



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

DEC 17 2019

Ms. Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

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

Dear Ms. Fulmer and Mr. Richards:

SUBJECT: Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U) (SRNS-RP-2017-00723, Revision 1 Redline, December 2019), Revised Public Notice Information, and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document, SEMS Number: 63

In accordance with the terms of the Federal Facility Agreement, the U. S. Department of Energy (DOE) is submitting the subject information for your review. The South Carolina Department of Health and Environmental Control (SCDHEC) and U. S. Environmental Protection Agency (EPA) provided comments on the Revision 0 Early Action Statement of Basis/Proposed Plan on April 4, 2018 and August 13, 2018, respectively. The draft comment responses were submitted electronically to the SCDHEC and EPA on September 9, 2019 and have been incorporated into the document. Please review the enclosures and provide your approval within thirty (30) days of receipt. The effort and time that the SCDHEC and the EPA have provided on this operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Hennessey".

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

DEC 17 2019

Ms. Susan Fulmer
Mr. Jon Richards

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Enclosures:

1. Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U) (SRNS-RP-2017-00723, Revision 1 Redline, December 2019) SEMS Number: 63
2. Early Action Statement of Basis/Proposed Plan Fact Sheet for the D-Area Operable Unit (ERD-EN-2018-0001, December 2019)
3. Revised Public Notice Information: Environmental Bulletin, Radio Ad, Appendix VIII-A Solid Waste Management Unit Remedy Selection
4. SRS Responses to South Carolina Department of Health & Environmental Control Comments on the Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U) (SRNS-RP-2017-00723, Revision 0, February 2018) SEMS Number: 63
5. SRS Responses to United States Environmental Protection Agency Comments on the Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U) (SRNS-RP-2017-00723, Revision 0, February 2018) SEMS Number: 63

cc w/o encl:

D. Scaturo, SCDHEC-Columbia
S. French, SCDHEC-Columbia
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R. H. Pope, EPA-Atlanta

cc w/encl:

D. Lloyd, EPA-Atlanta
M. McRae, TechLaw, Inc.

**SRS Responses to
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Comments on:

Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U)
CERCLIS Number: 63 (SRNS-RP-2017-00723, Revision 0, February 2018)

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EPA COMMENTS:

1. The Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U), CERCLIS Number 63, indicates the preferred remedial alternative for 489-D Coal Pile Runoff Basin (CPRB) (Southern 75%) subunit is “No Action”. The EASB/PP further indicates since there is no human health, ecological or contaminant migration constituents of concern (COCs) following the removal action and in its current state, this subunit supports unrestricted (residential) land use. The EASB/PP must clearly state the no action determination for the southern 75% portion of the 489-D CPRB does not include groundwater. The groundwater beneath the aforementioned unit is contaminated and must be addressed in the DAOU groundwater and that the existing LUCS will remain in place throughout the D Area.

Response: Clarification. Please refer to Section III. Operable Unit Background, second paragraph. A brief description of the groundwater in D Area is discussed in the Operable Unit Background section. The text states that groundwater is not part of the DAOU and is currently being addressed separately as part of the D-Area Groundwater (DAG) OU. No change to the document is proposed.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

2. The EA SB/PP states the preferred Alternative 2 (Land Use Controls) will be implemented for the 488-1D, 488-2D, and 488-4D subunits of the DAOU to limit access (e.g., land use and disturbance activities) in the area. Further, the text states that Engineering Controls (ECs) (i.e., warning signs) and Institutional Controls (ICs) (i.e., excavation permit restrictions and deed restrictions) will be used to restrict access to, or activities that can be performed at the impacted areas. However, the text does not specifically state groundwater use is limited to restrict exposure to contaminated groundwater. Revise the EASB/PP to address this issue to ensure the preferred remedy Alternative 2 will be protective of human health and the environment for the 488-1D, 488-2D, and 488-4D Subunits.

Response: Clarification. Please see response to Comment #1. Section VII. Summary of Remedial Alternatives, will be revised as follows:

“Alternative 2. Land Use Controls

...Groundwater monitoring will be performed to evaluate the long-term effectiveness of the cover systems and the results will be documented in the *Groundwater Monitoring Report for the D-Area Groundwater Operable Unit* (which is a full report issued in the even years), and the *D-Area Groundwater Operable Unit Letter Report* (which is an abbreviated

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report issued in the odd years). The groundwater sampling and monitoring requirements (including final remedial decisions) will be addressed by the DAG OU; therefore, costs associated with groundwater monitoring and reporting are not included in this estimate. Restrictions on groundwater use to prevent or limit exposure are not included in this remedy. Any remedial groundwater actions, including land use restrictions, will be selected in the remedial assessment for DAG OU. LUCs meet...

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

3. In Figure 3. Layout of the DAOU on Page 31 of 44 the location of the Bubble Tower Subunit and the Moderator Processing Subunit appear to be incorrect. For example, the Bubble Tower Subunit is located south of the Asbestos Pit and not to the east of the DAOU as depicted in the figure. Additionally, the Moderator Processing Subunit is located over 500-feet to the south of the currently shown location. Revise Figure 3 to address correct these apparent discrepancies.

Response: Disagree. The locations of the DAOU subunits are correctly depicted in Figure 3. No change to the document is proposed.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

4. A Focused Feasibility Study (FFS) must be prepared and referenced in the EA Proposed Plan, and subsequent EA ROD, in order to comply with the National Contingency Plan (NCP) requirements contained in 40 C.F.R. § 300.430(e).

