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OPERABLE UNIT 4 FINAL REMEDIAL DESIGN WORK PLAN

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Department of Energy
Fernald Environmental Management Project
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MAY 15 1995

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Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

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

Dear Mr. Saric and Mr. Schneider:

OPERABLE UNIT 4 FINAL REMEDIAL DESIGN WORK PLAN

Enclosed is the Operable Unit 4 (OU4) Final Remedial Design Work Plan (RDWP) and Comment Response Document resulting from the resolution of the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) comments on the conditionally approved Draft Work Plan for the OU4 Remedial Design (February 1995). In accordance with the extension request of April 17, 1995, for submittal of the Final RDWP, these documents are being transmitted to your attention for final review and approval by May 16, 1995.

Consistent with the teleconference conducted on May 8, 1995, among the Department of Energy, Fernald Area Office (DOE-FN), U.S. EPA, OEPA, and Fernald Environmental Restoration Management Corporation (FERMCO) representatives, the Final RDWP has been revised to incorporate the modified remedial design management strategy and submittal schedule. As part of DOE-FN's effort to address U.S. EPA Specific Comment Number 1 (U.S. EPA SC1), DOE-FN, and the FERMCO project team performed an in-depth review of the Title I/II remedial design and remedial action schedules. The team focussed its evaluation upon the technical and logical relationships between the Pilot Plant Treatability Study Program and the remedial management strategy for the development of Title I/II design support documentation (i.e., Functional Requirements Document and Design Criteria Package) and the engineering design efforts. The conditionally approved remedial design schedule reflected a direct logic tie between the completion of the Pilot Plant Treatability Study Program and the completion of the preliminary (30 percent) design review package for the Remedial Process Facility. This aggressive design approach created an inherent schedule risk arising from the completion of the remedial facility technical design basis [preliminary (30 percent) design review package] before the Pilot Plant Treatability Study Program is completed.

In consideration of U.S. EPA SCI, corrective actions to the schedule have been implemented and are reflected in the revised schedule contained in the Final RDWP. The Remedial Design/Remedial Action (RD/RA) schedule calls for the completion of the Pilot Plant Treatability Study Program in advance of the completion of Title I documentation for the Vitrification Plant. All Title I documentation will be updated and finalized to incorporate the inevitable design and operational changes resulting from the data and "lessons learned" from the Pilot Plant Treatability Study Program. This action is necessary to maximize the technical benefit from the Pilot Plant Treatability Study Program (e.g., scale-up parameters, continuous processing, material handling, etc.).

In addition, the technical re-evaluation of the schedule has caused a modified approach in the sequencing, development, and submittal of specific remedial design packages to ensure that the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 15-month criterion for initiation of substantial, physical, and continuous remedial activity on or before March 3, 1996, is achieved. Three separate remedial design packages, instead of one, have been identified to fulfill this requirement. These design packages will include the Underground Utilities/Site Preparation, Silo Superstructures, and the Silo Headspace Radon Treatment System. All of these remedial design packages and their submittal dates are included in the revised remedial design schedule and are described in greater detail in the Final RDWP.

Consistent with these modifications, the submittal of the OU4 Remedial Action Work Plan (RAWP) has been restructured into two document submittals. The RAWP reflects the implementation strategy and schedule for the remedial design packages which are affected by the technical issues being addressed by the Pilot Plant Treatability Study Program. Thus, the submittal of a single comprehensive RAWP in accordance with the schedule presented in the conditionally approved Draft Work Plan for the OU4 Remedial Design would be premature, in that many of the technical issues related to the vitrification plant would not be resolved at that time. Therefore, the submittal of two RAWPs to support the implementation of the phased design strategy is reflected in the text of the Final RDWP.

As you are aware, the impact of these revisions contributes to a 14-month extension in the initiation of Remedial Process Facility operations; however, through an acceleration of final site remediation activities, the net impact to the completion of all remedial activities is only five months.

The remedial design strategy and activity milestone dates presented in the Final Work Plan for the OU4 Remedial Design support a technically feasible and sound approach toward the safe and successful remediation of OU4 in a more realistic time frame. The DOE-FN will endeavor to accelerate design activities and improve the schedule as opportunities arise by continuously monitoring and re-evaluating the schedule throughout the entire RD/RA process.

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If you have any questions with regard to the schedule or require additional information, please contact Randi Allen at (513) 648-3102.

Sincerely,

Johnny Raising

FN:Allen

for

Jack R. Craig
Fernald Remedial Action
Project Manager

Enclosure: As Stated

cc w/enc:

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