



Department of Energy

**Ohio Field Office
Fernald Area Office**
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2974

MAY 15 2000

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-0673-00

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 APRIL 1, 2000
THROUGH APRIL 30, 2000**

This letter transmits the amended Consent Agreement Monthly Report for the period of April 1, 2000 through April 30, 2000. 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:

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MAY 15 2000

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

N. Hallein, EM-31, CLOV
G. Jablonowski, USEPA-V, SRF-5J
D. Sarno, FCAB
V. Dastillung, FRESH
P. Dunn, FRESH
F. Hodge, Tetra Tech
T. Hagen, Fluor Fernald, Inc./65-2
M. Jewett, Fluor Fernald, Inc./52-2
T. Walsh, Fluor Fernald, Inc./65-2
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

A. Tanner, OH/FEMP
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
D. Carr, Fluor Fernald, Inc./2
J. Harmon, Fluor Fernald, Inc./90
S. Hinnefeld, Fluor Fernald, Inc./31
B. Irvine, Fluor Fernald, Inc./65-2
ECDC, Fluor Fernald, Inc./52-7

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**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
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STUDY/CONSENT DECREE MONTHLY REPORT APRIL 1, 2000 THROUGH APRIL 30, 2000**

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Introduction

This report describes actions at the Fernald Environmental Management Project (FEMP) from April 1, 2000 through April 30, 2000. 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

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April 2000

- Enforceable Milestones Completed
 - None
- Major Work Initiated/Continued/Completed
 - Processed 3,407 tons of material from waste pits

May 2000 (Anticipated)

- Enforceable Milestones Expected to be Completed
 - None
- Major Work to be Initiated/Continued/Completed
 - Process 9,691 tons of material from waste pits, ship 120 railcars of material for disposal at Envirocare

**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**

April 2000

- Enforceable Milestones
 - On-Site Disposal Facility (OSDF)
 - None
 - Soil Characterization and Excavation Project (SCEP)
 - None
- Major Work Initiated/Continued/Completed
 - On-Site Disposal Facility
 - Continued OSDF operations and placement activities, placing impacted material in Cells 1, 2, and 3
 - Received Agency approval on Impacted Materials Placement Plan (IMPP) Addenda 2 and 3 on March 8, 2000

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- Soil Characterization and Excavation Project (SCEP) -- 2974
 - Area 1, Phase II
 - Completed laboratory analysis and data validation of certified samples
 - Transmitted draft Certification Report to DOE on April 27, 2000
 - Area 2, Phase I
 - The Active Flyash Pile Perimeter Excavation Design received OEPA approval on April 14, 2000
 - Area 2, Phase II
 - Continued Real-Time Scanning
 - Area 2, Phase III
 - Began excavation of Radium Hot Spot
 - Other Areas
 - Submitted draft Request for Proposal (RFP) to DOE on Area 3A/4A excavation/OSDF phase III construction on April 17, 2000
 - Completed Waste Acceptance Criteria (WAC) supporting OU4 project
 - Continued planting large trees in A8,PII Restoration
 - Continued negotiation toward property access in A9,PI; precertification is complete and the predesign investigation plan was submitted to the Agencies
- Real Time Program
 - Continued to seek approval of GATOR calibration report for use for WAC and predesign
- Natural Resource Restoration
 - Department of Interior and Ohio Attorney General's office continued to draft settlements
- Wetland Mitigation - Phase I
 - Continued monitoring of wetlands
- Conservation Area OU4 Supplemental Environmental Project
 - Sent request to the Agencies requesting approval of the cancellation of the project on March 6, 2000
- Ecological Research Projects
 - Continued final Ecological Restoration Case Study by Texas Southern University
- Public Use of FEMP
 - Began to prepare for public Workshop to be conducted in May

May 2000 (Anticipated)

