



Department of Energy

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DEC 22 1997

DOE-0283-98

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:

REQUEST FOR EXTENSION - OPERABLE UNIT 2; PLACEMENT OF SEASONAL COVER ON THE ON-SITE DISPOSAL FACILITY

This letter is a follow-up to our conference calls on December 18, 1997, during which we reviewed the status of the On-Site Disposal Facility (OSDF) and Leachate Conveyance System as related to the milestone for placement of seasonal cover on the OSDF.

As was conveyed during the conference call, we are in the process of placing the filter fabric layer on top of the gravel of the leachate collection systems within the first cell of the OSDF. All leaks within the leachate conveyance system have been repaired and the entire system pressure tested. We are conducting Construction Acceptance Testing and Systems Operability Testing on the system. This will be followed by a Standard Startup Review (SSR).

At the completion of the SSR for Cell 1 of the OSDF we will be ready to place a one foot lift of protective cover on the filter fabric. The Remedial Action Work Plan (RAWP) lists a milestone date of December 31, 1997, to accomplish the placement of seasonal cover.

As we have discussed, a cost-effective option for placement of the protective cover is to utilize impacted soil from the east stockpile. Another option, of course, is to utilize non-impacted, "clean" soils for the protective cover. The Department of Energy (DOE) is in a position to meet the December 31, 1997, milestone if clean soil is utilized for the cover. However, as we have discussed previously, DOE believes the more desirable option is to utilize the impacted east stockpile.

In light of your respective Agency's position that the entire leachate conveyance system must be operational prior to placement of impacted materials, DOE may be unable to meet the existing milestone if impacted material is used.

Section XVIII A of the Consent Agreement as amended allows for a schedule extension request. The Department of Energy, Fernald Environmental Management Project (DOE-FEMP) is respectfully requesting the Operable Unit 2 (OU2), RAWP milestone date of December 31, 1997, for placement of seasonal cover on the OSDF, be extended to January 15, 1998. This is a schedule request of 15 days beyond the existing milestone. This extension would ensure DOE's ability to utilize impacted material for the protective cover, and would not impact any related milestone, deadline or schedule.

The DOE-FEMP believes good cause exists for this extension and the opportunity to cost-effectively utilize impacted material for the protective cover. In an effort to reduce the amount of material that must be placed in the cell in accordance with good waste minimization actions, we have proposed to employ the impacted material from the east stockpile as the last one foot of protective cover that is required prior to placement of the crusting agent for seasonal cover.

Once the Systems Operability Testing and SSR are completed, it will take between two to four days to place the one foot of protective layer in Cell 1 to complete the required three feet of freeze protection. It will take approximately one to two days to then apply the crusting agent which will meet the seasonal cover requirement. We do not anticipate any detrimental effects of severe cold temperatures between now and January 15, 1998. In order to prevent any detrimental impact of the freeze-thaw cycle on the three feet of compacted clay liner, we have committed to placement of three feet of "material" over the clay. Presently, we have over two feet of material in place. This is more than adequate to protect the clay liner from the freeze thaw expected between now and January 15, 1998.

As you know, the DOE and Fluor Daniel Fernald (FDF) have made a good faith attempt to meet the December 31, 1997, milestone. The regulators and numerous other stakeholders have been closely involved in viewing the ongoing construction of Cell 1 of the OSDF and Leachate Conveyance System.

Pursuant to Section XVIII of the Consent Agreement as amended, DOE-FEMP is requesting agreement that "good cause" exists for an extension to January 15, 1998.

The DOE-FEMP and FDF are available at your request to discuss and review this issue. Please feel free to contact Jay Jalovec at (513) 648-3122, or me at (513) 648-3139.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

cc:

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