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**NOTIFICATION OF ADDITIONAL WORK OR
MODIFICATION TO WORK UNDER SECTION
XVII (EXTENSIONS OF THE AMENDED CONSENT
AGREEMENT**

02/02/93

**DOE-FN/EPA
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LETTER**



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FEB 2 1993

DOE-1032-93

~~Mr. James A. Saric~~
Remedial Project Manager
U.S. Environmental Protection Agency
Region V, 5HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Graham E. Mitchell
Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

**NOTIFICATION OF ADDITIONAL WORK OR MODIFICATION TO WORK UNDER SECTION XV
(ADDITIONAL WORK) AND REQUEST FOR EXTENSION UNDER SECTION XVIII (EXTENSIONS)
OF THE AMENDED CONSENT AGREEMENT**

This letter notifies you of additional work or modification to work that affects Operable Unit 2 (OU 2) and Operable Unit 3 (OU 3) milestones under the Amended Consent Agreement (ACA). The U.S. Department of Energy (DOE) proposes to manage the OU 2 subunits in two separate groups, maintaining the current Record of Decision (ROD) date for one of the groups and requesting an extension to scheduled milestones for the other group. We also propose the additional or modified work is to effect an accelerated interim ROD for OU 3. This notification and request is submitted under Section XV (Additional Work) and Section XVIII (Extensions) of the ACA. Good cause exists for the requested extensions because of U.S. Environmental Protection Agency (U.S. EPA) disapproval of the Draft Remedial Investigation (RI) Report for OU 2, the resulting expansion or change in OU 2 scope and the discovery of new information requiring more characterization work. Technical justification exists for the added or modified work. The technical justification, good cause, affected milestones (and documents) and proposed milestones are presented below.

OPERABLE UNIT 2 EXTENSION REQUEST

A schedule extension and strategy modification is necessary for OU 2 due to U.S. EPA's disapproval, pending incorporation of 450 comments into the Draft RI Report. Resolution of the concerns raised by U.S. EPA and Ohio Environmental Protection Agency (OEPA) comments will require additional field sampling and laboratory analysis to characterize the nature and extent of inorganic, organic, and radionuclide contamination. Subsequently, data validation, fate and transport modeling, and risk assessment must be performed to determine whether the OU 2 subunits represent an unacceptable risk to human health and the environment.

The need for additional field investigation was confirmed by discoveries resulting from post-RI sampling and analysis during the summer of 1992. Three trenches were dug in the Solid Waste Landfill to visually characterize landfill materials. Field scanning instruments detected both radioactive and volatile organic contaminants at levels that were considerably higher than expected, based on previous sampling. In the South Field area, Monitoring Well 1433 was installed and sampled. The laboratory result for total uranium concentration was in excess of 3,500 parts per billion in perched groundwater. The results of both the landfill trenching and Monitoring Well 1433 are inconsistent with the data and interpretations presented in the Draft RI Report and require further investigation.

An additional discovery was made January 27, 1993. Ebasco, a DOE contractor, was assigned the task of performing re-validation of the Characterization Investigation Study (CIS) data, previously validated by ASI/IT. Ebasco verbally informed FERMCO of their preliminary finding that CIS radionuclide data for OU 2 could not be validated for use in quantitative risk assessment. We informed you on January 28, 1993 of these preliminary findings. Because the CIS data comprises about 70 percent of the total radiological data available for OU 2, this discovery affects the schedule. Absent the CIS data validation issue, the draft ROD for OU 2 would be available earlier than the date proposed below. We are continuing our evaluation of the CIS data. If we can reach agreement with U.S. EPA on using the CIS data for quantitative risk assessment via the alternative methods defined in "Guidance for Data Useability in Risk Assessment," EPA/540/G-90/008, October 1990, DOE will request acceleration of the suggested schedule proposed below for the draft ROD for the Group 2 subunits.

OU 2 is comprised of five subunits: the Active Flyash Pile, Lime Sludge Ponds, Solid Waste Landfill, Inactive Flyash Pile, and South Field. To assure continued progress toward earliest remediation of OU 2 subunits, DOE proposes that they be managed as two separate groups. Group 1 would consist of the above-grade flyash component of the Active Flyash Pile, and the Lime Sludge Ponds. Group 2 would consist of the below grade component of the Active Flyash Pile, Inactive Flyash Pile, South Field, and Solid Waste Landfill.

