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**OPERABLE UNITS #1 & 2 ADDITIONAL WORK  
U.S. DOE FERNALD  
OHD 890 008 976**

**03/04/91**

**USEPA/DOE-FMPC  
1  
ENCLOSURE  
OU1**



UNITED STATES ENVIRONMENTAL  
REG  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

1500

MAR 04 1991

REPLY TO ATTENTION OF:

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

5HR-12

RE: Operable Units #1 & 2  
Additional Work  
U.S. DOE Fernald  
OHD 890 008 976

Dear Mr. Craig:

In two letters dated February 4, 1991, the United States Department of Energy (U.S. DOE) submitted requests for additional work for Operable Units (OU) #1 and #2 under Section XV of the 1990 Consent Agreement. U.S. DOE requested more time for completion of remedial primary documents because of "additional" remedial investigation field work that is required, but specific work plans were not submitted.

The additional remedial investigation field work that is required has been anticipated for an extended period of time. Much of the work is covered by RI work plans that were submitted to U.S. EPA last year and approved in mid and late 1990. U.S. DOE has not performed some of this sampling because of contracting difficulties and failure to adequately fund the activities.

The United States Environmental Protection Agency (U.S. EPA) does not consider the above-mentioned work to be "additional" work, as defined by the 1990 Consent Agreement. Since U.S. DOE is preparing a proposal for restructuring operable units and schedules, U.S. EPA will not at this time assess penalties for failure to submit the Remedial Investigation (RI) reports for OU #1 and #2, but reserves all rights to do so at a future time.

If you have any questions, please contact me at (312) 886-4436.

Sincerely,

Catherine A. McCord  
Remedial Project Manager