SC DEPARTMENT of ENVIRONMENTAL SERVICES

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

ENVIRONMENTAL COMPLIANCE &

October 8, 2026

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

OCT - 8 2026

SRNS-OS-2026-00359

AREA COMPLETION PROJECTS

Re: Early Action Record of Decision Remedial Alternative Selection for the Beneficial Use 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 Numbers: 61, 62, 88, 90, & 91 (SRNS-RP-2026-00742, Revision 0, August 2026) received August 12, 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,

for Heather H. Cathcart
Digitally signed by Heather H. Cathcart
Date: 2026.10.08 10:13:04 -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:
Early Action Record of Decision Remedial Alternative Selection for the Beneficial Use 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 Numbers: 61, 62, 88, 90, & 91
(SRNS-RP-2026-00742, Revision 0, August 2026) received August 12, 2026.

Specific Comments

1. Unit Investigation (Ash/Soil), pages 13-15. As indicated in the first paragraph of this section, characterization of the AAP, FAL, HAB, KAB and LAB OUs was conducted in 2020. The individual OU characterization discussions that follow for the AAP and FAL OUs do not include mention of the 2020 sampling. For clarity, it should be mentioned that the sampling discussed for each of these OUs is in addition to the 2020 sampling referenced on page 13. Additionally, the characterization discussion for the FAL OU does not mention the seventeen (17) soil samples collected in 2002 that is described in Section 2.3 of the 2020 Sampling and Analysis Plan. Please revise.

2. Summary of Human Health Risk Assessment, page 18. The second paragraph of this section should provide an explanation for the differences between the standard exposure assumptions used for the AAP/ACPRB OUs (30 years) and the HAB, LAB, KAB, and FAL OUs (26 years). Please revise.

3. References, page 47. The reference entitled "USEPA, 2022. *ProUCL: Statistical Software for Environmental Applications for Data Sets with and without Nondetect Observations*" is not cited in the report. Please include this reference where appropriate or remove it from the citation list if it is unnecessary.

4. Table 16, Alternative A-2: Land Use Controls and Beneficial Use Cost Estimate (ACPRB), page 99. The Total Estimated Cost for this OU was left blank. It should state "$1,005,629". Please edit the table accordingly.