

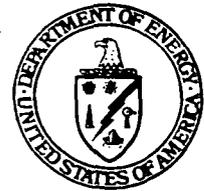


Department of Energy

**Ohio Field Office
Fernald Area Office**

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

1641



AUG 17 1998

**Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

DOE-1103-98

**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 JULY 1, 1998,
THROUGH JULY 31, 1998**

This letter transmits the amended Consent Agreement Monthly Report for the period of July 1, 1998, through July 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:

AUG 17 1998

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enc:

N. Hallein, EM-42, CLOV
G. Jablonowski, USEPA-V, SRF-5J
R. Beaumier, TPSS/DERR, OEPA-Columbus
D. Sarno, CAB
V. Dastillung, FRESH
P. Dunn, FRESH
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
JULY 1 THROUGH JULY 31, 1998

Introduction

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

July 1998

- Enforceable Milestones Completed
 - None

- Major Work Initiated/Continued/Completed
 - Submitted Draft Final Transportation and Disposal Plan to Agencies
 - Received verbal USEPA approval of Remedial Design package
 - Approved limited mobilization authorization for IT Corporation to begin treatment facility construction
 - Submitted Waste Pit Waste Acceptance Profile to Envirocare of Utah, Inc., and requested DOE place delivery order for over 192,000 cubic yards of pit wastes against DOE's Envirocare disposal contract
 - Completed review of IT's Draft Remedial Action deliverables
 - Completed review of IT's pre-mobilization deliverables
 - Continued construction of rail and access road lighting
 - Continued reviewing IT's pre-operations deliverables
 - Continued developing Draft Waste Management Plan

August 1998 (Anticipated)

- Enforceable Milestones
 - None

- Major Work to be Initiated/Continued/Completed
 - Receive initial shipment Of 50 DOE-procured gondola railcars
 - IT to initiate treatment facility construction
 - Initiate safety enhancements to Locomotive Maintenance Building
 - Begin negotiations and processing of rail transportation tender with Union Pacific Rail Road and CSXT
 - Continue construction of rail and access road lighting
 - IT to revise Draft Remedial Action deliverables and re-submit for DOE review
 - Continue development of Waste Management Plan
 - Continue reviewing IT's pre-operations deliverables

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OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY

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

July 1998

- Enforceable Milestones Completed
 - Began OSDF Phase II construction on June 26, 1998, in advance of July 15, 1998 milestone date

 - Major Work Initiated/Continued/Completed
 - On-Site Disposal Facility (OSDF)
 - Began Cell 3 excavation
 - Began construction of Cell 2 compacted clay liner
 - Resumed placement of waste into Cell 1
 - Began preparation of OSDF Clay Borrow Area (located east of Fernald Site South Access Road)
- NOTE: A Notice of Violation (NOV) was issued by USEPA on July 27, 1998, regarding Sediment Basin Activity
- Leachate Conveyance System (LCS)
 - Operated system and performed routine maintenance as required

August 1998 (Anticipated)

- Enforceable Milestones
 - Submit list of proposed enforceable milestones for Fiscal Year 1999 by August 15, 1998

- Major Work to be Initiated/Continued/Completed
 - OSDF
 - Complete installation of piping connecting leachate collection and leak detection manholes to pipes from Cells 2 and 3
 - Complete preparation of Clay Borrow Area
 - Complete Cell 3 excavation
 - Continue construction of Cell 2 compacted clay liner
 - Continue placement of waste into Cell 1
 - LCS
 - Finalize as-built drawings
 - Perform project closeout activities

