



Department of Energy

**Ohio Field Office
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2130

MAR 18 1999

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0543-99

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

Dear Mr. Saric and Mr. Schneider:

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY
STUDY/CONSENT DECREE MONTHLY REPORT FOR THE PERIOD OF FEBRUARY 1, 1999,
THROUGH FEBRUARY 28, 1999**

This letter transmits the amended Consent Agreement Monthly Report for the period of February 1, 1999, through February 28, 1999. This report is formatted to reflect the proposal presented in the letter, DOE-0395-96, J. Reising to J. A. Saric and T. Schneider, "Phase VII Removal Actions and Reporting Requirements under the FEMP Legal Agreements," dated January 16, 1996, and agreed to by the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA).

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

Sincerely,

FEMP:Reising

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosure

MAR 18 1999

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

N. Hallein, EM-42, CLOV
G. Jablonowski, USEPA-V, SRF-5J
R. Beaumier, TPSS/DERR, OEPA-Columbus
D. Sarno, FCAB
V. Dastillung, FRESH
P. Dunn, FRESH
F. Barker, Tetra Tech
D. Carr, FDF/52-2
T. Hagen, FDF/65-2
AR Coordinator, FDF/78

cc w/o enclosure:

A. Tanner, OH/FEMP
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
J. Harmon, FDF/90
R. Heck, FDF/2
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B. Irvine, FDF/65-2
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ECDC, FDF/52-7

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY
STUDY/CONSENT DECREE MONTHLY REPORT FEBRUARY 1 THROUGH 28, 1999**

Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from February 1, 1999 through February 28, 1999. The monthly report has been revised to reflect the proposal presented in the letter, DOE-0395-96, J. Reising to J.A. Saric and T. Schneider, "Phase VII Removal Actions and Reporting Requirements under the FEMP Legal Agreements", dated January 16, 1996, and agreed to by USEPA and OEPA.

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OPERABLE UNIT 1 - WASTE PITS REMEDIAL ACTION PROJECT

February 1999

- **Enforceable Milestones Expected to be Completed**
 - Initiation of Operations (i.e. Loading of Wastes) began February 23, 1999, ahead of the actual milestone date of March 1, 1999

- **Major Work Initiated/Continued/Completed**
 - Received U.S. and Ohio EPA's conditionally approved First Load Out Work Plan
 - Completed FDF comment resolution and resubmitted First Load Out Work Plan to Agencies as final
 - Received OEPA comments of the draft RA deliverables on February 13, 1999
 - Continued FDF revision of RA Deliverables to address USEPA and OEPA comments
 - Completed construction of facilities needed for First Load Out activities by IT Corporation
 - Continued with completion of remaining facilities for First Load Out
 - Completed training of First Load Out personnel for First Load out
 - Continued training of FAT&LC personnel for full Operations
 - Initiated and completed SSR for First Load Out Activities
 - Issued limited authorization to Operate to IT Corporation
 - Continued negotiations of Rail Tender with CSXT and Union Pacific

March 1999 (Anticipated)

- **Enforceable Milestones Expected to be Completed**
 - None

- **Major Work to be Initiated/Continued/Completed**
 - Complete revision of RA deliverables and resubmits to Agencies for review and approval
 - Continue with completion of remaining facilities
 - Continue training of FAT&LC personnel for full Operations
 - Complete review of Rail Tender
 - Initiate First Rail Shipment to Envirocare

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**OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY AND SOIL CHARACTERIZATION AND
EXCAVATION PROJECT**
Additional OU2 soils-related activities reported under OU5/Soils
Characterization and Excavation Project

February 1999

- Enforceable Milestones
 - On-Site Disposal Facility (OSDF)
 - None
 - Soil Characterization and Excavation Project (SCEP)
 - None