Response: Agree. Per the Core Team agreements made in the May 21, 2018, teleconference call, a *Focused Corrective Measure Study/Feasibility Study Letter* was prepared and submitted on April 17, 2019. SCDHEC provided approval on May 29, 2019; EPA had comments on the Revision 0 document. Therefore, a *Revision 1 Focused Corrective Measure Study/Feasibility Study Letter* was submitted on August 28, 2019. SCDHEC provided approval on September 27, 2019; EPA had comments on the Revision 1 document. A *Corrected Revision 1 Focused Corrective Measure Study/Feasibility Study Letter* was submitted on October 10, 2019. EPA provided approval on October 15, 2019 and SCDHEC provided approval on October 24, 2019. Section III. Operable Unit Background, will be revised to include a paragraph that acknowledges/references the FFS letter as follows:

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“...Phase 1 included the 488-2D Ash Basin and the 488-4D Ash Landfill; Phase 2 included the 488-1D Ash Basin and the 489-D CPRB (Southern 75%) (Figure 4).

A Corrected Revision 1 Focused Corrective Measures Study/Feasibility Study Letter in Support of the D-Area Operable Unit was submitted in October 2019 (USDOE 2019). The letter provides information regarding the evaluation of remedial alternatives for the subunits of the DAOU that are within the scope of this EASB/PP. The alternative evaluation supports the USDOE, USEPA and SCDHEC agreement on the preferred remedy for the 488-1D Ash Basin, 488-2D Ash Basin, 488-4D Ash Landfill, and 489-D CPRB (Southern 75%).”

In addition, Section XI. References, will be revised as follows:

“USDOE, 2019. Corrected Revision 1 Focused Corrective Measures Study/Feasibility Study Letter in Support of the D-Area Operable Unit, SEMS Number: 63, IACD-20-102, 10/10//19, United States Department of Energy, Savannah River Operations Office, Aiken, SC”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

5. Final Removal Action Reports for each of the subunits should be provided to the EPA for review prior to finalizing the Focused FS, EA Proposed Plan, and EA ROD. As previously discussed data summary reports must be provided prior to Focused FS and PP.

Response: Agree. The *Removal Action Report for the 488-2D Ash Basin and the 488-4D Ash Landfill (U)*, Rev.1, was approved in October 2017. The *Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U)*, Rev. 0, was submitted in March 2019. Comments received by the regulatory agencies on the Rev. 0 document have been resolved, and the Rev. 1 document was approved by both regulatory agencies in October 2019.

Section XI. References, will be updated as follows:

“SRNS, 2019b. Removal Action Report for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin (U), SRNS-RP-2018-01091, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken, SC”

Revisions to the text are provided in the response to comment #6.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

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6. Page 6., last paragraph. The document currently states that the Removal Action (RA) Report for 488-1D Ash Basin and 489-D Coal Pile Runoff Basin is scheduled to be submitted in September 2019 and will document construction activities and as-built conditions. The RA Report should be provided to EPA for review prior to SRS submitting a Rev.1 EA Proposed Plan to EPA for review and comment. The RA Report should also contain a summary of confirmation sampling results and discussion of any remaining residual risks following completion of the removal action (to be referenced in the Focused FS and considered in developing RAOs and alternatives). Data summary reports must be provided prior to Focused FS finalized PP.

Response: Agree. Please see response to comment #5. The data summary reports (i.e., summary of the confirmation sampling results, data usability reports, and the clean fill evaluations) are provided in the RAR documents. Section III. Operable Unit Background, will be updated as follows:

“488-1D Ash Basin (including Inlet Basins)

“...Completion of the removal action addresses the problems warranting action to human and ecological receptors in surface ash as well as the potential for migration of contaminants to groundwater identified prior to any construction activities. ~~A~~The Removal Action Report (RAR) for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin currently scheduled to be submitted in September 2019, will documents the construction activities and as-built condition of the 488-1D Ash Basin (including Inlet Basins) (SRNS 2019b).”

“489-D CPRB (Southern 75%)

“...(A retention structure is a permanent structure whose primary purpose is to permanently store a given volume of storm water runoff; release of the given volume is by infiltration and/or evaporation). ~~A~~The Removal Action Report (RAR) for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin, currently scheduled to be submitted in September 2019, will documents the construction activities and as-built condition of the Southern 75% of the 489-D CPRB (SRNS 2019b).”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

7. Page 8, first paragraph. Please explain why 488-2D ash basin soil sampling results were “indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use.” Risks presented by residual contaminants should be discussed in the Focused Feasibility
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Study. The document should clearly state that the remaining risks did not allow for UU/UE and therefore LUCS will be required.

Response: Clarification. Text in Section III. Operable Unit Background, will be revised to clarify the term “indeterminate” and be consistent with the approved FFS letter (comment #4) as follows:

“488-2D Ash Basin

“...~~However,~~ The confirmation sampling results located in the Human Health and Ecological Evaluation for Confirmation Sampling at the 488-2D Ash Basin (SRNS 2016c) report concluded that the basin soil results were indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use and because the residential threshold level for hexavalent chromium (0.29 mg/kg) is at (or very near) the method detection limit and there is a potential for analytical interferences resulting in false positives at these trace levels. Consequently, statistical hypothesis testing results and residual risks varied, depending on the analytical method used. Therefore, the report recommended that LUCs to prevent unrestricted land use would need to be implemented.”

In addition , text in Section V. Summary of Site Risks, will be revised as follows:

“488-2D Ash Basin: Summary of Human Health Risk Assessment

“...Confirmation sample results were evaluated to demonstrated that the ash has been successfully removed as reported in ~~the~~ Human Health and Ecological Evaluation for Confirmation Sampling at the 488-2D Ash Basin (SRNS 2016c). The confirmation report identified uncertainties regarding the evaluation of hexavalent chromium in basin soil concentrations. The results were indeterminate with regards to meeting acceptance criteria for unrestricted (residential) land use and because the residential threshold level for hexavalent chromium (0.29 mg/kg) is at (or very near) the method detection limit and there is a potential for analytical interferences resulting in false positives at these trace levels. Consequently, statistical hypothesis testing results and residual risks varied, depending on the analytical method used. The concentration of hexavalent chromium (maximum = 3.78 mg/kg) does not exceed the threshold level for an industrial use scenario (6.3 mg/kg). Therefore, the report recommended that LUCs to prevent unrestricted land use would need to be implemented. Coal-related contaminants may remain in basin soils that pose a risk to human receptors (hypothetical future resident risk >1E-06).”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

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8. Page 10, fifth paragraph. The document currently states that the Removal Action Report for 488-1D Ash Basin and 489-D Coal Pile Runoff Basin is scheduled to be submitted in September 2019 and will document construction activities and as-built conditions in the Southern 75% of the 489-D CPRB. The RA Report should be provided to EPA for review prior to SRS submitting a Rev.1 EA Proposed Plan to EPA for review and comment. The RA Report should also contain a summary of confirmation sampling results and discussion of any remaining residual risks following completion of the removal action (to be referenced in the Focused FS and considered in developing RAOs and alternatives). Data summary reports must be provided prior to Focused FS finalized PP.

