

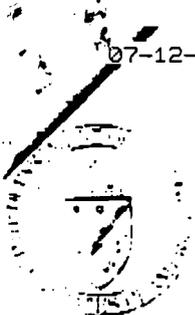
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REMEDIAL ACTION WORK PLAN FORMAT

07/07/95

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LETTER



Department of Energy
Fernald Environmental Management Project
P. O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 648-3155

JUL 07 1995

DOE-1183-95

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - SHRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

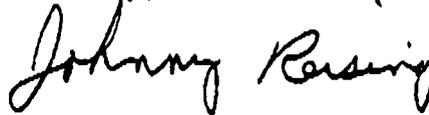
Dear Mr. Saric and Mr. Schneider:

REMEDIAL ACTION WORK PLAN FORMAT

Please find enclosed a proposed standard format for completion of Remedial Action (RA) Work Plans as required for each operable unit by the Amended Consent Agreement (ACA). The fundamental objective of the RA Work Plan as envisioned in the enclosed outline is to establish the enforceable schedule for completion of remedial activities. This outline also addresses the explicit requirements found in the ACA for RA Work Plans. Your comments and discussions on this proposed format would be appreciated.

If you have any questions, please contact Johnny Reising at (513) 648-3139.

Sincerely,



FN: Reising

fn

Jack R. Craig
Fernald Remedial Action
Project Manager

Enclosure: As Stated

w/enc:

- H. Chaney, EM-423/GTN
- Skokan, EM-423/GTN
- Jablonowski, USEPA-V, 5HRE-8J
- Kwasniewski, OEPA-Columbus
- Harris, OEPA-Dayton
- Proffitt, OEPA-Dayton
- McClellan, PRC
- Cohen, GeoTrans
- Bell, ATSDR
- Owen, ODOH
- D. George, FERMCO/52-2
- Hagen, FERMCO/65-2
- Coordinator, FERMCO

w/o enc:

- Little, FERMCO
- Yates, FERMCO/9

RA WORK PLAN

1.0 INTRODUCTION

General introduction describing the scope of objectives of the RA Work Plan. While a general description of the project is appropriate, there is no need to provide background material that has appeared in numerous, previous documents. The introduction should establish that the principal objective of the document is to set forth the schedule for implementation of remedial activities.

2.0 REMEDIAL ACTION IMPLEMENTATION STRATEGY

This section will provide a description of how the remedial action will be implemented. Items to actively discuss should include:

- Procurement issues that affect schedule (only)
- Construction and operations sequencing and logic ties
- Construction management and control
- Any required integration with other operable units.
- Specific identification of activities meeting the 15 month criteria
- Explicit definition of what constitutes completion of remedial activities and what constitutes O&M
- Waste management activities
- Project schedule to include:
 - a) Initiation of remedial activities (i.e. 15 month criteria)
 - b) Initiation of waste removal/treatment
 - c) Milestones as required in sections 4.0; 5.0; 6.0; and 7.0

Since these schedule dates will be enforceable, they should be limited to the highest level milestones practical and the associated activities are explicitly defined.

3.0 PROJECT PERMIT REQUIREMENTS

This section will only discuss permits that are required to implement remedial activities. For example, modification to the existing NPDES permit will be required for remedial wastewater flow. This requirement would be identified as well as a description of the process and time frame for completing the approved modification. This section will not actively discuss addressing the substantive requirements of permits that are not needed because the activity is associated

with a CERCLA remedial action conducted entirely onsite. A simple reference on this point to where those requirements are addressed (i.e. the design) will suffice.

4.0 SAMPLING AND ANALYSIS REQUIREMENTS

This section will generally identify sampling and analysis requirements associated with remedial action implementation and give an enforceable schedule for submittal of a Sampling and Analysis Plan(s). Please note that this plan can be submitted during remedial design. If this is the case, this section should so state.

5.0 HEALTH AND SAFETY/CONTINGENCY PLANNING REQUIREMENTS

Same general approach as for Section 4.0.

6.0 OPERATIONS AND MAINTENANCE PLANNING REQUIREMENTS

Same general approach as for Section 4.0. Please note that this section should include post-remediation O&M activities.

7.0 GROUNDWATER MONITORING

This section shall explain that an integrated site-wide groundwater monitoring plan will be developed under OU5. The OU5 RA Work Plan will establish an enforceable schedule for this document.