- Major Work to be Initiated/Continued/Completed
 - On-Site Disposal Facility
 - Began to locate and repair leaks in the Leachate Transmission Line
 - Implemented Contingency Plan for Leachate Management for Cells 1 and 2
 - Initiated investigation associated with leaks
 - Continued to evaluate the amount of clay that might be derived from the Borrow Area
 - Soil Characterization and Excavation Project (SCEP)
 - Continued Precertification activities for Area 2, Phase III for Radiation Tracking System (RTRAK)
 - Continued construction of Site preparation facilities
 - Began treatability study in regard to the Trap Range
 - Issued revised Area 1, Phase II Supplemental Characterization package to regulators on February 12, 1999
 - Received OEPA approval on WAC Attainment Sampling Report on February 5, 1999
 - Natural Resource Restoration
 - Continued discussions with Natural Resource Trustees regarding settlement of Ohio's claim
 - Continue to develop Findings and Responsiveness Summary regarding public comments received on the proposed final land-use at the FEMP
 - Continued project activities in the On-Property Public Access Habitat Area

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- Continue preparation of the Appraisal Report of the Conservation Area; final negotiations with the land owner will begin upon completion of the Appraisal Report

March 1999 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - On-Site Disposal Facility
 - Complete repair of leachate Transmission line
 - Complete investigation associated with Leachate Line leaks
 - Soil Characterization and Excavation Project (SCEP)
 - Continue construction of Site preparation facilities
 - Complete precertification and submit Certification Design Letter Draft on Area 2, Phase III RTRAK by March 31, 1999
 - Complete Trap Range Treatability Study
 - Continue advanced conceptual design of former production area and initiate Title I/II design work on Area 3A/4A
 - Natural Resource Restoration
 - Continue discussions with Natural Resource Trustees regarding settlement of Ohio's claim
 - Continue negotiations with land owners upon completion of appraisal report in Conservation Area
 - Ecological Research Projects
 - NOTE: This OU4 SCEP is a result of Dispute Resolution
 - Resume project activities

OPERABLE UNIT 3 - FACILITIES CLOSURE AND DEMOLITION PROJECT

February 1999

- Enforceable Milestones
 - Completed SEP Recycling Milestone on February 27, 1999, with shipment of 225 tons of rail, 130 tons of spike plates, 6 tons of spikes and 143 tons of metal skids to Alaron Corporation in Wampum, PA for decontamination and unrestricted release and/or use

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- Major Work Initiate/Continued/Completed
 - Facilities Shutdown Projects
 - Continued activities
 - ~~Completed removal of various material~~
 - Completed transfer of 120 drums of hold-up material to the Plant 1 pad
 - Facility Demolition/Supplemental Environmental Projects
 - Completed rinsing and sampling of the Trane incinerator Components, and sent samples the FDF Lab for analysis
 - Received analysis results from HWMU 28, Trane Incinerator, with the exception of the acid feed tank, all equipment analytical results were less than RCRA closure guidance concentrations.
 - Began to dismantle and dispose of Trane Incinerator equipment with the exception of the acid tank. The acid tank needs to be rinsed, sampled and analyzed.
 - Shipped over 589 tons of copper to Oak Ridge as a property transfer
 - Building 12 Relocation
 - Completed disconnecting, cleaning and relocating of equipment from Building 12 to Building 30/45
 - Completed removing miscellaneous debris and trash in Building 12
 - Completed building occupancy inspection and relocation of maintenance personnel from Building 12 to Building 30/45
 - Technical Services
 - Completed the development of manpower unit rates
 - Completed Traveler for temporary power to Plant 6 Perched Water System
 - Boiler Plant/Water Plant/Thorium/Plant 9
 - Completed Thorium/Plant 9 Complex D&D Project with subcontractor, NSC, on February 8, 1999
 - Maintenance/Tank Farm D&D and Water Storage Tank Project
 - Field activities remain suspended

March 1999 (Anticipated)

- Enforceable Milestones
 - None
- Major Work Initiated/Continued/Completed
 - Facilities Shutdown Projects
 - Complete scheduled Safe Shutdown activities in Plant 6 by March 5, 1999
 - Facility Demolition/Supplemental Environmental Projects
 - Continue planned activities

