



Department of Energy

**Ohio Field Office
Fernald Area Office**

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



MAR 13 1998

DOE-0579-98

**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:

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY
STUDY/CONSENT DECREE MONTHLY REPORT - FEBRUARY 1, 1998, THROUGH
FEBRUARY 28, 1998**

This letter transmits the amended Consent Agreement Monthly Report for the period of February 1, 1998, through February 28, 1998. This 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).

Sincerely,

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

Enclosure: As Stated

cc w/enc:

**N. Hallein, EM-42, CLOV
G. Jablonowski, USEPA-V, SRF-5J
R. Beaumier, TPSS/DERR, OEPA-Columbus
F. Barker, Tetra Tech
D. Carr, FDF/52-2
T. Hagen, FDF/65-2
AR Coordinator, FDF/78**

cc w/o enc:

**A. Tanner, DOE-FEMP
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
J. Harmon, FDF/90
R. Heck, FDF/2
S. Hinnefeld, FDF/2
B. Irvine, FDF/65-2
T. Walsh, FDF/65-2
EDC, FDF/52-7**

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Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from February 1 through February 28, 1998. 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

February 1998

- **Enforceable Milestones Completed**
 - None
- **Major Work Initiated/Completed**
 - Continued on-site rail infrastructure upgrade
 - Continued Shandon Yard upgrade construction
 - Submitted IT Corporation's Draft Remedial Design package to DOE-FEMP
 - Continued to develop and finalize IT Corporation's pre-mobilization contract deliverables
 - Awarded contract for construction of rail and access road lighting
 - Continued development of Waste Management Plan
 - Incorporated DOE-FEMP comments into Transportation and Disposal Plan

March 1998 (Anticipated)

- **Enforceable Milestones**
 - None
- **Major Work to be Initiated/Completed**
 - Complete on-site rail infrastructure construction
 - Complete Shandon Yard Upgrade construction
 - Continue Locomotive Maintenance Facility utilities installation
 - Continue the development and finalization of IT Corporation's pre-mobilization contract deliverables
 - Prepare for submittal of IT Corporation's Draft Remedial Design package to Agencies by April 9, 1998
 - Award contract for railcar procurement
 - Complete draft of Waste Management Plan and begin internal review
 - Continue incorporating DOE comments into Transportation and Disposal Plan

OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY

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

February 1998

- **Enforceable Milestones Completed**
 - None

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- Major Work Initiated/Completed
 - On-Site Disposal Facility (OSDF)
 - Began construction of OSDF Material Transfer Area and Decontamination Facility
 - Continued review of contractor proposals for OSDF Phase II/Southern Waste Units excavation contract (performed in conjunction with Soil Characterization and Excavation Project)
 - Performed regular inspection of Cell 1 seasonal cover; no maintenance was necessary
 - Leachate Conveyance System (LCS)
 - Continued working on construction punch list items, as permitted by weather conditions
 - Operated system and performed routine maintenance as required

March 1998 (Anticipated)

- Enforceable Milestones
 - Began impacted material placement in Cell 1 on December 23, 1997, fulfilling the actual milestone date of March 27, 1998
 - Completed construction of Haul Road and Relocated North Access Road as of December 5, 1997, fulfilling the actual milestone date of March 27, 1998

(NOTE: both of the above milestones were reported in the Monthly/Quarterly report submitted to the Agencies on January 16, 1998)

- Major Work to be Initiated/Completed
 - OSDF
 - Complete construction of OSDF Material Transfer Area and Decontamination Facility
 - Submit Consent Package for OSDF Phase II/Southern Waste Units excavation contract to DOE-FEMP
 - Continue regular inspection of seasonal cover; perform routine maintenance as required
 - LCS
 - Complete outstanding construction punch list items, contingent upon weather conditions
 - Continue operations and perform routine maintenance

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OPERABLE UNIT 3 - FACILITIES CLOSURE & DEMOLITION PROJECTS

February 1998

- **Enforceable Milestones Completed**
 - Submitted Maintenance/Tank Farm Complex D&D Implementation Plan to Agencies on February 27, 1998, complying with the actual milestone date of March 5, 1998 for combined complexes

- **Major Work Initiated/Completed**
 - **Safe Shutdown**
 - Plant 8
 - Completed holdup material removal from selected areas
 - Isolated underground sewage line
 - Isolated fire suppression system
 - Plant 6
 - Continued isolating storage tank containing sodium hydroxide/sodium sulfide mixture; activity will eventually involve drumming, coding and storage of material
 - Sealed up Rolling Mill area
 - **D&D**
 - Boiler Plant/Water Plant
 - Began demolition of Boiler Plant and Coal Handling Area
 - Continued demolition of railroad tracks
 - Completed window removal at Boiler Plant
 - Completed demolition of Process Water Break Tank
 - Sized, segregated, and containerized debris from demolition activities
 - Thorium/Plant 9 Complex
 - Began friable asbestos abatement, equipment removal and interior demolition activities in Plant 9
 - Continued with preparation/submittal of subcontractor Safe Work Plans
 - Continued demolition of railroad tracks
 - Maintenance/Tank Farm Complex
 - Continued Implementation Plan development
 - Sewage Treatment Plant Complex
 - Continued Implementation Plan development

