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**REQUEST FOR EXTENSION - OPERABLE UNIT 3 IMPLEMENTATION PLAN  
FOR THE ABOVE-GRADE DISMANTLEMENT OF THE HIGH AND LOW  
NITRATE TANKS**

12/11/96

DOE-0296-97

DOE-FEMP USEPA

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LETTER



**Department of Energy**

**Ohio Field Office  
Fernald Area Office**

P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



DEC 11 1996

DOE-0296-97

**Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - 5HSF-5J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590**

Dear Mr. Saric:

**REQUEST FOR EXTENSION - OPERABLE UNIT 3 IMPLEMENTATION PLAN FOR THE  
ABOVE-GRADE DISMANTLEMENT OF THE HIGH AND LOW NITRATE TANKS**

The purpose of this letter is to request an extension of milestones associated with the Operable Unit 3 (OU3) Implementation Plan for the Above-Grade Dismantlement of the High and Low Nitrate Tanks, which is being performed under the authority of the approved OU3 Remedial Design/Remedial Action (RD/RA) Work Plan for Interim Remedial Action. This request is consistent with Section XVIII of the Consent Agreement as Amended under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Sections 120 and 106(a).

The Implementation Plan, dated May 3, 1996, included milestones for "Certification of Construction Completion" and "Submit Draft Remedial Action Report to EPAs." Unexpected conditions encountered in the field, as described herein, have led to a conclusion that revision of these milestone dates is appropriate. The requested extension of these two milestones are:

- Certification of Construction Completion: February 28, 1997
- Submit Draft Remedial Action Report to EPAs: March 31, 1997

This represents an extension of these milestone dates by 88 and 59 days, respectively. However, there are no significant project impacts associated with the extension of these milestone dates. As described in the Implementation Plan, the dismantlement schedules of these two tanks were accelerated from 2001 to 1996 to accommodate the construction of

the Operable Unit 1 (OU1) Waste Treatment Facility and the construction of the Operable Unit 2 (OU2) haul road (from South Field Area to On-Site Disposal Facility). The Low Nitrate Tank was dismantled in a time frame to keep OU1 Waste Treatment Facility construction on schedule. The High Nitrate Tank dismantlement, although behind in regards to the Implementation Plan schedule, is still projected to be completed prior to the scheduled start of the OU2 haul road construction.

The issues and circumstances that have slowed progress on the High Nitrate Tank dismantlement primarily concern the facility shutdown activities (contents removal) for the tank. The Department of Energy, Fernald Environmental Management Project (DOE-FEW.) believes these issues and circumstances constitute "good cause" for an extension and are described below:

- Estimation of tank contents

Total sludge content was estimated by using sludge depth measurements that could be made at each of the four corners of the tank. Full access to the tank was impractical due to the presence of a thick membrane cover, which floated on the surface of the tank contents. Unfortunately, these measurements were not representative of the actual distribution of the settled sludge in the tank. An original estimate of about 40 vacuum truck loads has thus far been exceeded 5 times with additional amounts yet to be removed.

- Thorium contamination

Due to the thorium contamination in the tank contents and the associated additional safety precautions, removal of material from the tanks and material processing at Plant 8 were slowed. These precautions included additional radiological work control zoning, additional drum monitoring, more frequent area wash downs, and additional personal protective equipment requirements. During the summer months, as a heat stress preventative measure, the use of additional personal protective equipment required that limitations be placed on worker stay times in the tank area and the Plant 8 process area. Also, to prevent contamination of both site vacuum trucks and to continue support of other site projects, only one truck was dedicated for use on this project.

- Equipment failures

The removal of high-nitrate wastewater from the High Nitrate Tank, which was a result of the Uranyl Nitrate Hexahydrate (UNH) processing activities, was delayed due to the inability of the site Bionitrification Facility to achieve its expected throughput capacity. The industrial vacuum truck, used to remove the solid contents of the tanks, had unexpected equipment failures that required special order of replacement parts and special maintenance instructions and training from the truck supplier. Also, Plant 8 experienced numerous equipment failures due to the age and condition of the filtration equipment - agitators, motors, drives, pumps, and drum rollers.

- Rainfall

Heavy rainfall in 1996 delayed several aspects of the project. Material removal from the tanks was delayed due to the rainfall disrupting timely monitoring of the vacuum truck as it entered and exited contamination areas. Also, the rainfall resulted in the need to process additional wastewater at Plant 8, requiring interruption of Low and High Nitrate Tank contents processing at Plant 8, along with adding more water to the tanks.

The milestone dates requested herein are those necessary to support follow-on remediation efforts (i.e., OU2 haul road construction) and every effort will be made to expedite the completion of this project. However, expediting is dependent upon favorable weather conditions (no heavy rains or extreme cold) and upon other factors that are difficult to predict.

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

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

cc:

S. Fauver, EM-42/CLOV  
J. Trygier, DOE-FEMP  
G. Jablonowski, USEPA-V, 5HRE-8J  
R. Beaumier, TPSS/DERR, OEPA-Columbus  
T. Schneider, OEPA-Dayton  
F. Bell, ATSDR  
D. S. Ward, GeoTrans  
R. Vandegrift, ODOH  
S. McLellan, PRC  
T. Hagen, FDF/65-2  
J. Harmon, FDF/90  
S. Houser, FDF/52-3  
W. B. Jameson, FDF/2  
C. Little, FDF/2  
AR Coordinator/78  
EDC, FDF/52-7