



Department of Energy

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SEP 17 1999

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-1115-99

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

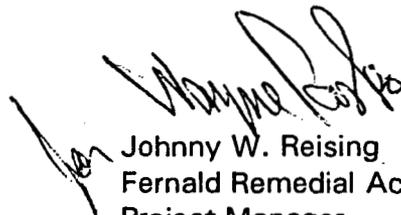
Dear Mr. Saric and Mr. Schneider:

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY
STUDY/CONSENT DECREE MONTHLY REPORT FOR THE PERIOD OF AUGUST 1, 1999,
THROUGH AUGUST 31, 1999**

This letter transmits the amended Consent Agreement Monthly Report for the period of August 1, 1999, through August 31, 1999. 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

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
D. Sarno, FCAB
V. Dastillung, FRESH
P. Dunn, FRESH
F. Barker, Tetra Tech
D. Carr, FDF/52-2
T. Hagen, FDF/65-2
AR Coordinator, FDF/78

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cc w/o enclosure:

A. Tanner, OH/FEMP
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
J. Harmon, FDF/90
R. Heck, FDF/2
S. Hinnefeld, FDF/90
B. Irvine, FDF/28
T. Walsh, FDF/65-2
ECDC, FDF/52-7

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
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STUDY/CONSENT DECREE MONTHLY REPORT AUGUST 1 THROUGH AUGUST 31, 1999**

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Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from August 1, 1999 through August 31, 1999. 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 1999

- Enforceable Milestones Expected to be Completed
 - None
- Major Work Initiated/Continued/Completed
 - Received conditional approval of Remedial Action (RA) Work Package from the Agencies
 - Initiated Standard Start-up Review (SSR) for Pit Excavation on August 11, 1999, and Completed SSR on August 27, 1999
 - Initiated excavation and load out of material from Waste Pits
 - Initiated Construction Acceptance Testing/System Operability Testing (CAT/SOT) for process facilities
 - Finalized plans for the Dryer Operations SSR
 - Submitted final RA Package to the Agencies for final approval
 - Processed 11, 634 tons of material from SP7 and Waste Pits
 - Shipped 102 railcars of material to Envirocare for disposal

September 1999 (Anticipated)

- Enforceable Milestones Expected to be Completed
 - None
- Major Work to be Initiated/Continued/Completed
 - Complete process facilities construction
 - Initiate and Complete SSR for Dryer Operations
 - Declare readiness for Authorization of Full Operations
 - Process 15,828 tons of material from the Waste Pits
 - Ship 102 railcars of material to Envirocare for disposal

OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY AND SOIL CHARACTERIZATION AND EXCAVATION PROJECT

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

August 1999

- Enforceable Milestones
 - On-Site Disposal Facility (OSDF)
 - None
 - Soil Characterization and Excavation Project (SCEP)
 - None

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- Major Work to be Initiated/Continued/Completed
 - On-Site Disposal Facility
 - Completed construction of Cell 3 clay liner
 - Continued placement of impacted materials in Cells 1 and 2
 - Began construction of secondary geosynthetic liner in Cell 3
 - Presented evaluation report "Required Minimum Thickness of Intervening Horizon of Category 1 Impacted" to the Agencies on August 17, 1999
 - Soil Characterization and Excavation Project (SCEP)
 - Area 1, Phase II
 - Received preliminary as-builts for Site Preparation Package
 - Completed excavation of RCRA and Above Waste Acceptance Criteria (AWAC) soils from sludge drying beds
 - Completed demolition and hauling of major structures
 - Continued work on deep excavation support systems
 - Initiated excavation and size reduction of underground utilities inside STP
 - Completed field activities in the A1PII Trap Range
 - Submitted Verification of Treatment Report(s) to Agencies showing that soil is no longer hazardous in both A2PI Firing Range and A1PII Trap Range
 - Area 2, Phase I
 - Received and commented on draft summary report showing stabilization results below toxicity characteristic levels
 - Completed Inactive Flyash Pile
 - Continued excavation of South Field stockpiles
 - Began excavation in South Field
 - Area 2, Phase II
 - Submitted Parts Two and Three of Project Specific Plan (PSP) to Agencies
 - Received Agency comments on Part One of the PSP and began to modify PSP, based upon the Agency comments
 - Area 2, Phase III
 - Completed field sampling, began data validation
 - Other Areas
 - Submitted Project Specific Plan for Area 3A/4A, "Sub-surface Predesign Investigation," to the Agencies on August 20, 1999
 - Completed real-time scanning in A7,PI
 - Conducted discussions with property owners for access in A9, PI

