

**Joseph Burch**

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**From:** Joseph Burch  
**Sent:** Friday, July 12, 2019 9:25 AM  
**To:** 'Jon Richards (richards.jon@epa.gov)'; Cathcahe (dhec.sc.gov)  
**Cc:** pope.robert (epa.gov); 'Fulmer, Susan'; HENNESSEY, BRIAN; ADAMS, KAREN; Chris Bergren; Mike Griffith; Thomas Kmetz; Thomas Gaughan; Amy Meyer; Thelesia Oliver; Susan Cornwell; Kelsey Holcomb; Dena Brett; Monique Rabin; James Kubar; 'Travis R. Fuss'; 'O'Quinn, Gregory'; 'Bethany Cameron'; 'Barbara Harris'; 'Beatty, K. Leigh'; BENDER, DAVID J; Mark Raymond; Ted Millings; Shelia Mcfalls; 'Taylorwf (dhec.sc.gov)'; 'Snyder, Sandra'  
**Subject:** Wetland Area at Dunbarton Bay Project Status Discussion Adobe Webcast - June 18, 2019  
**Attachments:** WADB Project Status June.pdf; WADB Meeting Conference Call June 18, 2019.pdf

**SRNS-J2600-2019-00315**

Reference 1: Corrective Measures Implementation/Remedial Action Implementation Plan for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U) (SRNS-RP-2018-00481, Revision 1, November 2018)

Reference 2: Record of Decision Remedial Alternative Selection for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (SRNS-RP-2013-00730, Revision 1, April 2018)

Reference 3: Land Use Control Implementation Plan for the Wetland Area at Dunbarton Bay in Support of Steel Creek Integrator Operable Unit (U) (SRNS-RP-2018-00479, Revision 1, November 2018)

A Wetland Area at Dunbarton Bay (WADB) Project Status Webcast meeting was conducted with the Core Team (USDOE, USEPA, SCDHEC) on June 18, 2019. The slide presentation and the attendees list are attached for information. This e-mail documents the meeting discussions for placement in the Administrative Record and meets the notification requirements defined within Section 4.3 of Corrective Measures Implementation/Remedial Action Implementation Plan (Reference 1). The purpose of the meeting was to present the current status of the remedy, provide details of the construction challenges, and to propose changes to the short term remedy implementation schedule. As presented in the meeting, the challenges resulting from subsurface water, the presence of additional ash within and exterior to the construction site, and the insufficient off-site disposal availability results in the need to re-evaluate the remedy and/or administrative schedule for the remaining ash.

During the meeting, SRS presented two options for Core Team consideration that are believed to be a reasonable approach to the administrative strategy for managing the remaining risk.

Option 1: Complete ash removal in the North Ash Remediation Area, limited ash removal in the South Ash Remediation Area, expand the Land Use Control Boundary to include all of the remaining three zones in the South Ash Remediation Area

Option 2: Complete ash removal in the North Ash Remediation Area, designate the South Ash Remediation Area as a separate unit to be addressed at a later date after identification of cost, and an effective on or off-site disposal facility with the capability to accept larger quantities of ash

The Core Team agreed to Option 2. Based on this agreement SRS will defer ash removal in the South Ash Remediation Area (Zones 2, 3, and 4) and will evaluate long term options for the disposal of all SRS CERCLA ash that requires future remediation (Note: the remediation of Zone 1 has been completed.). The Northern Ash Remediation Area will be completed now and land use controls established as defined in the approved Record of Decision (Carolina bay and 100 foot buffer area) (Reference 2) and the Land Use Control Implementation Plan (Reference 3). SRS will follow-up with

formal correspondence with regard to close-out of the completed scope and the administrative path for completion of the remedial action.

Please let me know if you have any questions or comments.

