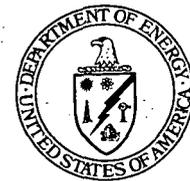




Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



APR 28 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-0347-03

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

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF HAUL ROAD ROUTING AMENDMENT TO THE FINAL WASTE PITS
REMEDIAL ACTION PROJECT EXCAVATION PLAN**

The purpose of this letter is to transmit the subject amendment to the Final Waste Pits Remedial Action Project (WPRAP) Excavation Plan for your review and comment. This amendment has been prepared to revise and supplement the discussions in the Excavation Plan regarding planned haul roads. Specifically, this amendment documents the need to haul materials excavated from Pits 4, 5, and 6 along the existing road between Pits 4 and 6 to the Material Handling Building, rather than on the berm between Pit 3 and the Burn Pit. Dust control and stormwater management activities specific to this change are also addressed in the amendment. Finally, this amendment discusses the need to revise the plans for the transfer of materials from other Fernald Closure Projects, to WPRAP, as a result of the haul road changes.

If you have any questions or comments, please contact Dave Lojek at 648-3127.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FCP:Nickel

Enclosure: As Stated

APR 28 2003

4849

Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0347-03

cc w/enclosure:

N. Hallein, EM-31/CLOV
D. Lojek, OH/FCP
K. Nickel, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra-Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
D. Carr, Fluor Fernald, Inc./MS1
M. Cherry, Fluor Fernald, Inc./MS52-1
T. Hagen, Fluor Fernald, Inc./MS1
T. Walsh, Fluor Fernald, Inc./MS52-3
ECDC, Fluor Fernald, Inc./MS52-7

**AMENDMENT TO THE FINAL WASTE PITS REMEDIAL ACTION PROJECT (WPRAP)
EXCAVATION PLAN
FOR CHANGES TO HAUL ROAD ROUTING**

1.0 PURPOSE

In the Final WPRAP Excavation Plan, August 1998, the excavation drawings provided an indication of the planned haul roads to be taken in transporting waste from the pits to the Material Handling Building (MHB). As pit excavation has progressed, changes to the routing of these roads have been deemed necessary, to respond to actual conditions in the field. Consistent with how previous changes were documented for EPA review and approval, this amendment to the Excavation Plan has been prepared to summarize the details associated with this change. Specifically, this amendment is to formally revise and supplement the Excavation Plan to reflect necessary changes to the planned haul roads. Dust control and stormwater management activities specific to these changes are also addressed. Finally, this amendment discusses the need to revise the plans for the transfer of materials from other FCP projects, to WPRAP, as a result of these haul road changes.

2.0 BACKGROUND

In the Excavation Plan (e.g., in Section 4.4), there is some general discussion about the haul roads, including information about their construction and maintenance. In general, these roads provide access for hauling waste from the pits to the MHB. The planned locations for these haul roads, based on the planned excavation approach, are shown in the excavation drawings for each of the excavation phases. From either Pit 5 or Pit 6, the haul road was identified as going west along the north end of Pit 4, then south across the berm separating the Burn Pit and Pit 3, through the truck wash, and to the MHB. From Pit 4, material was to be hauled out of the southwest corner, through the truck wash, and to the MHB.

3.0 CURRENT CONDITIONS

Excavation activities are currently taking place in Pits 1, 3, 4, and 5. Access from Pits 1 and 3 are generally as planned, and the routing of these roads is not expected to be impacted by the progression of the work. The haul road from Pit 5 currently runs as planned, from the east end of Pit 5, and west along the north end of Pit 4. Although this road then goes south to the truck wash, along the western end of the Burn Pit, this road actually goes over a portion of the Burn Pit. It was necessary to locate this road further to the east, than was originally planned, due to the fact that the berm between Pit 3 and the Burn Pit was much narrower than originally assumed.

