



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

**NOV 15 2019**

Ms. Susan B. Fulmer, P.G., Manager  
Federal Remediation Section  
Division of Site Assessment, Remediation and Revitalization  
Bureau of Land and Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Mr. Jon Richards  
Acting Savannah River Site Remedial Project Manager  
Superfund Division  
U. S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

**SUBJECT:** Building 235-F Regulatory Information Meeting (October 30, 2019), SEMS Number: 88

Savannah River Site (SRS) hosted an information meeting on the planning efforts for Building 235-F on October 30, 2019 at the South Carolina Department of Health and Environmental Control (SCDHEC) Aiken Environmental Affairs Office (see Enclosures 1 and 2). The U. S. Department of Energy (DOE), Savannah River Nuclear Solutions, (SRNS), South Carolina Department of Health and Environmental Control (SCDHEC), and the U. S. Environmental Protection Agency – Region IV (EPA) participated in the meeting. The purpose of the meeting was to present and discuss the current state of the deactivation of Building 235-F and to discuss with the Core Team (DOE, SCDHEC, and EPA) the administrative path for the building in the context of the Federal Facility Agreement (FFA).

SRS presented the following topics at the meeting:

- Facility history and detailed discussion of process equipment
- Facility status/update/radiological inventory
- Proposed removal action end-state alternatives
- Groundwater modeling results

The Core Team agreed to the following:

- Due to the location and the physical characteristics of the contamination (i.e., predominately plutonium [Pu-238] and neptunium [Np-237]) remaining after deactivation activities to date, the risk to the on-site worker is too great to justify the removal of any additional radiological material from the building; groundwater impacts within 10,000 years can be mitigated by reasonable in-situ decommissioning (ISD) approaches.

NOV 15 2019

- No further removal of radiological material is necessary as long as DOE commits to a building end state that is protective (i.e., is protective of human health and the environment and meets groundwater limits to the extent practicable).
- In accordance with the FFA, the Core Team agreed to proceed with a Non-Time Critical Removal Action (NTCRA) and development of a Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) to evaluate removal action alternative(s). An Action Memorandum documenting the preferred NTCRA would be issued with recognition that funding would determine the ability to schedule and complete decommissioning. A Resource Conservation and Recovery Act Facility Investigation / Remedial Investigation Report with Baseline Risk Assessment and Focused Corrective Measures Study / Feasibility Study will not be necessary prior to implementing the NTCRA.
- Other non-radiological hazards that remain in the facility after deactivation (lead, polychlorinated biphenyls, etc.) will be addressed as part of the NTCRA evaluation.
- Evaluation of removal alternatives will include a groundwater point of assessment at the F-Area Operable Unit boundary, located approximately 360 meters from Building 235-F.
- Decommissioning can be performed in phases as funding becomes available.

SRS agreed to schedule a follow-up meeting and facility tour in 2020 to begin the RSER/EE/CA scoping process. The range of alternatives to be included in the RSER/EE/CA will be determined at that time, but are expected to include no action, one or more ISD alternatives considering various grouting scenarios along with the installation of a modified roof, and removal/disposal.

The effort and time that the EPA and the SCDHEC have given on this facility are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,



Brian T. Hennessey  
SRS Remedial Project Manager  
Infrastructure and Area Completion Division

Ms. Susan Fulmer  
Mr. Jon Richards

3

NOV 15 2019

Enclosures:

1. F-Area Material Storage Building (235-F) Information Meeting, ERD-EN-2019-0045, October 30, 2019.
2. Building 235-F Information Meeting Attendance List

cc w/o encl:

D. Scaturo, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. Reece, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
T. Fuss, SCDHEC-Aiken Environmental Affairs Office  
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office  
B. Cameron, SCDHEC-Aiken Environmental Affairs Office  
R. H. Pope, EPA-Atlanta

cc w/encl:

M. McRae, TechLaw, Inc.  
J. Dawson, TechLaw, Inc.

BUILDING 235-F SCOPING MEETING  
INFO

October 29, 2019 @ 10:00 a.m.

Name	Agency	Phone Number
DENA BRETT	SRNS	803-952-6031
William Jolin	SRNS	803-952-6122
JOE BURCH	SRNS	803 952-6660
Hannah Gotsch	SRNS	803 952-4954
Jeff Ross	SRNS	803 952.6897
Jeff Mast	SRNS	803-952-4369
Brian Hennessey	DOE-SR	803.952.8365
RANDY CLENDENING	DOE-SR	803-208-3906
Chris Berguen	SRNS	803-952-6530
Jon Richards	USEPA	404 562-8418
Jana Dawson	Legacy Railway Techlaw	703627-0821
Mac McRae	Techlaw	678 281-1402
Ben Jump	SCDHEC	803-898-0905
Rob Pope	USEPA	404-272-5799
Heather Carnicant	SCDHEC	803-898-0916
Susan Fulmer	SCDHEC	803-898-4331
GREGG O'QUINN	SCDHEC	803-642-1637
Duke Taylor	SCDHEC	803 898 0889
GARY ROSE	SRNS	803-952-6143
Jack Musall	SRNS	803-952-2249
Barbara Harris	SCDHEC	803-394-0042
Sandra Snyder	SCDHEC	803-898-1699