Joseph Burch  
Environmental Compliance Authority – Area Completion Projects  
Building 730-4B, RM 3118, Phone: (803) 952-6660

Subject: Wetland Area At Dunbarton Bay Conference Call

Date: June 18, 2019

Time: 12:30 PM

**ATTENDEES:**

√	Name	Organization
√	Kelsey Holcomb	SRNS
√	Joseph Burch	SRNS
√	Jim Kupar	SRNS
√	Dena Brett	SRNS
√	Mike Griffith	SRNS
√	Monique Rabin	SRNS
√	Chris Bergren	SRNS
√	Susan Cornwell	SRNS
√	Tom Kmetz	SRNS
√	Karen Adams	DOE
√	Brian Hennessey	DOE
√	David Bender	DOE
√	Jon Richards	EPA
√	Heather Cathcart	SCDHEC
√	Susan Fulmer	SCDHEC
√	Duke Taylor	SCDHEC
√	Sandra Snyder	SCDHEC
√	Barbara Harris	SCDHEC-Aiken
√	Greg O'Quinn	SCDHEC-Aiken

**AGENDA**

- 1. Introductions**
- 2. Slide Presentation**

# Wetland Area at Dunbarton Bay (WADB) Project Status Update – June 2019

**Mike Griffith**

Manager, Area Completion Projects

**Kelsey Holcomb**

Control Account Manager

*June 18, 2019*

# Wetland Area at Dunbarton Bay (WADB) Project Background

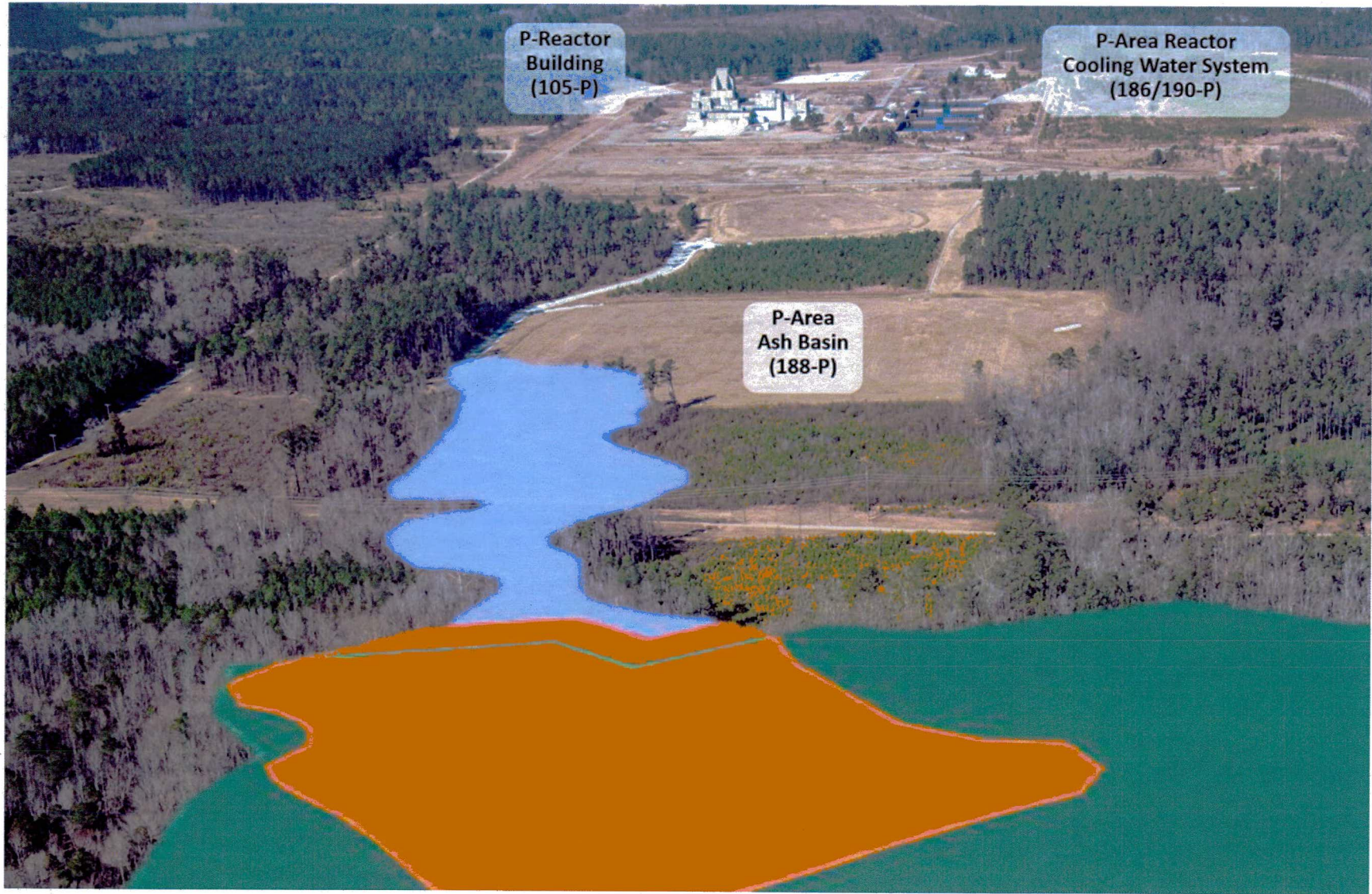
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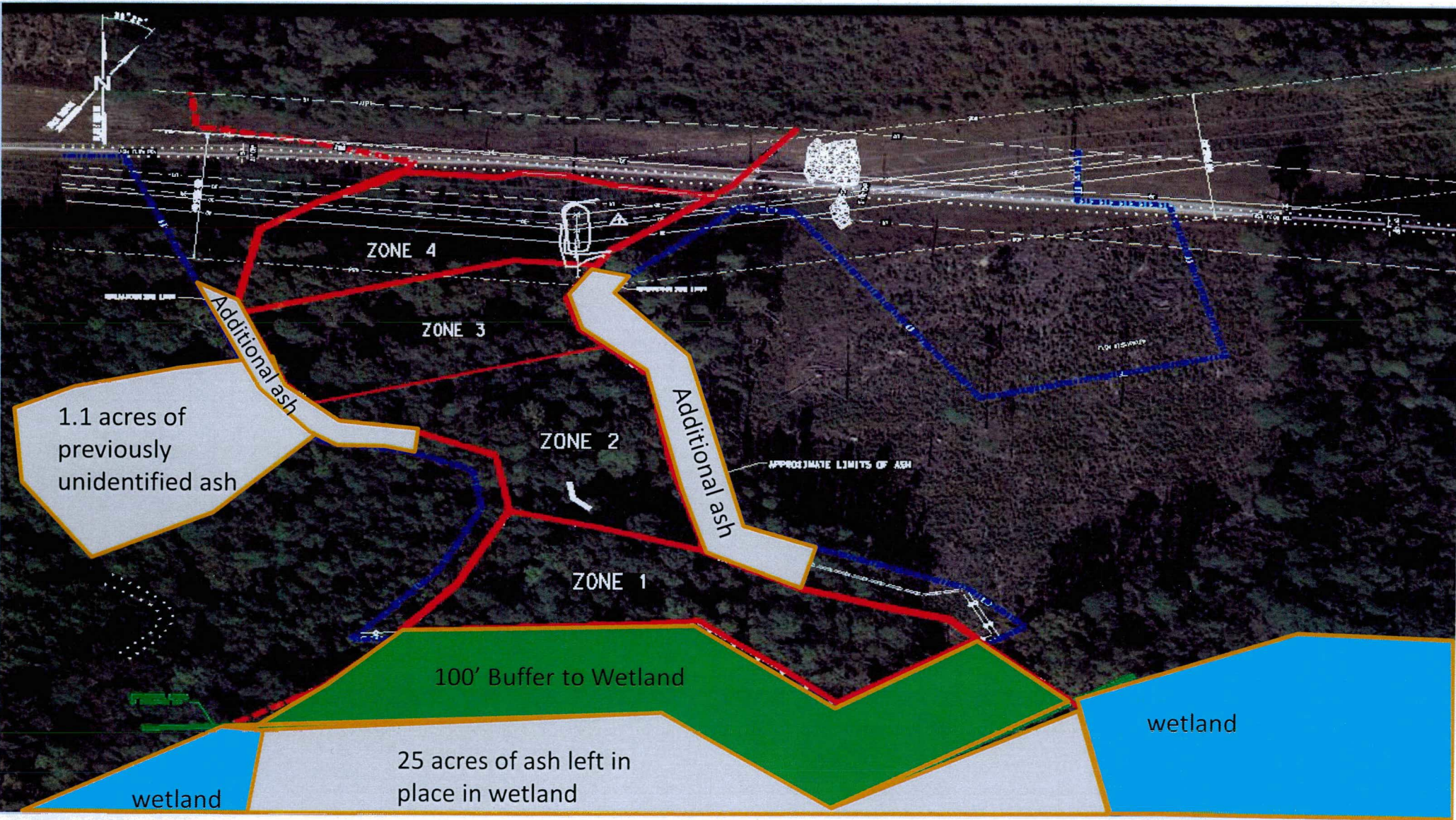
## Background

