

**ENVIRONMENTAL COMPLIANCE &**

February 27, 2023

**FEB 27 2023**

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: Explanation of Significant Difference for the Revision 1 Record of Decision Remedial Alternative Selection for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U), SEMS Number: 71 (SRNS-RP-2022-00982, Revision 0, January 2023) received January 12, 2023.

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: 2023.02.27 15:53:05 -05'00'

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:**  
Explanation of Significant Difference for the Revision 1 Record of Decision Remedial  
Alternative Selection for the Wetland Area at Dunbarton Bay  
in Support of Steel Creek Integrator Operable Unit (U),  
SEMS Number: 71 (SRNS-RP-2022-00982, Revision 0, January 2023) received January 12,  
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General Comments

1. As per the Savannah River Site's response to SCDHEC comments on the Preferred Remedial Action and Regulatory Strategy for Remaining Savannah River Site's Coal Ash and Coal Fines Operable Units (U) (IACD-22-166), the appropriate ARARs for the Industrial Wastewater closure criteria are to be considered and listed in the closure documents (Specific Comment #2). Although ARARs are not typically listed in an ESD, this commitment was made after the issue of the Revision 1 Record of Decision (ROD) and these specific ARARs were not considered in the ROD. Please address these ARARs in either a table or by a written statement in the revised ESD.
2. The Wetland Area at Dunbarton Bay (WADB) is a RCRA 3004(u) Solid Waste Management Unit/CERCLA subunit. Issuing an Explanation of Significance Difference (ESD) will require the Division of Waste Management (DWM) to revise the Appendix VIII-A Solid Waste Management Unit Remedy Selection of SRS RCRA Hazardous and Mixed Waste Permit (RCRA Permit). The DWM will capture the ESD in Appendix VIII-A in a future modification to the RCRA Permit.
3. It would be helpful to state that the WADB is a RCRA/CERCLA unit in the Introduction of the ESD.