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**REQUEST FOR APPROVAL OF INTERIM MANAGEMENT PLAN FOR
OPERABLE UNIT 5 INVESTIGATION DERIVED WASTE**

05/24/95

DOE-0961-95

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LETTER



Department of Energy
Fernald Environmental Management Project
P. O. Box 308705
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MAY 24 1995

DOE-0961-95

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

Mr. Thomas P. Schneider, Project Manager
Ohio Federal Facilities Office
Ohio Environmental Protection Agency
401 East Fifth Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Schneider:

**REQUEST FOR APPROVAL OF INTERIM MANAGEMENT PLAN FOR OPERABLE UNIT 5
INVESTIGATION DERIVED WASTE**

Reference: Letter, Thomas A. Schneider (OEPA) to Jack Craig (DOE-FN),
"Request for Approval of Interim Management Plan for Operable Unit
5 Investigation Derived Waste," dated July 5, 1994.

The Department of Energy, Fernald Area Office (DOE-FN) is requesting approval from the Ohio Environmental Protection Agency (OEPA) and the U. S. Environmental Protection Agency (U.S. EPA) for this proposed Interim Investigation-Derived Waste (IDW) Management Plan for Operable Unit 5 (OU5) soil/drill cuttings. This plan is intended to be in effect until the Sitewide Soil IDW Policy is approved. The objectives of this plan are consistent with the Interim IDW Management Plan that OEPA approved for Operable Unit 2 (OU2) on July 5, 1994 (Reference).

Currently there are numerous drums of IDW stored that were generated from earlier OU5 field investigations. These drums have been in the field since 1993, due to limited storage space and because there is presently no approved policy in place that adequately addresses management of OU5 IDW soil drill cuttings. Continued drum storage of existing or future OU5 IDW soil/drill cuttings is not considered appropriate in light of the National Contingency Plan's policy for Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) sites to minimize IDW generated by CERCLA activities.

Therefore, it is proposed that OU5 IDW soil/drill cuttings be managed as follows:

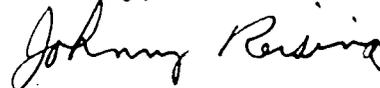
If the concentration of potential contaminants in IDW from a given depth of a sampling location exceeds the general concentration of existing ground surface contamination, or differs from the contaminants present at the ground surface, then the IDW will be managed on an Operable Unit 5 soil pile, as specified in Removal Action 17. If the concentration of potential contaminants in IDW collected from a given depth is generally equivalent to, or less than the concentrations of the same contaminants at the ground surface of a sampling location, then the IDW will be deposited in a shallow surface depression near the sampling location. If IDW is identified to contain listed or characteristic hazardous waste, then the soil containing those contaminants will be containerized and stored in an on-property RCRA storage facility, in accordance with Removal Action 17.

Information contained in the Operable Unit 5 RI Report provides an adequate basis for compliance with this interim policy to determine the disposition of IDW located within the Operable Unit 5 area of concern. The interim IDW management strategy and RI information that is pertinent for future investigations will be referenced, as appropriate, in each corresponding work plan for agency review. The same approach and documentation will also be applied to the existing IDW that has been stored in approximately 200 drums since 1993. These drums are located on the Fernald property outside of the Production Area near the locations where the investigations took place.

DOE understands that this proposed interim Management Plan applies to soil/drill cuttings generated from Operable Unit 5 investigations, until Operable Unit 5 remediation is initiated under CERCLA.

If you have any questions regarding this matter, please contact Robert Janke at (513) 648-3124 or Kathi Nickel at (513) 648-3166.

Sincerely,



for Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Nickel

cc:

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