



Department of Energy

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SEP 15 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-1201-98

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 OF AUGUST 1, 1998,
THROUGH AUGUST 31, 1998**

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

Enclosure

SEP 16 1998

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

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 enclosure:

A. Tanner, OH/FEMP
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
J. Harmon, FDF/90
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T. Walsh, FDF/65-2
EDC, FDF/52-7

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CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
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INVESTIGATION/FEASIBILITY STUDY/CONSENT DECREE MONTHLY REPORT
AUGUST 1 THROUGH AUGUST 31, 1998

Introduction

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

August 1998

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Continued/Completed
 - Submitted Final Remedial Design Package to Agencies August 31, 1998
 - IT Corporation initiated treatment facility construction
 - Initiated Safety Enhancements to Locomotive Maintenance Building
 - Received first shipment of DOE-procured gondola railcars
 - Revised Draft Remedial Action Package and resubmitted to DOE for review
 - Continued construction of rail and access road lighting
 - Continued reviewing/finalizing IT's pre-operations deliverables
 - Continued development of Draft Solid Waste Management Plan
 - Began negotiations and processing of rail transportation tender with Union Pacific Rail Road and CSXT

September 1998 (Anticipated)

- Enforceable Milestones
 - Submit Draft Remedial Action Design Package to Agencies by September 25, 1998
- Major Work to be Initiated/Continued/Completed
 - Complete Safety Enhancements to Locomotive Maintenance Building
 - Complete construction of rail and access road lighting
 - IT Corporation continue construction of treatment facility
 - Continue development of Waste Management Plan
 - Continue reviewing IT's pre-operations deliverables
 - Continue development of Draft Solid Waste Management Plan
 - Continue negotiations and processing of rail transportation tender with railroads

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OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY

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

August 1998

- Enforceable Milestones Completed
 - Submitted list of proposed OSDF enforceable milestone for next fiscal year to Agencies August 13, 1998
- Major Work Initiated/Continued/Completed
 - On-Site Disposal Facility (OSDF)
 - Completed excavation of Cell 3
 - Completed preparation of OSDF Clay Borrow Area (located east of Fernald Site South Access Road)
 - Completed installation of piping connecting leachate collection and leak detection manholes to pipes from Cell 2
 - Continued construction of Cell 2 compacted clay liner
 - Continued placement of waste into Cell 1
 - Began stockpiling Cell 2 liner system materials
 - FDF issued letter to DOE, including draft to OEPA, with regard to July 27, 1998 NPDES Permit Notice of Violation (NOV), on August 18, 1998. Letter stated corrections and asked for confirmation of OEPA's verbal authorization to resume excavation activities in the Area 1 Phase 2 Borrow Area
 - Leachate Conveyance System
 - Finalized as-built system drawings for OSDF Phase I
 - Performed project closeout activities

September 1998 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - OSDF
 - Complete construction of Cell 2 compacted clay liner
 - Continue placement of waste into Cell 1
 - Begin installation of Cell 2 geosynthetic liners
 - Begin installation of Cell 2 leak detection and leachate collection systems

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OPERABLE UNIT 3 - FACILITIES CLOSURE & DEMOLITION PROJECTS

August 1998

- Enforceable Milestones Completed
 - None

- Major Work Initiated/Continued/Completed
 - **Safe Shutdown**
 - Non-Nuclear Facilities
 - Performed various utility disconnects
 - Continued removal of equipment from Tank Farm Complex
 - Plant 2
 - Continued holdup material removal
 - Continued asbestos and biohazard removal
 - Plant 6
 - Continued holdup material removal
 - Continued asbestos removal
 - **D&D**
 - Boiler Plant/Water Plant Complex
 - Continued cutting remainder of structural steel, coal burner and boilers
 - Packaged steel for transfer to On-Site Disposal Facility
 - Thorium/Plant 9 Complex
 - Dismantled Building 9F and size-reduced material
 - Continued interior transite removal and interior/exterior dismantlement activities
 - Continued floor scabbling in various areas of Plant 9
 - Sewage Treatment Plant (STP) Complex
 - Completed D&D activities
 - Completed contractor demobilization
 - Began preparation of Project Closeout Report
 - Miscellaneous Small Structures
 - Completed D&D of Building 38
 - Maintenance/Tank Farm and Water Storage Tank Project
 - Continued evaluation of contractor submittals
 - Recycling Supplemental Environmental Projects
 - Decontaminated/free-released project total of 110 tons of rail as of August 31, 1998
 - Shipped 96 tons of shredded copper to recycling vendor for survey and free-release
 - Issued request for bids for recycling of 300 tons of rail, 130 tons of tie-plates and six tons of spikes

