



Department of Energy

Ohio Field Office
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



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DEC 19 2001

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-0195-02

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

Dear Mr. Saric and Mr. Schneider:

REQUEST FOR EXTENSION OF OPERABLE UNIT 5 SOIL REMEDIATION MILESTONE DATE - SUBMITTAL OF AREA 2, PHASE II INTEGRATED REMEDIAL DESIGN PACKAGE

- References:
- 1) Letter DOE-0076-00, J. Reising to J. Saric/T. Schneider, "Transmittal of Responses to the U.S. Environmental Protection Agency Comments and the Revised Project Specific Plan for Pre-design Sampling in the Area 2, Phase II - Parts Two and Three," dated October 29, 1999
 - 2) Letter 0788-00, J. Reising to J. Saric/T. Schneider, "Transmittal of the Final Report of Demonstrations of Two Geophysical Survey Techniques," dated June 27, 2000

The purpose of this letter is to request your approval to extend the date for submittal of the Area 2, Phase II (A2PII) Integrated Remedial Design Package (IRDP) from December 31, 2001 to July 1, 2002. This milestone date was established in the Site-wide Excavation Plan (SEP) in July 1998. Consistent with Section XVIII of the Amended Consent Agreement, DOE-FEMP believes good cause exists for extending this milestone date due to the extenuating circumstances encountered during the course of the pre-design characterization work.

DEC 19 2001

— Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0195-02

A2P11 represents the area of the FEMP, which is bounded to the south by the Southern Waste Units, west by Paddys Run Stream, and north and east by the Silos project and the water treatment facilities, respectively. It includes the arsenic soil contamination area found near the Pilot Plant Drainage Ditch, the trailer complex associated with the Southern Waste Units remediation work and the radium hot spot identified near Paddys Run. Early in Fiscal Year 2000, pre-design activities were initiated in A2P11 according to the approved Project Specific Plan (Reference 1). Throughout most of 2000 and 2001, extensive characterization activities were initiated and completed in A2P11, namely real-time radiological scanning and soil boring characterizations, ground penetrating radar, and electromagnetic scanning (Reference 2).

During these pre-design sampling activities, the arsenic soil contamination area and the radium hot spot area were identified. Furthermore, as you are aware from the weekly reports over the course of the past year, the bounding of the arsenic contamination area has proved to be somewhat difficult. In late October 2001, an excavation drawing based on the data available was provided and discussed via the weekly report outlining the arsenic soil contamination area and the FEMP's planned excavation this past fall in order to accelerate the overall schedule for the remediation of A2P11. The proposed excavation approach was approved. However, due to a relatively wet fall, the excavation of the arsenic contaminated soil was not initiated by the end of construction season. Also, additional bounding soil sampling results obtained since late October 2001 indicate that the impacted area is still not bounded. Further soil characterization activity in this area is currently ongoing. Excavation of the arsenic soil contamination area is now scheduled for the coming construction season (i.e., Spring 2002).

In spite of the strong efforts by the FEMP to characterize A2P11, the pre-design characterization activities have not been completed due to the unexpected arsenic conditions. This extension request, therefore, is needed to complete the necessary characterization work in A2P11. Consistent with Section XVIII of the Amended Consent Agreement, "good cause" exists given the efforts discussed above, which have been implemented by the FEMP over the past two years to fully characterize the area. The A2P11 IRDP is anticipated to be complete and submitted to the Regulatory Agencies on or before July 1, 2002.

If you should have any questions, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP: R.J. Janke

DEC 19 2001

Mr. James A. Saric
Mr. Tom Schneider

-3-

DOE-0195-02

cc:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
R. J. Janke, OH/FEMP
J. Reising, OH/FEMP
A. Tanner, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
F. Hodge, Tetra Tech
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
D. Carr, Fluor Fernald, Inc./MS2
J. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS65-2
S. Lorenz, Fluor Fernald, Inc./MS52-5
A. Madani, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
AR Coordinator, Fluor Fernald, Inc./MS78
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