REGION 4
ATLANTA, GA 30303

ENVIRONMENTAL COMPLIANCE &
FEB 12 2026
AREA COMPLETION PROJECTS

February 12, 2026

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

EPA Comments: Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U), SEMS Number: 69, SRNS-RP-2025-01449, Revision 0, November 2025

Dear Mr. Baker,

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed and provided comments on the Statement of Basis/Proposed Plan for D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U), SEMS Number: 69, SRNS-RP-2025-01449, Revision 0, November 2025.

If you have any questions or require additional information, please contact Brianne Martin at (404) 683-2220.

Sincerely,

BRIANNE MARTIN Digitally signed by BRIANNE MARTIN
Date: 2026.02.12 14:47:14 -05'00'

Brianne Martin, RPM
Federal Facilities Branch
Superfund and Emergency Management Division

cc: C.L. Bergren, SRNS-ACP
Susan Fulmer, SCDES

GENERAL COMMENTS

It is uncertain whether these determinations are necessary in order to determine the applicability or relevance and appropriateness of the Coal Combustion Residuals (CCR) rule, including the regulations at 40 CFR 257.102(c) or (d) related to closure. On page 20, the Focused Corrective Measures Study/Feasibility Study for D-Area Ash Basins Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (U) (hereinafter "FS") describes the DABW as "a forested mixed compositional bottomland wetland that received overflow ash from the D Area ash basins." In Appendix B of the FS, page B-8, section B-1.1 Background, it states "[d]epending on precipitation events, river flood levels, [sic] groundwater table fluctuations, portions of the DABW hold water."

a) Based on the reading of the Proposed Plan and other documents, it appears that the DABW is like a CCR management unit or like a CCR surface impoundment as defined in the Coal Combustion Residuals rule, at 40 CFR 257.53 *Definitions*, or associated with a release from such units. The CCR rule defines CCR management unit as "any area of land on which any noncontainerized accumulation of CCR is received, is placed, or is otherwise management, that is not a regulated CCR unit." The CCR rule defines CCR surface impoundment as "a natural topographic depression, man-made excavation, or diked area, designed to hold an accumulation of CCR and liquids, and the unit treats, stores, or disposes of CCR."
b) Alternative A-3 (i.e., excavation and disposal), includes excavation of all ash to an average depth of 5ft, disposal of the ash, and the DABW being contoured with clean fill and topsoil for proper drainage and wetland restoration. See Proposed Plan at 10. For Alternative A-3, portions of the CCR regulations 40 CFR 257.102(c)(1) and (c)(2) appear to be relevant and appropriate.
c) Thus, the proposed plan should include:
    1. A discussion of why a LUCs only remedy is sufficient, given the nature of the DABW in the light of the aforementioned definitions in the CCR regulations that includes ash or CCR disposal in natural depressions and the fact there has been documented releases of COCs into groundwater ; and
    2. A discussion of why "closure by removal of CCR", including certain requirements of 40 CFR 257.102(c)(1) and (c)(2) should not be relevant and appropriate to Alternative A-3.

SPECIFIC COMMENTS

1. **Section II, Community Participation, Page 11 of 42:** The text should discuss the possibility of having a virtual public meeting. The text states that the lead agency will provide an opportunity for a public meeting during the public comment period; however, it does not mention the possibility of having a virtual meeting as an option or in addition to a face-to-face meeting. The Statement of Basis/Proposed Plan should inform the public of the various options for holding the public meeting. Please revise the Statement of Basis/Proposed Plan to include the possibility of having a virtual meeting as an option or in addition to a face-to-face meeting.

2. **Section III, Operable Unit Background, PDF Page 12 of 42:** The fourth paragraph states, "The DEXOU RFI/RI/BRA concluded that there was a risk for exposure of human receptors to coal-related contaminants in surface ash/soil at the DABW subunit...;" however, it is more correct to state that there was no "unacceptable risk from exposure by human receptors." Please revise this statement accordingly.