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- Real Time Program
 - Establishing QA/QC program for instrumentation
 - Continued construction of calibration pad for HPGe and NaI detectors
 - Continued development of methods and procedures for documenting the calibration pad process
 - Continued to determine need for revision of RTRAK applicability Study
- Natural Resource Restoration
 - Continue to draft settlements
- Wetland Mitigation - Phase I
 - Project continues, being eighty percent complete
- Conservation Area OU4 Supplemental Environmental Project
 - US Army Corp of Engineers made final offer to land owners regarding land easements, which was rejected
- Ecological Research Projects
 - Subprojects consisting of
 - 1) Identification and Control of Invasive Species, continue to monitor growth of plants
 - 2) Monitoring of growth of A1PI and A8PI vegetation plots continues
 - 3) Ecological restoration case study by Texas Southern University is in progress, comments from FDF are being compiled on Draft Final Report
 - 4) American Chestnut Trees, growth continues to be monitored at Miami University - Middletown Campus
- Final Land Use
 - Continued to draft Master Plan for Public Use

September 1999 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - On-Site Disposal Facility
 - Continue to place impacted materials in Cells 1 and 2
 - Complete construction of secondary geosynthetic liner in Cell 3
 - Begin construction of primary geosynthetic liner in Cell 3
 - Soil Characterization and Excavation Project (SCEP)
 - Area 1, Phase II
 - Issue as-builts for Site Preparation Package and close out project
 - Complete work on deep excavation support systems

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- Complete excavation and size reduction of underground utilities with work limits
- Close out project
- Area 2, Phase I
 - Await Agency approval of sampling results in Firing Range
 - Continue excavation of soil for placement in the OSDF
 - Continue excavation of South Field
- Area 2, Phase II
 - Await Agency comments on A2PII Part Two and Three PSP
 - Await Agency approval of A2PII Part One and Non-Waste Units PSP
 - Initiate sampling of A2PII
- Area 2, Phase III
 - Complete analysis and continue data validation
- Other Areas
 - Perform field activities for Area 3A/4A surface predesign investigation
 - Begin physical sampling of A7, PI
 - Continue discussion with property owners in A9, PI regarding access
- Real Time Program
 - Complete construction of calibration pad
 - Continue development of methods and procedures for documenting the calibration pad process
 - Initiate/revise documents as needed and submit to Agencies for comment
 - Continue initial testing
- Natural Resource Restoration
 - Continue to settlement discussions
- Wetland Mitigation - Phase I
 - Issue addendum to design with as-built drawings
- Conservation Area OU4 Supplemental Environmental Project
 - Determine path forward
- Ecological Research Projects
 - Monitor growth of A8,PI vegetation plots
- Final Land Use
 - Continue to draft Master Plan for Public Use

OPERABLE UNIT 3 - FACILITIES CLOSURE AND DEMOLITION PROJECT

August 1999

- Enforceable Milestones
 - None

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- Major Work Initiate/Continued/Completed
 - Plant 5 D&D
 - Continue to conduct completion mobilization activities
 - Began cleaning Building 5E in preparation of demolition
 - Plant 6 - D&D
 - Review of contractor responses to Request for Proposal is being conducted
 - Miscellaneous Small Structures
 - Began field work on Building 63 D&D
 - Maintenance/Tank Farm Complex D&D
 - Continued D&D of Building 12A and the Pipe Bridge
 - Completed interior of the Pump House Building
 - Continued tie-ins to site utility systems
 - Continued Hydrostatic testing of underground piping for the Water Storage Tank

September 1999 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - Plant 5 D&D
 - Demolishing of Building 5E will be completed
 - Begin to clean and remove equipment from Buildings 5 A and 5 D
 - Maintenance/Tank Farm D&D and Water Storage Tank Project
 - Complete field D&D activities

OPERABLE UNIT 4 - SILOS PROJECT

August 1999

- Enforceable Milestones
 - None
- Major Work Initiated/Continued/Completed
 - Initiated internal review of the Silos 1 and 2 Feasibility Study
 - Completed construction activities for the Silos Infrastructure Project
 - Completed Integrated Hazard Analysis team reviews for Silo 3 and Accelerated Waste Retrieval Projects

September 1999 (Anticipated)

- Enforceable Milestones
 - None

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- Major Work to be Initiated/Continued/Completed
 - Initiate waste shipment, treatment and disposal for the VitPP Waste Disposition Project
 - Finalize contractor's schedule for the Accelerated Waste Retrieval Project
 - Rocky Mountain Remediation Services(RMRS) will present an update on the Preliminary Design for the Silo 3 Project for the Agencies
 - Complete internal review of the Draft Revised FS for Silos 1 and 2; submit draft to DOE for review
 - Initiate FDF and DOE review of Silo 3 Preliminary Hazard Analysis Report
 - Conduct FDF over-the-shoulder review of Silo 3 Preliminary Design Documentation

