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**PATH FORWARD FOR REVISION 3 OF THE REMOVAL ACTION 17
WORK PLAN**

05/06/96

DOE-0852-96
DOE-FN EPAS
3
WORK PLAN



Department of Energy

Ohio Field Office
Fernald Area Office

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MAY 06 1996

DOE-0852-96

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

PATH FORWARD FOR REVISION 3 OF THE REMOVAL ACTION 17 WORK PLAN

As a result of discussions with the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) regarding the disapproval of the Removal Action (RvA) 17 Work Plan, Revision 3, a path forward has been developed for providing an addendum to the work plan by May 31, 1996, which will include additional detailed information. The plan addendum will include an internal procedure to allow open, bulk storage of certain categories of debris in accordance with the verbal approval provided in our March 19, 1996, meeting.

The proposed addendum will provide enhanced detail for the soil and debris management approaches individually. The following provides proposed content:

- 1) Since only maintenance-based soils excavation is anticipated prior to the approval of operable unit remedial action plans governing respective soils excavation, the RvA 17 Work Plan would continue to address existing legacy soil piles and those soils generated by maintenance or construction activities prior to development of remedial action planning documents. The RvA 17 Work Plan would not be expected to apply directly to respective Operable Unit (OU) remediation plans, but would serve as a model on which to base upcoming soil management documents. The following enhancements would be added as an addenda to the existing submittal of the RvA 17 Work Plan, Revision 3:

- Identify probable staging areas for those soils generated by maintenance or construction activities prior to development of remedial action planning documents and intended for on-property disposal. The location and size of interim stockpiles designated for future on-property disposal resulting from actions by specific OUs will be identified on appropriate remedial design drawings along with a proposed schedule for removal and submitted to the Agencies for approval.
 - Recognize current Operable Unit 1 (OU1) plans for segregated soils management as part of OU1 remedial action.
 - Identify a soil tracking system, which supports interim segregated storage, as well as manifesting, and direct placement in the disposal cell.
 - Provide a specific protocol for soil management decisions associated with maintenance activities.
 - Identify documents, by applicability, which will supersede RvA 17 soils management requirements, during remediation (a document roadmap).
- 2) Since Operable Unit 3 (OU3) debris management will be specified in the final remedial action plans, the RvA 17 Work Plan provides an early method to identify future final debris management plans and assure interim operations are consistent with future plans. An addendum to enhance the details associated with debris management would be included in the planned RvA 17 addenda, including the following:
- Identify the anticipated amount, location, and duration for interim storage of debris, by type from each Decontamination and Decommissioning (D&D) activity.
 - Identify a debris tracking method, using the existing Sitewide Waste Information and Forecast Tracking System (SWIFTS), which supports management of debris by material category, regulatory category, and disposition plan.
 - Identify documents which will supersede RvA 17 debris management requirements during remediation (a document roadmap).

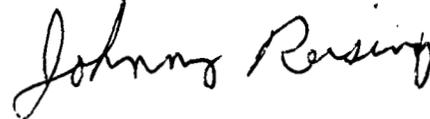
This addendum will be submitted to you by May 31, 1996.

As noted above, verbal approval for open, bulk storage of certain categories of debris currently in roll-off boxes that originated from Plant 4 was provided. This material is to be stored on the Plant 1 Pad. The procedure for debris storage is currently under

development; it will be completed by May 10, 1996. Additionally, the validation of the Integrated Debris, Waste, and Soil Disposal Model development is underway to assure that its output is reliable. A presentation on the model will be scheduled for you and your staff during the month of May 1996.

If you or your staff have any questions, please contact Pete Yerace at (513) 648-3161.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FN:Yerace

cc:

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