

Shelia Mcfalls

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Wednesday, April 15, 2020 4:05 PM
To: HENNESSEY, BRIAN; pope.robert (epa.gov); Fulmer, Susan; Cathcahe (dhec.sc.gov)
Cc: Mike Griffith; Shelia Mcfalls
Subject: RE: Demolition of Buildings

Ok thanks for the further explanation, and that's fine to do as you've been doing, and since nonFFA, & I'm certainly ok with email correspondence.

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

From: brian.hennessey@srs.gov <brian.hennessey@srs.gov>
Sent: Wednesday, April 15, 2020 3:46 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>; Pope, Robert <Pope.Robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe@dhec.sc.gov
Cc: mike.griffith@srs.gov; Shelia.Mcfalls@srs.gov
Subject: RE: Demolition of Buildings

Jon,

Thanks for sending the Oak Ridge Demolition CERCLA screening form. After discussing this internally a good bit, I don't believe we need a form for Non-Appendix K/Non-Industrial structures because:

- Our D&D Protocol already identifies three decommissioning models—Simple, Integrated Sampling, and CERCLA—based on an evaluation of release potential and hazard and produces a Facility Decommissioning Evaluation Report;
- The point here is that these buildings don't even warrant the records research and time necessary to complete that evaluation; these are not Simple Model buildings—they're beyond simple.

We would prefer for these Non-Appendix K/Non-Industrial structures to just send you, as we have in the past, a request (with a description) to decommission them without an FDE; you or SCDHEC would have an opportunity to inspect the structure or ask for additional information. But since these structures were not listed in the FFA and no section XL documentation of their decommissioning would be required, the email correspondence can be retained in the ARF to show that demolition took place with your cognizance. We will place the emails for the observation towers, the Truck Scale House, and 707-11F in the ARF. Of course, any required state permits for demolition will be obtained.

Let me know if we can proceed in this manner for Non-Appendix K/Non-Industrial structures, or if you want to discuss it further.

Thank you.

Brian T. Hennessey | Federal Facility Agreement Program Manager | DOE-Savannah River
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"A problem well-stated is half solved." - Charles Kettering, American Inventor

From: Richards, Jon M. <Richards.Jon@epa.gov>

Sent: Wednesday, April 8, 2020 5:07 PM

To: HENNESSEY, BRIAN <brian.hennessey@srs.gov>; pope.robert (epa.gov) <pope.robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe (dhec.sc.gov) <Cathcahe@dhec.sc.gov>

Cc: Mike Griffith <mike.griffith@srs.gov>

Subject: RE: Demolition of Buildings

I've enclosed what we do at oak ridge, for these 'non-haz' simple demos, that this looks like example of
So not sure you would consider doing something similar, but it does document this action, and we approve by emails
And we don't see need to inspect this one

Jon Richards

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Sent: Wednesday, April 8, 2020 4:15 PM

To: Richards, Jon M. <Richards.Jon@epa.gov>; Pope, Robert <Pope.Robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe@dhec.sc.gov

Cc: mike.griffith@srs.gov

Subject: Demolition of Buildings

Jon and Susan,

The attachment shows two structures that SRS would like to demolish and remove. Similar to the Observation Towers, we don't believe these structures rise to the level of D&D protocol involvement, and we would like for these to be demolished & removed without preparing FDE's and DPFRs. Neither is listed in Appendix K.1. Just wanted to get your read on these if possible.

The Truck Scale House has power, but no plumbing or drains, and no material of any kind was managed in it. Literally a chair, a desk, a light and a scale readout. It's next to Road 1A in A-Area.

707-11F is a simple Handi-House storage shed with no utilities.

Please let me know if you'd like more information on these structures. If you'd like to inspect them, we will wait until a later date. If you can concur with demolishing these without FFA documentation, please let me know.

Thank you.

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

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