



FACT SHEET

EXPLANATION OF SIGNIFICANT DIFFERENCES TO THE OPERABLE UNIT 1 RECORD OF DECISION MANAGEMENT OF MATERIALS FROM OTHER FEMP PROJECTS

INTRODUCTION:

This fact sheet provides a brief description of the U.S. Department of Energy's (DOE's) Explanation of Significant Differences (ESD) to the Operable Unit 1 (OU1) Record of Decision (ROD) at the Fernald Environmental Management Project (FEMP) in Fernald, Ohio. The OU1 ROD was signed on March 1, 1995 by the DOE and the U.S. Environmental Protection Agency (USEPA) Region 5. This ESD has been prepared to describe a change to allow material from other FEMP projects to be managed via the mechanisms established through the OU1 ROD for disposal, with the OU1 wastes, at a permitted commercial disposal facility (i.e., Envirocare of Utah). DOE, and both U.S. and Ohio EPAs, agree that the change provided through this ESD is significant but not fundamental because it does not change cleanup levels or the basic remedy for removal, safe transportation, and offsite disposal of the OU1 waste stream.

PROPOSED CHANGE:

This ESD has been prepared to formally provide for the processing of other FEMP waste streams through the OU1 remediation facilities. These waste streams will be low-level radiological wastes (i.e., no RCRA hazardous wastes) that, with processing available as part of OU1 remedial actions (including mixing with waste pits materials), can meet the waste acceptance criteria (WAC) at Envirocare. Further, the characteristics of these non OU1 waste streams will be such that managing them through OU1 remedial systems will not negatively effect the site's ability to meet the performance requirements set forth in the OU1 ROD. This ESD specifically prohibits the processing of any wastes from outside the FEMP through the OU1 remediation facility.

BASIS FOR CHANGE:

As plans for the OU1 remediation system were formulated, facilities constructed, and remedial action activities implemented, the potential for treatment of materials from other FEMP projects has always been a factor for consideration. Specifically, as it became clear to the site that some FEMP soils and other waste materials (with characteristics reasonably similar to those to be

encountered through OU1 waste pit excavation activities), would require disposition off site, the ability to accommodate these materials was integrated into the OU1 remedial action approach. The OU1 ROD presents a detailed discussion on the cost and safety advantages of bulk rail shipment of OU1 waste for disposal as compared to shipment by truck. These same advantages apply to utilizing the OU1 remedial infrastructure for disposal of other FEMP waste streams, and is consistent with the site plan for accelerated closure.

During finalization of the Operable Unit 5 (OU5) ROD, it was envisioned that excavated soils demonstrating contaminant concentrations above the WAC of the On-Site Disposal Facility (OSDF) would be dispositioned off site through the OU1 remedial infrastructure. Accordingly, other FEMP waste streams identified for management through the OU1 remediation facility included soils and soil-like material which did not meet the OSDF WAC, but could be disposed of at Envirocare without the need for treatment. In other words, this material could be managed through the OU1 remediation facility with minimal effort/impact. To date, over 50,000 tons of soil and/or soil-like material have been processed in this manner, with more planned for future processing.

Besides the OU5 waste streams, other FEMP waste streams have been identified which have the potential to be managed through the OU1 remediation facility with disposal at Envirocare, and in doing so save cost/time in completing the overall FEMP remediation. An example waste stream is approximately 600 containers of enriched, non-restricted, uranium waste. Unlike the initial other FEMP wastes, however, some of these new waste streams may require processing through the OU1 remediation facilities, may require augmentation of existing facilities to perform all necessary management/treatment, and/or may require mixing with OU1 waste pit material to provide for a product which meets the Envirocare WAC. Although the management of these additional FEMP waste streams through the OU1 facility does not fundamentally change the plan identified in the OU1 ROD, it has the potential to become a significant element of the OU1 remediation process.

IMPACT:

Processing these other FEMP waste streams (destined for off-site disposal) through the OU1 remediation facilities will allow the FEMP to take advantage of cost and safety advantages provided through bulk rail shipment. Specifically, bulk rail transportation is safer due to lower total shipping mileage, and cheaper due to economies of scale offered by bulking.

The processing of these waste streams will be implemented while preserving the basic elements of the plan for the remediation of OU1, as spelled out in the OU1 ROD. The change provided through this ESD does not change the protectiveness of the OU1 remedy because it does not change the basic remedy of removal, safe transportation, and off-site disposal of the OU1 waste streams. In addition, the applicable or relevant and appropriate requirements (ARARs) established in the OU1 ROD are not modified by this ESD.