SC DEPARTMENT of ENVIRONMENTAL SERVICES

**Susan Fulmer, P.G.**
**Bureau of Land and Waste Management**
2600 Bull Street
Columbia, SC 29201

May 5, 2026

ENVIRONMENTAL COMPLIANCE &
MAY 05 2026
AREA COMPLETION PROJECTS

Mr. Matthew R. Baker, Acting FFA Remedial Project Manager
Remediation, Deactivation and Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

Re: Seventh Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) – Aiken, South Carolina, (SRNS-RP-2025-01064, Revision 0, January 2026) received February 6, 2026.

Dear Mr. Baker:

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/SCDES 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: 2026.05.05 13:38:25 -04'00'

**Susan B. Fulmer, P.G., Manager**
Federal Remediation Section
Division of Site Assessment, Remediation, Revitalization

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Gregg O'Quinn, BRLS – Aiken
Jon Richards, EPA Region IV
Heather Cathcart, BLWM

**South Carolina Department of Environmental Services Comments on:**
Seventh Five-Year Remedy Review Report for Savannah River Site Operable Units with Engineered Cover Systems (U) – Aiken, South Carolina, (SRNS-RP-2025-01064, Revision 0, January 2026) received February 6, 2026.



General Comments

1. Please ensure findings are documented from the September 4, 2025, SCDES Annual Groundwater Comprehensive Monitoring Evaluation (CME) that are relevant to the engineered cover systems in Appendices E, G, I, J and K. For example, a small amount of erosion was noted on one of the H-Area Basin Covers during the CME. It is unclear if this was captured in the inspection notes.

2. The reference to the latest revision of the RCRA Permit Renewal Application is inconsistent. In Appendices E, G, and K, the actual revision number is used while the generic statement is used in Appendices I and J. The latest approved Revision is Revision 4, with Revision 5 being approved once the current draft permit is approved.

3. The information pertaining to groundwater (water table depth, groundwater flow direction, etc.) that is provided for the Ford Building Seepage Basin in the "Physical Characteristics" section of Appendix F is useful and would be appreciated in the same section of appendices for the other operable units that have groundwater associated with them (Appendices C and H).

Specific Comments

1. Appendix A, Table A-4, Chronological Listing of SRS Issued Decision Documents, pages A-17 through A-19. ROD Issuance Dates for the following operable units are inconsistent with the dates provided in Table 1 for each OU-specific appendix: M-Area Hazardous Waste Management Facility, H-Area Hazardous Waste Management Facility, K-Area Burning/Rubble Pit and K-Area Rubble Pile, and Central Shops Burning/Rubble Pits.

2. Appendix F, Basis for Taking Action, page F-3. The first sentence of the last paragraph on this page states: "The soil that required remedial action is located in the Seepage Basin Area (surface and subsurface) and Tank/Process Sewer Line Area (fully contained within a 1.2-m [4-ft] depth)." This statement implies there is contaminated soil left in place at the Sewer Line Area and appears to contradict information in the next couple of pages which clearly states that all contaminated soil from the Sewer Line Area has been removed and placed in the Seepage Basin Area. Please explain.

3. Appendix F, Figure F-5, Aerial Photograph of the Ford Building Seepage Basin, page F-15 and Attachment F-1, Section III Onsite Documents and Records Verified, page F-21. The Groundwater Monitoring Records subsection of Section III in Attachment F-1 is checked as applicable to the Ford Building Seepage Basin, yet there is no mention of any monitoring wells in Appendix F, nor do any appear to be shown in Figure F-2. Figure F-5, however, shows what appears to be at least one monitoring well at the seepage basin. This appendix

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should be revised to clarify the status of any monitoring well network associated with this operable unit and include discussion of these monitoring wells in the applicable sections. Also, please verify that the "N/A" box checked for Subsection D, Cover Penetrations, under Section VII, Landfill Cover/Containment, on page F-25 is correct regarding any monitoring wells associated with the covers.

4. Appendix F, Figure F-6, FBSB OU LUC Boundary, page F-16. Please include the locations of the soil covers for the seepage basin and excavated areas of the Tank/ Process Sewer Area in this figure.

5. Appendix K, Data Review, page K-7, and "Are the Exposure Assumptions, Toxicity Data, Cleanup Levels, and Remedial Action Objectives Still Valid?", page K-10. For pages K-7 and K-10, the correct reference to the RCRA Permit Application is the 2023 application. The reference on page K-11 is correct.