Response: Agree. The RAR for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin and the Focused Corrective Measure Study/Feasibility Study Letter have been submitted as described in responses to comments #4, #5 and #6.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

9. Page 12, second paragraph. Please explain why the confirmation sampling results were “uncertain” for soils from the western end of the 488-1D Ash Basin and Inlet Basin and were “indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use.” Risks presented by residual contaminants should be discussed in the Focused Feasibility Study. Data summary reports must be provided prior to Focused FS finalized PP.

Response: Agree. The RAR for the 488-1D Ash Basin and 489-D Coal Pile Runoff Basin and the Focused Corrective Measure Study/Feasibility Study Letter have been submitted as described in responses to comments #4, #5, #6 and #8.

Text in Section III. Operable Unit Background, summarizing the results of the confirmation sampling for the 488-1D Ash Basin and Inlet Basins will be updated as follows:

“488-1D Ash Basin (including Inlet Basins)

...The *Field Sampling Plan for the 488-1D Inlet Basins* (SRNS 2014a) identified a total of eight sample locations (four per Inlet Basin) for confirmation sampling. The confirmation sampling results located in the *Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins* (SRNS 2019a) report concluded that the residual concentrations of all analytes met the pre-established cleanup levels for unrestricted land use at the Inlet Basins. The *Field Sampling Plan for the 488-1D Ash Basin* (SRNS 2015a) identified a total of 19 confirmation sampling locations in

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the western end (16 within the basin and 3 basin berm) of the 488-1D Ash Basin. Also, two confirmation samples on the east side of the 488-4D Ash Landfill were collected and are included in the 488-1D Ash Basin confirmation sample dataset. Therefore, a total of 21 samples were evaluated to demonstrate that the ash has been successfully removed from the areas of excavation. The confirmation sampling results located in the *Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins* (SRNS 2019a) report concluded that the residual concentrations of all analytes, except hexavalent chromium, met the pre-established cleanup levels for unrestricted land use. The maximum concentration of hexavalent chromium (1.94 mg/kg) did not exceed the threshold level for an industrial use scenario (6.3 mg/kg). The residential threshold for hexavalent chromium is 0.29 mg/kg. The report recommended that land use controls to prevent unrestricted use (i.e., residential) be implemented at the 488-1D Ash Basin and Area East of the 488-4D Ash Landfill. Toxicity characteristic leaching procedure (TCLP) sample results from the same area confirm that the material is non-hazardous.

In addition, Section V. Summary of Site Risks, will be revised as follows:

“488-1D Ash Basin: Summary of Human Health Risk Assessment

~~...In addition, coal-related constituents may remain in soil in the western end of the basin and the Inlet Basins that would pose a risk to human receptors (hypothetical future resident risk >1E-06). It is uncertain if the confirmation sampling results for soil from the western end of the 488-1D Ash Basin and the Inlet Basins meet the acceptance criteria for unrestricted land use. Final conditions are similar to 488-2D Ash Basin where uncertainties in basin soil concentrations led to the conclusion that the results were indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use and LUCs to prevent unrestricted land use would need to be implemented. The confirmation sampling results located in the *Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins* (SRNS 2019a) report concluded that the residual concentrations of all analytes, except hexavalent chromium, met the pre-established cleanup levels for unrestricted land use. The concentration of hexavalent chromium (maximum = 1.94 mg/kg) did not exceed the threshold level for an industrial use scenario (6.3 mg/kg). The residential threshold for hexavalent chromium is 0.29 mg/kg. The report recommended that land use controls to prevent unrestricted use (i.e., residential) be implemented at the 488-1D Ash Basin and Area East of the 488-4D Ash Landfill. For the Inlet Basins portion of the 488-1D Ash Basin subunit, the residual concentrations of all analytes met the cleanup levels for unrestricted land use.”~~

And,

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“488-1D Ash Basin: Summary of Ecological Risk Assessment

~~... In addition, it is uncertain if the confirmation sampling results for soil from the western end of the 488-1D Ash Basin and the Inlet Basins will meet the acceptance criteria for ecological receptors, but conditions are expected to be similar to 488-2D Ash Basin. No ecological problems warranting action were identified for the 488-2D Ash Basin. The Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins (SRNS 2019a) report concluded that the residual concentrations of the remaining soils in the western portion of the 488-1D Ash Basin and the Inlet Basins did not pose an unacceptable risk to ecological receptors.”~~

Section XI. References, will also be updated as follows:

“SRNS, 2019a. *Human Health and Ecological Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins (U)*, Revision 1, ERD-EN-2018-0007, Savannah River Nuclear Solutions, LLC, Savannah River Site, Aiken SC (May)”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

10. Page 13, first paragraph. Given the “indeterminate” sampling results in 488-1D Ash Basin, the EPA disagrees with the conclusion that “there are no human health, ecological or contaminant migration problems warranting action upon completion of the removal action” as stated at the beginning of this paragraph. The second paragraph reiterates that “constituents may remain in soil in the western end of the basin and the Inlet Basins that would pose a risk to human receptors...” If sampling results were “indeterminate” how can the conclusion be drawn that no migration risks are presented from the basin?

