



Department of Energy

**Ohio Field Office
Fernald Area Office**

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SEP 16 1997

DOE-1423-97

**Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West 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:

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY
STUDY/CONSENT DECREE MONTHLY REPORT - AUGUST 1, 1997, THROUGH
AUGUST 31, 1997**

This letter transmits the amended Consent Agreement Monthly Report for the period of August 1, 1997, through August 31, 1997. The monthly 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 or your staff have any questions, please contact me at (513) 648-3139.

Sincerely,

**Johnny W. Reising
Fernald Remedial Action
Project Manager**

Enclosure: As Stated

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cc w/enc:

N. Hallein, EM-42, CLOV
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G. Jablonowski, USEPA-V, 5HRE-8J
F. Barker, Tetra Tech, EM Inc.
D. Carr, FDF/52-5
T. Hagen, FDF/65-2
AR Coordinator, FDF/78

cc w/o enc:

A. Tanner, DOE-FEMP
F. Bell, ATSDR
D. S. Ward, GeoTrans
J. Harmon, FDF/90
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EDC, FDF/52-7

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
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STUDY/CONSENT DECREE MONTHLY REPORT AUGUST 1 - 31, 1997**

Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from August 1 through 31, 1997. 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

August 1997

- **Enforceable Milestones Completed**
 - **None**

- **Major Work Initiated/Completed**
 - **Continued north railyard installation**
 - **Continued Site Improvements Project**
 - **Continued development of the Transportation Plan**
 - **Continued off-site trestle construction activities**
 - **Completed construction of rail maintenance building foundation**
 - **Mobilized contractor for Paddys Run bridge upgrade**
 - **Completed procurement of pre-fabricated rail maintenance facility**
 - **Completed draft waste profile documentation for disposal of pit wastes at Envirocare and performed initial review**
 - **Initiated development of Waste Management Plan**

September 1997 (Anticipated)

- **Enforceable Milestones**
 - **None**

- **Major Work to be Initiated/Completed**
 - **Award ARASA subcontract**
 - **Incorporate comments and submit waste profile documentation for disposal of pit wastes at Envirocare**
 - **Continue north railyard installation**
 - **Initiate procurement of subcontract for rail maintenance building installation**
 - **Complete draft of Transportation Plan, a RAWP deliverable, for initial review**
 - **Complete off-site trestle construction activities**
 - **Continue development of Waste Management Plan**
 - **Complete Paddys Run bridge upgrade**
 - **Complete WPRAP Site Improvements Project**

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OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY

August 1997

- **Enforceable Milestones Completed**
 - Submitted Final OSDF Groundwater/Leak Detection and Leachate Monitoring Plan to Agencies August 7, 1997

- **Major Work Initiated/Completed**
 - **On-Site Disposal Facility (OSDF)**
 - Completed excavation for Cell 1 liner
 - Initiated installation of Cell 1 horizontal perched groundwater monitoring well
 - Initiated installation of Cell 1 compacted clay liner
 - Began excavation of Cell 2
 - Submitted WAC Attainment Plan to Agencies August 21, 1997
 - Submitted Rev. H Impacted Materials Placement Plan No. 1 (oversized materials) to Agencies August 20, 1997
 - Submitted response to comments on Remedial Action Workplan on August 12, 1997 (This response proposed two new OU2 milestones: begin OSDF Phase II Construction 7/15/98; propose project milestone for each outlying fiscal year by August 15 of each preceding fiscal year)
 - **Leachate Conveyance System (LCS)**
 - Performed pressure testing on installed leachate lines
 - Began work on southern and eastern sections of LCS, including installation of permanent lift station
 - **Haul Road/Relocated North Entrance Road**
 - Continued subgrade work for both roads
 - Installed drainage culverts for Relocated North Entrance Road (gravel base not installed due to adverse weather conditions)

September 1997 (Anticipated)

- **Enforceable Milestones**
 - None

- **Major Work to be Initiated/Completed**
 - **OSDF**
 - Continue Cell 1 compacted clay liner installation
 - Complete Cell 1 horizontal groundwater monitoring well installation
 - Initiate installation of secondary composite liner and leak detection system
 - **LCS**
 - Continue installation of leachate lines/manholes

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- Roads
 - Install gravel base and geotextile for Relocated North Entrance Road and for portions of Haul Road

Additional OU2 soils-related activities reported under OU5/Soils Characterization and Excavation Project.

