



ENVIRONMENTAL COMPLIANCE &

December 20, 2021

JAN - 3 2022

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Infrastructure and Area Completion Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

Re: Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2022
(Print Date: 11/01/2021) dated November 15, 2021 and received November 16, 2021.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced Appendix E to the Savannah River Site (SRS) Federal Facility Agreement (FFA).

The positive work completed under the SRS FFA has made this one of the most successful agreements within the Department of Energy complex. While we are aware that ongoing missions will delay completion of cleanup to 2065, the Department continues to expect every effort will be made to maintain progress at the site in a timely manner that is protective of human health and the environment. The Department requests an evaluation be completed in the upcoming year to identify any projects that can be incorporated into the E.1 and E.2 timeframes. Further, the Department encourages the Savannah River Operations Office to seek appropriate funding levels to fully implement Appendix E and accelerate the schedule where possible.

In addition to the concerns noted in this cover letter, the Department requests the attached comments be addressed in the Revision 1 of FY2021 Appendix E document.

If you have any questions, please contact me at (803) 898-4331.

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan B. Fulmer", is written over a light blue horizontal line.

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, and Revitalization
Bureau of Land and Waste Management

Mr. Hennessey
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cc: C. L. Bergren, SRNS-ACP (Signed Original)
Jon Richards, EPA Region IV
Myra Reece, Environmental Affairs
Henry Porter, SCDHEC-BLWM
G. Ken Taylor, SCDHEC-BLWM
Travis Fuss, Aiken Environmental Affairs Office
Heather Cathcart, SCDHEC-BLWM

South Carolina Department of Health & Environmental Control Comment on:
Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2022
(Print Date: 11/01/2021) dated November 15, 2021 and received November 16, 2021.

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General Comments

1. The schedule outlined in Appendix E contains a completion date of 2065 due to continuing missions at the Savannah River Site (SRS); however, the latter years of the schedule continue to contain a significant volume of work to be completed to meet this commitment. The Department is concerned that extending the Area Completion activities out jeopardizes the goals established in the Comprehensive Cleanup Plan and Letter of Support, as well as the overall accelerated cleanup vision for the SRS. The extremely heavy ramping up of work scheduled for the end of the SRS lifecycle may not be achievable from a budget or personnel perspective.

Specific Comment

1. With the regulatory approval to extend the submittal of the Early Action Remedial Investigation Work Plan for F-Area Operable Unit, the Department looks forward to discussing potential alternatives that could be performed in the near-term in place of this milestone and the placement of these alternatives on Appendix D for FY2022 and Appendix E.1 for FY2023, as appropriate.