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Department of Energy

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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-0298-99

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

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF REMEDIAL ACTION WORK PLAN FOR FIRST LOADOUT ACTIVITIES - WASTE PIT REMEDIAL ACTION PROJECT, OPERABLE UNIT 1

Enclosed, please find the Operable Unit 1 (OU1) First Waste Loadout Work Plan. This work plan documents the activities, procedures, and facilities required to initiate OU1 first waste loadout by March 1, 1999, using the materials in Soil Piles 6 and 7.

As discussed in meetings with the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA), the activities described in the enclosed work plan represent the first portion of a phased approach to startup of OU1 remedial activities. In summary, the Fernald Environmental Management Project (FEMP) plans to initiate remedial action in three progressive phases as follows:

- Phase 1) Initiation of waste loadout and disposal activities using the materials in Soil Piles 6 and 7. These activities are the subject of the enclosed work plan.
- Phase 2) Continuation of waste loadout and disposal activities by excavation of materials from the waste pits. This phase will most likely utilize waste pit materials that do not require thermal drying to meet off-site disposal waste acceptance. These activities are covered under the OU1 Remedial Action (RA) Deliverables Package.
- Phase 3) Continue waste loadout and disposal activities at full scale capacity using the dryers as required. These activities are covered under the OU1 RA Deliverables Package.

Mr. James A. Saric
Mr. Tom Schneider

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The phased startup approach described above which includes development of the enclosed stand alone work plan is appropriate for several reasons. First, using a well-characterized waste material requiring a minimum of handling and processing leads to a deliberate and controlled startup that promotes safe and successful project initiation. Quickly establishing a successful "track record" for safety, waste transportation and disposal is vital to long term success for the waste pit project. In addition to establishing a "track record," this approach also allows transition to more complicated aspects of remedial operations in a safe, controlled manner. Second, this approach allows the flexibility for the FEMP to work with your agencies to fully address the significant comments on the Draft OU1 RA Deliverable Package without compromising the March 1, 1999, milestone for waste loadout.

DOE-FEMP recognizes that our strategy for first waste loadout should not result in a loss of focus in preparations for waste pit excavation and bringing all remedial facilities online. When final comments to the Draft RA Deliverable Package are received, the FEMP intends to initiate discussions with your agencies concerning the schedule for submittal of a Draft Final RA Deliverables Package. These discussions will, of course, be governed by the requirements of the Amended Consent Agreement.

In the meantime, all scheduled activities required to initiate waste pit excavations and to operate all remedial facilities, including the dryers, will continue without interruption. This includes the development of the RA Deliverable Package. Assuming that we will be able to address agency comments and concerns in sufficient detail by July 1, 1999, we are targeting that date for initiation of waste pit excavation. Please note that due to the expected conditions of the wastes to be first removed from the pits, the drying systems may not be initially required. Nonetheless, we are targeting August 15, 1999, for full scale operation including dryer operation. At this point all remedial systems would be functionally ready to operate.

The DOE-FEMP appreciates your assistance and cooperation in facilitating this first waste loadout approach. Please contact Dave Lojek at (513) 648-3127 if you have any questions on this submittal.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Lojek

Enclosure

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

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