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REQUEST FOR EXTENSION - OPERABLE UNIT 5

02/28/97

**DOE-0597-97
DOE-FEMP USEPA
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LETTER**



Department of Energy

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**Ohio Field Office
Fernald Area Office
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(513) 648-3155**

FEB 28 1997

DOE-0597-97

**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 5

This letter constitutes a request for schedule extension for the submittal of four upcoming deliverables on our Soils Certification/Excavation Project. This request for schedule extension is pursuant to Section XVIII of the Amended Consent Agreement. The four referenced deliverables and their current due dates are as follows:

Area 1, Phase I Certification Report (Subareas A, B, B1, PS, and SB)	March 1, 1997
Insitu Radiological Characterization Comparability Study Report	March 14, 1997
Sitewide Excavation Plan (SEP)	March 14, 1997
Area 2, Phase I Integrated Remedial Design Work Package (IRDP)	March 14, 1997

Good cause exists for the Area 1, Phase I Certification Report schedule extension for the following reasons. First, the number of weather related delays (i.e., rain days) during the soil excavation and certification field activities has been significantly higher than normally anticipated. For the three month soil excavation construction activities schedule alone, over 29 rain days were experienced, which resulted in associated delays in the certification sampling schedule. Second, as you know from our joint discussions, it was assumed that all contamination above Final Remediation Levels (FRL) would be removed within the initial six inch "strip" of soil. This assumption was reasonable considering the existing Operable Unit 5 (OU5) Remedial Investigation (RI) data and location of Area 1, Phase I relative to contaminant sources. Preliminary analysis of existing data indicates that in some limited

areas additional soil excavation will be necessary. Due to these factors, we request to extend the submittal date for the draft Area 1, Phase I Certification Report (Subareas A, B, B1, PS, and SB) to July 1, 1997.

Related deadlines that are affected by the Area 1, Phase I Soil Certification Report extension include the SEP, Area 2, Phase I IRDP, and the Insitu Radiological Characterization Comparability Study Report.

The Area 1, Phase I Certification Report should be completed prior to completing the development of a sitewide soil certification strategy (a major component of the scope of work for the SEP). Completing the Area 1, Phase I certification work allows the Department of Energy (DOE) and Environmental Protection Agency (EPA) to understand the critical issues with certification, identify lessons-learned, and provide time for follow-up alignment with you and the Ohio Environmental Protection Agency (OEPA) on resolution of outstanding issues and the development of a sitewide certification strategy prior to the submittal of the draft SEP. The proposed sitewide excavation and certification strategy will be described in the SEP with implementation described in area-specific integrated remedial design work packages, such as the Area 2, Phase I IRDP. The DOE believes that this is still an appropriate approach and, as such, good cause delays in the extension of the schedule for the Area 1, Phase I Certification Report (Subareas A, B, B1, PS, and SB) represent good cause to delay submittal of the SEP and the Area 2, Phase 1 IRDP. Similarly, since our insitu radiological characterization comparability study work is intimately tied to completion of Area 1, Phase I certification work and the development of the SEP, we are also, therefore, requesting an extension of the schedule for the submittal of the draft Insitu Radiological Characterization Comparability Study Report. We are requesting that final schedules for submittal of these draft deliverables (SEP, Area 2, Phase I IRDP, Insitu Radiological Characterization Comparability Study Report) be submitted by May 1, 1997.

If you wish to discuss this request, please contact either Robert Janke at (513) 648-3124, or me at (513) 648-3139. Otherwise, we can discuss this further at our upcoming meeting next week in Chicago, planned for Wednesday, March 5, 1997. We are looking forward to the opportunity at this meeting to provide you and the OEPA with additional information concerning the current status of the Soils Remediation Program.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

cc:

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