Response: Agree. Text in Section V. Summary of Site Risks will be updated to describe the results of the confirmation sampling for the 488-1D Ash Basin and Inlet Basins as follows:

“488-1D Ash Basin: Conclusion

~~“There are no human health, ecological or contaminant migration problems warranting action upon completion of the removal action. However, eCoal-related contaminants beneath the engineered cover system (eastern end) pose a risk to human receptors (future industrial worker risk >1E-06) and ecological receptors (HQ >1) if direct exposure were to occur. In addition, coal-related contaminants beneath the engineered cover system pose a potential for migration of contaminants to groundwater above protection standards if leaching of the source material were to occur.~~

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Following the removal action, coal-related constituents may remain in soil in the western end of the basin ~~and the Inlet Basins~~ that would pose a risk to human receptors (hypothetical future resident risk >1E-06). ~~It is uncertain if the confirmation sampling results for soil from the western end of the 488-1D Ash Basin and the Inlet Basins meet the acceptance criteria for unrestricted land use, but conditions are expected to be similar to the 488-2D Ash Basin. To manage this uncertainty, LUCs for the entire 488-1D Ash Basin subunit (including the Inlet Basins) will prevent unrestricted land use. The western end of the basin does not pose an unacceptable risk to ecological receptors.~~

There are no human health, ecological or contaminant migration problems warranting action following the non-time critical removal action at the Inlet Basins. The Inlet Basins meet the criteria for unrestricted land use.

Text in Section IX. Preferred Alternative will also be revised as follows:

First paragraph: “Table 6 presents a Comparative Ranking of DAOU Final Action Alternatives. The preferred alternative for the 488-1D Ash Basin, 488-2D Ash Basin and 488-4D Ash Landfill is Alternative 2 – LUCs. No action for the 489-D CPRB (Southern 75%) and the Inlet Basins is required.”

Last paragraph: “No Action is identified as the final remedial action for the 489-D CPRB (Southern 75%) and the Inlet Basins portion of the 488-1D Ash Basin subunit.”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

11. Page 13, fifth paragraph. Please explain why the confirmation sampling results were “uncertain” with regard to evaluation of hexavalent chromium in the 488-2D Ash Basin soils and were “indeterminate with regard to meeting acceptance criteria for unrestricted (residential) land use.” Risks presented by residual contaminants should be discussed in the Focused Feasibility Study. Data summary reports must be provided prior to Focused FS finalized PP.

Response: Agree. Please see response to comment #7 regarding clarification of the term “indeterminate” for the 488-2D Ash Basin. See responses to comments #4, #5, #6 and #8 for submittal of the FFS and RAR documents.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

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12. Page 14, fourth paragraph. 488-2D Ash Basin Conclusion. Same as previous comment #6 regarding soil sampling uncertainty.

Response: Clarification. The proposed revisions to the text in Section III. Operable Unit Background, and Section V. Summary of Site Risks, as outlined in the response to comment #7 (not #6) clarify the use of the term “indeterminate.” The uncertainty described in Section V. Summary of Site Risks, 488-2D Ash Basin: Conclusion, is obtained directly from the final Scoping Summary for the D-Area Operable Unit (Early Action Statement of Basis/Proposed Plan), ERD-EN-2007-0046, December 2017 that documents Core Team agreements. Therefore, no change to the text is proposed.

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

SRS Responses to
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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Early Action Statement of Basis/Proposed Plan Fact Sheet for the D-Area Operable Unit
(ERD-EN-2018-0001, February 2018)

Scoping Summary for the D-Area Operable Unit
(ERD-EN-2007-0046, December 2017)

and the *Draft Public Notice Information*, received February 6, 2018

(Comments received April 4, 2018)

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SPECIFIC COMMENTS

Early Action Statement of Basis/Proposed Plan

1. Section I, Introduction and Background, page 1 of 44. This section discusses a time critical removal action for the 488-2D Ash Basin, non-time critical removal actions for the other units, and references the Removal Site Evaluation Reports for the units. Please consider adding a very brief explanation for the type of removal action selected for each unit.

Response: Agree. Text will be added to Section I. Introduction and Background, as follows:

“...These documents include a Removal Site Evaluation Report (RSER) for the time-critical removal action at the 488-2D Ash Basin and a RSER/Engineering Evaluation/Cost Analysis (RSER/EE/CA) for each of the non-time critical removal actions at the 488-1D Ash Basin, 488-4D Ash Landfill and the 489-D CPRB (Southern 75%). The removal actions selected include ash removal and installation of a geosynthetic cover system at the 488-1D Ash Basin (non-time critical); ash removal at the 488-2D Ash Basin (time critical); installation of a geosynthetic cover system at the 488-4D Ash Landfill (non-time critical); and excavation and disposal of coal residue at the 489-D CPRB (Southern 75%) (non-time critical). The selected removal actions for each subunit were made available for public notice and comment, and Action Memoranda (AM) were issued after the comment periods ended.”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

2. Section V, Summary of Site Risks, 488-2D Ash Basin: Summary of Ecological Risk Assessment, page 13 of 44. The first paragraph refers to the removal action as non-time critical and should be corrected to time critical removal action. This correction should also be applied on page 14 of 44 under Summary of Contaminant Fate and Transport.

Response: Agree. Text in Section V. Summary of Site Risks, will be revised as follows:

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SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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(ERD-EN-2007-0046, December 2017)

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“488-2D Ash Basin:

Summary of Ecological Risk Assessment

Prior to implementation of the ~~non~~-time critical removal action, arsenic was identified as a historical COC in SRS surface ash that may pose a risk to ecological receptors (HQ >1).”

and

“488-2D Ash Basin:

Summary of Contaminant Fate and Transport Analysis

There were no contaminant migration problems warranting action identified prior to the ~~non~~-time critical removal action.”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

3. Section V, Summary of Site Risks, 488-4D Ash Basin: Summary of Contaminant Fate and Transport Analysis, page 15 of 44. Please correct of the heading of this subsection to “488-4D Ash Landfill”.