- Enforceable Milestones
- None

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- Major Work to be Initiated/Continued/Completed 2974
- On-Site Disposal Facility
 - Continue placement of impacted material in Cells 1 and 2
 - Begin 3 foot thick layer of select material in Cell 1
 - Begin screening for Cap #1 clay liner
- Soil Characterization and Excavation Project (SCEP)
 - Area 1, Phase II
 - Transmit Waste Acceptance Criteria (WAC) report
 - Begin preparation of Design Change Notice (DCN) for additional excavation
 - Area 2, Phase I
 - Awaiting USEPA approval of Active Flyash Pile Perimeter Excavation Design, Draft CDL and Draft PSP
 - Area 2, Phase II
 - Begin sample collection at 38 predesign sample locations
 - Area 2, Phase III
 - Complete excavation and perform precertification, and certification activities
 - Other Areas
 - Add 11 subsurface predesign borings for additional Final Remediation Limits (FRLs) and WAC bounding
 - Perform WAC sampling of West section of Stockpile 1
 - Submit Project Specific Plan (PSP) for sampling Area 3A miscellaneous stockpiles for OSDF WAC attainment
 - Complete spring planting in A8, PII Restoration
 - Real Time Program
 - Continue work on draft methods for calibration of NaI and HPGe tools on the calibration pad
 - Continue to revise "Guidelines, Operation Factors for the Deployment of In-Situ Gamma Spectroscopy at the Fernald Site"
 - Continue to make site calibration sources
 - Natural Resource Restoration
 - Dept. of Interior and Ohio Attorney General's office continue to draft settlements
 - Wetland Mitigation - Phase I
 - Continue monitoring of wetland growth
 - Conservation Area OU4 Supplemental Environmental Project
 - The project is being cancelled; awaiting approval of the request to the Agencies regarding approval to cancel the project
 - Ecological Research Projects
 - Continue to draft final report from Texas Southern University
 - Begin monitoring of growth in research projects
 - Final Land Use
 - Continue to draft Master Plan for Public Use

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OPERABLE UNIT 3 - FACILITIES CLOSURE AND DEMOLITION PROJECT

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April 2000

- Enforceable Milestones
 - Submitted Interim Project Completion Report for the Maintenance/Tank Farm D&D Project to the DOE on April 28, 2000 for submittal to the Agencies.
- Major Work Initiated/Continued/Completed
 - Continued asbestos abatement, interior transite removal in plant 5 Complex
 - Continued D&D activities in the Plant 6 area
 - Continued development of the Implementation plan, RFP, and Project Specifications for the Multi-Complex D&D Project

May 2000 (Anticipated)

- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - Continue with asbestos abatement and structural demolition in Plant 5 area
 - Continue interior equipment removal and dismantlement in Maintenance Shop area of Plant 6
 - Relocate T-85
 - Demolish concrete wall adjacent to Picnic Area, for egress area

OPERABLE UNIT 4 - SILOS PROJECT

April 2000

- Enforceable Milestones
 - None
- Major Work Initiated/Continued/Completed
 - Briefed the Nevada Test Site Citizens Advisory Board (NTSCAB) Transportation Subcommittee on the Proposed Plan for Silos 1 and 2
 - Conducted FEMP public hearing on the Revised Proposed Plan for Silos 1 and 2 on April 25, 2000
 - Revised the Silo 3 Site Preparation Package to incorporate USEPA and OEPA comments and re-submitted for agency approval on April 26, 2000
 - Addressed OEPA and USEPA comments on the site preparation portion of the Silos 1 and 2 Accelerated Waste Retrieval Project Remedial Design Package
 - Submitted a stand-alone Site Preparation Package to Agencies for approval on April 5, 2000; received additional comments from Ohio EPA April 28, 2000

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May 2000 (Anticipated)

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- Enforceable Milestones
 - None
- Major Work to be Initiated/Continued/Completed
 - Respond to Ohio EPA comments, received April 28, 2000, regarding the AWR Site preparation Package
 - Mobilize AWR contractor for Site Preparation activities (pending Agency approval of Site Preparation Package)
 - Submit Silo 3 Project Remedial Design Package to Agencies for review and approval
 - Await Agency approval of the Silo 3 Project Site Preparation Package
 - Conduct Public Hearing on the Revised Proposed Plan for Silos 1 and 2 for Nevada Test Site (NTS) stakeholders
 - Initiate preparation of Responsiveness Summary addressing comments at the close of Public Comment Period for the Revised Proposed Plan for Silos 1 and 2