- Area created by overflow of ash from the P-Area Ash Basin
- Scope includes excavation of 25,300 yd<sup>3</sup> of ash and contaminated soil media from the P-Area Ash Basin boundary to the end of the buffer around the Dunbarton Bay Wetland
- Waste being transported off-site to Three Rivers Landfill

# WADB Overlay

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# Project Status – June 2019

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- **Status/Summary Performance**
  - Remedial Action start date – January 2019
  - Completed clearing/grubbing and installation of stormwater controls for all areas
  - Completed excavation, stockpiling and disposal of ash from Zone 1 of the South Ash Remediation Area
    - Completed area stabilization
    - Visual inspection and confirmation sampling completed and satisfactory
  - Completed clearing and grubbing in the North Ash Remediation Area and began ash excavation

# Issues Encountered to Date

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## Waste Disposal

- Recently established quantitative moisture content requirements for landfill acceptance has increased material handling cost and heavier material has contributed to significantly increased disposal cost

## Southern Ash Remediation Area Site Conditions

- Additional ash outside of previously defined limits of ash required excavation to support area access which slowed installation of erosion control and stormwater management system (Approximately 3,052 cu-yds)
- Ash at greater depths in Zone 1 resulted in additional 2,600 cu-yds excavated (total 5,600 cu-yds)
- Higher than normal rainfall in the months before the start of remedial action activities resulted in wetter than anticipated field conditions
  - Perched water draining from other zones complicated excavation
- Additional 1 acre of ash identified outside limits of the South Ash Remediation Area

# South Ash Remediation Area Zone 1 Conditions

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- Excavated area filled with perched water that required management on-site within the construction area.



# South Ash Remediation Area Zone 1 Stabilized

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# Summary

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- Continuing ash excavation in the North Ash Remediation Area; conditions are favorable to complete excavation and disposal; however, additional ash is likely.
- Completed one of four zones in the South Ash Remediation Area with several complexities and increased cost
  - Ash at greater depths
  - Heavy wet ash required stockpiling and drying to meet landfill acceptance criteria
    - *Disposal cost has increased significantly due to additional weight*
  - Extremely wet conditions complicated excavation
  - Similar conditions expected in the remaining three zones
- 40K cubic yards max approved for disposal at Three Rivers Landfill for this project (current project estimate 38K); nowhere to dispose of additional ash when quantity is exceeded, or ash recently identified outside of the limit of the South Ash Remediation Area

# Options for Consideration

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**Increased cost and volume limits at current disposal facility will restrict disposal of ash from WADB and future ash remediation projects**

- **Option 1: Complete ash removal in the North Ash Remediation Area, limited ash removal in the South Ash Remediation Area, expand the Land Use Control Boundary to include all of the remaining three zones in the South Ash Remediation Area**
- **Option 2: Complete ash removal in the North Ash Remediation Area, designate the South Ash Remediation Area as a separate unit to be addressed at a later date after identification of cost, and effective on or off-site disposal facility with the capability to accept larger quantities of ash**