

6-104-18



Department of Energy

**Ohio Field Office
Fernald Area Office**

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

JUN 17 1998

DOE-0889-98

**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 FOR THE PERIOD MAY 1, 1998
THROUGH MAY 31, 1998**

This letter transmits the amended Consent Agreement Monthly Report for the period May 1, 1998, through May 31, 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

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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/REMEDIATION
INVESTIGATION/FEASIBILITY STUDY/CONSENT DECREE MONTHLY REPORT
MAY 1 THROUGH MAY 31, 1998

Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from May 1 through May 31, 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

May 1998

- Enforceable Milestones Completed
 - None

- Major Work Initiated/Continued/Completed
 - Completed on-site rail infrastructure upgrade
 - Completed Shandon Yard upgrade construction
 - Continued construction of rail and access road lighting
 - Continued developing/finalizing IT's pre-mobilization and pre-operations deliverables
 - IT continued development of Draft Remedial Action deliverables
 - Continued development of Draft Waste Management Plan

June 1998 (Anticipated)

- Enforceable Milestones
 - None

- Major Work to be Initiated/Continued/Completed
 - Continue construction of rail and access road lighting
 - Continue reviewing/finalizing IT's pre-mobilization and pre-operations deliverables
 - Respond to USEPA and OEPA comments on Draft Remedial Action deliverables
 - Continue development of Draft Waste Management Plan
 - Receive two locomotives obtained as excess government property from Department of Defense
 - Respond to USEPA comments on Draft Transportation and Disposal plan

OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY

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

May 1998

- Enforceable Milestones Completed
 - None

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- Major Work Initiated/Continued/Completed
 - On-Site Disposal Facility (OSDF)
 - Awarded OSDF Phase II/Southern Waste Units excavation subcontract to Petro Environmental Technologies, Inc., May 4, 1998
 - Continued construction of Decontamination Facility
 - Continued construction of access control and laboratory trailers
 - Began installation of piping to connect leachate collection and leak detection manholes to pipes from Cells 2 and 3
 - Initiated movement of containers of debris to OSDF Transfer Area, after successful completion of associated Standard Startup Review (SSR)
 - Leachate Conveyance System (LCS)
 - Continued work on outstanding construction punch list items
 - Operated system and performed routine maintenance as required

June 1998 (Anticipated)

- Enforceable Milestones Expected to Be Completed
 - None
- Major Work to be Initiated/Continued/Completed
 - OSDF
 - Complete construction of Decontamination Facility
 - Complete construction of access control and laboratory trailers
 - Complete Standard Start-up Review (SSR) confirming readiness to move above-grade debris and soil into OSDF and begin waste placement; note that select impacted material previously approved for placement into Cell 1 came from East Stockpile only
 - Complete installation of piping connecting leachate collection and leak detection manholes to pipes from Cells 2 and 3
 - Begin construction of Cell 2 compacted clay liner
 - Begin excavation of Cell 3
 - Issue Final Waste Acceptance Criteria Attainment Plan to Agencies
 - LCS
 - Complete all outstanding punch list items
 - Operate system and perform routine maintenance

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OPERABLE UNIT 3 - FACILITIES CLOSURE & DEMOLITION PROJECTS

May 1998

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Continued/Completed
 - **Safe Shutdown**
 - Non-Nuclear Facilities
 - Performed various utility disconnects
 - Continued removal of transite at the old Cooling Tower
 - Continued removal of equipment from Tank Farm Complex
 - Plant 2/3
 - Continued holdup material removal in selected areas
 - Continued asbestos and biohazard removal
 - Plant 6
 - Continued utility disconnects
 - Continued biohazard removal
 - **D&D**
 - Boiler Plant/Water Plant
 - Size-reduced and containerized Precipitator breeching and support steel
 - Prepared structural steel surrounding two northern boilers for demolition
 - Continued removal of transite and asbestos-insulated piping at old Cooling Tower
 - Sized, segregated, and containerized debris from demolition activities
 - Thorium/Plant 9 Complex
 - Continued interior dismantlement and asbestos abatement in Plant 9
 - Continued removal of equipment, acid brick, interior transite and concrete in Plant 9
 - Continued interior demolition activities, asbestos abatement and acid brick removal in Building 69
 - Began removal of exterior components, such as pipe bridges and conduit, in Building 78
 - Initiated roof removal on Building 32
 - Decontaminated, sized, segregated and staged/packaged debris from demolition activities

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- Miscellaneous Small Structures
 - Began processing Task Orders for cleanup of area around Building 38 in preparation for D&D
- Recycling Supplemental Environmental Projects
 - Decontaminated/free-released 53 tons of rail as of May 29, 1998
 - Inspected/prepared containers of shredded copper for shipment to recycling vendor
- Sewage Treatment Plant Complex
 - Responses to comments from USEPA and OEPA on the Draft Implementation Plan submitted May 26, 1998
 - Site support subcontractor initiated mobilization on May 26, 1998

