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JAN 24 2000

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

DOE-0265-00

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

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF STOCKPILE AMENDMENT TO THE FINAL WASTE PITS REMEDIAL ACTION PROJECT EXCAVATION PLAN

The purpose of this letter is to transmit for your review and approval, an amendment to the Final Waste Pits Remedial Action Project (WPRAP) Excavation Plan. This amendment has been prepared to revise and supplement the discussions in the Excavation Plan regarding material staging activities within the waste pit boundary. This amendment reflects the details discussed with the Ohio Environmental Protection Agency representatives during a December 2, 1999 walk-through of the WPRAP area.

If you have any questions or comments, please contact Dave Lojek at (513) 648-3127.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Lojek

Enclosures

Mr. James A. Saric
Mr. Tom Schneider

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JAN 24 2000

cc w/enclosures:

N. Hallein, EM-42/CLOV
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T. Schneider, OEPA-Dayton (three copies of enclosures)
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cc w/o enclosures:

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**AMENDMENT TO THE FINAL WASTE PITS REMEDIAL ACTION PROJECT (WPRAP)
EXCAVATION PLAN, AUGUST 1998**

1.0 PURPOSE

In the Final WPRAP Remedial Design Package, Volume 2 – "Excavation Plan", dated August 1998, reference is made to the staging of excavated materials within the pit area, prior to moving them into the Material Handling Building (MHB) for processing. With the initiation of waste pit excavation, experience gained to date has allowed the project to better define material staging needs and plans. The purpose of this amendment is to formally supplement the discussions provided in the Excavation Plan to reflect material staging activities within the pit area based on operational experience.

2.0 BACKGROUND

In the Excavation Plan - Section 4.7, information is provided relative how materials, once excavated, may be staged in the pit area before being transported elsewhere for processing (e.g., the MHB, the Non-Typical Waste Transfer Area, etc.). For non-typical and non-processable wastes, Section 4.7 states that these wastes will be staged within the pit area at the approximate locations shown on the excavation phase drawings, until sufficient volume has accumulated to support transport and further management. For processable waste, Section 4.7 states that such materials will only be staged within the pit area, for a time reasonably required to facilitate free water drainage from the material.

3.0 CURRENT CONDITIONS

There are two areas within the waste pit boundary where materials may be staged. The first area, is the excavation area, or any of the area within the waste pits where material removal has been initiated, including the working face of the excavation. The second area, includes any other location(s) within the waste pit boundary.

3.1 EXCAVATION AREA STAGING

Within the excavation area, various materials may be staged, in support of the overall materials management process. Specifically, as excavation proceeds, materials may be staged within the excavation area in a manner to facilitate blending and/or material handling. For example, as material is encountered which can benefit from blending with other materials (e.g., it is radiologically "hot"), that material may be set aside in the excavation area, until such time as blending can be facilitated. Another example of material management within the excavation area relates to the staging of wet materials. In this example, such materials are moved to the edge of the excavation area (i.e., on the excavation face), and staged there to facilitate free water drainage. The location of these staged materials will change as the excavation progresses.

3.2 OTHER PIT AREA STAGING

Two stockpiles outside of the excavation area, but within the waste pit boundary, are currently being maintained, as shown on Figure 1. These two piles include a debris pile and a pile containing waste pit cover soils.

The debris pile currently contains debris, which was excavated from the upper portions of Pit 3. Because of the large quantity of debris encountered, this material was stockpiled, and is being fed into the process in portions which allow it to be loaded into the railcars within the 10% debris limitation established by the commercial disposal facility. The location for this stockpile was selected to facilitate overall materials management. Specifically, this material was located outside of the excavation area - due to its physical size - so as not to interfere with continuing excavation activities, and was located at the southern end of Pit 3 so runoff from the pile would be directed into the Clearwell. The size of this stockpile will be dependent upon how much debris continues to be excavated versus the rate this material can be processed via railcar loadout.

The pit cover stockpile was developed to provide for a source of relatively clean and dryer material to be used for constructing haul roads within the waste pit area. As with the debris stockpile, this pile was placed in its current location so runoff from the pile would be directed into the Clearwell; and to promote access to the material; and to stay clear of the ongoing excavation area.

3.3 MANAGEMENT OF STAGED MATERIALS

As discussed in Sections 4.7 and 5.1.3 of the Excavation Plan, staged material will be secured at the end of each working shift and whenever inclement weather (e.g., high winds, rain, etc.) is expected, to preclude dust generation. This material will be secured by proofrolling, or bucket compacting to provide a tight surface, or covering with a fabric cover, or by spraying with ConCover or equivalent. As stated in Section 5.1.3 of the Excavation Plan, the type of dust suppression method to be used will be dependent upon the intended use of the material and the time period the material will be staged. Materials with a short exposure time may use water sprays to control dust, while materials with longer exposure times may be covered, compacted, or sprayed with ConCover.

