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 16 of 26

Comments Received July 31, 2025

work station, a school class room, a cafeteria in an industrial facility, a control room, and a work station at an assembly line.” “Low occupancy has the following text: “Examples could include an electrical substation or a location in an industrial facility where a worker spends small amounts of time per week (such as an unoccupied area outside a building, an electrical equipment vault, or in the non-office space in a warehouse where occupancy is transitory.” Please ensure that the exposure factors in the regulations have been used in evaluating the self-implementing TSCA regulations.

Response: Agree.

Section V. *Summary of Site Risks, Problems Warranting Action, ECODS L-3 Subunit* will be revised to include the recommended citation as follows:

“PCBs are present in surface soil (0 to 0.3 m [0 to 1 ft]) that exceed the Toxic Substance Control Act (TSCA) Applicable or Relevant and Appropriate Requirements (ARAR) threshold of 1 mg/kg for high occupancy (i.e., unrestricted land use) (40 CFR § 761.61(a)(4)(i)(A)). Aroclor 1254 maximum detected concentration = 5.63 mg/kg and Aroclor 1260 maximum detected concentrations = 2.17 mg/kg.”

The purpose of the *Problems Warranting Action* subsection in Section V. *Summary of Site Risks*, is to provide a summary level description of the constituents of concern, contaminated media, and threshold criteria exceedances that support the need for taking action. Including more detail for the Toxic Substance Control Act regulation such as examples of high and low occupancy is a level of detail that is not warranted in this summary section. The risk evaluation for the ECODS L-3, LRP 131-1L, and LRP 131-4L OU was conducted in accordance with the approved *EC&ACP Regulatory Document Handbook* protocols. Please refer to the RFI/RI/BRA/CMS/FS document for more detail pertaining to the technical evaluation.

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

17. **Section V. *Summary of Site Risks, Conclusion, Page 9 of 46*: This Conclusion paragraph does not conform with the standard language explaining the basis for taking action in EPA’s Proposed Plan Guidance. *Please revise*. See EPA Proposed Plan Guidance at Highlight 3-2 on p. 3-4 (“The risk section of the Proposed Plan should conclude with the standard statement in Highlight 3-2 (unless a “No Action” alternative is being proposed).”).**

Response: Agree.

Section V. *Summary of Site Risks, Conclusion* will be revised to conform with the standard language explaining the basis for taking action in USEPA’s Proposed Plan Guidance as follows:

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 17 of 26

Comments Received July 31, 2025

“It is the lead agency’s current judgement that the preferred alternative identified in this SB/PP, or one of the other active measures considered in the SB/PP, is necessary to protect public health or welfare or the environment from Aactual or threatened releases of hazardous substances from the ECODS L-3 and LRP 131-4L subunits, if not addressed by the Preferred Alternative or one of the other active measures considered, may present a current or potential threat to public health, welfare, or into the environment.”

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

18. **Section VI. Remedial Action Objectives, Applicable or Relevant and Appropriate Requirements, Page 10 of 46:** The document states “ARARs are cleanup standards, standards of control, and other substantive requirements, criteria or limitations promulgated under federal, state, or local environmental laws.” *Please revise as follows: “ARARs are Federal and more stringent, promulgated State environmental or facility siting requirements in a law or regulation that a selected remedy must attain, which vary from site to site.”* Cf. to CERCLA Section 121(d)(2).

Response: Agree.

The definition of ARARs in Section VI. *Remedial Action Objectives, Applicable or Relevant and Appropriate Requirements* will be revised as follows:

“ARARs are Federal and more stringent, promulgated State environmental or facility siting requirements in a law or regulation that a selected remedy must attain, which vary from site to site, cleanup standards, standards of control, and other substantive requirements, criteria or limitations promulgated under federal, state, or local environmental laws.”

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

19. **Section VII. Summary of Remedial Alternatives, Page 11 of 46:** *At the beginning of this section, the preferred alternative should be identified.* See EPA Proposed Plan Guidance at p. 3-5 (discussing the Summary of Remedial Alternatives section and stating that “[t]he alternative that is recommended as the preferred alternative should be identified as such at the beginning of this section”).

Response: Clarification.

See response to USEPA Specific Comment #15.

No change to the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 18 of 26

Comments Received July 31, 2025

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

20. **Section IX. Preferred Alternative, Page 18 of 46, last paragraph:** The last paragraph states that the alternatives “satisfy the preference for treatment as a principal element.” This is not an accurate statement. There is no treatment in the preferred alternative, any treatment in the excavation alternative would likely not be a principal element of the remedy. *Please correct this text in #5 to note that neither action alternative satisfies the statutory preference for treatment as a principal element of the remedy.*

Response: Agree.