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OPERABLE UNIT 3 - FACILITIES CLOSURE & DEMOLITION PROJECTS

July 1998

- Enforceable Milestones Completed
 - None

- Major Work Initiated/Continued/Completed
 - **Safe Shutdown**
 - Non-Nuclear Facilities
 - Performed various utility disconnects
 - Isolated fire protection line to Old Cooling Tower
 - Continued removal of equipment from Tank Farm Complex
 - Plant 2/3
 - Continued holdup material removal
 - Continued asbestos and biohazard removal
 - Plant 6
 - Continued utility disconnects and holdup material removal
 - Continued biohazard cleanup
 - Completed processing of 1,000 gallons of sodium hydroxide/sodium sulfide mixture
 - **D&D**
 - Boiler Plant/Water Plant Complex
 - Completed demolition of remaining Boiler Plant structure July 23, 1998
 - Demolished/size-reduced old Cooling Tower structure
 - Thorium/Plant 9 Complex
 - Completed D&D of Building 78
 - Completed removal/containerization of non-salvageable equipment in Building 9C
 - Completed floor scabbling in various areas of Plant 9
 - Continued D&D activities in Building 69
 - Sewage Treatment Plant (STP) Complex
 - Completed demolition of Skeet Range Building (Building 28F)
 - Demolished/size-reduced Chlorination Building (Building 25A)
 - Completed demolition of STP Incinerator Stack
 - Began removal of digester lid
 - Miscellaneous Small Structures
 - Initiated D&D of Building 38
 - Maintenance/Tank Farm Complex
 - Awarded demolition contract to NSC Energy Services, Inc., July 1, 1998
 - Began evaluation of contractor submittals

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- Recycling Supplemental Environmental Projects
 - Decontaminated/free-released total of 103 tons of rail as of July 31, 1998, representing approximately 28% of proposed project total
 - Visited copper recycling vendor's site to audit their recycling/waste management program in preparation for the shipment of shredded copper for recycling

August 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, holdup material removal and utility disconnects in Plant 6
 - Complete utility disconnects in selected areas of non-nuclear facilities
 - Complete removal of equipment from Tank Farm Complex
 - **D&D**
 - Boiler Plant/Water Plant Complex
 - Continue cutting remainder of structural steel, coal burner, and boilers
 - Package steel for transfer to OSDF
 - Thorium/Plant 9 Complex
 - Continue demolition activities in Plant 9
 - Complete release clean testing and begin removal of exterior transite from Plant 9A
 - Begin/complete floor scabbling activities in various areas of Plant 9
 - STP Complex
 - Complete D&D of buildings and miscellaneous fixtures
 - Start demobilization activities
 - Miscellaneous Small Structures
 - Complete D&D of Building 38
 - Maintenance/Tank Farm Complex
 - Initiate contractor mobilization

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
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OPERABLE UNIT 4 - SILOS PROJECTS

July 1998

- Enforceable Milestones Completed
 - None

- Major Work Initiated/Continued/Completed
 - **Silos 1 & 2 Project**
 - Received Draft Work Plan and Quality Assurance/Quality Control Plan submittals from Proof-of-Principle Testing contractors
 - Awarded contract for Silos Infrastructure Trailer Upgrade to Kelchner Environmental
 - **Silo 3 Project**
 - Initiated review of technical proposals in response to Silo 3 Request for Proposal (RFP)
 - Continued retrieval of material from Silo 3 for use in treatability testing

August 1998 (Anticipated)

- Enforceable Milestones
 - Award Silos 1 & 2 Proof-of-Principle Testing contracts by August 10, 1998; note that contracts were awarded June 3, 1998, substantially in advance of actual milestone date

- Major Work to be Initiated/Completed
 - **Silos 1 & 2 Project**
 - Finalize Work Plan and Quality Assurance/Quality Control Plan submittals from Proof-of-Principle Testing contractors
 - Receive proposals for Accelerated Waste Retrieval (AWR) Project and initiate evaluation process
 - Wise Construction (subcontractor) to initiate Silo Area K-65 bridge-widening work and preliminary infrastructure electrical installation
 - **Silo 3 Project**
 - Complete evaluation of RFP technical proposals; identify competitive range of potential contractors
 - Complete retrieval of treatability testing material from Silo 3 and ship samples to potential contractors in competitive range