OPERABLE UNIT 5 - AQUIFER RESTORATION AND WASTEWATER PROJECT

August 1999

- Enforceable Milestones
 - Submitted monthly NPDES Discharge Monitoring Report to the OEPA on August 13, 1999
 - Met 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by OU5 Record of Decision
- Work Initiated/Continued/Completed
 - Submitted the May 1999 Operating Report for the Re-Injection Demonstration on August 16, 1999 to DOE for transmittal to the Agencies. DOE transmitted to the Agencies on August 20, 1999
 - Completed construction for the Sludge Removal System at the Stormwater Retention Basin (SWRB) and Biosurge Lagoon (BSL) in July, the System Operability Testing was completed on August 12, 1999
 - Awarded, to System Sales, Inc., construction to switch out the IX Control panel at the AWWT to the DCS System
 - Completed core Rotosonic drilling and began the cable tool drilling for the installation of the two new 12-inch diameter groundwater extraction wells in the South Field Area
 - Completed Standard Startup Review (SSR) of the Sludge Removal System on August 20, 1999
 - Installed four new monitoring wells; two on-property in the South Field Area and two off-property in the South Plume Area

September 1999 (Anticipated)

- Enforceable Milestones
 - Submit monthly NPDES Discharge Monitoring Report to the OEPA covering the previous month
 - Meet 20 parts per billion (ppb) monthly average uranium discharge to Great Miami River as required by OU5 Record of Decision

CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY STUDY/CONSENT DECREE MONTHLY REPORT AUGUST 1 THROUGH AUGUST 31, 1999

- Work to be Initiated/Continued/Completed
 - Submit monthly 1999 Operating Report for the Re-injection Demonstration to DOE for transmittal to the Agencies
 - Prepare a PSP to conduct pre-design geoprobing in the Waste Storage Area and Plant 6 Area
 - September 2, 1999, will complete a one-year Groundwater Re-injection Demonstration
 - Continue compiling and evaluating data collected during the Groundwater Re-injection Demonstration in preparation for the Groundwater Re-injection Report
 - Complete construction of AWWT Laboratory Expansion by September 2, 1999

WASTE MANAGEMENT

August 1999

- Enforceable Milestones
 - None
- Work Initiated/Continued/Completed
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project
 - The project is complete. Crosswalk of surface areas and weights for PermaFix equipment to survey data for shipping calculations has been completed. Comments are being incorporated from Packaging & Shipping Compliance review of PT-0019
 - Thorium Legacy Waste Project (TLWP)
 - Repackaged 24 boxes of Low Level Waste (LLW) and 3 boxes of Mixed Waste (MW) for shipment to Nevada Test Site (NTS). Total boxes LLW repackaged to date is 347 and total MW boxes repackaged to date is 62
 - Completed the investigation into the Thorium Metal Fire that occurred on July 24, 1999, and issued the draft investigation report for review
 - Continued to repackage containers that have been determined to be free of the potentially hydrogen generating waste
 - RCI Solvent Extraction Project
 - Completed decontamination of remaining equipment
 - Completed identification of the equipment to be excessed by Property
 - Waste Minimization
 - Awarded Laserjet contract to LaserLife Inc. of Milford, Ohio
 - Liquid Mixed Waste Project
 - Shipped Batch 8, Shipment 5 tanker trailer, to TSCA Incinerator on August 4, 1999
 - Continued to evaluate newly generated waste streams for bulking into Batches 10, 11, and 12
 - Began developing MEF to allow for Batch 9 application to TSCA Incinerator

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September 1999 (Anticipated)

- Enforceable Milestones
 - None

- Work to be Initiated/Continued/Completed
 - Mixed Waste Shipping
 - Ship 143 candidate drums upon final determination of additional requirements for shipment of wastes to a permitted commercial disposal facility
 - Complete Real-Time Radioscopic Testing (RTR) on remaining candidate drums
 - Liquid Mixed Waste Project
 - Initiate and complete activities to decontaminate Batch 7 and Batch 8 consolidation tanks
 - Submit Batch 9 application to TSCA Incinerator upon receipt of characterization data
 - Initiate planning activities for bulking of Batch 10
 - Neutralization/Precipitation/Deactivation/Stabilization (NPDS) Project
 - This project is complete. PermaFix is to disassemble and package contaminated equipment
 - Complete radiological characterization for PermaFix packages
 - Thorium Legacy Waste Project
 - Develop a path forward for managing the inventory of thorium metal similar to that which caught fire on July 24, 1999 and issue a final investigation report
 - Continue support for the SSR in order to ship LLW Thorium to NTS
 - RCI Solvent Extraction Project
 - Complete decommissioning activities
 - Move equipment from Building 80 to Storage Area
 - Organic Treatment Project (OTP)
 - Review Project Execution Plan
 - Initiate field activities on task order to perform Real-Time Radioscopic Examination (RTR) of First Article Testing containers to support absorbent determination
 - Hazardous Waste/Recycling
 - Acquire cost estimate from Heritage Environmental for bulk water treatment chemicals pickup, treatment and disposal
 - Continue to prepare for labpack shipment