The preferred alternative does not include treatment or alternative treatment technologies. The last paragraph in Section IX. *Preferred Alternative* will be corrected to remove item 4 which refers to alternative treatment technologies and item 5 that refers to preference for treatment as a principal element as follows:

“The USDOE expects the Preferred Alternative to satisfy the statutory requirements in CERCLA Section 121(b) to: 1) be protective of HH and the environment, 2) comply with ARARs, and 3) be cost-effective, ~~4) utilize permanent solutions and alternative treatment technologies to maximum extent practicable, and 5) satisfy the preference for treatment as a principal element.~~”

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

21. **Section XII. Glossary, Applicable or Relevant and Appropriate Requirement (ARARs), Page 20 of 46:** *Please use the following definition for ARARs, “Federal and more stringent, promulgated State environmental or facility siting requirements in a law or regulation that a selected remedy must attain, which vary from site to site.”* Cf. to CERCLA Section 121(d)(2).

Response: Agree.

Section XII. *Glossary* will be corrected to use the recommended definition for ARARs as follows: “Applicable or Relevant and Appropriate Requirement (ARARs): ~~Applicable, or Relevant and Appropriate Requirements. Refers to the f~~Federal and more stringent, promulgated sState environmental or facility siting requirements in a law or regulation that a selected remedy will must attain. ~~These requirements may which vary from site to site.”~~

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 19 of 26

Comments Received July 31, 2025

MINOR COMMENTS

1. Throughout the document, the word “data” is not followed by plural verbs (i.e., “data are or were,” not “data is or was”). Please revise the Statement of Basis/Proposed Plan to correct this discrepancy.

Response: Agree.

The verb following the word “data” will be modified to plural tense throughout the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP document.

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

2. **Section I. Information and Background, Page 1 of 46:** The fourth paragraph states that the ECODS L-3, LRP 131-1L, and LRP 131-4L OU are shown on Figure 1; however, the location of these OUs are better illustrated on Figure 2 (Location of the ECODS L-3, LRP 131-1L, and 131-4L OU within the Savannah River Site). *Please revise this section with the updated figure reference.*

Response: Agree.

The Figure 1 callout in the 4th paragraph of Section I. Information and Background will be revised to Figure 2.

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

3. **Section V. Summary of Site Risks, Page 9 of 46:** There are two issues on this page with the second bullet under ECODS L-3 Subunit: 1) In the first sentence on the left-hand column, the unit “m” is missing after 0.3 (there is only a comma there); and 2) In the second sentence on the right-hand column, the words “risk of” are doubled. *Please revise this section accordingly.*

Response: Agree.

The suggested changes will be made to the text.

Responsible Party: Sadika O’Quinn, (803) 952-6697, sadika.o’quinn@srs.gov

4. **Section III. Operable Unit Background, LRP 131-1L Subunit, Page 5 of 46, last paragraph:** The document states “Based on observation of soil core during sampling activities, it was determined no waste material was placed below ground surface at the LRP 131-1L subunit.” *Unless only one soil core was taken, it should be soil cores.*

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 20 of 26

Comments Received July 31, 2025

Response: Agree.

Multiple soil cores were taken, and the suggested change will be made to the text.

Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.o'quinn@srs.gov

5. **Section V. Summary of Site Risks, Problems Warranting Action, ECODS L-3 Subunit, Page 9 of 46, second bullet point:** The document states "PCBs are present in the surface soil (0 to 0.3 , [0 to 1 ft]) that pose a risk greater than 1.0E-06" *Should the "0 to 0.3" be "0 to 0.3 m"?*

Response: Agree.

The suggested correction to "0 to 0.3 m" will be made to the text.

Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.o'quinn@srs.gov

6. **Section VIII. Evaluation of Alternatives, Comparative Analysis of Alternatives, LRP 131-4L Subunit, Implementability, Page 16 of 46:** The first sentence states "No implementation is required Alternative B-1; therefore, this alternative was ranked the highest." *There is a typo and a word such as "for" is missing in the first part of the sentence.*

Response: Agree.

The 1st sentence in Section VIII. Evaluation of Alternatives, Comparative Analysis of Alternatives, LRP 131-4L Subunit, Implementability will be revised as, "No implementation is required of Alternative B-1..."