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September 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 holdup material removal in Plant 6
 - Complete utility disconnects in selected areas of non-nuclear facilities
 - Continue removal of equipment from Tank Farm Complex
 - **D&D**
 - Boiler Plant/Water Plant Complex
 - Continue cutting and packaging of remaining steel
 - Thorium/Plant 9 Complex
 - Continue interior and exterior dismantlement activities
 - Begin/complete floor scabbling activities in various areas of Plant 9
 - STP Complex
 - Complete Project Closeout Report and submit it to Agencies
 - Maintenance/Tank Farm and Water Storage Tank Project
 - Mobilize contractor for construction of new water storage tank
 - Recycling Supplemental Environmental Projects
 - Evaluate bids received for recycling of rail, tie-plates and spikes

OPERABLE UNIT 4 - SILOS PROJECTS

August 1998

- Enforceable Milestones Completed
 - Awarded four Silos 1 and 2 Proof-of-Principle Testing contracts June 3, 1998, in advance of actual milestone date of August 10, 1998
- Major Work Initiated/Continued/Completed
 - **Silos 1 & 2 Project**
 - Reviewed Draft Work Plans and Quality Assurance/Quality Control Plans from Proof-of-Principle Testing contractors; submitted comments to contractors for incorporation
 - Submitted Soil Sampling Project Specific Plan (PSP) and drawings/design package for Silos Infrastructure Project to Agencies for review and comment

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- Received proposals for disposition of waste and debris which will result from closure of Vitrification Pilot Plant
- Initiated Silo Area K-65 bridge-widening work and preliminary infrastructure electrical installation by Site Support Contractor
- **Silo 3 Project**
 - Evaluated technical proposals for Silo 3 treatment; identified competitive range of potential contractors
 - Continued retrieval of material from Silo 3 for use in treatability testing
 - Shipped Silo 3 samples to competitive range potential contractors

September 1998 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Completed
 - **Silos 1 & 2 Project**
 - Continue development of alternatives for Feasibility Study revision
 - Receive proposals in response to Accelerated Waste Retrieval (AWR) Project Request for Proposal (RFP) by 9/21/98; initiate evaluation process
 - Mobilize for construction of Trailer Upgrade portion of Silos Infrastructure Project
 - Receive and evaluate bids for Roads and Electrical portion of Silos Infrastructure Project
 - Award contract for Vitrification Pilot Plant waste disposition; complete closure activities
 - Receive comments/approval from Agencies on Soil Sampling PSP and drawings/design package for Silos Infrastructure Project
 - **Silo 3 Project**
 - Retrieve additional material from Silo 3

OPERABLE UNIT 5

August 1998

- Enforceable Milestones Completed
 - **Aquifer Restoration/Wastewater Project (ARWWP)**
 - Submitted monthly National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report (DMR) for July 1998 to OEPA August 13, 1998
 - Submitted NPDES Noncompliance Report to OEPA August 13, 1998



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- Commenced South Field Extraction System operations July 13, 1998, in advance of actual milestone date of August 1, 1998
- Met 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by OU5 Record of Decision.
NOTE: USEPA and OEPA were informed, by DOE, of the exceedance of the 20 ppb during the month of July on August 6, 1998 (DOE-1063-98). No specific actions were required but FDF/DOE committed to evaluating the design capacity of the SWRB (sources of input and operational guidelines.)
- 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 Plume Optimization Module and commenced operations August 9, 1998
 - Completed System Operability Testing for Injection Demonstration Module August 28, 1998
 - Initiated SSR for Injection Demonstration Module August 31, 1998
 - SCEP
 - Completed excavation of Interceptor Ditch #2 within Area 2 Phase I (*Southern Waste Units*); continued excavation of Inactive Flyash Pile
 - Received approval from Agencies on Area 8 Phase I Certification Report; area is certified clean
 - Reviewed qualification statements from vendors interested in lead-contaminated soil treatability work in former Trap Range area of Area 1 Phase II (*Southern Portion of East Field*)
 - Submitted Area 1 Phase II Certified for Construction Site Preparation Design Package (including Final Work Plan) August 21, 1998
 - Natural Resource Restoration
 - Received Phase I Wetland Mitigation Conceptual Design from contractor August 21, 1998; initiated review
 - Army Corps of Engineers continued ongoing preparation of draft easement for property proposed for Conservation Area Supplemental Environmental Project
 - Completed design of On-Property Public Access Habitat Area and certified drawings for construction
 - Continued public involvement activities associated with determining final land use of Fernald property
 - Issued design contract to Munro Ecological Services for Demonstration Forest Project

