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**FERNALD ENVIRONMENTAL REMEDIATION PROGRESS STATUS
REPORT**

05/10/95

USEPA DOE-FN
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COMMENTS



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
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FILE
REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: Fernald Environmental Remediation
Progress Status Report

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the draft Fernald Environmental Remediation Progress Status Report. This document accurately represents the current status and path forward for remediation efforts at the Fernald site. For several years U.S. EPA, the Ohio Environmental Protection Agency (OEPA), and the United States Department of Energy (U.S. DOE) have been working together to remediate contamination from past waste management and disposal activities at the Fernald site.

Cleanup has already started, as 30 short-term removal actions have been completed or are currently being implemented. Four of the five Records of Decision (ROD) have been approved by U.S. EPA, and the proposed remedy for the fifth Operable Unit (OU) has also been approved. Thus the actual study phase, contaminant characterization and remedy selection, is essentially complete.

The Fernald site is at a critical junction with the study phase ending and actual large-scale remediation beginning. The path forward is clear as recommendations for the site's future land use have been provided by the Fernald Citizens Task Force.

The remedies selected by U.S. DOE were reviewed by U.S. EPA, OEPA and the public. They are remedies which represent a balanced approach for handling the waste materials and contaminated media at the site, by disposing of the most contaminated materials off-site and disposing of the remaining materials on-site. The selected remedies utilize technologies that have been implemented at several Comprehensive Environmental Response, Compensation, and Liability Act sites across the country. Many of the remedies have even had smaller-scale studies conducted to assure their applicability with the Fernald materials.

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U.S. EPA believes it is important to discuss the timeframe over which remediation will be implemented. In signing the various RODs, U.S. DOE presented a timeframe in which the various actions would be conducted. This remediation timeframe is part of one of the nine selection criteria (implementability), which U.S. EPA uses to consider, review, and ultimately approve the remedies. These timeframes were also conveyed to the public during the comment period. U.S. EPA believes that according to the Amended Consent Agreement (ACA), the timeframes specified in the RODs must be followed.

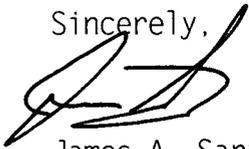
U.S. EPA, OEPA, U.S. DOE and the stakeholders have worked hard in completing the study phase of the cleanup process, and we are ready to move ahead. Current budget cuts severely threaten the future successes at the Fernald site. Clearly, given our position in the cleanup process, funding provided to the Fernald site will show direct results, as the remedies have been well researched and are supported.

Finally, the 10 year cleanup scenario, consistent with U.S. DOE's legal obligations in the ACA, estimates the total escalated costs for remediation at \$2.7 Billion. The 25 year cleanup scenario, based on U.S. DOE's target budget cuts, estimates the total escalated costs for remediation at \$ 5.7 Billion. The cost savings of \$3 Billion is not only fiscally responsible, but consistent with the desires of the stakeholders that have been directly involved with the Fernald site since the 1950's.

Therefore, U.S. EPA supports the 10 year cleanup scenario as one being both fiscally responsible and required under the ACA.

If you have any questions regarding the above matter, please contact me at (312) 886-0992.

Sincerely,



James A. Saric, Remedial Project Manager
Technical Enforcement Section #1
RCRA Enforcement Branch

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
Don Ofte, FERMCO
Jim Theising, FERMCO
Terry Hagen, FERMCO