

APPENDIX G

ANNUAL LAND USE CERTIFICATION REQUIRED UNDER SECTION 3.9

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Land Use Controls Units

During Fiscal Year (FY) 2000, the Parties approved the Land Use Control Assurance Plan (LUCAP) for Savannah River Site (SRS) and signed its associated Memorandum of Agreement. The LUCAP is updated periodically to include additional approved unit-specific Land Use Control Implementation Plans (LUCIPs). The unit-specific LUCIPs detail how SRS will implement, maintain, and monitor the land use control (LUC) elements of the selected remedy to ensure that the remedy remains protective of human health and the environment.

Records of Decision (RODs) have been issued for some Resource Conservation and Recovery Act (RCRA)/Comprehensive Environmental Response, Compensation, and Liability Act Units at the SRS in which the selected alternative is or includes LUCs. To assure United States Environmental Protection Agency, South Carolina Department of Health and Environmental Control, and the public that United States Department of Energy (USDOE) is maintaining the LUCs as stipulated, the Manager, Savannah River Operations Office, shall annually certify these units. These units are currently being controlled in accordance with the unit-specific RODs, unit-specific LUCIPs, and in accordance with the LUCAP for SRS.

Unit-specific LUCs were not part of the interim remedies at the E-Area Low-Level Waste Facility (LLWF) (Slit Trench Disposal Units 1 to 5) Operable Unit (OU) and the F-Area Tank Farm (FTF) OU (Waste Tanks 5, 6, and 17 to 20). The E-Area LLWF and the FTF OU are currently in the operational phase, and OU-specific LUCs are deferred until final closure of the entire E-Area LLWF and FTF OUs. SRS facility security and administrative controls that restrict unauthorized access to these operating facilities were not previously recognized as part of the interim remedies. In the *Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Geosynthetic or Stabilization/Solidification Cover Systems* (SRNS-RP-2016-00610, Revision 1.1, December 2017), USDOE recommended revising the Federal Facility Agreement Annual Progress Report list of LUC Units to include these OUs to recognize SRS facility security and administrative controls that restrict unauthorized access as providing long-term protection of human health and the environment.

The H-Area Tank Farm (HTF) OU (Waste Tank 16) Interim ROD (IROD) (SRR-CWDA-2015-00157, Revision 1, July 2016) was issued in August 2016. The HTF OU (Waste Tank 12) Explanation of Significant Difference to the IROD (SRR-CWDA-2016-00107, Revision 0, December 2016) was issued in April 2017. A remedy evaluation was premature for inclusion in the *Fifth Five-Year Remedy Review Report for Savannah River Site Operable Units with Geosynthetic or Stabilization/ Solidification Cover Systems* (SRNS-RP-2016-00610, Revision 1.1, December 2017). However, the same conditions apply to the operational HTF OU as to the E-Area LLWF and FTF OUs. Therefore, these OUs were added to the list below to certify long-term protectiveness through compliance with the SRS facility security and administrative controls. A remedy evaluation for the HTF OU (Waste Tanks 12 and 16) was discussed for the first time in the *Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Geosynthetic or Stabilization/ Solidification Cover Systems* (SRNS-RP-2021-04229, Revision 1, July 2022). Additional slit trench disposal units and waste tanks will be added as interim remedies are implemented.

Unit-specific LUCs were not part of the interim remedy at the C-Area Groundwater (CAGW) OU. The electrical resistance heating with soil vapor extraction interim remedy was determined to be protective of human health and the environment in the short-term. However, for the remedy to be protective in the long-term, additional remedial actions, including LUCs (if needed), will need to be implemented at CAGW OU. SRS facility security and administrative controls that restrict unauthorized access to this OU were not previously recognized as part of the interim remedy. In the *Sixth Five-Year Remedy Review Report for Savannah River Site Operable Units with Groundwater Remedies* (SRNS-RP-2019-00511, Revision 1, July 2020), USDOE recommended revising the FFA Annual Progress Report list of LUC Units to include this OU to recognize SRS facility security and administrative controls that restrict unauthorized access as providing long-term protection of human health and the environment. Therefore, the CAGW OU was added to the list below.

The FY2023 certification is applicable to the following RCRA/CERCLA Units.

