



Department of Energy

Ohio Field Office
Fernald Area Office

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AUG 07 1998

Mr. Thomas A. Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, OH 45402-2911

DOE-1075-98

Dear Mr. Schneider:

PROPOSAL FOR INTERIM MANAGEMENT OF CERTAIN MATERIALS

This is to request your concurrence with a proposal for interim management of certain materials to be generated during the Decontamination and Dismantling (D&D) of the old Sewage Treatment Plant (STP). D & D of the old STP is being conducted with the STP Implementation Plan for above grade D & D. As has been discussed with you verbally, it is estimated that approximately 400 cubic yards of sludge is contained within the digester associated with the old STP. Fluor Daniel Fernald intends to initiate removal of this material from the digester during the week of August 10, 1998. The Department of Energy (DOE) believes the most appropriate method of managing this material is to place it in the STP sludge drying beds pending final disposition.

DOE offers this proposal for several reasons. First, the sludge is expected to have a high moisture content. Placement in the sludge drying bed with the associated leachate collection system will allow effective dewatering of the sludge thus facilitating final disposition. Second, it avoids the expense and logistical issues associated with containerizing the wastes pending characterization and finalizing disposition determinations. Finally, given the disadvantages of containerizing the wastes, and the fact that the digester sludges have not yet been characterized, the sludge drying beds offer an interim management location that avoids, with certain precautions, cross-contamination issues. The sludge drying beds have already been characterized as above Waste Acceptance Criteria (WAC), Resource Conservation Recovery Act (RCRA) listed waste. Any cross-contamination potential from the sludges would not substantively affect the offsite disposal of the sludge drying bed material. The sludge drying beds are currently planned for excavation next year (1999).

As stated above, DOE recognizes that the sludge drying beds are within a Hazardous Waste Management Unit (HWMU) and contain listed waste. To avoid co-mingling non-RCRA wastes with listed wastes a permeable fabric capable of maintaining physical

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separation will be placed between the digester wastes and the sludge drying beds. DOE believes this action is consistent with the intent of the Resource Conservation Recovery Act/Comprehensive Environmental Response, Compensation, and Liability Act (RCRA/CERCLA) Integration Director's Findings and Orders. As such, DOE not only request OEPA's concurrence with this proposal, but more specifically requests OEPA agreement that this action will not invoke the "tag" of listed waste for the digester sludge (presuming physical separation is maintained).

Please call me at (513) 648-3139 if you have any questions or concerns with this proposal.

Sincerely,



Johnny W. Reising
Fernald Remediation Action
Project Manager

cc:

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