March 1998 (Anticipated)

- **Enforceable Milestones**
 - See Operable Unit 3 "Enforceable Milestones Completed" for February 1998

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- **Major Work to be Initiated/Completed**
 - **Safe Shutdown**
 - Continue asbestos removal in Plant 2/3; complete holdup material removal in selected areas
 - Continue biohazard cleanup and utility disconnects in Plant 6; complete control point setup
 - Complete all holdup material removal, utility disconnects and "turnover package" for Plant 8; turn building over to Site Facilities Services
 - Complete utility disconnects at Tank Farm Complex
 - Complete excavations on underground utility lines to Boiler Plant
 - **D&D**
 - **Boiler Plant/Water Plant**
 - Complete transite removal at Boiler Plant
 - Continue ongoing sizing, segregation, and containerization of debris
 - **Thorium/Plant 9 Complex**
 - Perform structural D&D of Magnesium Storage Building
 - Begin building preparation activities in and around Buildings 69 and 78
 - Continue preparation of subcontractor work plans
 - Continue friable asbestos abatement, equipment removal and interior demolition activities in Plant 9; commence similar activities in Building 69
 - **Sewage Treatment Plant Complex**
 - Complete Implementation Plan development

OPERABLE UNIT 4 - SILOS PROJECTS

February 1998

- **Enforceable Milestones Completed**
 - None
- **Major Work Initiated/Completed**
 - **Silos 1 & 2 Project**
 - Issued Request for Proposal (RFP) for Multi-Tech Proof of Principle Testing on February 11, 1998
 - Commenced preparation of initial sections of Silos 1 & 2 Feasibility Study amendment
 - Began Internal FDF/DOE Review of Draft RFP for Accelerated Waste Retrieval (AWR) Project
 - Transmitted Draft National Environmental Policy Act (NEPA) Supplemental Analysis for AWR Project to DOE-Ohio Field Office for approval

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- **Silo 3 Project**
 - Submitted Final Silo 3 Explanation of Significant Differences (ESD) to Agencies on February 17, 1998
 - Revised Draft RFP to allow off-site treatment; initiated internal reviews
 - Continued System Operability/Mock-Up Testing of Small Scale Waste Retrieval at Silo 4

March 1998 (Anticipated)

- **Enforceable Milestones**
 - None
- **Major Work to be Initiated/Completed**
 - **Silos Project -- General**
 - Hold March 4, 1998 public meeting to discuss Public Involvement opportunities
 - **Silos 1 & 2 Project**
 - Conduct pre-proposal meeting on Proof of Principle Testing RFP with DOE-FEMP, Fluor Daniel Fernald and interested contractors on March 3, 1998; receive proposals by March 31, 1998 and begin evaluations
 - Make Scope of Work, Evaluation Criteria and Summary of Technical Requirements Document from AWR RFP available for 30-day public review
 - **Silo 3 Project**
 - Await USEPA approval of Final ESD and prepare Draft Remedial Design Work Plan
 - Await Contract Review Board approval of RFP
 - Initiate installation of Small Scale Waste Retrieval equipment at Silo 3

OPERABLE UNIT 5 - SOILS AND WATER PROJECT

February 1998

- **Enforceable Milestones Completed**
 - **Aquifer Restoration/Wastewater Project (ARWWP)**
 - Submitted monthly National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report for January 1998 to OEPA on February 12, 1998
 - Met 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by the OU5 Record of Decision
 - Submitted Ohio Department of Natural Resources Water Withdrawal Report on February 27, 1998, fulfilling the actual milestone date of March 1, 1998

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- **Soil Characterization and Excavation Project (SCEP)**
 - Submitted Area 2 Phase I (*Southern Waste Units*) Final Design/Certified for Construction Excavation Package design drawings on December 17, 1997, fulfilling the actual milestone date of February 16, 1998
- **Major Work Initiated/Completed**
 - **ARWWP**
 - Started pipeline installation for South Plume Optimization Project
 - Continued various construction and/or readiness activities associated with:
 - Advanced Wastewater Treatment (AWWT) Facility Expansion
 - New Sewage Treatment Plant (STP)
 - Completed Construction Acceptance Testing (CAT), System Operability Testing (SOT) and Standard Startup Review (SSR) on AWWT Resin Regeneration System
 - Perform first ion exchange regeneration activities using new AWWT Resin Regeneration System
 - **SCEP**
 - Completed field activities for Phase II of Paddys Run Embankment Stabilization Project; also completed upstream bioengineering control
 - Continued Area 2 Phase I Site Preparation package field implementation activities; included installation of high density polyethylene infiltration barriers within retention basins
 - Continued procurement process for OSDF Phase II/Southern Waste Units excavation contract, to be performed in conjunction with OSDF Project
 - Submitted response to comments to Agencies for:
 - Prefinal Area 2 Phase I Integrated Remedial Design Package (IRDP)
 - Draft Sitewide Excavation Plan
 - Continued development of Project Specific Plans (PSPs) and IRDP for Area 3 (*Northern Portion of the Former Production Area*)

