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Department of Energy

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DOE-0115-98

**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:

ON-SITE DISPOSAL FACILITY LINER CERTIFICATION REPORT

Section 6.3 of the On-Site Disposal Facility (OSDF) Impacted Materials Placement Plan states that "Impacted material placement activities shall not commence in a cell until liner system construction has been completed in accordance with the contract documents and only after cell construction has been certified in accordance with the requirements of the OSDF Construction Quality Assurance (CQA) Plan and all other subcontract requirements." Cell construction certification is documented by a Construction Quality Control (CQC) Certification Report, as specified in Section 5.5 of the OSDF CQA Plan. The CQC Certification Report is a lengthy document that will take approximately two weeks to prepare following completion of liner construction. Because the construction of the Cell 1 liner will be completed during the late Fall, it is important to place the seasonal cover (consisting of impacted material) immediately after completion of the liner.

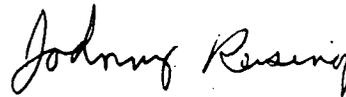
The Department of Energy (DOE) is therefore proposing a modification to the liner certification requirement in the Impacted Materials Placement Plan. Instead of prohibiting impacted material placement in Cell 1 until the CQC Certification Report is completed, DOE proposes impacted material placement begin immediately following completion of the liner with the requirements that GeoSyntec provide verbal confirmation to FDF that the liner has been constructed correctly and that the CQC Certification Report be submitted within two weeks of liner completion. If GeoSyntec does not submit the report to FDF within two weeks, impacted material placement will cease until the report is completed. Because the liner testing results and construction details will have been previously reviewed by both the

CQC Consultant (GeoSyntec) and Fluor Daniel Fernald, Inc. (FDF) Quality Assurance personnel, the preparation of the CQC Certification Report is merely a final recordkeeping and documentation process and is not expected to uncover any deficiencies.

At this time, the modification of the liner certification requirement is proposed only for Cell 1. However, as schedules are developed for future phases of OSDF construction, it may become apparent that this should be a permanent change to the OSDF Impacted Materials Placement Plan. If necessary, this change will be discussed with the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) in the future.

The DOE requests the U.S. EPA and OEPA concurrence with this modification. If there are any questions regard these submittals, please contact Jay Jalovec at (513) 648-3122.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Warner

cc:

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