



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

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

ENVIRONMENTAL COMPLIANCE &

December 12, 2025

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

DEC 12 2025

AREA COMPLETION PROJECTS

Re: Early Action Statement of Basis/Proposed Plan for the Beneficial Reuse of Select Coal Ash and Coal Fines at the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), and L-Area Ash Basin (188-L) Operable Units (U), SEMS Number: 61, 62, 88, 90, & 91 (SRNS-RP-2025-01221, Revision 0, October 2025) received October 20, 2025.

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: 2025.12.12 13:41:33 -05'00'

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

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South Carolina Department of Environmental Services Comments on:

Early Action Statement of Basis/Proposed Plan for the Beneficial Reuse of Select Coal Ash and Coal Fines at the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), and L-Area Ash Basin (188-L) Operable Units (U), SEMS Number: 61, 62, 88, 90, & 91 (SRNS-RP-2025-01221, Revision 0, October 2025) received October 20, 2025.

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General Comments

1. The Statement of Basis/Proposed Plan should discuss a contingency plan(s) as part of Alternative A-2 in the event that the ash removed from the ash basins would not be deemed appropriate for the intended future beneficial reuse discussed in the document. For reference, the "Proposed Core Team Remedial Actions and Regulatory Strategy for Remaining SRS Ash/Coal Fines Waste Units" Revision 1 Redline document dated April 19, 2022 discusses alternatives to beneficial reuse in this event on page 13.
2. Please reference the document in which the conditions for beneficial reuse in 40 CFR 257 were substantiated. This document reference should also be included in Table 2 as the reference for why 40 CFR 257 applies only to 288-F. In other words, please include the substantiated reference as to why 40 CFR 257 does not apply to any of the other ash basins.
3. Throughout the document, there are discussions regarding beneficial reuse of coal ash and coal fines. However, while the coal ash and fines are stated to be toxic and worthy of removal, there is no discussion regarding how the coal ash and fines will be treated and analyzed before its beneficial reuse to ensure it is no longer hazardous. Please add a section regarding the process to determine how the ash is safe to reuse.
4. The Draft Public Notice Documents section was not included electronically on the CD provided.

Specific Comments

1. SRS Compliance History, page 2. The third sentence of this section states that the RCRA permit from the SCDES was most recently renewed on February 11, 2014. The most recent hazardous and mixed waste permit was renewed on October 27, 2025.
2. Draft Radio Announcement. Please see the revised announcement below:

ANNOUNCER:

The U. S. Department of Energy (D-O-E) released an Early Action Statement of Basis/Proposed Plan on **Month, Day, Year** for A- Area Ash Pile, A-Area Coal Pile Runoff Basin, F-Area Ash Landfill, H- Area Ash Basin, K-Area Ash Basin, and L-Area Ash Basin Operable Units at the Savannah River Site (S-R-S). The proposed remedy consists of Land Use Controls with Beneficial Reuse. This document is available at the D-O-E Public Reading Rooms at the University of South Carolina – Aiken, Augusta University, the University of South Carolina – Columbia, Savannah State University and is available on the S-R-S webpage, www.srs.gov.

South Carolina Department of Environmental Services Comments on:

Early Action Statement of Basis/Proposed Plan for the Beneficial Reuse of Select Coal Ash and Coal Fines at the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), and L-Area Ash Basin (188-L) Operable Units (U), SEMS Number: 61, 62, 88, 90, & 91 (SRNS-RP-2025-01221, Revision 0, October 2025) received October 20, 2025.

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The South Carolina Department of Environmental Services (S-C-D-E-S) also released a draft hazardous and mixed waste permit modification for the remedy; the draft is available for review during regular business hours, 8:30 a.m. to 5:00 p.m., Monday through Friday, except legal holidays at SCDES's Bureau of Land and Waste Management office, 2600 Bull Street, in Columbia, telephone (803) 898-0255. The public is invited to review and comment on the proposed remedy.

Written comments and requests for a public hearing must be received no later than **Month, Day, Year** by Kent Krieg of S-C-D-E-S at kent.krieg@des.sc.gov or Barbara Smoak of S-R-S at Barbara.Smoak@srs.gov.