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**OPERABLE UNIT 2 DRAFT FEASIBILITY STUDY
REPORT/PROPOSED PLAN - ENVIRONMENTAL
ASSESSMENT REF: 5501, 5502, 5503, 5504, 5505,
5506, 5507**

04/28/94

**DOE-1585-94
DOE-FN/EPA
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LETTER
OU2**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705

5500

APR 28 1994
DOE-1585-94

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:

OPERABLE UNIT 2 DRAFT FEASIBILITY STUDY REPORT/PROPOSED PLAN - ENVIRONMENTAL ASSESSMENT

Enclosed is the Operable Unit 2 (OU 2) Draft Feasibility Study Report/Proposed Plan - Environmental Assessment (FS/PP-EA). The Comprehensive Response Action Risk Evaluation (CRARE) for Operable Units 1 and 2 (Volume 6) is being transmitted separately. The entire transmittal is submitted in accordance with Section X.C.2.c of the Amended Consent Agreement. The submittal date for the FS/PP-EA was revised according to the April 9, 1993 Agreement Resolving Dispute Concerning Denial of Request for Extension of Time to Submit OU 2 Documents.

As required by the Amended Consent Agreement, members of my staff met with you on March 31, 1994 to discuss potential applicable or relevant and appropriate requirements (ARARs) for remediation of OU 2. Based on this discussion, the ARAR portion for OU 2 has been revised.

An unresolved portion of the OU 2 FS is the ARAR determination for the OEPA Solid Waste regulations and policies concerning siting of a solid waste landfill over a federally designated sole-source aquifer. We understand that this issue is currently being discussed by US EPA and OEPA to determine the appropriate ARAR mechanism for placing remediation wastes in an engineered facility at Fernald.

The draft FS/PP-EA contains an ARAR determination that the Corrective Action Management Unit (CAMU) rule is relevant and appropriate. This allows remediation wastes from OU 2 subunits to be consolidated or placed on site without being considered disposal. This ARAR determination was one of the options discussed during the writing of the draft FS. We will revise the appropriate portions of the document when a final determination is made by the regulators.

If you have any questions or comments, please contact Rod Warner at 513-648-3156.

Sincerely,

Johnny Reising
for Jack Craig
Fernald Remedial Action
Project Manager

FN:Shroff

Enclosure: As Stated

cc w/enc:

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