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Department of Energy

Ohio Field Office
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MAY 13 1998

DOE-0772-98

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 FROM APRIL 1, 1998, THROUGH APRIL 30,
1998**

This letter transmits the amended Consent Agreement Monthly Report from April 1, 1998, through April 30, 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).

If you have any questions, please contact me at (513) 648-3139.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Reising

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

CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL
INVESTIGATION/FEASIBILITY STUDY/CONSENT DECREE MONTHLY REPORT
APRIL 1 THROUGH APRIL 30, 1998

Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from April 1 through April 30, 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

April 1998

- Enforceable Milestones Completed
 - Submitted Transportation and Disposal Plan to Agencies April 27, 1998

- Major Work Initiated/Completed
 - Completed Locomotive Maintenance Building utilities installation
 - Continued on-site rail infrastructure upgrade
 - Continued Shandon Yard upgrade construction
 - Initiated construction of rail and access road lighting
 - Continued developing/finalizing IT's pre-mobilization and pre-operations deliverables
 - Initiated IT's development of Draft Remedial Action deliverables
 - Continued development of Draft Waste Management Plan
 - Awarded contract for 50 gondola railcars

May 1998 (Anticipated)

- Enforceable Milestones
 - None

- Major Work to be Initiated/Completed
 - Complete on-site rail infrastructure construction
 - Complete Shandon Yard Upgrade construction
 - Continue construction of rail and access road lighting
 - Continue reviewing/finalizing IT's pre-mobilization and pre-operations deliverables
 - Continue IT's development of Draft Remedial Action deliverables
 - Complete draft of Waste Management Plan and begin initial reviews
 - Receive two locomotives obtained as excess from Department of Defense

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OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY

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

April 1998

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Completed
 - On-Site Disposal Facility (OSDF)
 - Completed placement of 2-foot layer of select impacted material into Cell 1 April 15, 1998, using East Soil Stockpile materials
 - Continued construction of Decontamination Facility
 - Placed additional Category 1 (soil and soil-like) material from East Stockpile into Cell 1
 - Began construction of access control and laboratory trailers
 - Submitted Consent Package for OSDF Phase II/Southern Waste Units excavation subcontract to DOE April 8, 1998 (to be performed in conjunction with Soil Characterization and Excavation Project)
 - Leachate Conveyance System (LCS)
 - Continued work on outstanding construction punch list items
 - Operated system and performed routine maintenance as required

May 1998 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Completed
 - OSDF
 - Complete construction of Decontamination Facility
 - Continue construction of access control and laboratory trailers
 - Begin movement of containers of debris to OSDF Transfer Area
 - Award OSDF Phase II/Southern Waste Units excavation contract
 - Issue Final Waste Acceptance Criteria Attainment Plan
 - LCS
 - Complete all outstanding punch list items
 - Operate system and perform routine maintenance

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OPERABLE UNIT 3 - FACILITIES CLOSURE & DEMOLITION PROJECTS

April 1998

- Enforceable Milestones Completed
 - Submitted Sewage Treatment Plant Complex D&D Implementation Plan to Agencies March 2, 1998, in advance of actual milestone date of April 2, 1998
- Major Work Initiated/Completed
 - **Safe Shutdown**
 - Non-Nuclear Facilities
 - Completed excavation of Cooling Water Line to old Cooling Tower
 - Completed utility isolation/tie-ins to steam and chlorine lines
 - Plant 2/3
 - Continued holdup material removal in selected areas
 - Continued asbestos removal
 - Plant 6
 - Completed control point setup
 - Continued utility disconnects and biohazard removal
 - Continued ongoing packaging and movement of drummed material to Plant 1 Pad and other Resource Conservation and Recovery Act (RCRA) Storage Area
 - **D&D**
 - Boiler Plant/Water Plant
 - Completed Boiler Plant transite removal
 - Completed demolition of East and West Precipitator breeching and support steel
 - Completed demolition of Boiler Plant South Bay structural steel and removed all equipment
 - Started asbestos abatement and transite removal at old Cooling Tower
 - Sized, segregated, and containerized debris from demolition activities
 - Thorium/Plant 9 Complex
 - Completed removal of asbestos-containing material in Plant 9
 - Completed demolition of railroad tracks for this complex
 - Continued interior dismantlement, equipment removal and interior demolition activities in Plant 9
 - Completed building preparation activities in and around Building 69
 - Completed removal of asbestos-containing material in Building 69
 - Continued interior demolition activities in Building 69
 - Decontaminated, sized, segregated and staged/packageged debris from demolition activities at Plant 9

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- Miscellaneous Small Structures
- Submitted D&D Implementation Plan to Agencies April 30, 1998

May 1998 (Anticipated)

- Enforceable Milestones
 - None
- 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; initiate holdup material removal
 - Complete utility disconnects in selected areas of non-nuclear facilities
 - Complete work on old Cooling Tower
 - Begin removal of equipment from Tank Farm Complex
 - **D&D**
 - Boiler Plant/Water Plant
 - Complete demolition activities in North Bay of Boiler Plant
 - Complete transite removal and asbestos abatement at old Cooling Tower
 - Complete old Cooling Tower demolition
 - Continue ongoing sizing, segregation, and containerization of debris
 - Thorium/Plant 9 Complex
 - Continue demolition activities in Plant 9 and Building 69
 - Perform roof removal on Magnesium Storage Building (Building 32)
 - Begin demolition activities in Building 78
 - Begin scabbling activities in Plant 9.