Unit Name	SRS Index Number(s)	SEMS Number(s)
A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A and -5A) OU (includes A-Area Ash Pile, 788-2A)	45, 46, 49, 101, 102, 237	28
A-Area Miscellaneous Rubble Pile (731-6A) OU	48	30
B-Area OU (consisting of Heavy Water Components Test Reactor [Building 770-U] and Early Construction and Operational Disposal Site [ECODS] B-3 [East of B Area, South of Road C] [no building number {NBN}] and ECODS B-5 [Adjacent to ECODS B-3] [NBN])	528, 530, 2003	48
C-, K-, and L-Reactor Complexes Early Action	577, 583, 584	79, 90, 91
C-Area Burning/Rubble Pit (131-C) and Old C-Area Burning Rubble Pit (NBN) OU	51, 566	31
C-Area OU Early Action (consisting of C-Area Process Sewer Lines as Abandoned [NBN], C-Area Reactor Area Cask Car Railroad Tracks as Abandoned [NBN], ECODS C-1 [Near C-Area Reactor Discharge Canal {NBN}], Potential Release from C-Area Disassembly Basin [NBN], Potential Release from C-Area Reactor Cooling Water System [186/190-C])	555, 475, 522, 240, 242	79
C-Area Groundwater OU (NBN)	146	82
C-Area Reactor Seepage Basins (904-66G, -67G, and -68G) OU	53, 54, 55	60
Central Shops Burning/Rubble Pits (631-1G and -3G) OU	58, 59	50
Chemicals, Metals, and Pesticides Pits (080-170G, -171G, -180G, -182G, -183G, and -190G) OU	61, 62, 63, 64, 65, 66, 67	24
D-Area Burning/Rubble Pits (431-D and -1D) OU	32, 33	15
D-Area Expanded OU (consisting of D-Area Rubble Pit [431-2D] and D-Area Ash Basin [488-D])	68, 273	67
D-Area Oil Seepage Basin (631-G) OU	26	27
D-Area Operable Unit (DAOU) Early Action (consisting of D-Area Asbestos Pit [080-20G] and D-Area Coal Pile Runoff Basin [489-D] [Northern 25%])	69, 211	63
DAOU Second Early Action (consisting of D-Area Ash Basins [488-1D {including Inlet Basins} and 488-2D], D-Area Ash Landfill [488-4D], and D-Area Coal Pile Runoff Basin [489-D] [Southern 75%])	238, 272, 548, 211	63
E-Area Low-Level Waste Facility (643-26E) OU (Slit Trench Disposal Units 1 to 5)	592	86
ECODS L-1, N-2, P-2, and R-1A, -1B, -1C OU	535, 539, 545, 540	22
F-Area Burning/Rubble Pits (231-F, -1F, and -2F) OU	34, 35, 36	14
F-Area Industrial Solid Waste Landfill (F-Area Railroad Crosstie Pile) (NBN)	279	N/A*
F-Area Retention Basin (281-3F) OU	73	23
F-Area Tank Farm OU (Waste Tanks 5 to 6, 17 to 20, F-Area Diversion Boxes 5 and 6)	283, 580	23

Unit Name	SRS Index Number(s)	SEMS Number(s)
Ford Building Seepage Basin (904-91G) OU	75	58
General Separations Area Consolidation Unit (consisting of Old Radioactive Waste Burial Ground [ORWBG] [including Solvent Tanks 650-01E to 650-22E] [643-E], HP-52 Ponds, H-Area Retention Basin [281-3H] and Spill on 05/01/1956 of Unknown of Retention Basin Pipe Leak [NBN], Warner's Pond [685-23G] and Spill on 03/08/1978 of Unknown of Seepage Basin Pipe Leak in H-Area Seepage Basin [NBN], and Spill on 02/08/78 of Unknown of H-Area Process Sewer Line Cave-In [NBN])	18, 29, 28, 417, 27, 405, 398	32
Gunsite 012 OU (consisting of Gunsite 012 Rubble Pile [NBN], Rubble Pile Across from Gunsite 012 [NBN], and ECODS G-3 [Adjacent to Gunsite 012] [NBN])	163, 337, 544	78
H-Area Tank Farm OU (Waste Tanks 12 and 16)	298, 582	89
Heavy Equipment Wash Basin (NBN) OU	502	53
K-Area Bingham Pump Outage Pit (643-1G) OU	83	20
K-Area Burning/Rubble Pit (131-K) and K-Area Rubble Pile (631-20G) OU	84, 88	40
K-Area Reactor Seepage Basin (904-65G) OU	87	55
L- and P-Area Bingham Pump Outage Pits (643-2G, -3G, and -4G) OU	91, 92, 107	26, 39
L-Area Oil and Chemical Basin (904-83G) OU	96	17
L-Area Reactor Seepage Basin (904-64G) OU	306	65
L-Area Southern Groundwater (NBN) OU	487	77
Lower Three Runs Integrator Operable Unit (IOU) Tail Portion (Middle and Lower Subunits)	505	35
Lower Three Runs IOU (Upper Subunit)	110, 312, 505	35
M-Area OU (consisting of Potential release of Heavy Metals from 321-M Abandoned Sewer Line [NBN], Salvage Yard [741-A], Underground Sump 321-M #001, and Underground Sump 321-M #002)	585, 326, 340, 465, 466	92
M-Area Settling Basin Inactive Process Sewer Lines OU (081-M)	100, 234	19
Old F-Area Seepage Basin (904-49G) OU	105	16
P-Area Burning/Rubble Pit (131-P) OU	108	59
P-Area OU (consisting of Spill on 03/15/79 of 500 Gallons of Contaminated Water [NBN], P-Area Ash Basin [188-0P], Potential Release from P-Area Disassembly Basin [105-P], Potential Release from the P-Area Reactor Cooling Water System [186/190-P], P-Area Reactor Area Cask Car Railroad Tracks as Abandoned [NBN], P-Area Process Sewer Lines as Abandoned [NBN])	126, 313, 314, 316, 477, 557, 587	94
P-Area Reactor Seepage Basins (904-61G, -62G, and -63G) OU	317, 318, 319	66
R-Area Bingham Pump Outage Pits (643-8G, -9G, and -10G) and R-Area Unknown Pits #1, #2, #3 (RUNK-1, -2, and -3) OU	113, 114, 115, 550, 551, 552	38
R-Area Burning/Rubble Pits (131-R and 131-1R) and R-Area Rubble Pile (631-25G) OU	117, 116, 118	43