3. **Section V, Summary of Site Risks, Summary of Human Health Risk Assessment, PDF Page 14 of 42:** Although the context of the carcinogenic risk threshold is given in Section XII, Glossary, under Target Risk Range, it would be more appropriate to provide a less technical explanation of the conclusions of the updated human health risk assessment (HHRA), which states that exposure to arsenic and radionuclides, "exceed the 1E-06 risk threshold for the IOU [Integrator Operable Unit]...." The Statement of Basis/Proposed Plan is a document intended to facilitate public involvement in the remedy selection and should be easily understood. As such, the term "Target Risk Range" is not used in the text, so it might be hard to find in the glossary, and the numerical total cumulative risks for the receptors of interest could be provided in a text

box so that further information is available should someone desire it. Therefore, please revise this section by simplifying the conclusions of the 2025 updated HHRA and considering moving the description of the numerical carcinogenic risks to a text box.

4. **SRS Compliance History Section, last complete paragraph, page 3, first paragraph**: The document states "[s]election of the remedial alternative that will satisfy the FFA requirements will be made by USDOE, in consultation with USEPA and SCDES." Revise to "Selection of the remedial alternative that will satisfy the FFA requirements will be made jointly by USDOE and USEPA, in consultation with SCDES." Under CERCLA both EPA and the lead agency select the remedial action, unless the parties are unable to reach an agreement. *See* 42 USC § 9604(e)(4)(A) ("Each Interagency agreement under this subsection shall include . . . [a] review of alternative remedial actions and *selection of a remedial action by the head of the relevant department, agency, or instrumentality and the Administrator* or, if unable to reach agreement on selection of a remedial action, selection by the Administrator." (emphasis added)). The NCP also requires that the remedy be selected by EPA and the lead agency. *See* 40 CFR § 300.430(f)(4)(iii) ("The process for selection of a remedial action at a federal facility on the NPL, pursuant to CERCLA section 120, shall entail: (A) Joint selection of remedial action by the head of the relevant department, agency, or instrumentality and EPA . . . .").

5. **Community Participation Section:** Please include the name and contact information for the local Community Advisory Group at SRS (i.e. the "Savanna River Site Citizens Advisory Board", https://cab.srs.gov/srs-cab.html, 1-800-249-8155, srscitizensadvisoryboard@srs.gov) in the Community Participation Section. *See* A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, OSWER 9200.1-23P, July 1999 (herein after "ROD Guidance"), at 3-10 ("The following public participation information should be included in the Proposed Plan: . . . [n]ame and contact number of local Community Advisory Group (CAG), if applicable.").

6. **Operable Unit Background Section, page 4, first full paragraph, second sentence:** The document states "[t]hese powerhouses were located in each industrial/administrative area of the SRS with coal ash (coal combustion products) products as a waste as a result of boiler operations." Please revise to use the regulatory term CCR or "coal ash waste" because coal ash is not a "coal combustion product" but rather is a solid waste. *See* 40 CFR 257.53 ("Coal combustion residuals (CCR) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers."). Please revise accordingly and replace "coal combustion products" with "coal ash waste" or CCR.

7. **Operable Unit Background Section, page 5, second full paragraph, second sentence**: The document states that "[w]hile other coal ash and coal fines OUs have the potential for beneficial reuse of contaminated ash material, the Core Team agreed that LUCs was the more likely remedial alternative for the DABW due to the wetland/floodplain environment." Please explain why the wetland/floodplain environment required that LUCs be the remedial action for the DABW considering that it appears to qualify as a CCR surface impoundment in a manner that a member of the public would understand.

8. **Operable Unit Background Section, page 4, first full paragraph, second sentence**: The PP states that "[w]hile other coal ash and coal fines OUs have the potential for beneficial reuse of contaminated ash material, the Core Team agreed that LUCs was the more likely remedial alternative for the DABW due to the wetland/floodplain environment." Please revise to use the regulatory term CCR or "coal ash waste" because coal ash is not a "material" but rather a solid waste. *See* 40 CFR 257.53 ("Coal combustion residuals (CCR) means fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers."). Please revise accordingly and make conforming changes throughout the document such that "ash material" is replaced with "coal ash waste" or CCR.

