



Department of Energy

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MAR 17 1998

DOE-0580-98

**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:

**REVISION TO CERTIFICATION DESIGN LETTER FOR AREA 1, PHASE II - SECTOR 1, 2a,
AND CONVEYANCE DITCH**

**Reference: Letter DOE-0297-98, Reising to Saric and Schneider, "Revision to Area 1
Phase II, Sector 1 Certification Design Letter," dated December 23, 1997.**

As per the recent discussions, the purpose of this letter is to provide the final revisions to the above referenced Certification Design Letter (CDL) and the Project Specific Plan (PSP) of Area 1 Phase II (A1PII) - Sector 1, 2a, and the Conveyance Ditch. These revisions are the result of comments from the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) as well as some Fernald Environmental Management Project (FEMP) directed changes. During recent meetings and conference calls, these revisions were discussed with the U.S. EPA and OEPA. These revisions are being provided instead of a revised CDL. An appendix to the draft Certification Report (scheduled to be submitted to the U.S. EPA and OEPA by May 31, 1998) will be added to include a response-to-comments component to address each of the comments received from both the U.S. EPA and OEPA.

Certification Design Letter**Revisions to the CDL include the following:**

1. All comments as noted in the OEPA Conditional Approval Letter, dated January 7, 1998, have been incorporated. These include:
 - Reconfiguration of the Certification Units (CU) S1-01 through S1-08.
 - The collection and analysis of 16 samples versus 12 for CUs within the initial borrow area.
2. As discussed in the CDL, the most northern CU (A1PII-S2-2a-01) falls within the footprint of On-Site Disposal Facility (OSDF) Cell 3. Also, part of the A1PI East Stockpile fell within the CU. The original plan was to move the stockpile out of the CU, and then excavate six inches from this CU. Based on field conditions, the stockpile could not be moved as far south as originally planned, but could be moved far enough to give OSDF sufficient area to construct Cell 3. Therefore, the southern CU boundary was moved approximately 50 feet north, which made the CU smaller. The random sample point selection process was revised based on the new configuration. Upon completion of the excavation of approximately six inches of material, certification samples were collected. Prior to the excavation of the area, a Radiation Tracking System (RTRAK) scan was performed and a physical sample for Waste Acceptance Criteria (WAC) determination was taken. Both the WAC sample and the RTRAK scan showed no contamination approaching the WAC or Final Remediation Level (FRL) limits. The excavated soil was then placed on the A1PI East Impacted Stockpile.
3. The PSP was changed to add sample collection efforts from the Sewage Treatment Plant (STP) access road in addition to the South Entrance Road to characterize these areas for potential re-use. Two samples were taken from each location, one from the fill material, and one from the native soil.
4. The sampling strategy for the CU, which represents the outfall area (A1PII-S2-01) west of the South Access Road, was modified. This area is currently being used by the South Plume Optimization Project for the installation of two force mains. Where these force mains cross the future A1PII outfall ditch, the trench excavation was not backfilled with soil (except covering the force mains) with the balance of excavated soil stockpiled within the confines of the CU. Four samples were taken from the stockpile, bringing the total number of samples in the CU to 20. The four samples from the soil stockpile will be statistically evaluated separately from the 16 CU samples to ensure that both sets of data passes CU certification, which in this case is for Characterization for Re-use.
5. The following schedule shows key activities for completion of the work within the scope of the CDL. This schedule replaces the preliminary schedule submitted with the draft CDL in December 1997. The primary drivers for completing this certification work

are OSDF construction activities, particularly the area within A1PII-S2a, necessary for the construction of Cell 3, and the development of the borrowed area within A1PII-S1.

ACTIVITY	TARGET DATE
<u>Submittal of Certification Design Letter</u>	<u>Complete</u>
Complete Field Work	Complete
Complete Analytical	March 27, 1998
Complete Statistical Analysis	April 15, 1998
Preliminary Data Summary Submittal	April 20, 1998
<u>Certification Report Agency Submittal</u>	<u>May 31, 1998</u>

Notice the informal submittal of a preliminary data package has been added. Also, as per our discussions, only the underlined reports are considered regulatory milestones. Once all the data are received and the statistical analyses for each CU are completed the data will be forwarded to the agencies for information and, hopefully, to assist you in your review of the draft Certification Report. The complete draft Certification Report will be submitted to the agencies by May 31, 1998.

Project Specific Plan

The following revisions and variances were issued during the completion of the field work:

1. Revision 2 of the PSP documented adding HPGe measurements co-located with the physical samples for the following CUs: A1PII-S2-2A-01, A1PII-S2-2A-02, A1PII-S1-04, A1PII-S1-06, A1PII-S1-18 A1PII-S2-08, A1PII-S1-10, A1PII-S1-14. This was done to collect additional data for the HPGe Comparability Study. Review of approximately 90 percent of the measurements show no contamination approaching the FRLs for Total U, Ra-226, or Thorium-232.
2. In CU A1PII-S1-05, Sample Point No. 5 was moved about eight feet to the west of its current location. The original point fell in the middle of a gravel road (1-1.5 feet thick) that was installed in 1993.
3. In CU A1PII-S2-2a-02, four sample points (Nos. 4, 6, 14, and 15) fell on the berm of the relocated North Access Road. The samplers were allowed to move the samples approximately 10 to 15 feet west to a location off the berm.

