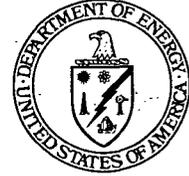




Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



MAR 10 2003

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

DOE-0249-03

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

Dear Mr. Saric and Mr. Schneider:

**REQUEST TO DEVIATE FROM THE ONSITE DISPOSAL FACILITY LEACHATE
 MANAGEMENT CONTINGENCY PLAN**

The purpose of this letter is to request your approval to deviate from the On-Site Disposal Facility (OSDF) Leachate Management Contingency Plan (LMCP - January 2001). As you are aware, a problem occurred on February 23, 2003 with the Leachate Conveyance System (LCS) force main resulting in a release of leachate waters through Manhole Number 1 of the system into the Sediment Basin Number 2 of the OSDF. The problem has been identified as a completely separated joint within the carrier pipe located approximately two feet upstream of the leachate clean out at Manhole 1A. The contingency plan identifies Temporary Operating Mode D whereby, a minimum of 12,000 gallons of collected water is trucked directly to the Advanced Waste Water Treatment (AWWT) Phase II. This Operating Mode D triggers temporary impacted runoff management (Section 4.5 of the LMCP) whereby, one or more of the catchments within the individual cells will be pumped to a storm water inlet that feeds the Storm Water Retention Basin (SWRB) for treatment through AWWT Phase I.

As previously discussed with you, and based on the analytical results enclosed, the Department of Energy, Fernald Closure Project (DOE-FCP) requests your approval to transfer both collected leachate and impacted runoff to a storm water inlet feeding the SWRB. This will require only one pumping operation rather than several operating at each individual cell. More importantly, it will alleviate the necessity to truck any water. Precipitation for the month of February totaled 3.17 inches.

MAR 10 2003

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0249-03

Specifically, the proposal is to close the knife gate (Valve V-660, Figure 3 in the LMCP) in Valve House 6 (VH6) and attach a 3-inch hose to the cam lock fitting immediately up stream of this knife gate. The fire hose will be positioned to run out of VH6 to a Catch Basin (CB) approximately 30 feet south (CB225). From here the water will drain to the Storm Water Retention Basin (SWRB). By closing the knife gate at this location all water entering the leachate transmission system (commingled leachate and impacted runoff) will be captured at this point and pumped to CB225.

The enclosed document includes the list of Volatile Organic Contaminant (VOC) analyzed, the VOC results (indicating they were below detection limits with three specific exceptions), and the total uranium LCS results for each OSDF disposal cell. Consistent with your informal letters of approval, the FCP will not place any waste until the carrier pipe is repaired. Separately, the FCP will pursue preparatory work for the Cell 2 Cap and begin grading work in Cell 4 to prepare for the eventual placement of impacted materials this construction season.

If you have any questions regarding the modification to the OSDF LMCP, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FCP:R.J. Janke

Enclosures: As Stated

MAR 10 2003

DOE-0249-03

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosures:

R. J. Janke, OH/FCP
A. Murphy, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosures)
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
D. Brettschneider, Fluor Fernald, Inc./MS52-5
D. Carr, Fluor Fernald, Inc./MS2
M. Frank, Fluor Fernald, Inc./MS90
T. Hagen, Fluor Fernald, Inc./MS9
W. Hertel, Fluor Fernald, Inc./MS52-5
M. Jewett, Fluor Fernald, Inc./MS52-5
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7

Volatile Organics Sampled at the OSDF Cells 1-5 LCS System

Bromodichloromethane
1,1-Dichloroethene
1,2-Dichloroethene (total)
Tetrachloroethene
Trichloroethene
Vinyl Chloride
Acetone
Acrylonitrile
Benzene
Bromochloromethane
Bromoform
Bromomethane
2-Butanone
Carbon disulfide
Carbon tetrachloride
Chlorobenzene
Chloroethane
Chloroform
Chloromethane
Dibromochloromethane
1,2-Dibromo-3-chloropropane
Ethylene dibromide
1,2-Dichlorobenzene
1,4-Dichlorobenzene
trans-1,4-Dichloro-2-butene
1,1-Dichloroethane
1,2-Dichloroethane
trans-1,2-Dichloroethene
1,2-Dichloropropane
cis-1,3-Dichloropropene
trans-1,3-dichloropropene
Ethylbenzene
2-Hexanone
Methylene bromide
Methylene chloride
Methyl iodide
4-Methyl-2-pentanone
Styrene
1,1,1,2-Tetrachloroethane
1,1,2,2-Tetrachloroethane
Toluene
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Trichlorofluoromethane
1,2,3-Trichloropropane
Vinyl acetate
Xylenes (Total)

Results for the Leachate samples for VOAs:

LCS-0241: all Ketone compounds are < 50 ug/L
all other compounds are < 5.0 ug/L EXCEPT 1,2-dibromo-3-chloropropane which is
5.01 ug/L

LCS-0242: all Ketone compounds are < 50 ug/L
all other compounds are < 5.0 ug/L EXCEPT 1,2-dibromo-3-chloropropane which is
8.33 ug/L

LCS-0243: all Ketone compounds are < 50 ug/L
all other compounds are < 5.0 ug/L EXCEPT 1,2-dibromo-3-chloropropane which is
6.42 ug/L

LCS-0244: all Ketone compounds are < 50 ug/L
all other compounds are < 5.0 ug/L

LCS-0245: all Ketone compounds are < 50 ug/L
all other compounds are < 5.0 ug/L

The uranium results are as follows:

<u>OSDF LCS#</u>	<u>Result (ppb)</u>
1	46.9
2	78.8
3	23.7
4	54.7
5	100.4