



Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
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MAR 13 2003

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0265-03

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

Dear Mr. Saric and Mr. Schneider:

**PROPOSED APPROACH FOR UNDERGROUND STORAGE TANK REMOVAL AND SOIL EXCAVATION AT THE FORMER FIRE TRAINING FACILITY**

The purpose of this letter is to describe the proposed approach for the removal of the underground storage tank found at the former Fire Training Facility (FTF) as well as the approach for the excavation and staging of the soil that is above the On-Site Disposal Facility (OSDF) Waste Acceptance Criteria (WAC) for tetrachloroethene (PCE) at the FTF. Discussions regarding these approaches have been held via telephone on March 11 and 12, 2003 between the United States Environmental Protection Agency (USEPA), Ohio Environmental Protection Agency (OEPA), and Department of Energy, Fernald Closure Project (DOE-FCP). Sampling results related to the underground storage tank have also been presented to OEPA to address potential Resource Conservation and Recovery Act (RCRA) concerns. Listed below are the key steps to be taken that were agreed upon as a result of the discussions.

Underground Storage Tank

- Thaw ice (complete)
- Soak up organic solvents with absorbent pads (complete)
- Dispose of pads per Waste Acceptance Organization (WAO) (ongoing)
- Sample and analysis of the water from spill area as well as material inside tank (complete)
- Pending acceptable test results, send water to Advance Waste Water Treatment Facility Phase II treatment from general area and inside tank

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- If results are not acceptable in spill area, another attempt to remove organic solvents and additional sampling/analysis
- If material in tank does not pass test, remove and containerize content in tank/drums
- Consolidate solvent/fuel saturated soils with containment of soils while excavating
- Per EPA/WAO concurrence solvent/fuel saturated soil will be sent to OSDF
- Excavate adjacent to tank and remove tank from excavation
- Demolish tank by crushing, shearing or cutting
- Proceed with general excavation in lifts
- Closure sampling

#### PCE Excavation

- Start shear wall excavation in morning 10-foot depth by 28-foot by 38-foot
- Load and haul to AR3-007 Area (burrito)
- Complete above-WAC PCE excavation in one work day
- Fence excavation area in for safety
- Temporary cover AR3-007 with 60 mil High Density Polyethylene (HDPE) cover in the same day
- At 4-foot intervals, sample side walls and bottom after known above-WAC removed
- Pending acceptable confirmation sample results of the excavated area verifying all above-WAC material has been removed, complete final permanent cover
- If excavation cannot be completed in one day, a daily cover of AR3-007 with plastic or surfactant will be utilized
- If additional WAC is found, pull back any cover and repeat above.

Both areas will follow the above protocol to complete excavations. If conditions change and warrant a modification to the approach outlined above, DOE-FCP will obtain your concurrence prior to initiating any deviations. The final closure sampling and WAC confirmation data will be documented in the Area 6, Phase I Certification Design Letter following the completion of all soil remediation in the FTF area.

If you have any questions or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FCP:R.J. Janke

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## cc:

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