Response: Agree. Text in Section V, Summary of Site Risks, will be revised as follows:

“488-4D Ash ~~Basin~~ Landfill:

Summary of Contaminant Fate and Transport Analysis”

Responsible Party: Doug Martinson, (803) 952-6043, douglas.martinson@srs.gov

**SRS Responses to
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL**

Comments on:

Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U)
CERCLIS Number: 63 (SRNS-RP-2017-00723, Revision 0, February 2018)

Early Action Statement of Basis/Proposed Plan Fact Sheet for the D-Area Operable Unit
(ERD-EN-2018-0001, February 2018)

Scoping Summary for the D-Area Operable Unit
(ERD-EN-2007-0046, December 2017)

and the Draft Public Notice Information, received February 6, 2018
(Comments received April 4, 2018)

Page 3 of 4

Draft Appendix VIII-A, Solid Waste Management Unit Remedy Selection

1. Since there is an existing remedy selection from the first Record of Decision, the current remedy will be combined with it. Please see the language below to be inserted in the existing table.

The D-Area Operable Unit shall be maintained under Land Use Controls by the Permittee as documented in the approved Statement of Basis/Proposed Plan (Rev. 1.1, June 2010) and the first Early Action Record of Decision (Rev. 1.2, July 2011) for the D-Area Operable Unit.

No action for the 489-D Coal Pile Runoff Basin (Southern 75%) and Land Use Controls 488-1D Ash Basin, 488-2D Ash Basin and 488-4D Ash Landfill shall be maintained by the Permittee as documented in the approved Early Action Statement of Basis/Proposed Plan (Rev. 1, December 2019) and the effective Second Early Action Record of Decision (insert revision number and date).

Response: Agree. The table will be restructured in the Draft Appendix VIII-A, Solid Waste Management Unit Remedy Selection as shown below:

Solid Waste Management Unit	Remedy Selection
D-Area Operable Unit	The D-Area Operable Unit shall be maintained under a combination of No Action and Land Use Controls by the Permittee as documented in the approved: <ul style="list-style-type: none">• Statement of Basis/Proposed Plan (Rev. 1.1, June 2010)• Early Action Record of Decision (Rev. 1.2, July 2011) for the D-Area Operable Unit• Early Action Statement of Basis/Proposed Plan (Revision 1, December 2019) (for 489-D Coal Pile Runoff Basin (Southern 75%), the 488-1D Ash Basin, 488-2D Ash Basin, and the 488-4D Ash Landfill subunits only)• Second Early Action Record of Decision (insert revision number and date) (for 489-D Coal Pile Runoff Basin (Southern 75%), the 488-1D Ash Basin, 488-2D Ash Basin, and the 488-4D Ash Landfill subunits only)

Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov

SRS Responses to
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Comments on:

Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (U)
CERCLIS Number: 63 (SRNS-RP-2017-00723, Revision 0, February 2018)

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Scoping Summary for the D-Area Operable Unit
(ERD-EN-2007-0046, December 2017)

and the *Draft Public Notice Information*, received February 6, 2018

(Comments received April 4, 2018)

Page 4 of 4

Draft Environmental Bulletin

1. Page 2. Please correct the name of the SCDHEC's Aiken office to "SCDHEC, Aiken Environmental Affairs Office".

Response: Agree. The name of the SCDHEC Aiken office in the Draft Environmental Bulletin will be revised as indicated in the comment.

Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov

Draft Radio Ad

1. Please modify the last sentence of the second paragraph to read "...Aiken Environmental Affairs Office, located at..."

Response: Agree. The last sentence of the second paragraph in the Draft Radio Ad will be revised as indicated in the comment.

Responsible Party: Joe Burch, (803) 952-6660, joseph.burch@srs.gov



United States Department of Energy
Early Action Statement of Basis/Proposed Plan
FACT SHEET
for the D-Area Operable Unit

ERD-EN-2018-0001

Savannah River Site, South Carolina

December 2019

INTRODUCTION

This fact sheet summarizes the Early Action Statement of Basis/Proposed Plan (EASB/PP) for portions of the D-Area Operable Unit (DAOU) located at the Savannah River Site (SRS). The United States Department of Energy (USDOE) owns and operates the SRS. Hazardous substances that are regulated under the Federal law requirements of the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act are managed at the SRS as part of a comprehensive cleanup program.

A remedial action is needed at portions of DAOU because coal-related contaminants are present that may pose a threat to human health and the environment. The EASB/PP for the DAOU outlines the range of remedial alternatives evaluated to prevent exposure to the contaminated media (coal and coal ash) and presents the proposed remedy. The document describes how the public can comment on the proposed action through written comments and by participating in public meetings.

DAOU BACKGROUND

D Area is located in the southwest quadrant of the SRS approximately 3,000-feet east of the nearest Site boundary, the Savannah River. The DAOU is approximately 210 acres and consists of three main facility areas: the 484-D Powerhouse, the D-Area Heavy Water Facility (i.e., bubble towers), and the Moderator Processing Facility. The facilities began operation in the early 1950s. The bubble towers were shut down in January 1982, the Moderator Processing Facility remained operational until the late 1990s, and the 484-D Powerhouse (and associated support facilities) was shut down in April 2012.

The EASB/PP pertains to the following four DAOU subunits that were associated with the operation of the 484-D Powerhouse: 488-1D Ash Basin (including two Inlet Basins), 488-2D Ash Basin, 488-4D Ash Landfill, and the 489-D Coal Pile Runoff Basin (CPRB) (Southern 75%). Removal actions for each of these subunits to support an accelerated cleanup strategy for the DAOU have been completed. An aerial photograph of the DAOU EASB/PP subunits is shown in Figure 1.