OPERABLE UNIT 4 - SILOS PROJECTS

April 1998

- Enforceable Milestones Completed
 - None

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- Major Work Initiated/Completed
 - **Silos 1 & 2 Project**
 - Held public workshop April 1, 1998, on Accelerated Waste Retrieval (AWR) Project Request for Proposal (RFP)
 - Obtained review of AWR RFP by independent consultants, and began addressing stakeholder, regulatory agency and consultant comments
 - Initiated evaluation of Silos 1 & 2 Proof of Principle Testing RFP proposals
 - **Silo 3 Project**
 - Issued Notice of Availability for Final Explanation of Significant Differences
 - Prepared Draft Remedial Design Work Plan (RDWP); submitted it to DOE for review
 - Submitted revised RFP to DOE for advance notice
 - Continued relocation of equipment and other activities in preparation for Standard Startup Review (SSR) for Small Scale Waste Retrieval

May 1998 (Anticipated)

- Enforceable Milestones
 - Submit Draft Silo 3 RDWP to Agencies by May 26, 1998
- Major Work to be Initiated/Completed
 - **Silos 1 & 2 Project**
 - Continue evaluation of Proof of Principle Testing RFP proposals
 - Address stakeholder, regulatory agency and independent consultant comments on RFP for AWR Project; issue RFP for bid at an undetermined date.
 - **Silo 3 Project**
 - Issue RFP for bid; hold pre-proposal meeting for interested contractors
 - Complete SSR for Small Scale Waste Retrieval Project

OPERABLE UNIT 5

April 1998

- Enforceable Milestones Completed
 - **Aquifer Restoration/Wastewater Project (ARWWP)**
 - Submitted monthly National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report (DMR) for March 1998 to OEPA April 13, 1998
 - Successfully completed SSR April 22, 1998, and commenced operation of AWWT Facility Expansion on April 30, 1998
 - Met 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by OU5 Record of Decision

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- **Soil Characterization and Excavation Project (SCEP)**
 - Submitted Revised Work Plan for On-Property Public Access Habitat Area to Agencies April 16, 1998
- Major Work Initiated/Completed
 - **ARWWP**
 - Completed construction of new Sewage Treatment Plant
 - Submitted Draft Final South Field Extraction System/South Plume Optimization Start-Up Monitoring Plan to Agencies
 - Received OEPA approval of Final Re-Injection Demonstration Test Plan
 - Met with Agencies April 8, 1998, for groundwater technical information exchange; ARWWP plans to hold this type of meeting on a quarterly basis, concurrent with submittal of Integrated Environmental Monitoring Plan update reports
 - **SCEP**
 - Substantially completed field implementation of Area 2 Phase I (*Southern Waste Units*) Site Preparation package, including construction activities, hydrostatic testing of piping systems, and installation of fencing and gates
 - Completed following sampling activities:
 - Additional Waste Acceptance Criteria (WAC) attainment sampling of Area 1 Phase I (*OSDF Cell 1 Footprint and Nearby Areas*) West Soil Stockpile
 - Above-WAC and Firing Range sampling in Area 2 Phase I
 - Held meeting with Natural Resource Trustees (representing DOE, Office of Attorney General/OEPA, Department of Interior, and U.S. Fish & Wildlife Service) on April 16, 1998; trustees proposed possible settlement of State of Ohio lawsuit against DOE for natural resource damages
 - Initiated Phase I wetland mitigation design
 - Sponsored training session April 27 and 28, 1998, on bioengineered land stabilization; conducted walkdown of selected areas of Paddys Run to determine which ones are likely to require future embankment stabilization
 - Published solicitation in Commerce Business Daily for potential sources sought to perform lead-contaminated soil treatability work in former Trap Range Area of Area 1 Phase II (*Southern Portion of East Field*)
 - Submitted following items to Agencies:
 - Draft Final Area 2 Phase I Integrated Remedial Design Package, with responses to comments, revised Excavation Package drawings, etc. --- April 7, 1998
 - Responses to OEPA comments on Draft Natural Resource Impact Assessment and Draft Natural Resource Restoration Plan --- April 8, 1998 (also submitted to Natural Resource Trustees)
 - Draft Final Sitewide Excavation Plan --- April 17, 1998
 - North Access Road WAC Attainment Data Summary --- April 24, 1998

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- Responses to comments from Agencies on Area 1 Phase I Certification Report --- April 27, 1998
- Revised Radiation Tracking System Applicability Study --- April 30, 1998
- Draft Certification Report for Area 1 Phase II - Sector 1, Sector 2a and Conveyance Ditch --- April 30, 1998