OPERABLE UNIT 3 - FACILITIES CLOSURE & DEMOLITION PROJECTS

August 1997

- Enforceable Milestones Completed
 - Submitted Plant 1 D&D Completion Report to Agencies August 25, 1997 (this milestone due date was January 20, 1998)
- Major Work Initiated/Completed
 - **Safe Shutdown**
 - Completed holdup removal from:
 - Vacuum System in Building 69
 - Trane Incinerator in Building 39A
 - Drum Washer in Plant 8
 - **D&D**
 - Boiler Plant/Water Plant
 - Continued asbestos abatement inside/outside Boiler Plant
 - Sheared two trailers
 - Removed all transite and friable asbestos from Water Plant
 - Awarded Thorium/Plant 9 Complex Decontamination and Dismantlement contract to NSC Energy Services, Inc., August 22, 1997. The actual scheduled date for this award was October 15, 1997.
 - Plant 4
 - Received USEPA approval of Project Completion Report August 12, 1997, and submitted final version to DOE-FEMP August 25, 1997
 - Completed project closeout

September 1997 (Anticipated)

- Enforceable Milestones
 - Issue Notice to Proceed to Thorium/Plant 9 D&D subcontractor
- Major Work to be Initiated/Completed

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- **Safe Shutdown**
 - Continue energy isolation procedures in Plant 2/3 and Plant 8
 - Remove MAWS equipment from Plant 9
- **D&D**
 - Continue Boiler Plant/Water Plant activities
 - Asbestos abatement
 - Equipment removal from boilers
 - Demolition of pipe bridge and fly ash silo
 - Thorium/Plant 9 Complex ---
 - Prepare subcontractor work plans (Safe Work Plan and Health & Safety Plan)
 - Maintenance/Tank Farm Complex
 - Continue development of Implementation Plan

OPERABLE UNIT 4 - SILOS PROJECTS

August 1997

- **Enforceable Milestones Completed**
 - None
- **Major Work Initiated/Completed**
 - Revised baseline and silos remediation activities schedule in accordance with July 22, 1997, OU4 Dispute Settlement
 - Participated in USEPA-hosted Public Workshop on OU4 Dispute Settlement August 26, 1997
 - Completed design for Silo 3 Small-Scale Waste Retrieval Project; involves retrieval of small amount of Silo 3 waste to support potential analytical and treatability testing requirements
 - Continued dismantlement/removal of piping and equipment at Vitrification Pilot Plant (VitPP) as part of efforts to bring facility to long-term standby configuration

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September 1997 (Anticipated)

- **Enforceable Milestones**
 - Submit Silo 3 Draft Explanation of Significant Differences (ESD) to Agencies by September 15, 1997
 - Submit following deliverables to Agencies by September 15, 1997, under the auspices of OU4 Dispute Settlement:
 - Work Plan for Structural Steel Debris Recycling Project
 - Work Plan for Railroad Track Recycling Project

(Note: The above items are SEPs projects required under the OU4 Dispute Resolution, July 22, 1997. They are to be managed and implemented by OU3.)

- **Major Work to be Initiated/Completed**
 - Prepare Commerce Business Daily announcement for Silos 1 and 2 Multi-Tech Proof-of-Principle Testing
 - Release Draft RFP for Silo 3 to Agencies, stakeholders, and potential subcontractors, contingent upon approval by DOE-HQ
 - Initiate design for Silos 1, 2 and 3 core sampling in support of silo integrity testing
 - Continue dismantlement/removal activities at VitPP

OPERABLE UNIT 5

August 1997

- **Enforceable Milestones Completed**
 - **Aquifer Restoration/Wastewater Project (ARWWP)**
 - Transmitted Final Integrated Environmental Monitoring Plan (IEMP) to Agencies August 7, 1997; Final OSDF Groundwater/Leak Detection and Leachate Monitoring Plan was included as part of transmittal (National Emissions Standards for Hazardous Air Pollutants [NESHAP] approval was granted by the Air and Radiation Section of USEPA Region V on August 1, 1997)
 - **Soils Characterization and Excavation Project (SCEP)**
 - Received USEPA approval on August 13, 1997, of DOE-FEMP's June 27, 1997, request for extension of two milestones:
 - Prefinal Area 2 Phase I Integrated Remedial Design Package (IRDP) - extended from July 14, 1997 to October 20, 1997
 - Area 2 Phase I Final Design/Certified for Construction excavation package design drawings - extended from August 11, 1997 to February 16, 1998

