

Shelia Mcfalls

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Thursday, April 01, 2021 2:06 PM
To: HENNESSEY, BRIAN
Cc: Shelia Mcfalls; Cathcahe (dhec.sc.gov)
Subject: [EXTERNAL] RE: Federal Facility Agreement Appendix K Update (SRNS-MS-2020-00145, March 19, 2021) - Re: Deletion of 22 Structures

Yes we are ok with the App K updates

Jon Richards
Regional Radiation Expert & RPM
US EPA R4, SEMD
Richards.jon@epa.gov
404-431-1340

From: brian.hennessey@srs.gov <brian.hennessey@srs.gov>
Sent: Thursday, April 1, 2021 2:01 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>
Cc: Shelia.Mcfalls@srs.gov; Cathcahe@dhec.sc.gov
Subject: FW: Federal Facility Agreement Appendix K Update (SRNS-MS-2020-00145, March 19, 2021) - Re: Deletion of 22 Structures

Jon – I think you may have already approved this proposal in your 9/17/2020 email (below), but please confirm or let me now if you are still evaluating it. Thanks.

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Thursday, **September 17, 2020** 10:51 AM
To: HENNESSEY, BRIAN <brian.hennessey@srs.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>
Cc: pope.robert (epa.gov) <pope.robert@epa.gov>; Cathcahe (dhec.sc.gov) <Cathcahe@dhec.sc.gov>; Shelia Mcfalls <Shelia.Mcfalls@srs.gov>
Subject: [EXTERNAL] RE: D&D Facilities and Appendix K.1 - a Proposal

EPA is ok with this proposal, based on our previous discussion on these type structures, but if SC wants a brief, please include us of course

Jon Richards
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From: Cathcart, Heather E. <cathcahe@dhec.sc.gov>
Sent: Wednesday, March 31, 2021 2:09 PM
To: Shelia Mcfalls <Shelia.Mcfalls@srs.gov>; 'Jon Richards (richards.jon@epa.gov)' <richards.jon@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>

Cc: pope.robert (epa.gov) <pope.robert@epa.gov>; HENNESSEY, BRIAN <brian.hennessey@srs.gov>; Chris Bergren <chris.bergren@srs.gov>; Robert Shirley <Robert.Shirley@srs.gov>; Thelesia Oliver <thelesia.oliver@srs.gov>; Ross Fanning <ross.fanning@srs.gov>; Manuel Terronez <manuel.terronez@srs.gov>; J Ross <j.ross@srs.gov>; Steven Conner <Steven.Conner@srs.gov>; William Griffin <William.Griffin@srs.gov>; John Blankenship <john.blankenship@srs.gov>; Brianna Zawacki <Brianna.Zawacki@srs.gov>; Dena Brett <dena.brett@srs.gov>; Joseph Burch <joseph.burch@srs.gov>; Fuss, Travis R. <FUSSTR@dhec.sc.gov>; O'Quinn, Gregory <OQUINNGN@dhec.sc.gov>; Beatty, K. Leigh <BEATTYKL@dhec.sc.gov>; Cameron, Bethany <cameroba@dhec.sc.gov>; Taylorwf (dhec.sc.gov) <Taylorwf@dhec.sc.gov>

Subject: Re: Federal Facility Agreement Appendix K Update (SRNS-MS-2020-00145, March 19, 2021)

Shelia,

SCDHEC has reviewed the updated presentation and agrees with the removal of the of the 22 non-industrial facilities from Appendix K of the FFA. Please contact me if you have any questions or concerns.