OPERABLE UNIT 5 - AQUIFER RESTORATION AND WASTEWATER PROJECT

April 2000

- Enforceable Milestones
 - Submitted NPDES Discharge Monitoring Report to the OEPA on April 18, 2000
 - Submitted the Noncompliance Report to the OEPA on April 17, 2000
 - 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 November 1999 Operating Report for the Re-Injection Demonstration on April 24, 2000 to DOE for transmittal to the Agencies; DOE transmitted to the Agencies on April 26, 2000
 - Completed Advanced Wastewater Treatment Groundwater Reroute Project punch list items on April 20, 2000
 - Continued Pre-design Geoprobng in the Waste Storage Area
 - Began preparing report on the pre-design activities for the Waste Storage Area and Plant 6 Area Modules

May 2000 (Anticipated)

- Enforceable Milestones
 - Submit 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

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- Work to be Initiated/Continued/Completed
 - Submit the monthly 1999 Operating Report for the Re-injection Demonstration to DOE for transmittal to the Agencies
 - Award Enhanced Permanent Leachate Transmission System construction contract
 - Incorporate DOE comments into the Re-Injection Demonstration Report
 - Submit Draft Pre-Design Report for Waste Storage Area and Plant 6 Area modules to DOE

WASTE MANAGEMENT

April 2000

- Enforceable Milestones
 - None
- Work Initiated/Continued/Completed
 - Wastewater Treatment Project
 - Completing further characterization/sampling pertaining to 27, 55-gallon containers decanted from 4 type-300 containers
 - Thorium Legacy Waste Project (TLWP)
 - Reviewed comments on the draft plan for thorium management received from the Defense nuclear Facilities Safety Board (DNFSB)
 - Began Standard Startup Review for shipment of thoria gel; this was stopped due to issue resolution needs
 - Continuing the inventory and characterization reassessment of 18 boxes of thorium residues
 - Identified Plant 1A Slab as the location for storage of thorium, subject to walkdown by Engineering
 - Liquid Mixed Waste (Bulking) Project
 - Continued the delay of DOE tanker trailer, pending receipt of additional inspection information from TSCA Incinerator (TSCAI), regarding Batch 9, Shipment 1
 - Continued discussions between TSCAI, DOE and State of Tennessee regarding the schedule for initiation of Batch 9 shipments
 - Hazardous Waste Project
 - Shipped 11 labpack containers to Heritage Environmental Services
 - Shipped 1 container of x-ray silver solution to Safety-Kleen
 - Shipped 24 skids of lead-acid batteries to American Compressed Steel for recycling
 - Mixed Waste Shipping
 - Completed sampling profiles on containers of below-LDR mixed waste for shipment to Envirocare

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- Organic Treatment Project
 - Discussed the absorbent determination requirements for TOC boxes with Waste Characterization
- Waste Minimization/Pollution Prevention
 - Continued tracking of defective fax cartridges
 - Submitted Quarterly Pollution Progress Program Report to DOE Headquarters on April 27, 2000

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May 2000 (Anticipated)

- Enforceable Milestones
 - None
- Work to be Initiated/Continued/Completed
 - Mixed Waste Shipping
 - Ship 143 drums upon completion of additional sampling analysis and completion submittal and approval of profile by Envirocare
 - Liquid Mixed Waste (Bulking) Project
 - Resume shipments to TSCA Incinerator, Batch 9
 - Complete consolidation tank decontamination and initiate dismantlement of tank regarding Batch 7
 - Initiate bulking of Batch 10 upon completion of Batch 8 consolidation tank decontamination
 - Thorium Legacy Waste Project
 - Recommence SSR for shipment of thoria gel
 - Prepare for DNFSB visit
 - Continue inventory and characterization reassessment for boxes of thorium residues and thoria gel
 - Begin development of expression of interest for Thorium treatment
 - Organic Treatment Project
 - Finalize absorbent determinations