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- Building 12 Relocation
 - Complete electrical test shop fabrication
 - Continue spray paint booth fabrication activities
- Technical Services
 - Continue working on revisions to Parts 6, 7 and 8 of the Model Construction Contract
 - Main Electrical Redistribution Project
 - Continue to install overhead cables for the west leg feeders
 - Continue to splice feeder cables in manholes
 - Continue to install conduit and cable for the Plant 6 power Redistribution
 - Begin installation of conduit and cable for relocation of Alarm System from Plant 6
- Boiler Plant/Water Plant/Thorium/Plant 9
 - Complete and submit Project Closeout Report to the Agency
- Maintenance/Tank Farm D&D and Water Storage Tank Project
 - Resume field activities for construction of new water storage tank
 - Resume field activities for D&D of Tank Farm and Pipe Bridges
 - Begin D&D of Building 12A

OPERABLE UNIT 4 - SILOS PROJECT

February 1999

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - Received VitPP Waste Disposition Project Plan from Theta Engineering for review and comment
 - Received OEPA approval of the Design Package for the Roads and Electrical Upgrade portion of the Silos Infrastructure project; issued Notice to Proceed and Authorization to Mobilize to Staver Group
 - Silo 1 and 2 Project
 - Awarded contract for Silos 1 and 2 Accelerated Waste Retrieval (AWR) Project to Foster Wheeler Environmental Corp. on February 26, 1999
 - Submitted draft cost models alternatives in support of and evaluation of the Silos 1 and 2 Feasibility Study to DOE for review

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- Silo 3 Project
 - Received draft Baseline Schedule for the Silo 3 project from RMRS. Initiated FDF review of the baseline schedule and preparation of a draft Remedial Design-Deliverables Schedule
 - Conducted an alignment meeting between FDF and DOE Silo Project personnel and key RMRS personnel; personnel from OEPA and USEPA attended portions of the meeting

March 1999 (Anticipated)

- Enforceable Milestones
 - Submit Silo 3 Remedial Design Deliverables Schedule to the Agencies by March 18, 1999
- Major Work to be Initiated/Continued/Completed
 - Finalize project plan and schedule readiness audit for the VitPP Waste disposition project
 - Initiate construction activities for the Roads and Electrical upgrades portion of the Silos Infrastructure Project
 - Obtain draft Proof of Principle (POP) Test reports from the four POP contractors; initiate FDF review of the draft reports
 - Silo 1 and 2 Project
 - Issue Notice to Proceed to Foster Wheeler for the Silos 1 and 2 Accelerated Waste Retrieval Project
 - Silo 3 Project
 - Finalize RMRS Baseline Schedule for the Silo 3 Project
 - Receive and review RMRS Management Plans

OPERABLE UNIT 5 - AQUIFER RESTORATION AND WASTEWATER PROJECT

February 1999

- Enforceable Milestones
 - Submitted monthly NPDES Discharge Monitoring Report to OEPA on February 12, 1999, covering the month January
 - Submitted the NPDES Noncompliance Report to the OEPA on February 12, 1999 covering the month of January

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- Met the established limit of 20 parts per billion (ppb) monthly average uranium concentration discharge in the FEMP effluent discharge to the Great Miami River as required by the OU5 ROD
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- Work to be Initiated/Continued/Completed
 - Submitted the December 1998 Operating Report for the Re-Injection Demonstration transmittal to the Agencies (DOE transmitted to Agencies on February 17, 1999)
 - Prepared the initial draft of the revised Operations and Maintenance Master plan (OMMP) for Aquifer Restoration and Wastewater Treatment
 - Prepared initial drafts of the groundwater section of the IEMP quarterly report for 4th quarter 1998
 - Prepared responses to the Agency's comments pertaining to groundwater on the 3rd quarter 1998 IEMP report and on the October 1998 revision of the IEMP

March 1999 (Anticipated)

- Enforceable Milestones
 - Submit monthly NPDES Discharge Monitoring Report
 - Meet 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by OU5 Record of Decision
- Work to be Initiated/Continued/Completed
 - Continue to geoprobe in South Field area
 - Begin demolition of existing AWWT Lab to support AWWT Lab Expansion
 - Complete construction of Ozone Injection at Biosurge lagoon (BSL) in March
 - Initiate construction of Ozone Injection at Stormwater Retention Basin (SWRB) in March
 - Complete construction of the Bionitrification (BDN) Bypass Project in March
 - Submit revised OMMP to the Agencies after addressing internal (FDF and DOE) comments

