

**Shelia Mcfalls**

---

**From:** Richards, Jon M. <Richards.Jon@epa.gov>  
**Sent:** Thursday, May 09, 2019 2:07 PM  
**To:** Fulmer, Susan; HENNESSEY, BRIAN  
**Cc:** pope.robert (epa.gov); Cathcahe (dhec.sc.gov); Shelia Mcfalls; Mike Griffith; James Kupar; Dena Brett  
**Subject:** RE: Lower Three Runs IOU Feasibility Study

EPA as well agrees to disregard the 6/7 date for the FS Rev 1.1 submittal.  
And next week DOE will provide new date proposal

Jon Richards  
RPM & Radiation Expert  
US EPA R4 Superfund Division  
Restoration & Site Evaluation Branch  
[Richards.jon@epa.gov](mailto:Richards.jon@epa.gov)  
404-562-8648 Cell: 404-431-1340

**From:** Fulmer, Susan <fulmersb@dhec.sc.gov>  
**Sent:** Wednesday, May 8, 2019 4:21 PM  
**To:** brian.hennessey@srs.gov; Richards, Jon M. <Richards.Jon@epa.gov>  
**Cc:** Pope, Robert <Pope.Robert@epa.gov>; Cathcart, Heather E. <cathcahe@dhec.sc.gov>; Shelia.Mcfalls@srs.gov;  
mike.griffith@srs.gov; james.kupar@srs.gov; dena.brett@srs.gov  
**Subject:** RE: Lower Three Runs IOU Feasibility Study

Brian and Jon,

Thanks for the call this afternoon to discuss the LTR IOU FS. SCDHEC understands the potential impact of the Oak Ridge dispute; therefore, we agree to an extension of the June 7<sup>th</sup> FS submittal date and understand that DOE will get back to us next week with a new timeframe for submittal.

Thanks,  
Susan

Susan B. Fulmer, P.G.  
Manager  
Federal Remediation Section, Division of Site Assessment, Remediation & Revitalization  
S.C. Dept. of Health & Environmental Control  
Office: (803) 898-4331  
Connect: [www.scdhec.gov](http://www.scdhec.gov) [Facebook](#) [Twitter](#)



**From:** [brian.hennessey@srs.gov](mailto:brian.hennessey@srs.gov) [<mailto:brian.hennessey@srs.gov>]  
**Sent:** Tuesday, May 7, 2019 10:18 AM  
**To:** Jon Richards ([richards.jon@epa.gov](mailto:richards.jon@epa.gov)) <[richards.jon@epa.gov](mailto:richards.jon@epa.gov)>; Fulmer, Susan <[fulmersb@dhec.sc.gov](mailto:fulmersb@dhec.sc.gov)>

Cc: [pope.robert@epa.gov](mailto:pope.robert@epa.gov); Cathcart, Heather E. <[cathcahe@dhec.sc.gov](mailto:cathcahe@dhec.sc.gov)>; [Shelia.Mcfalls@srs.gov](mailto:Shelia.Mcfalls@srs.gov); [mike.griffith@srs.gov](mailto:mike.griffith@srs.gov); [james.kupar@srs.gov](mailto:james.kupar@srs.gov); [dena.brett@srs.gov](mailto:dena.brett@srs.gov)

Subject: Lower Three Runs IOU Feasibility Study

\*\*\* Caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*

Jon and Susan,

SRS recently notified you by the attached letter of a 30-day extension to our revision of the Rev.1 FS for the Lower Three Runs IOU (originally due on May 8), resulting in a June 7, 2019 due date for the Rev.1.1 FS. The notification also requested extension of the Proposed Plan submittal to July 27, which you approved.

After discussion with EPA last week of a formal dispute between DOE-EM-Oak Ridge and EPA over an ARAR for aqueous discharges from a CERCLA landfill, and the potential impact of that dispute on ARARs for the excavation alternative in the LTR IOU FS, **we would like to suspend the June 7 submittal date for the Rev.1.1 FS.** (Please note that the original May 8 date was based on our expectation of a 30-day revision period after receiving EPA's comments on the Rev.1 FS, as there is not an FFA-required timeframe for the revision of Rev.1 documents.) Until the outcome of the dispute is known, the ARAR remains indeterminate for the excavation alternative and the FS cannot be finalized. A date for submittal of the Rev.1.1 FS will be determined by the Core Team.

Depending on when the dispute is resolved and the FS can be revised, it is also likely that SRS will request another extension of the Proposed Plan due date (currently July 27).

Please let us know if you have any concerns or if you'd like to discuss the rationale for this notification. Thank you.

**Brian T. Hennessey** | Federal Facility Agreement Program Manager, DOE-Savannah River

Bldg. 730-B, #3412

PO Box A | Aiken, SC 29802

803.952.8365 office phone | 803.952.9591 fax

*"A problem well-stated is half solved." - Charles Kettering, American Inventor*