



ENVIRONMENTAL COMPLIANCE &

August 25, 2022

AUG 25 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: Preferred Remedial Action Regulatory Strategy for Remaining Savannah River Site's Coal Ash and Coal Fines Operable Units (U) (IACD-22-166) dated July 21, 2022 and received July 22, 2022.

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 Digitally signed by Susan B. Fulmer
Date: 2022.08.25 11:42:47 -04'00'

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:
Preferred Remedial Action Regulatory Strategy for Remaining Savannah River Site's Coal Ash
and Coal Fines Operable Units (U) (IACD-22-166) dated July 21, 2022
and received July 22, 2022.

Page 1 of 1

Specific Comments

1. The Confirmation Sampling and Analysis Plan for Coal and/or Ash Removal at the Savannah River Site (U) (SRNS-RP-2013-00332, Revision 1.1, July 2014) received July 30, 2014, should be referenced in this Regulatory Strategy document and confirmed that it will still be used in conjunction with site-specific closure plans.
2. Ash units which received sluiced ash, and coal pile runoff basins (if not alternatively covered by BOW's stormwater program), are wastewater units and are, therefore, subject to Industrial Wastewater closure criteria. Please make sure the appropriate ARARs for this closure criteria are listed in the closure documents. The applicable waste units are A-Area Coal Pile Runoff Basin (788-3A), D-Area Ash Overflow, D-Area Ash Basin Wetlands, K-Area Ash Basin (188-K), L-Area Ash Basin (188-L), Wetland Area at Dunbarton Bay (Phase II), H-Area Ash Basin (288-H), and H-Area Coal Pile Runoff Basin (289-H).
3. Plan A on page 9 of the presentation mentions using ash and coal fines as lower backfill under a final closure cap. It should be noted that the Performance Assessments (PA) for the Tank Farms and Saltstone Disposal Facility (SDF) do not discuss specific backfill material, nor do the Closure Cap Concept documents referenced in the PAs. The cap concept documents do not specify material but give more general design criteria to be met at each level. There is one brief mention in the SDF PA of clayey sands for the lower backfill and one mention of mixing some bentonite with the backfill in a cap concept document; but all PAs state materials will be selected closer to actual closure. This would require a revision to each PA.
4. The document and presentation should clearly state that if beneficial reuse of the ash within FAL 288-F does not occur, then the closure plan will be updated to provide a Class 3 cap over the landfill and submitted to SCDHEC for review and approval.