June 1998 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/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 and asbestos cleanup
 - Complete utility disconnects in selected areas of non-nuclear facilities
 - Complete work on old Cooling Tower
 - Complete removal of equipment from Tank Farm Complex; begin piping disconnects
 - **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
 - Demolish and size-reduce old Cooling Tower structure
 - Begin dismantling boiler maintenance building
 - Continue ongoing sizing, segregation, and containerization of debris
 - Thorium/Plant 9 Complex
 - Continue demolition activities in Plant 9, Building 69 and Building 78
 - Finish roof removal on Building 32; remove metal roof decking and begin exterior demolition
 - Begin floor scabbling activities in Plant 9

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- Sewage Treatment Complex
 - Transite removal at STP Incinerator
 - Enclosure of STP Incinerator
 - Initiate dismantlement of STP Incinerator

OPERABLE UNIT 4 - SILOS PROJECTS

May 1998

- Enforceable Milestones Completed
 - Submitted Draft Silo 3 Remedial Design Work Plan to Agencies on May 6, 1998
- Major Work Initiated/Continued/Completed
 - **Silos 1 & 2 Project**
 - Addressed comments from stakeholders, regulatory agencies and independent consultants regarding Accelerated Waste Retrieval (AWR) Project Request for Proposal (RFP)
 - Issued AWR Project RFP for bid May 26, 1998
 - Completed evaluation of Silos 1 & 2 Proof-of-Principle Testing RFP proposals
 - **Silo 3 Project**
 - Issued Silo 3 RFP on May 6, 1998; conducted pre-proposal conference May 27-28, 1998
 - Completed preparations for Small Scale Waste Retrieval Project Standard Start-up Review (SSR)

June 1998 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - **Silos 1 & 2 Project**
 - Award contracts for Proof-of-Principle Testing
 - Hold pre-proposal conference for interested contractors on AWR Project RFP
 - **Silo 3 Project**
 - Respond to questions received from interested contractors during Silo 3 RFP pre-proposal conference
 - Conduct Standard Start-up Review (SSR) and initiate retrieval operations for Silo 3 SSR Project

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OPERABLE UNIT 5

May 1998

- Enforceable Milestones Completed
 - **Aquifer Restoration/Wastewater Project (ARWWP)**
 - Submitted monthly National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report (DMR) for April 1998 to OEPA May 13, 1998
 - Submitted NPDES Noncompliance Report to OEPA May 13, 1998
 - Transmitted Integrated Site Environmental Report to Agencies May 29, 1998, in advance of actual milestone date of June 1, 1998
 - Met 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River, as required by OU5 Record of Decision
 - **Soil Characterization and Excavation Project (SCEP)**
 - None

- Major Work Initiated/Continued/Completed
 - **ARWWP**
 - Successfully completed Standard Start-up Review (SSR) of new Sewage Treatment Plant and commenced operations May 8, 1998
 - Completed construction on South Field Extraction System/South Plume Optimization System/Injection Demonstration System combined projects
 - Finalized 1997 Integrated Site Environmental Report
 - Received approval of South Field Extraction System/South Plume Optimization Start-Up Monitoring Plan from Agencies
 - Submitted Final Groundwater Restoration Area Verification Sampling Program Summary Report to Agencies
 - **SCEP**
 - Completed various Area 2 Phase I (*Southern Waste Units*) Site Preparation package construction punch list items
 - Awarded OSDF Phase II/Southern Waste Units excavation subcontract to Petro Environmental Technologies, Inc., May 4, 1998
 - Continued Phase I wetland mitigation design
 - Initiated bioengineering stabilization of Paddys Run Embankment in vicinity of Southern Waste Units retention basins
 - Received USEPA approval of Area 8 Phase I (*13-Acre Tract Centrally located in Portion of Fernald Property West of Paddys Run*) Draft Certification Design Letter; initiated and completed certification sampling
 - Issued letter from DOE to Natural Resource Trustees (NRTs) May 28, 1998, tentatively accepting NRTs proposed settlement of lawsuit against DOE for natural resource damages

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- Initiated public involvement activities associated with determining final land use of Fernald property
- Initiated two Ecological Research subprojects (*American Chestnut Restoration* and *Identification & Control of Invasive Species*)
- Began design of On-Property Public Access Habitat Area
- Reviewed vendor response to Commerce Business Daily solicitation for lead-contaminated soil treatability work in former Trap Range Area of Area 1 Phase II (*Southern Portion of East Field*)
- Submitted following documents/plans to Agencies:
 - Area 9 Phase I (*Northern Portion of Area East of Fernald's Eastern Property Line*) Precertification Project Specific Plans (PSPs) for real-time surveys and for physical sampling --- May 11, 1998
 - Area 1 Phase II Site Preparation Precertified for Construction Design Package --- May 12, 1998
 - Revised Area 1 Phase I (*OSDF Cell 1 Footprint and Nearby Areas*) Certification Report, plus formal response to comments document --- May 28, 1998
 - Area 1 Phase I Sediment Traps and Wetland Mitigation Certification Design Letter --- May 29, 1998