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OPERABLE UNIT 5

July 1998

- Enforceable Milestones Completed
 - **Aquifer Restoration/Wastewater Project (ARWWP)**
 - Submitted monthly National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report (DMR) for June 1998 to OEPA on July 14, 1998
 - Submitted NPDES Noncompliance Report to OEPA on July 14, 1998
 - Exceeded 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by OU5 Record of Decision (ROD). The actual concentration level was 20.7 ppb
 - Commenced South Field Extraction System operations July 13, 1998, in advance of actual milestone date of August 1, 1998
 - **Soil Characterization and Excavation Project (SCEP)**
 - Submitted Area 8 Phase I (*13-Acre Tract Centrally Located in Portion of Fernald Site West of Paddys Run*) Certification Report to Agencies July 31, 1998, in advance of actual milestone date of August 31, 1998

- Major Work Initiated/Continued/Completed
 - **ARWWP**
 - Completed Standard Startup Review (SSR) for South Field Extraction System and commenced operations July 13, 1998
 - Submitted Substantive Permitting Cross-Walk for Sludge Removal Systems Project to Agencies July 28, 1998
 - Continued preparations for SSRs for South Plume Optimization and Injection Demonstration modules
 - **SCEP**
 - Mobilized Area 2 Phase I (*Southern Waste Units*) subcontractor for excavation of Stockpile 5 and Inactive Flyash pile; completed Stockpile 5
 - Completed bioengineering stabilization at Paddys Run Embankment in vicinity of Southern Waste Units retention basins
 - Completed data validation and statistical analysis of certification sampling performed for Area 8 Phase I (*13-Acre Tract Centrally Located in Portion of Fernald Property West of Paddys Run*); Certification Report completed and submitted as noted in SCEP milestones listed above
 - Received OEPA acceptance of response to comments on Area 1 Phase II (*Southern Portion of East Field*) precertified-for-construction design package
 - Began preliminary screening of vendor proposals for lead-contaminated soil treatability work in former Trap Range area of Area 1 Phase II

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- Natural Resource Restoration
 - Completed design of On-Property Public Access Habitat Area Supplemental Environmental Project; initiated procurement activities
 - Army Corps of Engineers continued ongoing survey of property proposed for Conservation Area Supplemental Environmental Project
 - Continued public involvement activities associated with determining final land use of Fernald property
 - Ecological Research Supplemental Environmental Projects
 - Work Plan approved by USEPA July 10, 1998 (previously approved by OEPA June 24, 1998)
 - Issued scope of work for *Ecological Restoration Case Study* subproject to prospective universities
 - Surveyed reference sites for *Establishment of Prairie Vegetation on Undisturbed Areas of Area 8 Phase I* subproject
 - *American Chestnut Restoration* subproject trees in greenhouse have reached approximately 3-4 feet in height
- Submitted following documents/plans to Agencies:
 - Revised Users Guidelines, Measurement Strategies, and Operational Factors for the Deployment of In-Situ Gamma Spectroscopy at the Fernald Site — July 15, 1998
 - Revised Precertification Project Specific Plans (PSPs) for Area 9 Phase I (*Northern Portion of Area East of Eastern Fernald Property Line*) — July 23, 1998
 - Revised Natural Resource Impact Assessment and Revised Natural Resource Restoration Plan — July 28, 1998
 - Final Sitewide Excavation Plan — July 31, 1998
 - Area 2 Phase I Final Implementation Plan (including response to comments on Addendum Number 1) — July 31, 1998

August 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 ROD
 - Commence South Field Extraction System operations by August 1, 1998; operations began July 13, 1998, in advance of actual milestone date
 - **SCEP**
 - Submit Certification Report for Area 8 Phase I by August 31, 1998; report submitted July 31, 1998, in advance of actual milestone date