The reason for managing the OU 2 subunits as two groups is that selection of a remedy for the Group 1 subunits requires significantly less additional field data than for the Group 2 units. Hence, we believe we can achieve the draft Interim ROD for Group 1 within the current ACA schedule. The specific ACA milestone changes that should be made are as follows:

MILESTONE	CURRENT SCHEDULE	SUGGESTED SCHEDULE
<u>GROUP 1 SUBUNITS</u>		
Revised RI Report	February 6, 1993	June 18, 1993
Draft FS Report	March 15, 1993	August 6, 1993
Proposed Plan	March 15, 1993	August 6, 1993
Draft Interim ROD	December 10, 1993	December 10, 1993
<u>GROUP 2 SUBUNITS</u>		
Revised RI Report	February 6, 1993	April 5, 1994
Draft FS Report	March 15, 1993	May 26, 1994
Proposed Plan	March 15, 1993	May 26, 1994
Draft ROD	December 10, 1993	March 1, 1995

We believe that the modifications to the ACA milestones proposed above provide for accelerated achievement of site cleanup goals in portions of OU 2, while recognizing the need for additional time to complete supplemental characterization work. This further characterization work is required by the recent discoveries in OU 2 mentioned above. It is also required to address U.S. EPA and OEPA comments on the Draft RI Report. Addressing some of the comments represents a change or expansion in the scope of the previously-approved work plan addendum for OU 2. For example, some comments require characterization of areas not within the defined boundary of OU 2 (e.g., sampling of the pit areas present in the 1954 photograph, and soils north of the Solid Waste Landfill). Other comments require sampling and analysis of surface water, sediments and groundwater; these media were to be more fully evaluated in OU 5. Further evaluation of these media within OU 2 represents an expanded work scope to obtain the data required to address these comments.

DOE is continuing its evaluation of the impact of the CIS data validation issues on the other operable units and the Cumulative Response Action Risk Evaluation. We should have an assessment of the potential schedule impacts within the next few weeks and we'll be available to meet with you at that time.

ACCELERATION OF OU 3

As discussed in our January 13, 1993 meeting, we believe that remediation of the buildings which comprise OU 3 can be significantly accelerated through recognition that the only alternative under serious consideration for that unit is decontamination and/or demolition of the buildings with interim onsite storage of the resulting waste materials. We believe that accelerated

submittal of a Focused Feasibility Study/Proposed Plan, including characterization information, process alternatives analysis, and a proposal for remedial action, can lead to an interim ROD for building decontamination and demolition more than two years ahead of the current ACA schedule. The final ROD will be provided according to the current ACA schedule for OU 3.

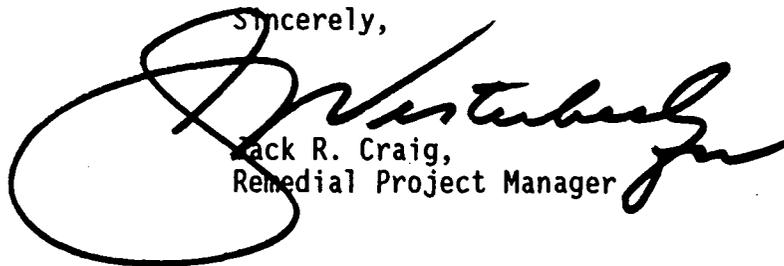
This action will result in initiating significant building decontamination and demolition activities more than two years earlier than anticipated by the ACA. Specific milestone additions related to this proposed change include:

MILESTONE	DATE
Submittal of Draft Focused Feasibility Study/Proposed Plan to EPA	September 1, 1993
Submit Draft Interim Record of Decision to EPA	September 15, 1994

Since most of the issues which would normally be addressed in the RI study will be addressed in the Focused Feasibility Study and Proposed Plan for the Interim ROD, DOE proposes that these RI milestones be deleted from the ACA schedule for OU 3. The Feasibility Study (FS), addressing waste disposition issues, would be submitted according to the current ACA schedule.

We will continue our review of the ACA milestones with the intent of proposing acceleration of cleanup actions where such targets of opportunity exist. DOE appreciates the opportunity to have discussed this request with both U.S. EPA and OEPA yesterday.

Sincerely,



Jack R. Craig,
Remedial Project Manager

cc w/enc.:

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