



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
LOG B-1143

APR 23 2001

2001 APR 26 P 1:16

Mr. Johnny W. Reising
United States Department of Energy
Fernald Area Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

FILE: _____ SRF-5J
REPLY TO THE ATTENTION OF: _____

LIBRARY: _____

Subject: Silo 3 Extension Request

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) April 16, 2001, letter requesting an extension for the regulatory milestone for submittal of the Operable Unit (OU) 4 Silo 3 project Remedial Action Work Plan (RAWP). U.S. EPA concurs with the extension request.

Notwithstanding our concurrence with this extension request, U.S. EPA believes U.S. DOE did a poor job of informing U.S. EPA on the problems associated with the project. Also, U.S. EPA believes U.S. DOE must become more involved in the work of their primary contractor Fluor Fernald, as there is some question about their ability to manage their subcontractors. Finally, this delay calls into question the suitability of the U.S. DOE contracting mechanism for such technically complex projects. U.S. EPA expects U.S. DOE to review whether a better contracting mechanism or another approach would ensure future success on the project.

U.S. EPA remains concerned over the uncertainties and lack of progress with respect to the entire OU 4 Silos project and U.S. DOE's inability to manage these contracts. For example, U.S. EPA believes that there are clear signs that in the absence of U.S. DOE action now, the Advanced Waste Retrieval (AWR) project will also be delayed. U.S. DOE should understand that U.S. EPA expects that the Department will take appropriate action now to avoid a repeat of the Silo 3 experience with respect to the AWR project.

With this letter, U.S. DOE must provide a date for submittal of the RAWP by July 15, 2001, which is an enforceable milestone under the 1991 Amended Consent Agreement. Please contact me at (312) 886-4591 if you have any questions regarding this matter.

Sincerely,

Gene Jablonowski
Project Manager
Federal Facilities Section
Superfund Division

cc: Tom Schneider, OEPA-SWDO
Kim Chaney, U.S. DOE-HDQ
John Bradburne, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald