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TRANSMITTAL OF CHANGE PAGES FOR THE OPERABLE UNIT 3 REMEDIAL INVESTIGATION/FEASIBILITY STUDY REPORT (APPENDIX G)

11/18/96

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LETTER

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Department of Energy

Ohio Field Office
Fernald Area Office
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NOV 1 3 1996

DOE-0186-97

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

TRANSMITTAL OF CHANGE PAGES FOR THE OPERABLE UNIT 3 REMEDIAL INVESTIGATION/FEASIBILITY STUDY REPORT (APPENDIX G)

The purpose of this letter is to transmit changed pages for the Operable Unit 3 (OU3) Remedial Investigation and Feasibility Study (RI/FS) Report. These changed pages reflect two revised reference citations within Appendix G of the final OU3 RI/FS Report, February 1996, which were identified during the process of finalizing the OU3 Administrative Record file. Specifically, the following two references have been modified:

U.S. Department of Energy (DOE), 1994h ~~1990~~, "Uranium Mill Tailings Remedial Action Project, Naturita, Colorado," prepared by Morrison Knudsen Corporation ~~MK-Environmental Services~~, DOE Albuquerque Field Office, Albuquerque, NM.

~~MK-Environmental Services~~ ~~U.S. Department of Energy (DOE)~~, 1992, "Weldon Spring Site ~~Subcontract~~ Remedial Action Project ~~Plan~~," prepared for MK-Ferguson Company, San Francisco, CA, and Jacobs Engineering Group, St. Charles, MO ~~by MK-Environmental Services, DOE Albuquerque Field Office, Albuquerque, NM~~.

These document revisions contain the same pertinent information as the original citations and do not in any way alter conclusions drawn in the OU3 RI/FS Report, Proposed Plan, or Record of Decision. Please replace Pages G-7 and G-29 in Appendix G (Volume 3) of the final OU3 RI/FS Report with the enclosed changed pages.

Recycled and Recyclable

If you have any questions regarding this matter, please contact John Trygier at (513) 648-3154.

Sincerely,

Susan M Pete

for Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Hall

Enclosure: As Stated

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REFERENCES

Freeze, R.A., and J.A. Cherry, 1979, Groundwater, Prentice-Hall, New York, New York.

International Technologies (IT) Corporation, 1993, "Adsorption of Select Metals and Radionuclides on Glacial Overburden Present at the Fernald Environmental Management Project Site," prepared for FERMCO, Fernald, OH.

MK-Environmental Services, 1992, "Weldon Spring Site Remedial Action Project," prepared for MK-Ferguson Company, San Francisco, CA, and Jacobs Engineering Group, St. Charles, MO.

Stalmons, M., A. Maes and A. Cremers, 1984, "Role of Organic Matter as a Geochemical Sink for Technetium in Soils and Sediments," Technetium in the Environment, G. Desnet and C. Myttermaere, eds., Elsevier Applied Science Publishers, London, England.

State of Ohio Environmental Protection Agency (OEPA), 1994, Letter to U.S. Department of Energy (DOE). Subject: Siting Criteria for On-Property Disposal Facility at Fernald Environmental Management Project.

U.S. Department of Energy (DOE), 1991, "Uranium Mill Tailings Remedial Action Project, Rifle, Colorado," prepared by MK-Environmental Services, DOE Albuquerque Field Office, Albuquerque, NM.

U.S. Department of Energy (DOE), 1993a, "Development and Application of the ECTran Model to Support RI/FS at the FEMP," prepared by Halliburton-NUS, DOE Fernald Area Office, Fernald, OH.

U.S. Department of Energy (DOE), 1993b, "Operable Unit 3 Remedial Investigation/Feasibility Study Work Plan Addendum," DOE Fernald Field Office, Fernald, OH.

U.S. Department of Energy (DOE), 1994a, "Feasibility Study Report/Proposed Plan for Remedial Actions at Operable Unit 2," DOE Fernald Area Office, Fernald, OH.