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- Ecological Research Supplemental Environmental Projects
 - Received initial proposals from prospective universities for *Ecological Restoration Case Study* subproject
 - *American Chestnut Restoration* subproject trees in greenhouse have reached 4 feet in height

September 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 the OU5 ROD
 - Begin operating South Plume Optimization Module by September 1, 1998; note that operations began August 9, 1998, in advance of actual milestone date
 - Submit Integrated Environmental Monitoring Plan Quarterly Update Report to Agencies by September 28, 1998
 - Begin operating Injection Demonstration Module by September 30, 1998
 - **SCEP**
 - None
- Major Work to be Initiated/Completed
 - **ARWWP**
 - Complete SSR for Injection Demonstration Module and commence operations
 - Continue operating remainder of ARWWP modules
 - **SCEP**
 - Continue excavation activities in Area 2 Phase I
 - Continue development of Request for Proposal for lead stabilization in former Trap Range Area
 - Begin precertification real-time and physical sampling activities in Area 9 Phase I (*Northern Portion of Area East of Eastern FEMP Property Line*), pending discussions with property owner regarding access
 - Submit following items to Agencies:
 - Revised Area 1 Phase II Sewage Treatment Plant Excavation pre-certified for construction design package
 - Area 2 Phase I Site Preparation as-built plans and updated excavation drawings
 - Phase I Wetland Mitigation Conceptual Design

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- Natural Resource Restoration
 - Continue public involvement activities associated with determination of final land use of Fernald property
 - Initiate construction of On-Property Public Access Habitat Area
 - Initiate Aesthetic Barrier Project activities
 - Solicit final offers from prospective universities in response to *Ecological Restoration Case Study* scope of work
 - Army Corps of Engineers to continue development of draft easement for Conservation Easement Supplemental Environmental Project
 - Await Natural Resource Trustees' approval of Natural Resource Restoration Plan/Environmental Assessment and clearance to issue documents to public; NRT-sponsored public meeting to be held September 23, 1998

WASTE MANAGEMENT

August 1998

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Continued/Completed
 - Low Level Waste
 - Received report from Nevada Test Site (NTS) Radioactive Waste Acceptance Program team, based on audit of Fernald's Waste Packaging and Shipping Program conducted July 27-30, 1998
 - Shipping remains suspended pending resolution of one remaining corrective action item
 - Mixed Waste Shipping
 - Continued evaluation of historical laboratory analysis of 150 drums of mixed waste identified for shipment to Envirocare of Utah, Inc.
 - Mixed Waste Treatment Projects
 - Liquid Mixed Waste --- Received approval for shipment of Batch #7 (19,000+ gallons mixed waste) to Toxic Substance Control Act (TSCA) Incinerator; continued evaluation of newly generated waste streams for potential bulking into Batches #9 and #10

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- Chemical Treatment Projects
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project --- Treated 176 drums of waste in August, for project total of 1,209 drums; completed all processing as of August 19, 1998
 - Organic Treatment Project --- Completed final draft of RFP Statement of Work
- Hazardous Waste/Recycling Project --- Shipped total of 47 labpack drums of excess chemicals (via Heritage Environmental Services, Inc.) in two separate shipments; made one shipment of photochemicals (via Safety-Kleen, Inc.)
- Thorium Legacy Waste Stabilization Project --- Approved Lift Plans for installation of subcontractor equipment in Building 65, finalizing Phase I of contract

September 1998 (Anticipated)

- Enforceable Milestones to Be Completed
 - 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
 - Prepare waste profiles for 150 drums of materials eligible for shipment to Envirocare of Utah, Inc., pending evaluation/acceptance of historical laboratory analysis
 - Mixed Waste Treatment Projects
 - Liquid Mixed Waste Project --- Prepare for shipment of Batch #7 for disposal at TSCA Incinerator; begin bulking of Solvent Extraction Project aqueous waste into Batch #9
 - Chemical Treatment Projects
 - NPDS Project --- Weigh remaining drums and prepare task orders for their removal; begin developing demobilization plan
 - Solvent Extraction Project --- Complete project closeout after bulking of aqueous waste into Batch #9
 - Organic Treatment Project --- Revise Project Execution Plan to reflect revisions to RFP Statement of Work; continue investigating offsite treatment options

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- Hazardous Waste/Recycling Project --- Complete revision of Photochemical Services contract
- Thorium Legacy Waste Stabilization Project --- Investigate alternate storage for low level waste thorium awaiting shipment
- Waste Minimization/Pollution Prevention Project --- Begin preparations to ship scrap copper motor winding containers to East Tennessee Technology Park in Oak Ridge, TN