

**Joseph Burch****ERD-EN-2018-0014**

**From:** Richards, Jon M. <Richards.Jon@epa.gov>  
**Sent:** Tuesday, March 06, 2018 9:40 AM  
**To:** HENNESSEY, BRIAN; Tufts, Jennifer; Joseph Burch; Cathcahe (dhec.sc.gov)  
**Cc:** pope.robert (epa.gov); Fulmer, Susan; PRATER, M PHILIP; Chris Bergren; Mike Griffith; Thomas Kmetz; Thomas Gaughan; Catherine Lewis; Amy Meyer; Jeffcj Ward; Benjamin Terry; Thelesia Oliver; J Ross; Mark Amidon; Monique Rabin; Dena Brett; Mac McRae (mmcrae@techlawinc.com); Travis R. Fuss; O'Quinn, Gregory; Beatty, K. Leigh; Shelia Mcfalls  
**Subject:** RE: RSER/EE/CA for Trichloroethylene Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (SRNS-RP-2017-00372, Revision 0, October 2017) Comment Resolution Conference Call

Brian,  
 EPA has discussed this and we can agree to wait until after the monitoring period and look at the conditions in the distal portion to see if they have changed to see if another action is warranted at that time.  
 EPA agrees with the statement: "As we agreed, we should execute the PRB early action at the plume neck, monitor its effectiveness, and then evaluate whether another EA would be appropriate. "

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**Cc:** Pope, Robert <Pope.Robert@epa.gov>; Richards, Jon M. <Richards.Jon@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; m.prater@srs.gov; chris.bergren@srs.gov; mike.griffith@srs.gov; thomas.kmetz@srs.gov; Thomas.Gaughan@srs.gov; catherine.lewis@srs.gov; Amy.Meyer@srs.gov; jeffcj.ward@srs.gov; benjamin.terry@srs.gov; thelesia.oliver@srnl.doe.gov; j.ross@srs.gov; mark.amidon@srnl.doe.gov; monique.rabin@srs.gov; dena.brett@srs.gov; Mac McRae (mmcrae@techlawinc.com) <mmcrae@techlawinc.com>; Travis R. Fuss <FUSSTR@dhec.sc.gov>; O'Quinn, Gregory <OQUINNGN@dhec.sc.gov>; Beatty, K. Leigh <BEATTYKL@dhec.sc.gov>; Shelia.Mcfalls@srs.gov  
**Subject:** RE: RSER/EE/CA for Trichloroethylene Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (SRNS-RP-2017-00372, Revision 0, October 2017). Comment Resolution Conference Call

Jennifer,

DOE cannot agree to the change you have requested--to presumptively schedule another NTC removal action in Appendix E for this OU in the near future, even with the understanding that the three parties could decide that one is not needed. Any decision about another removal action should consider both the observed and expected effects of the first action, and the characterization data. As we agreed, we should execute the PRB early action at the plume neck, monitor its effectiveness, and then evaluate whether another EA would be appropriate.

Also, creating an enforceable milestone for another NTCRA would require SRS to allocate the necessary resources for it now, and to change current plans for Appendix E scope to accommodate it. We do not believe changing the cleanup program's out-year plan is warranted at this time, but as we agreed, we will do so if the Core Team evaluation of data and PRB performance indicates that a second action is needed.

You have our commitment to discuss the results of this action after the agreed-to period of monitoring, and to perform another one if conditions suggest that it would be appropriate and the Core Team prioritizes it over other planned, Appendix E-required work at that time. We are open to determining how that commitment should be documented.

DOE prefers to leave our agreement in place. I'm happy to discuss this if you would like to.

Thank you.

---Brian Hennessey  
Federal Facility Agreement Project Manager  
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"A problem well-stated is already half solved."--Charles Kettering, American Inventor



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**Subject:** RE: Meeting Confirmation: RSER/EE/CA for Trichloroethylene Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (SRNS-RP-2017-00372, Revision 0, October 2017) Comment Resolution Conference Call

Thanks Joe,

The revised responses to EPA comments are acceptable. However, after discussing the direction of the investigation of the distal source area with Rob and Jon, we prefer that SRS commit to an Action Memo as part of the schedule and Appendix E. So for response to EPA comment #2, rather than state that a future Action Memo will be considered to address the distal (elbow) area if warranted, the response should state that an additional removal action will be

implemented in the distal portion once characterization is complete. If the Core Team finds an action is not necessary for the distal portion based on investigation results, then then Action Memo may be removed from Appendix E.

Please let me know if the team would like to discuss further.

Thanks,

Jennifer

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Based on our conference call held on February 13, 2018, the attached draft comment responses have been revised to address your concerns expressed at the meeting.

Please review the draft responses by COB Tuesday, 2/27/18 and let me know if they are acceptable.

Thanks

Joe

**From:** Shelia Mcfalls  
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Jennifer and Heather,

All Parties have confirmed. The subject conference call is scheduled for **Tuesday, February 13, 2018, starting at 10:30 a.m.** The SRS submitted the RSER/EE/CA for Trichloroethylene Plumes Discharging to Steel Creek in P-Area Groundwater Operable Unit (NBN) (SRNS-RP-2017-00372, Revision 0, October 2017) on 10/30/2017. The SCDHEC and EPA provided their respective comments on 12/13/2017. The SRS submitted draft responses to the regulatory comments on the RSER/EE/CA electronically on 01/17 2018 (see attachments). After reviewing, the draft comment responses, SCDHEC and EPA requested a comment resolution conference call.

The SRS participants will meet in Building 730-4B, Conference Room 332.

The conference call phone number is **800-832-0736** and the access code is **4971238**.

Please contact me if you have any questions, comments, or concerns.

Thanks

**Shelia L. McFalls** | Savannah River Nuclear Solutions, LLC | Environmental Compliance & Area Completion Projects | [shelia.mcfalls@srs.gov](mailto:shelia.mcfalls@srs.gov) | 1.803.952.6819 office | 1.803.725.7243, #19367 pager | 1.803.952.6403 fax | Savannah River Site | Building 730-4B, 3134 | Aiken, SC 29808