The current haul road from Pit 4 begins at the northeast corner of Pit 4, basically using the same route being used for the Pit 5 waste hauling. This change was necessitated to accommodate the enhanced excavation activities currently being performed for the excavation of Pit 4. As a part of this enhanced excavation process, the material is to be screened, and the location selected for this screening activity was at the northeast corner of Pit 4.

4.0 PLANNED CHANGES

As soon as activities have been completed regarding the sampling of the Burn Pit area, relative to the investigation of the NEC solvents, the plan is to begin excavating the Burn Pit. The timing for this Burn Pit excavation is consistent with the Excavation Plan, so as to ensure that material continues to be available to support blending to meet the WAC for radiological purposes. Although the Excavation Plan had anticipated that the Burn Pit excavation could be done concurrent with hauling activities from Pits 5 and 6, this will not be possible. As discussed above, during excavation activities in Pit 3, it was found that the berm between Pit 3 and the Burn Pit was much narrower than originally assumed.

Without the availability of the haul road over the Burn Pit, a new route is necessary to support the current Pit 4, 5, and 6 excavation activities. The plan is to use the existing road between Pits 4 and 6, extending it to the turnaround area adjacent to the loading ramps to the MHB. This route, which is shown on the attached figure, is basically the only viable route available for hauling the material from these pits, under the current excavation approach. In using this route, the trucks will not be able to use the truck wash prior to entering the turnaround area; however, as discussed below, the project is confident that conditions/controls will be such that dust controls can be maintained. In addition, as discussed below, the haul road shall be constructed such that stormwater is controlled consistent with the Excavation Plan, and other approved documents. It should be noted that if screening can be eliminated to support the excavation of Pit 4, it may be possible to haul Pit 4 material as planned, from the southwest corner of Pit 4.

With this change, the project will also no longer be able to place material delivered from other FCP projects in either Pit 3 or Pit 4. Accordingly, the plan is to place this material into Pit 6, until it is removed for processing. This plan is also discussed below in further detail.

4.1 Dust Control

WPRAP will continue to use practices, consistent with the Sitewide Dust Control Policy, to control dust during excavation and hauling activities. Specifically, as detailed in the Excavation Plan (e.g., Section 5.1.1) and the Operations Environmental Control Plan (Section 5), water will be used to control dust on haul roads (e.g., through the use of water trucks). Water will be applied judiciously, however, to avoid runoff, ponding, or the generation of mud, and will be dependent on ambient conditions. In addition, the concrete road (and the turnaround) to the west of the MHB will continue to be cleaned of gross materials at the end of each shift using a front-end loader or bobcat. Finally, speed limits will be maintained to minimize the potential for dust generation.

In addition to these controls, loading activities associated with Pits 4, 5, and 6, will also help to control the generation of dust. Unlike the excavation of Pits 1, 2, and 3, the plan is to haul material from Pits 4, 5, and 6 in a manner that minimizes contact with the waste material. In doing so, the potential for waste material to accumulate on the truck tires and the undercarriage of the truck will be substantially reduced. Material excavated from Pit 4 utilizing the current enhanced excavation approach, for example, is loaded into trucks at the perimeter of Pit 4 after it has been excavated and screened. Because of the size of Pit 6, the plan is to also load Pit 6 material from the perimeter of the pit. Although trucks do

enter into the Pit 5 area, they do so on a clay bench constructed in the pit, and as such, do not travel on the waste material. Since the trucks for these pits will have minimum contact with the waste before traveling to the MHB, less waste will be tracked on the trucks. In that the truck wash mainly serves to remove this material from the trucks (prior to entering the concrete haul road to the MHB), there will be little adverse impact in not going through the truck wash via this new haul road.