Unit Name	SRS Index Number(s)	SEMS Number(s)
R-Area OU (consisting of Area on the North Side of Building 105-R, Laydown Area North of 105-R, and Release from the Decontamination of R-Area Reactor Disassembly Basin [NBN], Combined Spills North of Building 105-R [NBN], Cooling Water Effluent Sump [107-R], Potential Release from R-Area Disassembly Basin [NBN], Potential Release of NaOH/H ₂ SO ₄ from 183-2R [NBN], R-Area Ash Basin [188-0R], R-Area Groundwater, R-Area Process Sewer Lines as Abandoned [NBN], and R-Area Reactor Area Cask Car Railroad Tracks as Abandoned [NBN])	231, 233, 271, 288, 324, 329, 330, 478, 513, 517, 556, 588	95
R-Area Reactor Seepage Basins (904-57G, -58G, -59G, -60G, -103G, and -104G) OU	119, 120, 121, 122, 123, 124	25
Silverton Road Waste Site (731-3A)	41	13
Savannah River Laboratory Seepage Basins (904-53G1, -53G2, -54G, and -55G) OU	133, 134, 135, 136	47
T-Area OU (consisting of Neutralization Sump [678-T], TNX Outfall Delta, Lower Discharge Gully, and Swamp [NBN], TNX-Area Process Sewer Lines and Tile Fields as Abandoned [NBN], and X-001 Outfall Drainage Ditch [NBN] [See USDOE Letter SGP-05-128 for list of decommissioned facilities added to T-Area Completion])	589, 310, 500, 559, 467	96
TNX OU (consisting of TNX Burying Ground [643-5G] [including Spill on 01/12/53 of 1/2 Ton of Uranyl Nitrate], New TNX Seepage Basin [904-102G], Old TNX Seepage Basin [904-076G], and TNX Groundwater [082-G])	139, 104, 106, 25, 127	21, 29
Wetland Area at Dunbarton Bay in Support of Steel Creek IOU	509	71

* N/A = Not Applicable

SEMS = Superfund Enterprise Management System

Notes:

1. The L-Area Hot Shop OU (717-G) was designated as a No Action OU in FY2014 and was removed from this LUC certification list.
2. The L-Area Rubble Pile (131-3L) OU was designated as a No Action OU in FY2018 and was removed from this LUC certification list.
3. The E-Area LLWF, FTF, HTF, and CAGW OUs were added to the list to certify long-term protectiveness through compliance with the SRS facility security and administrative controls.
4. The LUCIP for the Lower Three Runs Integrator Operable Unit (Upper Subunit) (SRNS-RP-2022-00017, Revision 1, August 2022) was approved by South Carolina Department of Health and Environmental Control (SCDHEC) and United States Environmental Protection Agency (USEPA) on September 22, 2022 and October 4, 2022, respectively. The installation of the 55 signs was completed on July 17, 2023. The initial inspection is expected to be conducted in Spring of 2028. Field inspections will be completed every five years. Additional inspections may be necessary in the event of unusual weather or other condition warranting inspection.
5. The LUCIP for the Wetland Area at Dunbarton Bay in Support of Steel Creek IOU (SRNS-RP-2018-00479, Revision 1, November 2018) was approved by EPA and SCDHEC on November 14, 2018 and November 28, 2018, respectively. The signs were installed on January 8, 2020. Per the regulatory approved LUCIP, the field inspections will be performed every five years. The initial inspection was completed on November 15, 2022. The Addendum to the Revision 1 LUCIP for the Wetland Area at Dunbarton Bay in Support of Steel Creek IOU (SRNS-RP-2023-00335, Revision 0, June 2023) was approved by EPA and SCDHEC on July 31, 2023. The signs discussed in the LUCIP Addendum were installed on October 17, 2023. Per the LUCIP Addendum, there is no change to the field inspection and maintenance activities because of the Addendum. The next inspection will be completed in November 2027. Additional inspections may be necessary in the event of unusual weather or any other condition warranting inspection.

USDOE-SR Certification for Land Use Controls

I certify that the Savannah River Site has maintained compliance with all unit-specific Land Use Control Implementation Plans in accordance with the *Land Use Control Assurance Plan for the Savannah River Site*.

Signature: **Michael D. Budney**
Michael D. Budney
Manager
Savannah River Operations Office

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