4.0 FUTURE PLANS

As the excavation proceeds, the material staging within the excavation area may change to meet changes in materials encountered (e.g., the encountering of non-typical waste), and the progression of excavation activities through the waste pits. For that area within the waste pit boundary, but outside of the excavation area, no additional stockpiles, beyond those identified above, will be established without prior U.S. EPA and Ohio EPA approval.

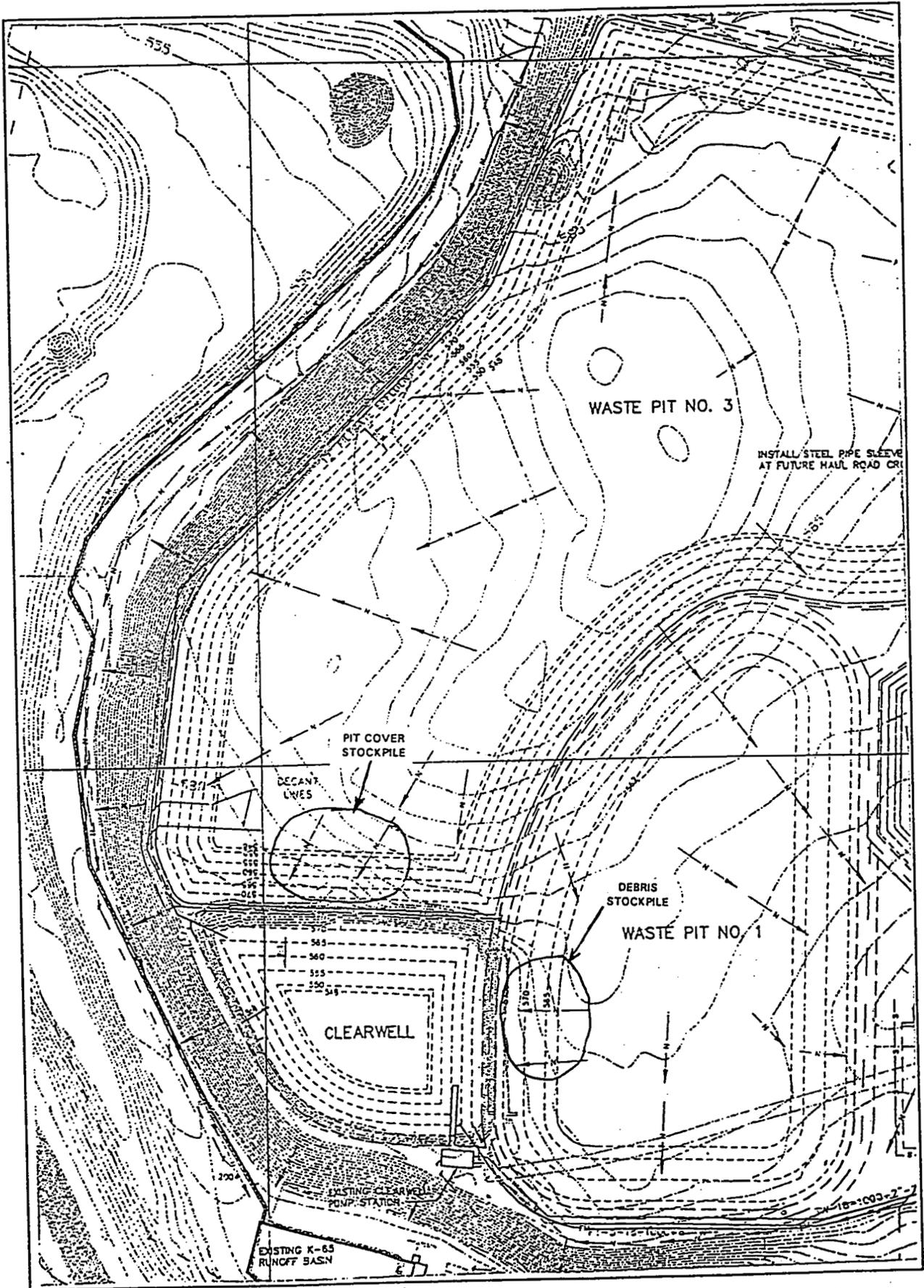


Figure 1 - Stockpile Locations