Department of Energy

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JUL 2 2 1999

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

DOE-0952-99

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

Dear Mr. Jablonowski and Mr. Schneider:

IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT OF THE PLANT 6/EAST WAREHOUSE COMPLEX, REVISION 0

References:
1) Letter, G. Jablonowski to J.W. Reising, "Disapproval of Implementation Plan for the Above-Grade Decontamination and Dismantlement of the Plant 6 and East Warehouse Complex," dated June 2, 1999

2) Letter, T.A. Schneider to J.W. Reising, "Approval Implementation Plan for D&D of Plant 6/East West Complex," dated June 25, 1999

This letter transmits the Plant 6/East Warehouse (EW) Complex Implementation Plan for Above-Grade Decontamination and Dismantlement (D&D) in final form to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA). The draft version of this implementation plan was disapproved by the U.S. EPA on June 2, 1999, due to insufficient detail on the coordination between D&D activities at the Plant 6/EW Complex and the other D&D activities at the site, especially how they relate to disposal of waste in the On-Site Disposal Facility (OSDF). The sole U.S. EPA comment was resolved on July 8, 1999, during an informal meeting at the Department of Energy (DOE), Nevada Test Site (NTS) between U.S. EPA and Fluor Daniel Fernald, Inc. (FDF), in which a copy of the draft revision of the Implementation Plan was reviewed and approved. A copy of that draft revision is enclosed in redline form (PP. 14-15 for your reference).

The revision to the Implementation Plan accounts for the draft OSDF Optimization Plan, which DOE delivered to the U.S. EPA on June 3, 1999, for review. The OSDF Optimization Plan integrates types and quantities of debris that are available or will be

generated from all D&D projects for OSDF placement. The OSDF Optimization Plan therefore, serves as a tool for OSDF managers to properly forecast soil/debris for placement and better manage debris destined for OSDF disposal. The OSDF Optimization Plan provides a schedule that is continually updated to be integrated with current D&D project schedules. The current version of that plan includes plans for placement of available debris from Plant 6/EW Complex shortly following generation.

Please contact Art Murphy at (513) 648-3132 if you have any questions.

Sincerely,

Johnny Reising

FEMP:Murphy

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosure:

cc w/enclosure:
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J. Reising, OH/FEMP
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T. Schneider, OEPA-Dayton (three copies of enclosure)
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M. Schupe, HSI GeoTrans
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2.3.4 Material Handling, Storage, Treatment, and Disposition

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Materials generated from the D&D of the Plant 6/EW Complex will be reduced in size, segregated, and containerized and/or staged/stockpiled in accordance with the requirements identified in the MSCC form supplied to the Contractor. Quantities and disposition of specific material categories were documented in the PWID form for internal use. Tables 2-3, 2-4, and 2-5 summarize the MSCC and PWID by identifying quantities, containerization, staging/interim storage, and disposal requirements for each category of material. Debris size requirements are described in Sections 3.3.2.1 and 3.3.6.2 of the OU3 Integrated RD/RA Work Plan.

As stated in Section 3.3.2.2 of the OU3 Integrated RD/RA Work Plan, materials will be identified according to the OU3 debris categories identified in the MSCC. The MSCC for the Plant 6/EW Complex allows for commingling of OU3 debris categories A, B, D, and incidental E into a single Roll-Off Box (ROB) since each of these material types conform to OSDF Impacted Material Category 2. The majority of Debris Category E (concrete), however, will be placed in separate ROBs. Commingling of OU3 debris categories A, B, D, and incidental E is being done to conform to the OSDF impacted material categories in order to facilitate placement. By allowing the commingling of these types of debris into the same ROB, there will be more efficient use of a limited number of ROBs at the FEMP. Materials will be containerized inside the project boundaries adjacent to structures being dismantled. It is currently planned that filled containers will be covered/sealed, screened for exterior radiological contamination, inspected, tagged, and transported directly to the OSDF Transfer Area. Should any materials be encountered that do not meet the OSDF waste acceptance criteria (e.g., materials with "visible process residues" such as yellow cake, black oxide, green salt, etc.) as defined in Specification Section 01120, they will be containerized separately from OSDF-bound materials. These materials will follow the same load-out and transportation procedures, and be packaged for off-site disposal at either the Plant 1 Storage Pad or a material packaging area that would be established within the project boundaries.