May 1998 (Anticipated)

- Enforceable Milestones
 - **ARWWP**
 - Submit monthly NPDES DMR to OEPA
 - Meet 20 ppb average monthly uranium discharge to Great Miami River as required by OU5 Record of Decision
 - **SCEP**
 - None
- Major Work to be Initiated/Completed
 - **ARWWP**
 - Successfully complete SSR on Sewage Treatment Plant and begin operations
 - Continue construction of South Field Extraction System/South Plume Optimization System/Injection Demonstration System
 - Finalize following documents:
 - Groundwater Restoration Area Verification Sampling Program Summary Report
 - Start-Up Monitoring Plan for South Field Extraction and South Plume Optimization Groundwater Restoration modules
 - **SCEP**
 - Complete remaining punch list items for Area 2 Phase I Site Preparation
 - Submit drawing to Agencies of proposed stabilization concept for Paddys Run east embankment (in vicinity of Area 2 Phase I retention basins) to mitigate erosion suffered during April 1998 storm event; also install approximately 100 cubic yards of riprap at upper end of west bank of Paddys Run
 - Award OSDF Phase II/Southern Waste Units excavation subcontract
 - Submit Revised Area 1 Phase I Certification Report by May 28, 1998
 - Await USEPA comments on/approval of Draft Certification Design Letter and Project Specific Sampling Plan for Area 8 Phase I (Portion of FEMP Property West of Paddys Run); anticipate initiation of certification sampling in early May
 - Submit Revised Operable Unit 5 RDWP Addendum addressing certification strategy for off-property areas, as well as two Precertification Project Specific Plans for Area 9 (Area East of Eastern FEMP Property Line)
 - Submit Final Ecological Research Projects Work Plan; initiate selected subprojects

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- Submit letter to Natural Resource Trustees tentatively accepting proposed restoration settlement; after submittal, initiate public involvement activities associated with determination of final land use of Fernald property

WASTE MANAGEMENT

April 1998

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Completed
 - Low Level Waste
 - Shipping remains suspended due to incidents involving transportation of white metal boxes to Nevada Test Site (NTS)
 - Continued corrective action implementation and path forward evaluation resulting from Leaking White Metal Boxes Type B Investigation Report and associated Corrective Action Plan; Corrective Action Plan remains in review at DOE-Headquarters
 - Mixed Waste Shipping
 - Shipping remains postponed pending resolution of preliminary injunction against DOE for disposal at permitted commercial facilities
 - Mixed Waste Treatment Projects
 - Liquid Mixed Waste --- Completed and submitted shipment application for Batch #8 (newly generated low level waste); continued to evaluate newly generated waste streams for bulking into Batches #9 and #10
 - Chemical Treatment Projects
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project --- Total of 760 drums treated in project so far; moved selected drummed and boxed waste to Plant 6 for processing under contract extension
 - RCI Solvent Extraction Project --- Completed Phase I decontamination and demobilization of Solvent Dehydrator Unit; initiated isolation of Vacuum Exhaust Heater unit for Phase I work
 - Organic Treatment Project --- Evaluated responses to Commerce Business Daily announcement seeking potential bidders for treatment of mixed wastes formerly under auspices of RCI Solvent Extraction Project; prepared RFP and initiated internal review
 - Hazardous Waste/Recycling Project --- Shipped photochemicals for incineration or recovery through Safety-Kleen, Inc.; shipped fluorescent light tubes for recycling through Recyclights, Inc.
 - Thorium Legacy Waste Stabilization Project --- Issued SSR Implementation Plan

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May 1998 (Anticipated)

- Enforceable Milestones
 - None

- Major Work to be Initiated/Completed
 - Low Level Waste
 - Continue corrective action implementation in support of eventual resumption of shipments to NTS
 - Mixed Waste Treatment Projects
 - Liquid Mixed Waste Project --- Ship Batch #7 (19,000+ gallons of mixed waste, including final volume of Site Treatment Plan waste) for disposal at Toxic Substances Control Act (TSCA) Incinerator in Oak Ridge, Tennessee, contingent upon final State of Tennessee approval
 - Chemical Treatment Projects
 - NPDS Project --- Begin treatment under extended contract; initiate sampling of contents of 2,000 gallon sodium sulfide tank from Plant 6
 - RCI Solvent Extraction Project --- Complete Phase I (RCRA and TSCA) decontamination and demobilization of subcontractor's equipment; begin Phase II (Radiological) D&D for free release immediately following Phase I
 - Organic Treatment Project --- Issue RFP
 - Hazardous Waste/Recycling Project --- Make preparations for shipments of fluorescent light tubes, lead acid batteries, and Lab Packs
 - Thorium Legacy Waste Stabilization Project --- Continue staging low level waste repackaging activities in Building 64 to support eventual shipment of these wastes to NTS, pending resolution of corrective actions stemming from Type B Investigation and from NTS Triennial Audit