The enclosed figure shows the final configuration of the CUs and sample locations. If you have any questions, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure: As Stated

cc w/enc:

K. Nickel, DOE-FEMP
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R. Beaumier, TPSS/DERR, OEPA-Columbus
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M. Davis, ANL
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra Tech
D. Carr, FDF/52-2
J. Chiou, FDF/52-5
T. Crawford, FDF/52-5
T. Hagen, FDF/65-2
J. Harmon, FDF/90
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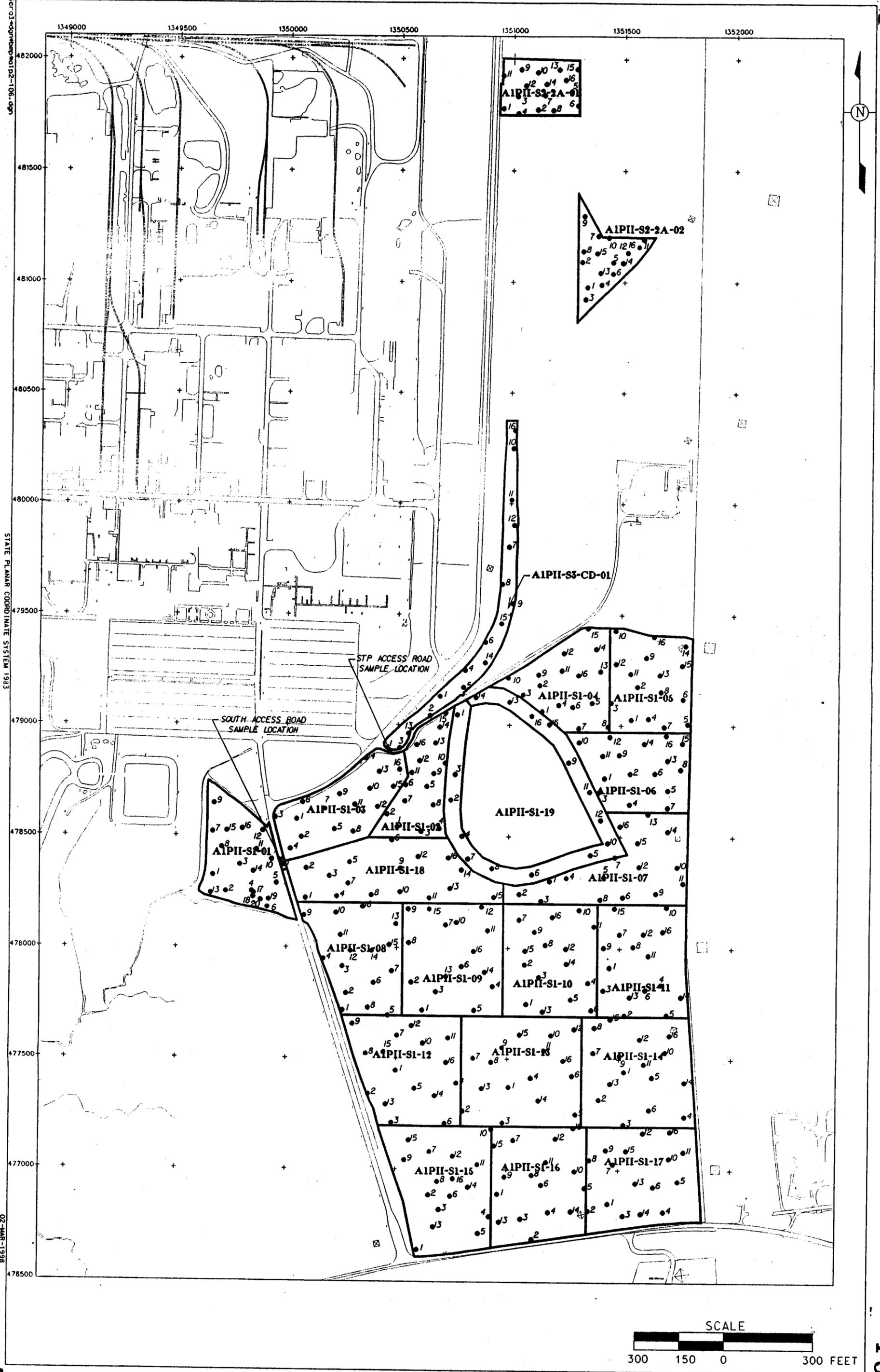
cc w/o enc:

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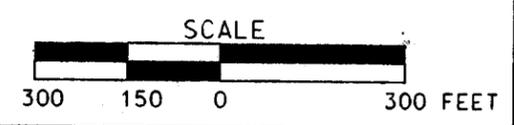
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FINAL SAMPLE LOCATIONS



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