

**Joseph Burch**

**From:** Joseph Burch  
**Sent:** Tuesday, October 22, 2019 10:40 AM  
**To:** Cathcahe (dhec.sc.gov)  
**Cc:** Fulmer, Susan; Jon Richards; pope.robert (epa.gov); Diedre Lloyd; HENNESSEY, BRIAN; ADAMS, KAREN; Shelia Mcfalls; James Kupar; Kelsey Holcomb  
**Subject:** FW: SCDHEC Comments on the Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U), SEMS Number: 63 (SRNS-RP-2018-01091, Revision 1 Redline, July 2019) received September 19, 2019.  
**Attachments:** daou(488-1D&489-D)-rar\_rr1.pdf; DAOU RAR Page 11 Section 2.3.pdf

Heather,

On October 17, 2019, the South Carolina Department of Health and Environmental Control (SCDHEC) provided one Specific Comment on Section 2.3 of the Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U) (SEMS Number: 63 (SRNS-RP-2018-01091, Revision 1 Redline, July 2019). After the Savannah River Site (SRS) received the comment, SRS personnel realized that page 11 (see attached) was inadvertently omitted from the hard copy enclosures to the U.S. Department of Energy (DOE) submittal letter (IACD-19-181, dated September 19, 2019). Page 11 was correctly included in the electronic version of the document that was submitted with the page changes.

Please review the attached pdf along with the previously submitted electronic copy and provide SCDHEC's response that this information addresses your comment. This e-mail will be included in the Administrative Record File for completeness.

Joseph Burch  
 Environmental Compliance Authority – Area Completion Projects  
 Building 730-4B, RM 3118, Phone: (803) 952-6660

**From:** Cathcart, Heather E. <[cathcahe@dhec.sc.gov](mailto:cathcahe@dhec.sc.gov)>  
**Sent:** Thursday, October 17, 2019 10:29 AM  
**To:** FFA <[ffa@srs.gov](mailto:ffa@srs.gov)>; richards.jon@epa.gov; Lloyd, Diedre <[Lloyd.Diedre@epa.gov](mailto:Lloyd.Diedre@epa.gov)>  
**Cc:** Fulmer, Susan <[fulmersb@dhec.sc.gov](mailto:fulmersb@dhec.sc.gov)>; Jumper, Benjamin A. <[JUMPERBA@dhec.sc.gov](mailto:JUMPERBA@dhec.sc.gov)>; Taylorwf (dhec.sc.gov) <[Taylorwf@dhec.sc.gov](mailto:Taylorwf@dhec.sc.gov)>; Snyder, Sandra <[snydersl@dhec.sc.gov](mailto:snydersl@dhec.sc.gov)>; Schwinn, Jacob L. <[SchwinJL@dhec.sc.gov](mailto:SchwinJL@dhec.sc.gov)>; Rippy, Crystal <[RIPPYCD@dhec.sc.gov](mailto:RIPPYCD@dhec.sc.gov)>; Koon, Justin <[koonjt@dhec.sc.gov](mailto:koonjt@dhec.sc.gov)>  
**Subject:** [EXTERNAL] SCDHEC Comments on the Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U), SEMS Number: 63 (SRNS-RP-2018-01091, Revision 1 Redline, July 2019) received September 19, 2019.

All,

Attached is copy of the Department's comments. The signed original was sent via mail.

If you should have any questions or require comment clarification, please contact the SCDHEC project lead, Ben Jumper, at 803-898-0905.

Thank you.

**Heather H. Cathcart**

Federal Remediation Coordinator  
Federal Remediation Section, Division of Site Assessment, Remediation & Revitalization

**S.C. Dept. of Health & Environmental Control**

Office: (803) 898-0916

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October 17, 2019

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

Re: Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U), SEMS Number: 63 (SRNS-RP-2018-01091, Revision 1 Redline, July 2019) received September 19, 2019.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/DHEC comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

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

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

**South Carolina Department of Health and Environmental Control Comments on:**  
Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U),  
SEMS Number: 63 (SRNS-RP-2018-01091, Revision 1 Redline, July 2019)  
received September 19, 2019.

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Specific Comments

1. SCDHEC Specific Comment #3 and Section 2.3, Removal Action Activities, page 10. The Revision 1 Redline page changes have incorporated the inlet basins in applicable areas as requested, with the exception of the response to our Specific Comment #3. The submitted pages for Section 2.3 do not include the addition of the inlet basins along with 488-1D Ash Basin in the Major Construction Segments discussion as agreed. In fact, only the Area East of 488-4D and 489-D CPRB segments are included. Please correct.

**488-1D Ash Basin (Including Inlet Basins)**

- Clearing and grubbing
- Dewatering
- Processing/Initial Drying of Ash/Contaminated Soil in the West End of the 488-1D Ash Basin and Inlet Basins
- Loading and Hauling of Material to the East End of 488-1D
- Confirmation Sampling
- Placement and Compaction of Ash on the East end of 488-1D Covered Portion
- Construction of New Western Berm (NWB)
- Backfilling of Western Portion of the Basin
- Permanent Stormwater System Installation
- Geosynthetic Cover Installation
- Soil Cover
- Site Restoration

**2.4 Construction Activities Common to all Segments of the Project**

**2.4.1 Mobilization**

Prior to mobilization, the contractor project team participated in pre-construction meetings with SRNS. The team provided a detailed schedule and discussed each task. Meeting topics included operational requirements, review of safety requirements and site pre-construction requirements necessary to start work.

Project personnel began mobilization upon approval of required pre-construction submittals. The contractor management team performed submittal preparation and managed equipment mobilization during this time frame. The mobilization of craft personnel began once the Notice to Proceed was received. Two construction field office trailers were located at the site and included office spaces, a conference room, and a crew/lunch room. The temporary office trailer and parking area was set up on an existing concrete pad in one of the laydown/storage areas designated for the project. Several additional laydown/storage areas were established to allow for equipment maintenance, material storage, etc.

Upon arrival, all equipment delivered to the site is inspected for cleanliness, operability, and compliance with the Occupational Safety and Health Administration (OSHA) standards. Delivery and service vehicles, tools, and equipment entering the site, were subject to the same inspection