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**COMPLIANCE WITH LAND DISPOSAL
RESTRICTIONS (LDR) FOR INVESTIGATION
DERIVED WASTES AT THE U.S. DEPARTMENT
OF ENERGY (DOE) FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT**

08/10/92

**DOE-2237-92
DOE-FN/OEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

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AUG 10 1992

DOE-2237-92

Mr. Donald R. Schregardus, Director
Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Dear Mr. Schregardus:

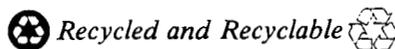
COMPLIANCE WITH LAND DISPOSAL RESTRICTIONS (LDR) FOR INVESTIGATION DERIVED WASTES AT THE U. S. DEPARTMENT OF ENERGY (DOE) FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Reference: Letter, R. E. Tiller to D. R. Schregardus, "Compliance of Radioactive Mixed Wastes Subject to Land Disposal Restrictions (LDR) at the U. S. Department of Energy's Fernald Environmental Management Project (FEMP)," May 7, 1992

The referenced correspondence informed the Ohio Environmental Protection Agency (OEPA) of the current compliance status of radioactive mixed wastes subject to LDRs at the FEMP. The reference also informed OEPA of the intent of the FEMP to continue to generate waste resulting from those activities required to insure environmental compliance (e. g. compliance with FEMP's Amended Consent Agreement [ACA] and Proposed Amended Consent Decree [PACD]) or further protection of the health and safety of workers or the public. This letter provides supplemental information pertaining to one such waste stream, Investigation Derived Wastes (IDW), which is being generated by activities required to satisfy the provisions of the Amended Consent Agreement.

As you are aware, the FEMP is in the process of performing a Remedial Investigation/Feasibility Study (RI/FS) under the provisions of the Amended Consent Agreement with U.S. EPA. Field and laboratory investigations associated with the RI/FS are continuing consistent with the terms of the agreement. These investigations include the completion of subsurface borings, the installation and sampling of monitoring wells and other investigations necessary to evaluate the nature and extent of contamination associated with FEMP operations. Also ongoing is the conduct of treatability studies at off-site facilities to support the detailed evaluation of remedial alternatives for the RI/FS and remedial design activities. IDW including soil cuttings, spent samples, purge waters, decontamination fluids, personal protective equipment, and treatability wastes are being generated as a consequence of these field and laboratory investigations. By the nature of these

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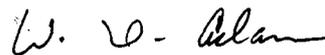
investigations and the materials involved, there is a significant potential to generate radioactive mixed wastes restricted from land disposal.

Consistent with available guidance pertaining to the management of IDW (i.e., OSWER 9345.3-03FS), the DOE considers that storing IDW until implementation of a final disposal option as identified in a Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Record of Decision is allowable storage under the Resource Conservation and Recovery Act (RCRA) Land Disposal Restriction storage prohibition. It is the intent of the FEMP to continue these investigative activities and manage all IDW in a responsible manner, in compliance with our drum management plan and other applicable regulatory requirements.

Enclosed is a summary of FEMP investigating activities which generate potential LDR waste streams. The activities identified in the enclosure are considered non-discretionary, in that continuation of these operations is necessary to achieve environmental compliance. FEMP is requesting your concurrence for the continued generation of the waste streams identified in the enclosure.

If you or your staff have any questions, please call David Rast at (513) 738-6322.

Sincerely,



W. D. Adams
Acting Manager

FN:Rast

Enclosure: As Stated

cc w/enc.:

J. J. Fiore, EM-42, TREV
K. A. Hayes, EM-424, TREV
J. Benetti, USEPA-V, AT-18J
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AR Coordinator, WEMCO

CERCLA INVESTIGATIVE ACTIVITIES

<u>ACTIVITY</u>	<u>WASTE STREAMS</u>	<u>GENERATION DATE</u>
Well/Piezometer Installation	Soil Cutting, Development Water, PPE, Contact Waste, Decon Fluids, Sludges/Solids, Disposable Sampling Eqpt.	Ongoing
Subsurface Soil Sampling (Borings/Trenching)	Soil Cuttings, PPE, Contact Waste, Decon Fluids, Disposable Sampling Equipment, Extract Wastes	Ongoing
Surface Soil Sampling	PPE, Contact waste, Decon Fluids, Disposable Sampling Eqpt, Extract Wastes	Ongoing
Surface Water sampling	Spent Samples, PPE, Contact Wastes, Disposable Sampling Eqpt, Decon Fluids, Extract Wastes	Ongoing
Groundwater Sampling	Same As Surface Water + Purge Water	Ongoing
Treatability Investigation	Contact Waste Sludges/Sediments, PPE, Decon Fluids, Extract Wastes, Spent Samples	Ongoing
Plugging & Abandonment Of RI/FS Wells	Spent Grouts, Casing Materials, PPE, Soil	Ongoing
Sampling Of Contaminated Facilities	Spent Samples, Contact Waste, Extract waste, Decon Fluids, Disposable Sampling Eqpt, PPE	Summer 1992 Thru Fy 1995
Sampling Of Containers	Same As Sampling Of Contaminated Facilities	Ongoing