U.S. Department of Energy (DOE), 1994b, "Feasibility Study Report/Proposed Plan for Remedial Actions at Operable Unit 1," DOE Fernald Area Office, Fernald, OH.

U.S. Department of Energy (DOE), 1994c, "Feasibility Study Report/Proposed Plan for Remedial Actions-Environmental Impact Statement for Operable Unit 4," DOE Fernald Area Office, Fernald, OH.

U.S. Department of Energy (DOE), 1994d, Letter DOE-0037-95 to US EPA and OEPA. Subject: Strategy for the Management of Operable Unit 3 Legacy Wastes.

U.S. Department of Energy (DOE), 1994e, "Record of Decision for Remedial Actions at Operable Unit 1," DOE Fernald Area Office, Fernald, OH.

U.S. Department of Energy (DOE), 1994f, "Record of Decision for Remedial Actions at Operable Unit 4," DOE Fernald Area Office, Fernald, OH.

U.S. Department of Energy (DOE), 1994g, "Remedial Investigation Report for Operable Unit 5," DOE Fernald Area Office, Fernald, OH.

Consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the terms of the Amended Consent Agreement, reviews would be conducted every five years, at a minimum, after completion of remedial actions to assure that human health and the environment are continuously protected. These reviews would be performed by US EPA, in consultation with DOE and the Ohio Environmental Protection Agency (OEPA). If, upon completion of such review, US EPA determines that additional remedial actions or modifications to existing remedial systems are required, such actions would be implemented pursuant to the terms of the Amended Consent Agreement.

G.3 PHYSICAL CONFIGURATION OF MATERIALS

This section provides a physical description of OU3 materials as they would be segregated for potential on-property disposal under Alternative 2. Sizing requirements would be met during dismantlement activities associated with the interim remedial action. OU3 materials that meet the contaminant-specific WAC and are designated for on-property disposal will meet this description until specifications are finalized in the waste placement design. Anticipated physical conditions of OU3 materials in the sitewide disposal facility will be used, in part, to estimate contaminant leaching potential from these materials during the risk-based WAC development process.

G.3.1 Material Categories and Quantities

This section identifies OU3 materials and associated material quantities for potential on-property disposal. As discussed in more detail in Section G.4, contaminant-specific WAC need to be developed for these materials. WAC development is generally based on these material groupings and quantities.

Table G-1 provides estimated quantities for OU3 materials. Material groupings in this table are primarily based on the material categories as discussed in Sections 3 and 5 of this report. However, certain material types within these categories are distinguished because they are expected to have different leachabilities or because they represent a significant portion of materials within a given category.

For these reasons, two material categories have been sub-divided. The concrete material category (Material Category E) is divided into two sub-groups: concrete/masonry and asphalt/clay piping. The non-regulated asbestos containing material (ACM) material category (Material Category G) is also divided into two sub-groups: transite and nonregulated ACM (excluding transite).

G.3.2 Size Constraints for On-Property Disposal

Although material groupings as discussed in this appendix are slightly different from those presented in Section 3 of this report, materials will be sized, segregated, and handled according to the general RI/FS material categories. Under Alternative 2, size constraints would be applied to facilitate ease of material handling during waste placement operations in the on-property disposal facility. General requirements are to minimize projections for all construction materials (to the extent practical) to improve material handling abilities and to facilitate incorporation of individual pieces of debris into surrounding soils. Individual pieces of debris will range in size, depending on the type of equipment used during dismantlement and removal operations. In addition, on a limited basis material sizes could potentially exceed the maximum size limits. Materials that are in a monolithic form that are not compressible, do not have inaccessible areas, and do not contain interior void spaces can be handled separately allowing individual placement within the disposal facility. An example of a material satisfying these criteria is a concrete beam (e.g., 3 foot by 3 foot by 10 foot block).