

Shelia Mcfalls

From: Fulmer, Susan <fulmersb@dhec.sc.gov>
Sent: Monday, March 05, 2018 10:48 AM
To: HENNESSEY, BRIAN; Cathcahe (dhec.sc.gov); Lloyd, Diedre; pope.robert (epa.gov)
Cc: Jon Richards (richards.jon@epa.gov); Thomas Gaughan; Shelia Mcfalls; Dena Brett
Subject: RE: D-Area Groundwater

Brian,

We are conceptually good with your proposal but would like to talk through how the subsequent milestones would be replaced in light of the suspension agreement.

Thanks,
Susan

Susan B. Fulmer, P.G.
Manager
Federal Remediation Section, Division of Site Assessment, Remediation & Revitalization
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From: brian.hennessey@srs.gov [mailto:brian.hennessey@srs.gov]
Sent: Thursday, March 1, 2018 4:44 PM
To: Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcart, Heather E. <cathcahe@dhec.sc.gov>; Lloyd, Diedre <Lloyd.Diedre@epa.gov>; pope.robert@epa.gov
Cc: Jon Richards (richards.jon@epa.gov) <richards.jon@epa.gov>; Thomas.Gaughan@srs.gov; Shelia.Mcfalls@srs.gov; dena.brett@srs.gov
Subject: RE: D-Area Groundwater

I think you'll find it interesting!

Thank you.

---Brian Hennessey
Federal Facility Agreement Project Manager
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"A problem well-stated is already half solved."--Charles Kettering, American Inventor



From: Fulmer, Susan [<mailto:fulmersb@dhec.sc.gov>]

Sent: Thursday, March 01, 2018 4:41 PM

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

Cc: Jon Richards (richards.jon@epa.gov) <richards.jon@epa.gov>; Thomas Gaughan <Thomas.Gaughan@srs.gov>; Shelia Mcfalls <Shelia.Mcfalls@srs.gov>; Dena Brett <dena.brett@srs.gov>

Subject: RE: D-Area Groundwater

Thanks, Brian. We'll take a look at this and get back to you soon.

Susan B. Fulmer, P.G.

Manager

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

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From: brian.hennessey@srs.gov [<mailto:brian.hennessey@srs.gov>]

Sent: Thursday, March 1, 2018 4:33 PM

To: Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcart, Heather E. <cathcahe@dhec.sc.gov>; Lloyd, Diedre <Lloyd.Diedre@epa.gov>; pope.robert@epa.gov

Cc: Jon Richards (richards.jon@epa.gov) <richards.jon@epa.gov>; Thomas.Gaughan@srs.gov; Shelia.Mcfalls@srs.gov; dena.brett@srs.gov

Subject: D-Area Groundwater

Susan and Diedre,

Attached is a white paper on the proposed early action in response to low-pH groundwater in the vicinity of the 489-D Coal Pile Runoff Basin and 484-17D Coal Laydown Yard. This paper, written in 2016 by Gerald Blount, is the conceptual basis for one of the actions that I proposed during our discussions of the Suspension Agreement for LW Milestones in November 2017.

I'm requesting that you consider allowing SRS to perform this work as a Treatability Study (TS), rather than a non-time-critical removal action, for a number of reasons:

- SRS believes this concept is hydrologically and chemically sound, but this is not a standard, off-the-shelf response action that SRS has any prior experience with;
- Some aspects of the project/action described in the paper are too uncertain to support its selection as a removal action – the actual flow that the artesian wells will generate and sustain, the number and design of wells that are required to supply an adequate amount of water to the aquifer, and the magnitude of the effect on groundwater (pH change) that will result;
- Again, SRS believes this idea is sound and will be beneficial for a significant portion and quantity of D-Area groundwater; if so, it may prove appropriate for inclusion as part of the overall DAGW OU remedy in 2023. Through a TS we can investigate the potential of this approach—determine/demonstrate its effectiveness and suitability as a potential remedy—which is the purpose of a TS;

- An EE/CA must compare alternatives for a response action. The opportunity we have here is to try this innovative action using available resources to address a generally known condition (locally low pH under coal-containing soils) rather than a well-defined Problem Warranting Action. It is not SRS's intention to consider or perform any different action for this portion of the plume until after the RI/FS has been completed for DAGW, so evaluating alternatives at this time would not be productive.

I anticipate that the other DAGW OU early action (484-17D Coal Laydown Yard Soil Neutralization) will go forward as a non-time-critical removal action, as proposed.

If you concur with this strategy, the 7/2018 Rev.0 EE/CA milestone in the Suspension Agreement would be replaced in Appendix E for FY2018 with a Rev.0 Treatability Study Work Plan. Subsequent milestones could be discussed.

I know we have a lot on our plates right now, but if we need to discuss this, it would be good if we could do so next Tuesday or Wednesday. I'll be out of the office from 3/8 through 3/15, and the project team needs to get to work on whichever document we decide on. We can discuss it the week of March 19 if needed.

Thank you.

----Brian Hennessey
Federal Facility Agreement Project Manager
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