March 1998 (Anticipated)

- **Enforceable Milestones**
 - **ARWWP**
 - Submit monthly NPDES Discharge Monitoring Report to OEPA
 - Meet 20 ppb average monthly uranium discharge to Great Miami River as required by OU5 Record of Decision
 - Submit Restoration Area Verification Sampling Report (groundwater remedial footprint) to Agencies by March 5, 1998
 - Submit Integrated Environmental Monitoring Plan Quarterly Report to Agencies by March 30, 1998

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- **SCEP**
 - Submit Revised Work Plan for Ecological Research Project by March 24, 1998
- **Major Work to be Initiated/Completed**
 - **ARWWP**
 - Complete construction/perform Integrated CAT and SOT activities on following projects:
 - AWWT Facility Expansion
 - New STP
 - Continue construction of South Field Extraction System/South Plume Optimization System/Injection Demonstration System
 - **SCEP**
 - Complete demobilization activities associated with Paddys Run Embankment Stabilization
 - Continue field implementation of Area 2 Phase I Site Prep package, including installation of high density polyethylene piping and trailer facilities
 - Submit Revised Site Preparation construction drawings and technical specifications, incorporating Design Change Notices
 - Submit Consent Package for OSDF Phase II/Southern Waste Units excavation contract to DOE-FEMP (in conjunction with OSDF Project)
 - Submit Draft Work Plan for Aesthetic Barrier Project
 - Perform additional Waste Acceptance Criteria attainment sampling of West Soil Stockpile
 - Continue development of PSPs and IRDP for Area 3
 - Submit response to comments to Agencies for:
 - Area 1 Phase I (*OSDF Footprint*) Certification Report
 - Proposal Establishing Conservation Area Near the FEMP
 - Ecological Research Projects Supplemental Environmental Project Draft Work Plan
 - On-Property Public Access Habitat Area Supplemental Environmental Project Draft Work Plan
 - Area 1 Phase II (*Southern Portion of East Field*) Prefinal IRDP
 - Submit Revised Operable Unit 5 Remedial Design Work Plan Addendum to address certification strategy for off-property areas
 - Await OEPA comments on following SCEP submittals presently in review:
 - Waste Acceptance Criteria Attainment Completion Reports, Area 1 Phase I, Eastern Portion and Western Portion, both submitted June 1997
 - Preliminary Wetland Mitigation Assessment, submitted January 1998

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WASTE MANAGEMENT

February 1998

- **Enforceable Milestones Completed**
 - None

- **Major Work Initiated/Completed**
 - **Low Level Waste**
 - All low level waste shipping remains suspended per Department of Energy direction following an incident involving transportation of white metal boxes to Nevada Test Site (NTS); DOE Type B Investigation Team performed an investigation during January and issued their report on February 6, 1998
 - **Mixed Waste Treatment Projects**
 - **Liquid Mixed Waste** --- Received sampling results for Batch #8 (newly generated low level waste) and initiated characterization; continued to evaluate newly generated waste streams for bulking into Batches #9 and #10
 - **Chemical Treatment Projects**
 - **Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project** --- Neutralized 47 drums during February 1998; total of 724 drums treated in project thus far
 - **RCI Solvent Extraction Project** --- Subcontractor submitted final equipment decontamination plan
 - **Organic Treatment Project** --- Issued Commerce Business Daily announcement on February 9, 1998, to seek potential bidders for treatment of tri-mixed wastes (these wastes formerly under auspices of RCI Solvent Extraction Project)
 - **Hazardous Waste/Recycling Project** --- Made preparations for next Lab Pack shipment from Analytical Laboratory Services

March 1998 (Anticipated)

- **Enforceable Milestones to Be Completed**
 - None

- **Major Work to be Initiated/Completed**
 - **Low Level Waste**
 - Issue Corrective Action Plan responding to Type B Investigation Report on Leaking White Metal Boxes by March 23, 1998

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- **Mixed Waste Treatment Projects**
 - **Liquid Mixed Waste Project** --- Ship Batch #7 (19,000+ gallons mixed waste) to Toxic Substances Control Act Incinerator; note that all shipments to Toxic Substances Control Act Incinerator are on hold pending resolution of disposal issues between Oak Ridge and NTS
 - **Chemical Treatment Projects**
 - **NPDS Project** --- Evaluate contents of storage tank in Plant 6 for addition to project (tank contains approximately 2,000 gallons sodium hydroxide/sodium sulfide mixture); consider extension of contract to treat 500 additional drums
 - **Organic Treatment Project** --- Await letters of interest from qualified vendors; prepare Request for Proposal for treatment of tri-mixed wastes
 - **Hazardous Waste/Recycling Project** --- Ship next Lab Pack
 - **Thorium Legacy Waste Stabilization Project** --- Continue staging low level waste repackaging activities in Building 64, in order to support eventual shipment of these wastes to NTS