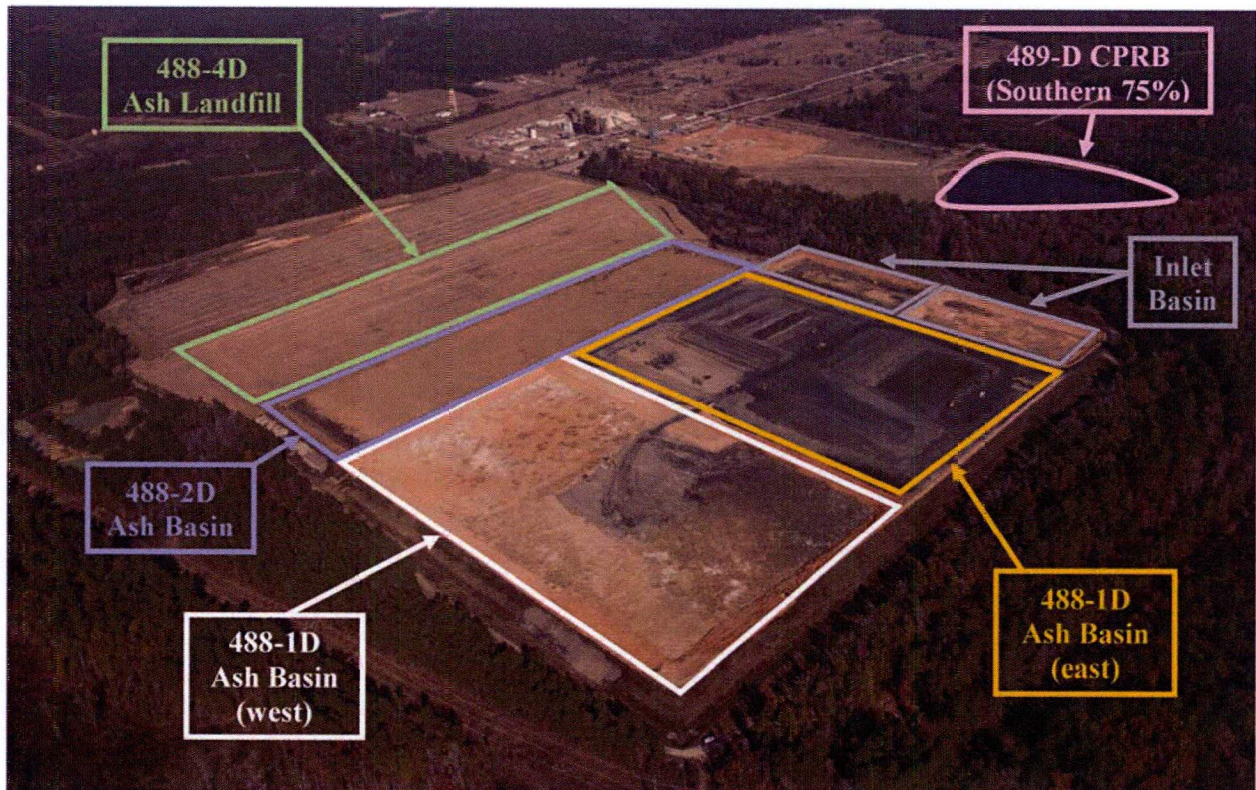


Figure 1. Aerial Photograph of the DAOU EASB/PP Subunits

488-1D Ash Basin

Arsenic and coal-related radionuclides were identified as constituents of concern (COCs) in surface ash that may pose a risk to human receptors (future industrial worker risk $>1E-06$)¹ and arsenic may pose a risk to ecological receptors (hazard quotient [HQ] >1)² at the 488-1D Ash Basin and Inlet Basins. The non-time critical removal action to address the surface ash problem included water and vegetation removal, monitoring well abandonment/replacement, ash excavation/consolidation, installation of a geosynthetic cover system, and confirmation sampling. Following completion of the removal action, coal-related contaminants remain beneath the engineered cover system at the 488-1D Ash Basin that require a final remedial action.

- Coal-related contaminants beneath the engineered cover system (eastern end) pose a risk to human receptors (future industrial worker) and ecological receptors if direct exposure were to occur.

¹ A risk greater than or equal to $1E-06$ indicates a probability of 1 chance in 1,000,000 of an individual developing cancer.

² A hazard quotient (HQ) greater than or equal to 1 indicates that a receptor could experience adverse effects from exposure to the contaminant.

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- Coal-related contaminants beneath the engineered cover system pose a potential for migration of contaminants to groundwater above protection standards if leaching of the source material were to occur.
- Coal-related constituents remain in soil in the western end of the basin that would pose a risk to human receptors (hypothetical future resident).

488-2D Ash Basin

Arsenic and coal-related contaminants were identified as COCs in surface ash that may pose a risk to human receptors (future industrial worker risk $>1E-06$) and arsenic may pose a risk to ecological receptors ($HQ >1$). The time critical removal action to address the surface ash problem included water removal, ash excavation, placement of excavated ash into the 488-4D Ash Landfill, and confirmation sampling. Although there were no contaminant exceedances for the future industrial worker scenario following the removal action, uncertainties regarding the evaluation of the hexavalent chromium (i.e., coal-related contaminant) were inconclusive to support unrestricted land use and require a final remedial action.

- Coal-related contaminants may remain in basin soils that pose a risk to human receptors (hypothetical future resident).

488-4D Ash Landfill

Arsenic and coal-related contaminants were identified as COCs in surface ash that may pose a risk to human receptors (future industrial worker risk $>1E-06$) and arsenic may pose a risk to ecological receptors ($HQ >1$). The non-time critical removal action for the 488-4D Ash Landfill included monitoring well abandonment/replacement and installation of a geosynthetic cover system. Following completion of the removal action, waste consisting primarily of coal and coal-related combustion ash remain beneath the engineered cover system at the 488-4D Ash Landfill that require a final remedial action.

- Waste consisting primarily of coal and coal-combustion ash beneath the engineered cover system poses a risk to human receptors (future industrial worker) and ecological receptors if direct exposure were to occur.
- Waste beneath the engineered cover system poses a potential for migration of contaminants to groundwater above protection standards if leaching of the source material were to occur.