WASTE MANAGEMENT

February 1999

- Enforceable Milestones
 - None

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- Work to be Initiated/Continued/Completed
 - Mixed Waste Shipping
 - Continued to identify sampling and container requirements for waste materials determined to be candidate for shipment to a permitted commercial disposal facility. Upon this determination, 143 drums will be shipped to the permitted facility
 - Liquid Mixed Waste Project
 - Received approval from TSCA Incinerator and the State of Tennessee for the shipment of Batch 7 for treatment and of Batch 8, that will follow
 - Continued DOT certification activities and Technical Review Board review prior to setting shipping date for Batch 7
 - Continued to evaluate newly generated waste streams for bulking into Batch 9, Batch 10 and Batch 11
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project
 - This project is complete. A letter acknowledging USEPA's concurrence regarding the acceptability of the 61 drums of treated sodium sulfate was forwarded to DOE-FN and will be included in the waste stream profile for NTS review. No further container activities will be conducted until profiles are approved by NTS
 - Thorium Legacy Waste Project
 - Repackaged 55 boxes for shipment to NTS, making total boxes repackaged to date 103
 - Worked with Maintenance to rectify problems with the scale in Building 64 and the HEPA units
 - RCI Solvent Extraction Project
 - Awaiting manpower to complete task order for the removal of the remaining waste from the OEP tanks to tote tanks to be bulked into Batch 9
 - Organic Treatment Project (OTP)
 - Met with Broad Spectrum vendor in Oak Ridge, Tennessee, to evaluate schedule and cost alternatives between treating at their facility or on site
 - Met with Broad Spectrum Contracts personnel for Bechtel Jacobs regarding differences in contract issues between Oak Ridge and FEMP
 - Prepared final scope of work and pricing in conjunction with Material & Energy Corporations's (M&EC) task order to prepare submittal for Advance Consent Package for DOE approval for project award/funding
 - Commenced characterization of radiological constituents for DOT requirements
 - Continued evaluation of FDF wastes bound for OSDF

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- Hazardous Waste/Recycling
 - Began writing a Training Evaluation Standard for newly issued lead acid battery procedure

March 1999 (Anticipated)

- Enforceable Milestones
 - None
 - NOTE: Waste Treatment Projects will evaluate a possible amendment to the Site Treatment Plan to account for the Fire Training Facility wastes anticipated routing to the OSDF. Also, a meeting will be scheduled with the OEPA to discuss newly identified/newly generated wastestreams.
- Work to be Initiated/Continued/Completed
 - Mixed Waste Shipping
 - Ship 143 drums to the permitted facility upon determination by Waste Characterization of additional requirements to be met for transport of the materials
 - Liquid Mixed Waste Project
 - Finalize shipment date for the shipment of Batch 7 for treatment, with shipment of Batch 8 to follow, upon resolution of shipping requirements; must await completion of the FDF TRB process
 - Continue bulking of remaining oils from Plant 6
 - Bulk tote tanks containing Organic Extraction Project (OEP) waste into Batch 9, weather and volume permitting
 - Initiate sampling request for Batch 9 after bulking of tote tanks
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project
 - Obtain NTS waste acceptance of the 61 drums of sodium sulfate waste treated by PermaFix
 - Thorium Legacy Waste Project
 - Continue repackaging operation
 - Continue storage and treatment plan for the Mixed Waste Thorium
 - RCI Solvent Extraction Project
 - Prepare to remove the remaining waste from the OEP tanks to tote tanks upon manpower arrival
 - Organic Treatment Project (OTP)
 - Continue efforts toward dispositioning of waste streams from Fire Training Facility through the OSDF rather than through treatment in the OTP, as a cost saving endeavor

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- Hazardous Waste/Recycling
 - Ship eight 5-gallon buckets of packaged nickel-cadmium batteries and 4 and 8 foot fluorescent lamps to Recyclights in Columbus, Ohio
 - Prepare photochemicals from the FDF Drafting Services for shipment on March 1, 1999