Thanks,
Heather

Heather H. Cathcart

Federal Remediation Coordinator
Federal Remediation Section, Division of Site Assessment, Remediation & Revitalization

S.C. Dept. of Health & Environmental Control

Office: (803) 898-0916

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From: Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>

Sent: Tuesday, March 23, 2021 8:45 AM

To: 'Jon Richards (richards.jon@epa.gov)' <richards.jon@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>

Cc: pope.robert@epa.gov <pope.robert@epa.gov>; Cathcart, Heather E. <cathcahe@dhec.sc.gov>; brian.hennessey@srs.gov <brian.hennessey@srs.gov>; chris.bergren@srs.gov <chris.bergren@srs.gov>; Robert.Shirley@srs.gov <Robert.Shirley@srs.gov>; thelesia.oliver@srs.gov <thelesia.oliver@srs.gov>; ross.fanning@srs.gov <ross.fanning@srs.gov>; manuel.terronez@srs.gov <manuel.terronez@srs.gov>; j.ross@srs.gov <j.ross@srs.gov>; Steven.Conner@srs.gov <Steven.Conner@srs.gov>; William.Griffin@srs.gov <William.Griffin@srs.gov>; john.blankenship@srs.gov <john.blankenship@srs.gov>; Brianna.Zawacki@srs.gov <Brianna.Zawacki@srs.gov>; dena.brett@srs.gov <dena.brett@srs.gov>; joseph.burch@srs.gov <joseph.burch@srs.gov>; Fuss, Travis R. <FUSSTR@dhec.sc.gov>; O'Quinn, Gregory <OQUINNGN@dhec.sc.gov>; Beatty, K. Leigh <BEATTYKL@dhec.sc.gov>; Cameron, Bethany <cameroba@dhec.sc.gov>

Subject: Federal Facility Agreement Appendix K Update (SRNS-MS-2020-00145, March 19, 2021)

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SRNS-J2000-2021-00214

Jon and Susan,

On September 16, 2020, the U.S. Department of Energy (DOE) submitted a proposal to the South Carolina Department of Health and Environmental Control (SCDHEC) and U. S. Environmental Protection Agency (EPA) to remove approximately 22 structures from the Federal Facility Agreement (FFA) Appendix K.1. These are non-industrial, non-decommissioning protocol structures with no potential for environmental impact and they do not warrant the Comprehensive Environmental Response, Compensation, and Liability Act-like screening and documentation that our Facility Decommissioning Evaluations (FDEs) and Decommissioning Project Final Reports (DPFRs) Protocol requires. In addition, not producing FDEs and DPFRs for these structures saves DOE, SCDHEC, and EPA time and resources.

On September 17, 2020, EPA responded that they were in agreement with the proposal based on previous discussions on these type structures.

On September 18, 2020, SCDHEC replied that they wanted the items listed below addressed to ensure they were in agreement before removing the structures from Appendix K.1.

- Please include photos of the inside of the structures.
- Please clarify the use of the Deer Hunt Building. (Was this where hunters were registered? Samples of the deer collected? Something else?)
- SCDHEC – Aiken Environmental Affairs Office site visit for the Tire Storage Canopy.

The presentation was updated to include photos of the insides of the structures and to clarify the use of the Deer Hunt Building. Leigh Beatty visited the Tire Storage Canopy on September 23, 2020. However, the updated presentation was not submitted to SCDHEC and EPA for final review and approval because DOE, SCDHEC, and EPA started working on the FDE/DPFR Protocol in an effort to get it finalized.

The initial idea was to remove the 22 non-industrial structures before the FFA Revision 0 Appendix K for Fiscal Year (FY) 2021 was submitted to the regulators. Due to time constraints, the decision was made to leave them in and remove them in the Revision 1 submittal of Appendix K for FY2021. However, the SCDHEC and EPA approved the FFA Revision 0 Appendix K for FY2021 in letters dated January 21, 2021 and January 27, 2021, respectively. Therefore, there was no further discussion on the removal of the structures from Appendix K. The presentation was then updated to reflect the status of the FFA Appendix K for FY2021.

The purpose of this email is to submit the updated presentation for your review and concurrence. Once SRS receives your concurrence, the FFA Revision 0 Appendix K for FY2021 will be updated to remove the 22 non-industrial facilities listed in the presentation. All email correspondence will be placed in the Administrative Record File as documentation of the agreement.

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 | 1.803.952.6819 office | 1.803.645.8119 cell | 1.803.725.7243, #19367 pager | 1.803.952.6403 fax | Savannah River Site | Building 730-4B, 3134 | Aiken, SC 29808