489-D CPRB (Southern 75%)

Arsenic was identified as a COC in basin sediment (coal residue) that may pose a risk to human receptors (future industrial worker risk >1E-06). Arsenic and 2-methylnaphthalene in sediment and aluminum, beryllium, cobalt, copper, iron, manganese and zinc in surface water were present at levels that may pose a risk to ecological receptors (HQs >1). The non-time critical removal action for the 489-D CPRB included water removal, residual coal/contaminated sediment excavation and placement into the 488-1D Ash Basin, and confirmation sampling. No human health, ecological or contaminant migration problems remained following the non-time critical removal action, and the 489-D CPRB (Southern 75%) meets the criteria for unrestricted land use.³

CLEANUP GOALS

The remedial action objectives for the 488-1D Ash Basin, 488-2D Ash Basin and 488-4D Ash Landfill are described below:

488-1D Ash Basin

- Maintain the engineered cover system (eastern end) to eliminate or control all routes of exposure to contaminants beneath the cover that pose a risk to future industrial workers and ecological receptors and/or present a contaminant migration concern.
- Protect hypothetical future residents from exposure to residual contamination in soil in the western end of the basin.

488-2D Ash Basin

- Protect hypothetical future residents from exposure to residual contamination in basin soils.

488-4D Ash Landfill

- Maintain the engineered cover system to eliminate or control all routes of exposure to contaminants beneath the cover that pose a risk to future industrial workers and ecological receptors.

³ 489-D CPRB (Northern 25%) addressed in the *Early Action Record of Decision Remedial Alternative Selection for D-Area Operable Unit*, SRNS-RP-2010-00162, Revision 1.1, June 2011.



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- Maintain the engineered cover system to prevent migration of contaminants to groundwater that could exceed groundwater protection standards.

PROPOSED REMEDY

The preferred remedial alternative for the 488-1D Ash Basin, 488-2D Ash Basin and 488-4D Ash Landfill subunits of the DAOU is Land Use Controls to prevent unrestricted land use. No current or future development of the DAOU is planned and land use is reasonably anticipated to remain industrial. The USDOE will restrict land use through administrative measures and the placement and maintenance of warning signs at these subunits.

No remedial action for the 489-D CPRB (Southern 75%) or the Inlet Basins portion of the 488-1D Ash Basin is needed. In their current state, these subunits pose no risk to human health and the environment and support unrestricted land use.

The United States Environmental Protection Agency and South Carolina Department of Health and Environmental Control concur with the proposed remedies.

FOR MORE INFORMATION

The Administrative Record File, which contains the information pertaining to the selection of the response action, is available at the following locations:

US Department of Energy
Public Reading Room
Gregg-Graniteville Library
University of South Carolina – Aiken
471 University Parkway
Aiken, South Carolina 29803
(803) 641-3504

Thomas Cooper Library
Government Information and Maps
Department
University of South Carolina
1322 Green Street
Columbia, South Carolina 29208
(803) 777-4841

Hard copies of the EASB/PP for the DAOU are available at the following locations:

Reese Library
Government Information Department
Augusta University
2500 Walton Way
Augusta, Georgia 30904
(706) 737-1744

Asa H. Gordon Library
Savannah State University
2200 Tompkins Road
Savannah, Georgia 31404
(912) 358-4324



**United States Department of Energy
Early Action Statement of Basis/Proposed Plan
FACT SHEET
for the D-Area Operable Unit**

ERD-EN-2018-0001

Savannah River Site, South Carolina

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HOW TO SUBMIT COMMENTS

The public comment period for the EASB/PP for the DAOU begins March 10, 2020, and ends April 23, 2020. To request a public meeting during the public comment period, to obtain more information concerning this document, or to submit written comments, contact one of the following:

Janet Griffin
Savannah River Nuclear Solutions, LLC
Public Involvement
Savannah River Site
Building 730-1B
Aiken, South Carolina 29808
(803) 952-8467
janet.griffin@srs.gov

The South Carolina Department of Health and
Environmental Control
Attn: Stacey French, P.E., Director
Division of Waste Management
Bureau of Land and Waste Management
2600 Bull Street
Columbia, South Carolina 29201
(803) 898-2000

DRAFT ENVIRONMENTAL BULLETIN

Early Action Statement of Basis / Proposed Plan for the D-Area Operable Unit Available for Public Comment

The United States Department of Energy (DOE) will release an Early Action Statement of Basis / Proposed Plan (EASB/PP) for the D-Area Operable Unit (DAOU) on **March 10, 2020** describing the preferred remedial approach for portions of this unit at the Savannah River Site (SRS). The South Carolina Department of Health and Environmental Control (SCDHEC) will also release a draft Resource Conservation and Recovery Act (RCRA) permit modification for the proposed remedial action for this unit. These documents will be available for public review and copying at the locations listed below. The forty-five (45) day public comment period is scheduled for **March 10, 2020** to **April 23, 2020**.

The Early Action SB/PP was completed to meet the terms of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), a law governing the investigation and cleanup of waste units. DOE has worked with the United States Environmental Protection Agency-Region 4 (EPA) and the SCDHEC to ensure the remedial approach is consistent with all applicable environmental requirements. DOE, EPA, and SCDHEC have reviewed the risks associated with the DAOU and have evaluated cleanup alternatives presented in this plan.

D Area is located within the southwest quadrant of the SRS. The DAOU was built on approximately 210 acres, with the purpose to supply heavy water for the defense program. To support the operations, the 484-D Powerhouse was constructed to provide power to the Site. The 484-D Powerhouse was shut down in 2012. This EASB/PP addresses four subunits that were associated with the operation of the 484-D Powerhouse: 488-1D Ash Basin, 488-2D Ash Basin, 488-4D Ash Landfill, and the 489-D Coal Pile Runoff Basin (Southern 75%). Removal actions for each of these subunits have been completed. A final remedial action is needed at these subunits due to the remaining coal-related contaminants, which may pose a threat to human health and the environment. Groundwater is not considered part of the DAOU and will be addressed in the D-Area Groundwater Operable Unit.