Responsible Party: Sadika O'Quinn, (803) 952-6697, sadika.o'quinn@srs.gov

7. **The residential screening level for lead is 100 mg/kg not 400 mg/kg.**

For lead in soil, the CERCLA value of 400 mg/kg was set by the USEPA Office of Solid Waste Emergency Response and adopted as a TBC for the screening process. At the ECODS L-3 subunit, one (1) of the 61 REG (81 total soil samples) from all soil depth intervals within the subunit boundary was above this concentration. The maximum detected concentration of lead is 1,300 mg/kg from location EL3-06 (0 to 0.3 m [0 to 1 ft]) interval. The ARAR TBC screening threshold corresponds to the residential RSL of 400 mg/kg. The 95% UCL in surface soil is 214 mg/kg and the residential HQ is 0.54 (RSL 400 mg/kg). The all-depths soils mean concentration is 49.5 mg/kg. The isolated lead hotspot is not deemed significant enough to warrant a remedial response, and lead is not identified as an ARAR RCOC.

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 21 of 26

Comments Received July 31, 2025

Response: Clarification.

USEPA recommended a residential soil lead regional screening level (RSL) of 200 ppm in February 2024 and published the updated lead RSL in the USEPA RSL Generic Tables in May 2024. The updated RSLs also decreased the lead RSL to 100 ppm if there are other lead sources present in the area or community, especially where children are at greater risk.

The screening value of 400 mg/kg for lead that was used in the BRA for the ECODS L-3, LRP 131-1L, and LRP 131-4L OU was the latest value at the time of document preparation based on the USEPA RSL Generic Tables November 2023 update that were accessed in December 2023. The combined RFI/RI/BRA/CMS/FS Revision 0 document was submitted in July 2024, and USEPA submitted comments on the Revision 0 document in October 2024, including a comment on the updated lead RSL value of 200 mg/kg. SRS reevaluated the HHRA for the ECODS L-3 subunit with the updated lead RSL of 200 mg/kg and responded that there were no substantive changes with the updated lead threshold of 200 mg/kg that would impact the conclusions of the HHRA. USEPA agreed with the response that lead is not a HH RCOC at the ECODS L-3 subunit and provided approval of the RFI/RI/BRA/CMS/FS Revision 1 document. In addition, SRS agrees with the USEPA that the isolated lead hotspot noted in the comment is not deemed significant enough to warrant a remedial response, and lead is not identified as an ARAR RCOC.

No change to the ECODS L-3, LRP 131-1L, and LRP 131-4L OU SB/PP is proposed.

Responsible Party: Adam Willey, (803) 646-4944, adam.willey@srs.gov

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 22 of 26

Comments Received July 31, 2025

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SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 23 of 26

Comments Received July 31, 2025

<i>Asbestos Waste In Place</i>			
Standards for inactive asbestos waste disposal sites	<p>Must comply with one of the following:</p> <ul style="list-style-type: none"> • Either discharge no visible emissions to the outside air from an inactive disposal site subject to this paragraph; or • Cover the asbestos-containing waste material with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area to prevent exposure of the asbestos-containing waste material; or • Cover the asbestos-containing waste material with at least 60 centimeters (2 feet) of compacted nonasbestos-containing material, and maintain it to prevent exposure of the asbestos-containing waste 	Closure of an area that received asbestos- containing waste materials – relevant and appropriate	40 CFR § 61.151(a) (1)-(3)
Deed notice for asbestos waste disposal site	<p>Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that:</p> <ul style="list-style-type: none"> • The land has been used for disposal of asbestos-containing waste material; and • The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site ; and 	Closure of an inactive disposal area that received asbestos containing waste materials – relevant and appropriate	40 CFR § 61.151(e) (1)-(3)

Response: Agree.

SRS agrees that the two additional ARARs are appropriate for waste units at SRS where asbestos is left in place. Table 2 will be revised as shown in attached Table CR-1 to show the ARARs for the preferred remedy only, including the two additional ARARs recommended by USEPA.

Responsible Party: Caleb Jones, (803) 952-2906, caleb.jones@srs.gov

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 24 of 26

Comments Received July 31, 2025

Table CR-1. Revised Table 2 *Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits*