9. **Summary of Site Risks, page 14**: The opening paragraph introduces the term "refined constituents of concern [RCOCs]." This term is not used in CERCLA, the NCP, or EPA guidance. Please include a footnote that describes how this term relates to the term "Contaminant of Concern" used in Superfund cleanups. *See* EPA RI-FS guidance, *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*, EPA OSWER 9355.3-01, October 1988, and EPA ROD guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, EPA OSWER 9200.1-2P, July 1999, for discussions of how contaminants of concern are identified and used in the remedial process. Going forward and to avoid confusion, ORC recommends that the SRS remedial process use terms that have been developed in EPA guidance documents or ensure that the remedial documents contain an explanation that cross-references the CERCLA term.

10. **Summary of Fate and Transport Analysis, page 15**: The PP states, "[a]s documented in the DABW FCMS/FS, review of the groundwater monitoring data from the seven wells at DABW supports the conclusions of the DEXOU RFI/RI/BRA that ash located in the DABW wetland/floodplain is not a CM concern to groundwater." Table 2 of the FS on page 80 indicates that during 6 monitoring years groundwater sample results exceeded the MCL for arsenic and they did so two years for beryllium. The FS only states on page 29 that these samples had high turbidity values, but there is no explanation of why high turbidity values would negate the finding that a sample exceeded the MCL for a COC. Please reconcile the statements in these two documents. Please clarify why elevated levels of contaminants in the groundwater which appears to be related to the D-Area Ash Basin Wetlands would not require excavation or some other remedy that is protective of leaching COCs into groundwater. A LUCs only remedy is not capable of addressing leaching of COCs into groundwater.

11. **Remedial Action Objectives Section, fourth paragraph, page 16:** The PP states that the RAO identified for the DABW is to "[p]revent the IOU onsite worker from exposure to contaminants in surface ash/soil and concentrations exceeding 1E-06 or SRS background levels." The use of the word "and" appears incorrect. A suggested revision is: "Prevent the IOU onsite worker from exposure to contaminants in surface ash/soil at concentrations exceeding 1E-06 or SRS background levels." Also, as mentioned in the comment above, an RAO related to protection of groundwater seems appropriate considering documented releases of COCs into groundwater that resulted in concentrations above MCLs.

12. **Summary of Remedial Alternatives, page 17:** The preferred alternative should be identified at the beginning of the summary of remedial alternatives section. *See* ROD Guidance at 3-5 ("The alternatives that is recommended as the Preferred Alternative should be identified as such at the beginning of this [Summary of Remedial Alternatives] section.").

13. **Preferred Alternative, page 21**: The first full paragraph, sixth sentence, notes that the LUCIP will be "considered incorporated by reference into the DABW ROD." Note that the EPA LUC checklist (*Sample Federal Facility Land Use Control ROD Checklist with Suggested Language (LUC Checklist),* EPA OSWER 9355.6-12) recommends specific text (at the time of the ROD) that states,

    > A LUC Remedial Design will be prepared as the land use component of the Remedial Design. Within 90 days of ROD signature, the [federal agency] shall prepare and submit to EPA for review and approval a LUC remedial design that shall contain implementation and maintenance actions, including periodic inspections." Another option is to refer to the enforceable schedule in the IAG for the RD or RAWP.

    To be consistent with the LUC Checklist and with what should be stated in the following ROD, please revise this part of the sentence in the PP to state that the LUCIP ". . . is the land use component of a

remedial design and is considered the LUC Remedial Design report, establishing LUC implementation and maintenance requirements enforceable under CERCLA."

MINOR COMMENTS

Preferred Alternative Section, page 20, first paragraph: The PP states, "[a] comparative alternative analysis, provided in Table 4 for the DABW, was developed to quantitatively evaluation the alternatives as they relate . . . ." Should it be "evaluate" instead of "evaluation" in this sentence?