ARF-025751

ENVIRONMENTAL COMPLIANCE &

REGION 4
ATLANTA, GA 30303

September 17, 2026

SEP 17 2026

SRNS-OS-2026-00327

AREA COMPLETION PROJECTS

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: Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2026-00391, Revision 0, July 2026)

Dear Mr. Baker,

The U.S. Environmental Protection Agency, Region 4 (EPA) reviewed and commented on the Land Use Control Implementation Plan for the Early Construction and Operational Disposal Site L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U) (SRNS-RP-2026-00391, Revision 0, July 2026).

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: 2026.09.17 14:13:56 -04'00'

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

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

GENERAL COMMENT

1. The LUCIP does not specify whether photographic evidence will be submitted along with the field inspection checklist to support the observations of LUC protectiveness. This photographic documentation should be provided to support the field observations on the condition of the access roads, warning signs and that no unauthorized activity occurred within the LUC boundary in both subunits. It is noted the annual inspection checklist presented in Appendix B (Field Inspection Checklist) provides verification that the land use controls (LUCs) are protective; however, no photographs are required to support the field observations of LUC protectiveness. Please revise the checklist and the text to consider the inclusion of photographic documentation taken during field inspections.

SPECIFIC COMMENT

1. **Section 2.1, General Description and History of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU, Page 2 of 24:** The text indicates the site area consists of relatively flat terrain and references Figure 2 (Location of the ECODS L-3, LRP 131-1L, and LRP 131-4L OU (L Area); however, Figure 2 does not include ground surface elevation contours. Please revise Figure 2 to include ground surface elevation contours.

MINOR COMMENTS

1. **Section 2.1.2, LRP 131-1L Subunit, Page 4 of 24 and Section 4.3, Site Use Program, Page 12 of 24:** Page 4 cites "(SRNS 2025a)" and Page 12 cites "(SRNS 2024)"; however, there are no corresponding references in Section 5.0 (References) for these citations. According to Section 5.0, it appears that "(SRNS 2025a)" should be "(SRNS 2025)" and "(SRNS 2024)" should be "(SRS 2024)". Please revise the in-text citations accordingly.

2. **Section 2.2, Nature and Extent of Contamination, Page 6 of 24:** The abbreviation "RCOCs" is used for the first time in the first bullet; however, it is not defined. Please revise the text to define "RCOCs" upon the first use.

3. **Section 2.3, Remedial Actions Selected, Page 7 of 24:** The last sentence of the first bullet appears to be an incomplete sentence. Please revise the text to complete the sentence.

4. **Figure 5, ECODS L-3, LRP 131-1L, and 131-4L OU Generic Conceptual Site Model after Completion of Final Remedial Action, Page 22 of 24:** The abbreviations "RCOC" and "PCBs" are not defined in the legend. Please include these abbreviations and their definitions in the legend.

5. **Table 1, Land Use Controls for ECODS L-3 and 131-4L Subunits, Page 23 of 24:** There appears to be a typographical error in item 2. Specifically, item 2 states, "A. Land Use", which appears to be incomplete. Additionally, the footnotes b, c, d, e, and g in the Type of Control column for 1, 2, 3, 4 and 6 are shown lower case and not upper case superscript at the end of each listed control. Please revise these typographical errors accordingly.