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**APPROVAL FOR RUST FORCE ACCOUNT TO
COMPLETE THE SILOS 1 AND 2 REMOVAL
ACTION**

12-18-90

**WMCO/DOE
WMCO:EMT:90-869**

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LETTER

Westinghouse
Materials Company
of Ohio

DEC 21 1990

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December 18, 1990

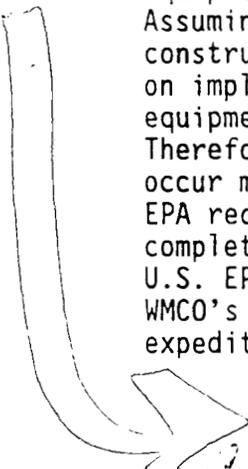
Mr. Gerald W. Westerbeck
FMPC Site Manager
U. S. Department of Energy
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Westerbeck:

APPROVAL FOR RUST FORCE ACCOUNT TO COMPLETE THE SILOS 1 AND 2 REMOVAL ACTION

On November 30, 1990, the U.S. EPA conditionally approved the Silos 1 and 2 Removal Action Work Plan. The conditional approval included the requirement that the installation of the bentonite in Silos 1 and 2 be completed on or before December 1, 1991. In an effort to expedite the current schedule presented in the Silos 1 and 2 Removal Action Work Plan, WMCO requests DOE approval to use RUST Force Account. Use of the RUST Force Account will eliminate the currently scheduled activities associated with advertising and awarding a fixed price construction contract. These activities normally follow issuance of the certified for construction (CFC) package.

Historically, the duration to complete the activities associated with advertising and awarding a fixed price construction contract is 60 to 75 working days. At that time the Construction Work Order (CWO) is issued to enable the subcontractor to start procuring the equipment and, subsequently, implementing the actual construction. Currently, the Silos 1 and 2 Removal Action CFC package is schedule to be issued on May 15, 1991. With a fixed price contract, equipment procurement would begin in mid August, 1991 or September, 1991. Assuming that the equipment can be available within 2 months, the actual construction would be initiated in mid October, 1991 or November, 1991. Based on implementing projects at the FMPC and input from Parsons, installing the equipment and training the operators will take approximately two months. Therefore, completing the installation of the bentonite in Silos 1 and 2 would occur mid December, 1991 or January, 1992. This is not consistent with the U.S. EPA requirement that the installation of the bentonite in Silos 1 and 2 be completed on or before December 1, 1991. In an effort to meet or exceed this U.S. EPA commitment, WMCO has investigated alternate contracting strategies. WMCO's conclusion is that the utilization of RUST Force Account will be the most expeditious alternative.



Concurrence: Ray/Mason 12/20/90
Approval: G. Westerbeck 12/20/90

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Historically, RUST performance and qualifications have shown how effectively work can be accomplished using a mixture of its force account and the combined knowledge of equipment vendors and specialized subcontractors. Through established relationships with other parties RUST has been able to respond quickly to projects such as the covering of Pit 4 and installation of the temporary surge lagoon tanks. Another recent example of this integrated working relationship is the Plant 1 fabricated structure.

Also, RUST has previous experience concerning the Waste Storage Silos. One area of involvement has been constructability reviews involving the silos. The most notable are the Environmental Isolation Enclosure, the Silo 4 demolition and the interim removal action to protect the dome from collapsing on Silos 1 and 2. Specifically, RUST has managed the following work in the K-65 Silo area:

- o K-65 dome cap installation, done by RUST force account.
- o The foaming of the domes, done by a specialty contractor and assisted by RUST force account personnel.
- o The installation of the Radon Treatment System and closed circuit TV cameras, done by an 8A contract with assistance from RUST force account personnel.

RUST has demonstrated adept ability to work with WMCO in managing the changing mission at the FMPC. RUST craft and staff personnel were one of the first groups to complete CERCLA training and come into compliance with 29 CFR 1910.120 requirements by:

- o Drafting and obtaining WMCO's approval on ten (10) site specific health and safety plans, training subcontractors/RUST force account to the plan and periodic audits to ensure the salient points of the plan are being followed.
- o Obtaining baseline physicals from the WMCO Medical Facility.
- o Receiving the necessary 40 hour or 48 hour training.
- o Verifying required 24 hour field experience for each CERCLA trained person.

It should be noted that of RUST's direct hire CERCLA trained current laborers 50% of them received an additional 40 hours of hands on hazardous waste material removal training by their union. The Laborer's Union, a member of the Greater Cincinnati Building and Trades Council, has an established 80 hour hazardous waste management training program for its members that is offered at their training facilities near Columbus, Ohio.

RUST has managed other projects that fall into the removal/remediation work classification. Projects that directly involve RUST force account personnel are:

- o Dust Collector Removals in Plant 9

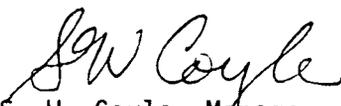
G. W. Westerbeck

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- o Dust Collector Removals in Plant 5
- o Removal of abandoned above ground tanks and the underground storage tanks (UST's) at the existing tank farm.
- o The Thorium Silo Reinforcement Project. This required reinforcement of the silo legs and silo shell while containing thorium product.
- o Administration and supervision of the Thorium Silo removal subcontract. Assistance was also given with RUST force account personnel.
- o TACO heat treatment equipment removal in Plant 6.
- o Sitewide installation of erosion control measures.
- o Contaminated soil removal throughout the site.
- o The Bentonite and clay placement to cover pit 4. This involved blending and placement of bentonite and clay to cap the pit.
- o Tunnel at the Lab after CERCLA went into affect. This allowed Caddell, the General Contractor for the Lab project, to proceed with their contract and minimized the cost impact to the project.

With these projects RUST has demonstrated a wealth of resources that can be drawn on to handle all types of removal/remedial activities. If DOE approval is granted for RUST force account to complete the Silos 1 and 2 Removal Action, RUST will assign R. M. Nichols as the Project Coordinator so that a single point contact will help coordinate any RUST input/assistance that is needed.


S. W. Coyle, Manager
Environmental Management

LAH/lem

- c: D. P. Capelle, RUST
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