June 1998 (Anticipated)

- Enforceable Milestones
 - **ARWWP**
 - Transmit Integrated Site Environmental Report to Agencies by June 1, 1998; see ARWWP May enforceable milestones section above
 - Submit Integrated Environmental Monitoring Plan Quarterly Update Report to Agencies by June 29, 1998
 - Submit monthly NPDES DMR to OEPA by June 15, 1998
 - 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/Continued/Completed
 - **ARWWP**
 - Successfully complete Standard Start-up Review (SSR) and remaining construction punch list items for South Field Extraction System/South Plume Optimization System/Injection Demonstration System combined projects; commence operations
 - Distribute 1997 Integrated Site Environmental Report to stakeholders

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- **SCEP**
 - Complete remaining punch list items for Area 2 Phase I Site Preparation
 - Initiate excavation/waste placement under OSDF Phase II/Southern Waste Units subcontract
 - Continue bioengineering stabilization in vicinity of Southern Waste Units retention basins; install natural-fiber matting to encourage growth of vegetation and mitigate erosion
 - Install approximately 100 cubic yards of riprap at upper end of west bank of Paddys Run at tree log installation
 - Submit following items to Agencies:
 - Addendum to Area 2 Phase I Southern Waste Units Implementation Plan, presenting additional sampling/analysis data
 - Revised Area 1 Phase II Implementation Plan and response to comments document
 - Certified for Construction Design Package for On-Property Public Access Habitat Area
 - Revised Natural Resource Impact Assessment and Revised Natural Resource Restoration Plan
 - Final Ecological Research Projects Work Plan
 - Continue public involvement activities associated with determination of final land use of Fernald property

WASTE MANAGEMENT

May 1998

- **Enforceable Milestones Completed**
 - None
- **Major Work Initiated/Continued/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
 - **Mixed Waste Shipping**
 - Initiated plan for sampling of approximately 150 drums of mixed waste eligible for shipment to Envirocare of Utah, Inc.

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- Packaging, Certification and Shipping Compliance
 - Successfully completed Standard Start-up Review (SSR) for Movement of Above-Grade Debris to OSDF Transfer Area; initiated operations May 13, 1998
- Mixed Waste Treatment Projects
 - Liquid Mixed Waste --- Transmitted summary of evaluation of potential on-site treatment of Batch #7 (19,000+ gallons mixed waste) vs. off-site treatment at Toxic Substance Control Act (TSCA) Incinerator to OEPA
 - Chemical Treatment Projects
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project --- Completed movement of selected drummed and boxed waste to Plant 6; sampled sodium sulfide tank in Plant 6 in support of potential processing under contract extension
 - RCI Solvent Extraction Project --- Completed Phase I (triple rinse) decontamination and demobilization of all Terra-Kleen equipment; continued Phase II (radiological) decontamination
 - Organic Treatment Project --- Began investigation of off-site treatment options; continued RFP preparation/reviews
 - Hazardous Waste/Recycling Project --- Prepared lead-acid batteries for shipment
 - Thorium Legacy Waste Stabilization Project --- Prepared low level waste operations package for review by Technical Review Board

June 1998 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - Low Level Waste
 - Continue corrective action implementation in support of eventual resumption of shipments to NTS
 - Mixed Waste Shipping
 - Identify sampling/container requirements for mixed waste eligible for shipment to Envirocare of Utah, Inc.
 - Await DOE determination concerning Fernald access to Oak Ridge National shipping contract for disposal of mixed waste; contract extended to 3/99
 - Packaging, Certification and Shipping Compliance
 - Host Advanced Hazardous Waste Transportation Training (sponsored by DOE National Transportation Program) June 9-11, 1998

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- 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) and Batch #8 (newly generated and recharacterized low level waste) for disposal at TSCA Incinerator in Oak Ridge, Tennessee, contingent upon final State of Tennessee approval
 - Chemical Treatment Projects
 - NPDS Project --- Begin treatment of 400 additional drums under extended contract
 - RCI Solvent Extraction Project --- Complete Phase II decontamination and demobilization for free-release of subcontractor's equipment
 - Organic Treatment Project --- Finalize and issue RFP
 - Hazardous Waste/Recycling Project --- Prepare/ship lead-acid batteries, Site Analytical Laboratory Lab Packs, and Paint Room excess chemicals for recycling
 - 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