The current project strategy for managing debris is to deliver containerized debris directly to the OSDF Transfer Area; however, stockpiling of Category A, B, D and E debris for interim storage is a possibility due to the limited number of ROBs at the FEMP. Stockpiling of debris, if utilized, will follow the strategies provided under Section 3.3.2.3 of the OU3 Integrated RD/RA Work Plan, which requires best available storage configuration for OU3 Debris Categories A, B, D, and E. The strategy for stockpiling also requires removing or encapsulation of contaminants. Specification Section 01517 debris release criteria requires that gross contamination be removed or encapsulated on debris surfaces prior to their removal from a building enclosure or local containment. To the maximum extent practicable, debris will be containerized following sizing when sufficient containers are available. Should the best available storage configuration (i.e., containers with lids or tarps) be temporarily unavailable, stockpiling of debris that meet the release criteria would be performed (as done on previous D&D projects at the FEMP).

Debris estimates for the Plant 6/EW Complex D&D project have been provided to OSDF and Waste Management integrators for the purpose of optimizing types and quantities of debris that are available or will be generated from all D&D projects for OSDF placement. This planning effort resulted in the preparation of a OSDF Optimization Plan, which was provided to the U.S. EPA in draft in June 1999. The OSDF Optimization Plan integrates the prioritized strategy of removing stockpiled debris from the Plant 1 Storage Pad and Areas 3A and 4A at

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the earliest opportunity to allow SCEP access to Area 3A and 4A soils. The OSDF Optimization Plan schedule, which is continually integrated with current D&D project schedules, accounts for placement of available debris from the Plant 6/EW Complex shortly following generation. Since the Plant 6/EW Complex project will generate debris during a period of time when the OSDF is in its seasonal shutdown, it is anticipated that debris stockpiles may remain on the Plant 6 pad or along "D" and "E" Streets, where run-off controls would be established, for up to 6 months following project completion.

Material tracking and reporting will be accomplished by including a project-specific Site-Wide Waste Information, Forecasting and Tracking System/Integrated Information Management System (SWIFTS/IIMS) summary in the Project Completion Report. Section 3.3.2.2 (Segregation, Containerization, Tracking) of the OU3 Integrated RD/RA Work Plan describes material tracking and reporting using SWIFTS. OU3 Debris Categories A, B, D, and E debris are classified as OSDF Category 2 material. Therefore, commingled Debris Categories A, B, D, and E quantities will be tracked in SWIFTS/IIMS under a discreet Material Evaluation Form that corresponds to Impacted OSDF Category 2 debris in interim storage. OU3 Debris Category I (Miscellaneous Materials) is also OSDF Category 2 but will not be commingled and therefore actual volumes will be easily obtained. Debris Category G (Transite) and Debris Category H (Regulated ACM) are regarded as OSDF Categories 3 and 5, respectively, and will also be handled separately. Since the volume of commingled debris will represent a combination of waste streams, proportions of OU3 debris categories within that total volume will be derived based on original estimates to identify and track waste volumes by OU3 debris category. These derived quantities will be documented in the Project Completion Report for the Plant 6/EW Complex. Other than debris tracking more specifically for the purpose of OSDF placement, project-specific material tracking and reporting strategies for the Plant 6/EW Complex project do not differ from the strategies laid out in the OU3 Integrated RD/RA Work Plan and therefore no additional details were developed during the remedial design process.

The disposition strategy for the Plant 6/EW Complex materials is consistent with the requirements stated in the OU3 Final Action ROD (1996b) and strategies presented in the OU3 Integrated RD/RA Work Plan. Table 2-3 identifies that debris generated from this project will be placed in the OSDF. No treatment will be necessary for those materials destined for on-site disposal since all chemical-based waste acceptance criteria are met based on OU3 RI/FS data.

2.3.5 Material Recycling/Reuse

Accessible metals (Category A) from the Plant 6/EW Complex have been evaluated for potential recycling options and a detailed summary of that evaluation is available in Appendix B. Using the Decision Methodology for Fernald Material Disposition Alternatives (the "Decision Methodology"), 1,495 tons of potentially recyclable accessible metals (OU3 Debris Category A) from all Plant 6/EW Complex components were evaluated by comparing the four leading alternatives to on-site disposal. Of the three phases of the Decision Methodology (Threshold Phase, Life Cycle Analysis Phase, and Decision Phase), only the first phase was applied since the comparative evaluation of project costs for each alternative showed that the total costs for each of the recycling options greatly exceed the 25 percent total cost criteria compared to the OSDF.