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- Major Work Initiated/Completed
 - **ARWWP**
 - Evaluated bids for combined South Field Extraction System, Injection Demonstration Project, and South Plume Optimization Projects, and awarded contract to DeBra August 13, 1997
 - Issued Notice to Proceed to DeBra for above combined projects August 25, 1997
 - Continued construction on Advanced Waste Water Treatment (AWWT) Ion Exchange Regeneration System; construction is 90% complete and will be followed by training and system operability testing activities
 - **SCEP**
 - Awarded contract for Area 2 Phase I (*OU2 Southern Waste Units & OU5 Soil*) on August 6, 1997
 - Met with USEPA on August 5 - 6, 1997, to resolve comments on Draft Area 2 Phase I Site Preparation Plan and Area 2 Phase I Certified for Construction Site Preparation Package Drawings
 - Participated in conference call with Agencies on August 13, 1997, to discuss Area 2 Phase I Site Preparation Project Specific Plan (PSP), and Technetium-99 and Thorium-232 issues
 - Performed selected Area 2 Phase I Site Preparation Areas sampling activities
 - Performed Area 1 Phase I (*Northern Half of East Field & Areas North of Production Area*) field sampling for East Soil Stockpile WAC Attainment
 - Performed Area 1 Phase II (*Southern Half of East Field*) Trap Range Lead field sampling; also began Area 1 Phase II Real-Time Above WAC sampling
 - Continued development of IRDPs for Area 2 Phase I, Area 1 Phase II, and Area 3 (*Portion of former Production Area North of 2nd Street*)

September 1997 (Anticipated)

- Enforceable Milestones
 - **ARWWP**
 - Submit Re-Injection Demonstration Test Plan to Agencies by September 1, 1997
 - Submit responses to comments on Operations and Maintenance Master Plan to Agencies in September 1997
 - **SCEP**
 - None
- Major Work to be Initiated/Completed
 - **ARWWP**
 - Begin construction on combined South Field Extraction System, Injection Demonstration, and South Plume Optimization Projects
 - Award contract for Sewage Treatment Plant (STP) Relocation

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SCEP

- Review Safe Work Plan when received from Area 2 Phase I Site Preparation contractor; begin construction upon resolution of Agency comments
- Perform/complete selected sampling activities in Area 2 Phase I, Area 1 Phase I, and Area 1 Phase II
- Continue development of IRDPs for Area 2 Phase I, Area 1 Phase II, and Area 3
- Continue development of PSPs for Area 3

WASTE MANAGEMENT

July 1997

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Completed
 - Low Level Waste
 - Shipped 116,169 ft³ low level waste to Nevada Test Site (NTS), bringing FY97 total to 472,721 ft³ of 612,000 ft³ FY97 goal
 - DOE-NV auditors visited FEMP the week of August 18, 1997, and closed Corrective Action Requests made during their June 1997 surveillance
 - Mixed Waste Treatment Projects
 - Mixed Waste Shipping --- Preparing 308 drums of selected mixed waste for disposal at Envirocare; received analytical results, prepared and submitted waste profile to Envirocare for review
 - Chemical Treatment Projects
 - Treated 1.6 m³ mixed waste in the Neutralization/Precipitation/Deactivation/ Stabilization (NPDS) Project
 - Organic Extraction Project (RCI/Terra-Kleen) --- Standard Startup Review was conducted week of August 18, 1997
 - Thorium Legacy Waste Project --- Awarded contract to OHM August 8, 1997
 - Other Waste Management
 - Shipped last of Thorium Overpack Containers in Thorium Overpacking Project to NTS
 - Issued Final Plan - Decision Methodology for Fernald Material Disposition Alternatives

September 1997 (Anticipated)

- Enforceable Milestones
 - None

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- Major Work to be Initiated/Completed
 - Low Level Waste
 - Shipping goal of 128,000 ft³
 - Mixed Waste Treatment Projects
 - Chemical Treatment Projects
 - Organic Extraction Project (RCI/Terra-Kleen) --- Begin operations
September 3, 1997
 - NPDS Project --- Continue treatment activities
 - Hazardous Waste/Recycling Project --- Ship 2 drums of Graphic Department's
waste