For the 488-1D Ash Basin, 488-2D Ash Basin and the 488-4D Ash Landfill subunits, the proposed remedy is Land Use Controls. Land Use Controls will be implemented in the short-term through the SRS Site Use Program, which includes access controls for on-site workers, and site access control to prohibit trespassing (e.g., fencing and entry control systems) from off-site personnel. In the long-term, if the property is ever transferred to nonfederal ownership, the deed shall include restrictions precluding residential use of the property. For the 489-D Coal Pile Runoff Basin (Southern 75%) and the Inlet Basins portion of the 488-1D Ash Basin subunit, the proposed remedy is No Action, since it poses no threat to human health or the environment.

Comments on the Early Action SB/PP and the draft RCRA permit are requested by **April 23, 2020**. Upon completion of the public comment period, a Responsiveness Summary that addresses public comments will be prepared. The Responsiveness Summary will be made available with the Record of Decision and the final RCRA permit modification and will be sent to each person who submits comments.

To aid in the review of the Early Action SB/PP, an Early Action SB/PP Fact Sheet for the DAOU was prepared.

DRAFT ENVIRONMENTAL BULLETIN

Early Action Statement of Basis / Proposed Plan for the D-Area Operable Unit Available for Public Comment

Copies of the Early Action SB/PP and the Fact Sheet are available in the Administrative Record. The Administrative Record is available in the information repositories listed below:

- DOE Public Reading Room at the Gregg-Graniteville Library at the University of South Carolina (USC)-Aiken campus in Aiken, SC; and
- Thomas Cooper Library Government Documents Department at USC in Columbia, SC.

Hard copies of the Early Action SB/PP and Fact Sheet are available at the following locations:

- Reese Library Government Information Section at Augusta University in Augusta, GA; and
- Asa H. Gordon Library at Savannah State University in Savannah, GA.

The Early Action SB/PP and Fact Sheet are available electronically at the following address:

<http://www.srs.gov/general/programs/soil/pub/pubinv.html>

Copies of the draft RCRA permit modification are available for review at SCDHEC during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

SCDHEC
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
Phone: (803) 898-2000

or

SCDHEC
–Aiken Environmental Affairs Office
206 Beaufort St., N.E.
Aiken, SC 29801
Phone: (803) 642-1637

If there is interest in discussing the recommended remedial approach, a public hearing may be requested. Comments on the Early Action SB/PP should be sent to Ms. Janet Griffin. Comments on the draft RCRA permit modification or requests for a public hearing should be sent to Ms. Stacey French. For additional information or to request a public meeting contact:

Janet Griffin
Savannah River Nuclear Solutions, LLC
Savannah River Site
Building 730-1B
Aiken, SC 29808
(803) 952-8467

DRAFT ENVIRONMENTAL BULLETIN

**Early Action Statement of Basis / Proposed Plan for the D-Area Operable Unit
Available for Public Comment**

janet.griffin@srs.gov

or

SCDHEC
Attn: Stacey French, P.E., Director
Division of Waste Management
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
(803) 898-2000

DRAFT RADIO AD

ANNOUNCER:

The U. S. Department of Energy (D-O-E) has released an Early Action Statement of Basis and Proposed Plan on **March 10, 2019** for the proposed remedy of No Action for the 489-D Coal Pile Runoff Basin Southern 75% and Land Use Controls for the 488-1D Ash Basin, 488-2D Ash Basin, and the 488-4D Ash Landfill subunits of the D-Area Operable Unit located at the Savannah River Site, located in Aiken County. The South Carolina Department of Health and Environmental Control (dee-heck) has also released a draft hazardous waste permit modification for the operable unit area. The U. S. D-O-E and DHEC invite your review and comment on the proposed remedy.

The State's draft hazardous waste permit modification along with the administrative record is available during regular office hours of 8:30 a.m. to 5:00 p.m. Monday through Friday at DHEC's Bureau of Land and Waste Management, located at 2600 Bull Street in Columbia, S. C. These materials are also available at DHEC's ~~Midlands-Aiken~~ Environmental ~~Control-Affairs~~ Office, located at 206 Beaufort Street in Aiken, S. C.

The D-O-E's Early Action Statement of Basis and Proposed Plan is available from the D-O-E Public Reading Room at the University of South Carolina at Aiken, S. C., the Reese Library Government Information Section at Augusta University in Augusta, Georgia, the Thomas Cooper Library at the University of South Carolina in Columbia, S.C., and the Asa H. Gordon Library at Savannah State University in Savannah, Georgia.

Written comments and requests for a public hearing are to be sent no later than **April 23, 2020** to ~~David Seature~~[Stacey French](#) in DHEC's Bureau of Land and Waste Management, 2600 Bull Street, Columbia, S.C. -29201. You may also contact Janet Griffin of the Savannah River Site at 803-952-8467 or write her at SRS, Building 730-1B, Aiken South Carolina 29808.

DRAFT
APPENDIX VIII-A
SOLID WASTE MANAGEMENT UNIT REMEDY SELECTION

Solid Waste Management Unit	Remedy Selection
D-Area Operable Unit	<p>The D-Area Operable Unit shall be maintained under a combination of No Action and Land Use Controls by the Permittee as documented in the approved:</p> <ul style="list-style-type: none"> • Statement of Basis/Proposed Plan (Rev. 1.1, June 2010) • Early Action Record of Decision (Rev. 1.2, July 2011) for the D-Area Operable Unit • Early Action Statement of Basis/Proposed Plan (Revision 1, December 2019) (for 489-D Coal Pile Runoff Basin (Southern 75%), the 488-1D Ash Basin, 488-2D Ash Basin, and the 488-4D Ash Landfill subunits only) • Second Early Action Record of Decision (insert revision number and date) (for 489-D Coal Pile Runoff Basin (Southern 75%), the 488-1D Ash Basin, 488-2D Ash Basin, and the 488-4D Ash Landfill subunits only)