CHEMICAL-SPECIFIC ARARs/TBC			
Chemical	Requirements	Prerequisite	Citation(s)
<i>Asbestos Waste in Place</i>			
Standards for inactive asbestos waste disposal sites	<p>Must comply with one of the following:</p> <ul style="list-style-type: none"> • Either discharge no visible emissions to the outside air from an inactive disposal site subject to this paragraph; or • Cover the asbestos-containing waste material with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area to prevent exposure of the asbestos-containing waste material; or <p>Cover the asbestos-containing waste material with at least 60 centimeters (2 feet) of compacted nonasbestos-containing material, and maintain it to prevent exposure of the asbestos-containing waste</p>	Closure of an area that received asbestos-containing waste materials – relevant and appropriate	40 CFR § 61.151(a) (1)-(3)
Warning signs for disposal site	Display warning signs at all entrances and at intervals of 100m (328 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited.	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – relevant and appropriate	40 CFR § 61.151(b)(1)
	<p>The warning signs must:</p> <ul style="list-style-type: none"> (i) Be posted in such a manner and location that a person can easily read the legend; and (ii) Conform to the requirements for (20"x14") upright format signs specified in 29 CFR 1910.145(d)(4) and this paragraph; and (iii) Display the legend as prescribed in § 61.151(b)(1)(iii) located in the lower panel with letter sizes and styles of visibility at least equal to those specified in § 61.151(b)(1)(iii). 	Closure of an area that received asbestos-containing waste materials that does not include a natural barrier to adequately deter access by the general public – relevant and appropriate	40 CFR § 61.151(b)(1)(i)-(iii)

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 25 of 26

Comments Received July 31, 2025

Table CR-1. Revised Table 2 Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits (continued)

Chemical	Requirements	Prerequisite	Citation(s)
Fence for disposal site	Fence the perimeter of the site in a manner adequate to deter access by the general public. NOTE: Access control at SRS boundary meets this requirement to deter the general public		40 CFR § 61.151(b)(2)
Deed notice for asbestos waste disposal site	Record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that: <ul style="list-style-type: none"> The land has been used for disposal of asbestos-containing waste material; and The survey plat and record of the location and quantity of asbestos containing waste disposed of within the disposal site required in § 61.154(f) have been filed with the Administrator; and The site is subject to 40 CFR part 61, Subpart M. NOTE: Recordation of deed notice that informs potential purchaser on the waste disposal site is considered a substantive requirement for post-closure. NOTE: SRS complies with the Land Use Control Assurance Plan (WSRC 1999) to ensure these land use restrictions are maintained, including deed restrictions.	Closure of an inactive disposal area that received asbestos containing waste materials – relevant and appropriate	40 CFR § 61.151(e)(1)-(3)
Bulk PCB Waste in Place			
Bulk PCB remediation waste (self-implementing)	Unit meets the low occupancy thresholds and the residual PCB concentrations in the soil will be less than 25 mg/kg. May remain onsite without further conditions (e.g., no fencing or cap requirements).	Bulk PCB remediation waste remaining in a <i>low occupancy area</i> (as defined in 40 C.F.R. § 761.3) at concentrations ≤ 25 mg/kg. – relevant and appropriate	40 C.F.R. § 761.61(a)(4)(i)(B)(1)

SRS Responses to USEPA Comments on the Statement of Basis/Proposed Plan 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) (SRNS-RP-2025-00724, Revision 0, June 2025), Statement of Basis/Proposed Plan Fact Sheet (SRNS-RP-2025-00790, June 2025), Scoping Summary (SRNS-RP-2021-05232, April 2025, Final), and the Draft Public Notice Information, SEMS Number: 91 Savannah River Site, Aiken, South Carolina

Page 26 of 26

Comments Received July 31, 2025

Table CR-1. Revised Table 2 Potential ARARs for the Preferred Remedial Alternative for the ECODS L-3 and LRP 131-4L Subunits (continued/end)

Chemical	Requirements	Prerequisite	Citation(s)
Deed restrictions for caps, fences and low occupancy areas	Deed Restrictions	Use of procedures and requirements for a low occupancy area— relevant and appropriate	40 C.F.R. § 761.61(a)(8)
	<p>Within 60 days of completion of cleanup activity shall record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, which will in perpetuity notify any potential purchaser of the property:</p> <p>NOTE: Any deed restriction ARARs will be met though the implementation of the final Land Use Control Implementation Plan at the time of future property transfers.</p>		40 C.F.R. § 761.61(a)(8)(i)(A)
	That land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in 40 C.F.R. § 761.3.		40 C.F.R. § 761.61(a)(8)(i)(A)(1)
	The applicable cleanup levels left at the site, inside the fence, and/or under the cap.		40 C.F.R. § 761.61(a)(8)(i)(A)(3)
LOCATION-SPECIFIC ARARs/TBC			
Location	Requirements	Prerequisite	Citation
NONE IDENTIFIED			
ACTION-SPECIFIC ARARs/TBC			
Action	Requirements	Prerequisite	Citation
NONE IDENTIFIED			