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- Major Work to be Initiated/Completed
 - **ARWWP**
 - Complete SSR for South Plume Optimization and commence operations August 10, 1998
 - Complete SSR for Injection Demonstration and commence operations August 31, 1998
 - Perform DOE Annual Conduct of Operations Assessment of ARWWP
 - **SCEP**
 - Plant willow cuttings at upper end of west bank of Paddys Run at tree log installation; discussions with OEPA have determined this action will be taken in lieu of installation of approximately 100 cubic yards of riprap
 - Continue excavation activities in Area 2 Phase I
 - Continue preliminary screening of proposals for lead-contaminated soil treatability work in former Trap Range Area; select qualified bidders
 - Begin precertification real-time and physical sampling activities in Area 9 Phase I
 - Submit following items to Agencies:
 - Area 1 Phase II Certified for Construction Site Preparation Design Package (including Final Work Plan)
 - Revised Area 1 Phase II Implementation Plan and response to comments document (including Sewage Treatment Plant Excavation Package)
 - Area 2 Phase I Site Preparation as-built plans and updated excavation drawings
 - Phase I Wetland Mitigation Conceptual Design
 - Natural Resource Restoration
 - Continue public involvement activities associated with determination of final land use of Fernald property through informational meetings with Ross Merchants, Hamilton County Planning Commission, and Butler County Planning Commission
 - Await proposals from prospective universities in response to *Ecological Restoration Case Study* scope of work
 - Army Corps of Engineers to develop draft easement for Conservation Easement Supplemental Environmental Project
 - Issue Demonstration Forest Project scope of work

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WASTE MANAGEMENT

July 1998

- Enforceable Milestones Completed
 - None

- Major Work Initiated/Continued/Completed
 - Low Level Waste
 - Shipping remains suspended due to incident involving transportation of white metal boxes to Nevada Test Site (NTS); implementation of corrective actions is ongoing
 - NTS Radiological Waste Acceptance Program team visited Fernald July 28-31, 1998, to perform an audit of Waste Packaging and Shipping Program
 - Mixed Waste Shipping
 - Continued evaluation of historical sampling and analysis of 150 drums of mixed waste identified for shipment to Envirocare of Utah, Inc.
 - Mixed Waste Treatment Projects
 - Liquid Mixed Waste --- Applications for shipment of Batches #7 (19,000+ gallons mixed waste) and #8 (newly generated and recharacterized low level waste) to Toxic Substance Control Act (TSCA) Incinerator remained in review by State of Tennessee; DOE has requested written response concerning delay of review
 - Chemical Treatment Projects
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project --- Treated 209 drums of waste in June, for project total of 1,033 drums
 - Solvent Extraction Project --- Completed inventory of equipment to be free-released and finished moving it into position for shipment
 - Organic Treatment Project --- Continued investigation of off-site treatment options and preparation/review of RFP
 - Hazardous Waste/Recycling Project --- Prepared paperwork for photochemical shipment (by Safety-Kleen, Inc.) and Lab Pack shipment (by Heritage Environmental Services, Inc.)
 - Thorium Legacy Waste Stabilization Project --- Finalized Lift Plans for installation of subcontractor equipment in Building 65

August 1998 (Anticipated)

- Enforceable Milestones
 - None

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- Major Work to be Initiated/Continued/Completed
 - Low Level Waste
 - Continue corrective action implementation in support of eventual resumption of shipments to NTS
 - Await report from NTS Radiological Waste Acceptance Program team
 - Mixed Waste Shipping
 - Finalize sampling/container requirements for mixed waste to be shipped to Envirocare of Utah, Inc.
 - Mixed Waste Treatment Projects
 - Liquid Mixed Waste Project --- Ship Batches #7 and #8 for disposal at TSCA Incinerator, contingent upon final State of Tennessee approval; initiate bulking of Solvent Extraction Project aqueous waste into Batch #9
 - Chemical Treatment Projects
 - NPDS Project --- Continue repackaging of 12 remaining white metal boxes of floor sweepings into 55-gallon drums for treatment
 - Solvent Extraction Project --- Complete project closeout after bulking of aqueous waste into Batch #9
 - Organic Treatment Project --- Complete RFP Statement of Work; continue investigating offsite treatment options and thermal desorption treatment technology
 - Hazardous Waste/Recycling Project --- Complete Lab Pack and photochemicals shipments; complete revision of Lab Pack Services and Photochemical Services contracts
 - 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