As noted in the Excavation Plan, a potential source of dust generated during the excavation process, is from haul trucks tracking excavated materials from the pits to the processing facilities. As such, by maintaining practices that minimize the amount of material deposited on the haul road, the potential for creating a dust problem is reduced. In addition, the rerouting of the haul road will reduce the distance that the trucks need to travel, by about 300%. Therefore, even though trucks hauling from Pits 4, 5, and 6, along this new haul road, will not be able to use the truck wash, there should be no adverse impact relative to the generation of dust. Additionally, however, efforts will be made to routinely (i.e., at least once per day) clean the tires and undercarriage of the trucks (e.g., using the truck wash, hoses, and/or other acceptable methods), to remove any material which may accumulate on the trucks. Also, the project will continue to monitor for dust in the area consistent with Section 5.3 of the Excavation Plan.

4.2 Stormwater Management

Because water landing on this new haul road has the potential to come in contact with waste material, it will be collected, and managed in the same manner as the contact stormwater. Areas along the north end of this haul road will drain to the waste pits for collection. At the south end of the haul road, however, there is a potential for this contact stormwater to drain into the ditch south of Pit 4, which runs through a culvert under the truck wash, and down to the K-65 Runoff Basin. To ensure that this contact stormwater does not go to the K-65 Runoff Basin, the culvert under the truck wash will be blocked, and a manhole with sump pump will be provided to collect runoff and deliver it to the excavation stormwater main.

4.3 Management of Materials from Other FCP Projects

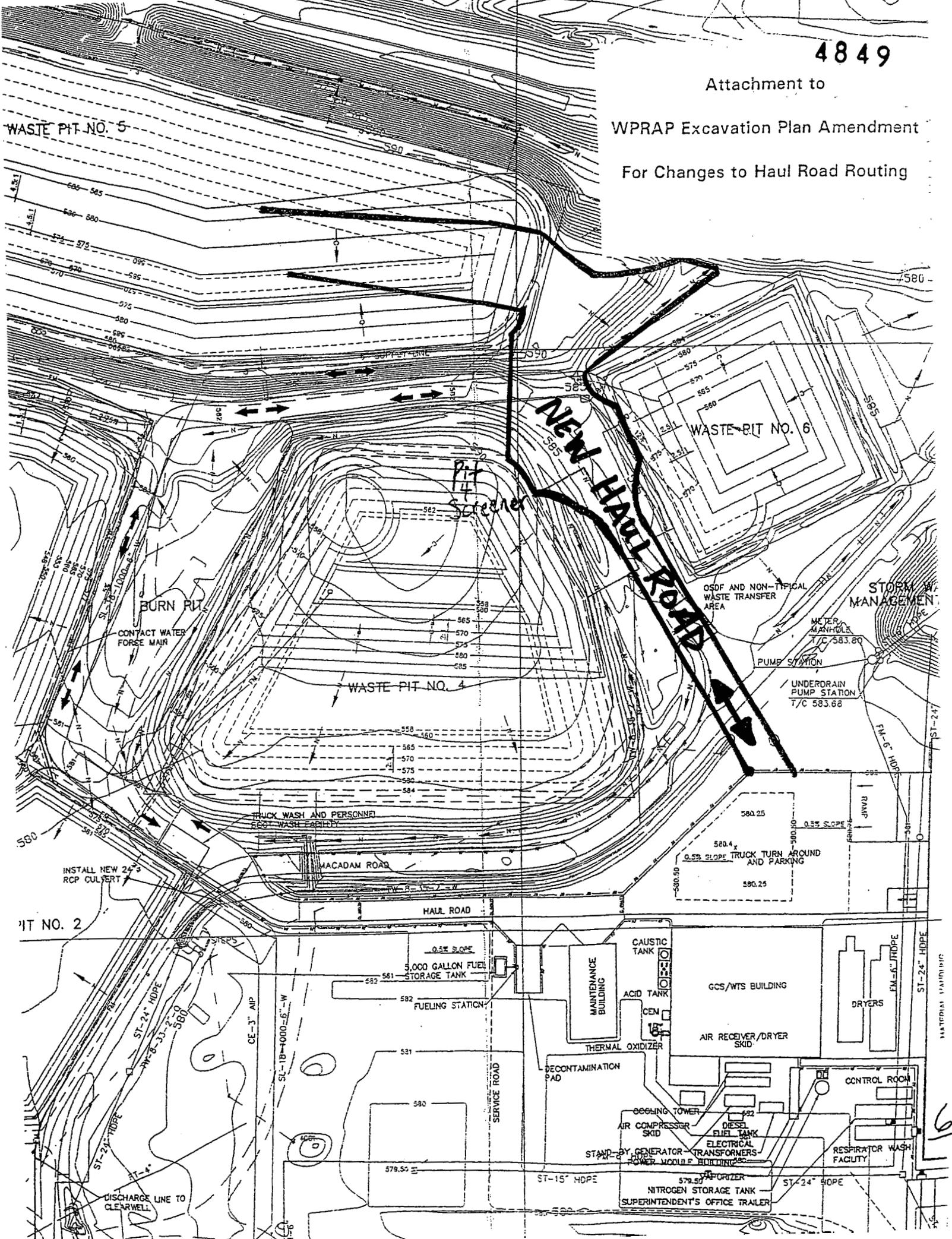
As indicated above, this new haul road will block access to Pits 3 and 4, relative to deliveries of material from other FCP projects. Since these pits were the primary locations for the receipt of bulk delivery of this material, an alternative location is necessary. The plan, therefore, is to use Pit 6 as the new location for the receipt of bulk deliveries from SDFP and Waste Management, as necessary. With the recent initiative to process containers of waste in Pits 2 and 3, rather than bulk this material, it is anticipated that the remaining volume of bulked material from Waste Management will be minimal. Bulked material that is received from SDFP or Waste Management will be dumped in the vicinity of Pit 6. This material will either be pushed into Pit 6, or staged in the area immediately adjacent to Pit 6 (as is currently being done with some of the SDFP soils), where it will remain until it can be processed.

