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**RE: FERNALD OPERABLE UNIT 2
TREATABILITY STUDY: PATH FORWARD**

09/14/93

**DOE-2971-93
DOE-FN/EPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
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SEP 14 1993

DOE-2971-93

Mr. James A. Saric, Remedial Project Director
 U.S. Environmental Protection Agency
 Region V - 5HRE-8J
 77 W. 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:

RE: FERNALD OPERABLE UNIT 2 TREATABILITY STUDY: PATH FORWARD

The purpose of this letter is to describe the planned course of action with respect to the Operable Unit (OU) 2 Draft Treatability Study Report, issued on July 1, 1992. The Draft Treatability Study Report initially was disapproved by the United States Environmental Protection Agency (U.S. EPA) and, after a series of discussions and comment responses, was approved conditionally on October 21, 1992, pending incorporation of the comment responses into the Report. Comment resolution also resulted in Ohio Environmental Protection Agency (OEPA) approval of the document on November 23, 1992.

Two waste units within OU 2 were the focus of the Treatability Study: the Lime Sludge Ponds and the Solid Waste Landfill. The intent of the Treatability Study was to demonstrate that the wastes in these OU 2 subunits could be processed into high-strength waste forms through cement stabilization. Additionally, since it was thought that the landfill would contain a significant volume of organic matter, incineration was investigated as a potential means of volume reduction prior to the cement stabilization of landfill wastes.

However, based on the following recent developments we have found it necessary to re-evaluate the applicability of the draft OU 2 Treatability Study:

- Reclassification on April 1, 1993 of the Lime Sludge Ponds from HWMUs to SWMUs;
- Evaluation of Lime Sludge analytical results from the Remedial Investigation Field Program indicate very low levels of radionuclides and below levels of regulatory concern of hazardous constituents;

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- Results from the 1992 trenching and the 1993 field investigation indicate a much lower organic content in the Solid Waste Landfill than previously anticipated.

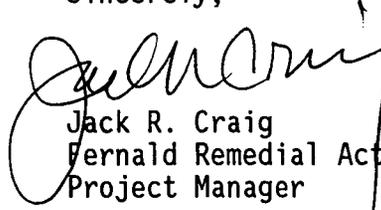
Neither cement nor other high strength stabilization alternatives are envisioned to become the preferred remedy for the Solid Waste Landfill or the Lime Sludge Pond. The preferred alternatives for the Solid Waste Landfill now include excavation, sorting and compaction, with on/off site disposal or hot spot removal, and capping in place. On this basis, the August 1992 OU 2 Treatability Study no longer supports the current direction of remedial efforts for OU 2.

A preliminary investigation is underway to determine the most appropriate treatability studies. This investigation includes coordination with the activities of the other OUs. Ongoing treatability studies within OU 1 (solidification and encapsulation), OU 4 (vitrification), and OU 5 (soil decontamination), potentially relevant to OU 2, are being monitored closely for their applicability for OU 2.

We intend to resolve any open issues from the August 1992 Treatability Study Report in the Remedial Investigation/Feasibility Study (RI/FS) Report, and future Treatability Studies. Specifically, we propose to identify in the RI Report that the 1992 Treatability Study was performed and to discuss in the FS report its inapplicability to the alternatives assessment. This process will administratively bring to closure the 1992 OU 2 Treatability Study Report. The matter would also be addressed in any future Treatability Studies, should they become needed.

We request your concurrence to this proposed approach. If you or your staff have any questions or desire a meeting to discuss this matter, please contact Rod Warner at (513) 648-3156 or Johnny Reising at (513) 648-3139.

Sincerely,



Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Warner

cc:

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