Attachment to

WPRAP Excavation Plan Amendment

For Changes to Haul Road Routing

WASTE PIT NO. 5



NEW HAUL ROAD

PIT SCENE

BURN PIT

WASTE PIT NO. 6

WASTE PIT NO. 4

CONTACT WATER FORSE MAIN

OSDF AND NON-TYPICAL WASTE TRANSFER AREA

STORM WATER MANAGEMENT

CONTACT WATER FORSE MAIN

METER MANHOLE T/C 583.80

PUMP STATION

UNDERDRAIN PUMP STATION T/C 583.68

TRUCK WASH AND PERSONNEL REST WASH FACILITY

MACADAM ROAD

0.5% SLOPE

0.5% SLOPE TRUCK TURN AROUND AND PARKING

0.5% SLOPE

PIT NO. 2

HAUL ROAD

5,000 GALLON FUEL STORAGE TANK

FUELING STATION

MAINTENANCE BUILDING

CAUSTIC TANK

ACID TANK

GCS/WTS BUILDING

CEN

AIR RECEIVER/DRYER SKID

THERMAL OXIDIZER

DRYERS

DECONTAMINATION PAD

CONTROL ROOM

COGGING TOWER

AIR COMPRESSOR SKID

STAND-BY GENERATOR

TRANSFORMERS

POWER MODULE BUILDINGS

NITROGEN STORAGE TANK

SUPERINTENDENT'S OFFICE TRAILER

DIESEL TANK

ELECTRICAL

RESPIRATOR WASH FACILITY

RESPIRATOR WASH FACILITY

RESPIRATOR WASH FACILITY

RESPIRATOR WASH FACILITY

DISCHARGE LINE TO CLEARWELL

MATERIAL HANDLING

ST-24 HOPE

ST-24 HOPE

ST-24 HOPE

ST-15 HOPE

ST-15 HOPE

ST-15 HOPE

ST-14 HOPE

ST-14 HOPE

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ST-4 HOPE

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ST-3 HOPE

ST-2 HOPE

ST-2 HOPE

ST-1 HOPE

CE-3" AIP

SL-18 1000-6"-W

NW-8 33'-2"-S

ST-24 HOPE

ST-24 HOPE