



Department of Energy

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NOV 17 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-0045-04

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 EXTEND APPLICATION OF THE STREAMLINED MANIFESTING PROCESS

Reference: Letter DOE-0505-03 from G. Griffiths to J. Saric and T. Schneider, "Request to Streamline Manifesting Process Between Specific Impacted Material Source Areas in Area 3A and the On-Site Disposal Facility," dated September 5, 2003

The purpose of this letter is to request your concurrence to extend application of the streamlined manifesting process, which utilizes radio communications, field tally sheets, and summary manifests for multiple loads with the same source, material category and placement location per the reference above. The primary benefit of this streamlined approach is that it frees Waste Acceptance Organization (WAO) personnel from the administrative burden of completing hundreds of manifests per day, and instead allows them to focus primarily on visual inspection of excavated soil and debris for prohibited materials.

The streamlined process was tested during a trial period of approximately two months for manifesting 800 loads of material from the crushed concrete and lime sludge/soil piles, both of which were within line of sight of the On-Site Disposal Facility (OSDF) entrance. Implementation during this trial period entailed the following WAO actions:

- Radioing from the source excavation to the OSDF entrance, the truck number and material category of each load that met visual and other waste acceptance criteria (WAC).

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- Documenting approved truck numbers and associated information on tally sheets at both the source excavation and the OSDF.
- Reconciling and compiling truck counts at least once per day.
- Preparing one manifest per day for each unique combination of source, material category, and placement location (including total volume).

The U.S. Environmental Protection Agency (EPA), Ohio Environmental Protection Agency (OEPA), U.S. Department of Energy (DOE) and Fluor Fernald discussed lessons learned for the trial period in a Technical Information Exchange (TIE) Meeting on November 6, 2003 at the Fernald site. WAO indicated that the streamlined process, as summarized above, had been successfully used for one source and one disposal cell at a time, with no discrepancies between the placarded trucks radioed from the excavation site and those received at the OSDF. The following items were discussed and agreed to in the November 6, 2003 meeting as variations on initial conditions in the letter referenced above:

- Limit use to one source and one cell at a time.
- Limit use to high volume below-WAC soil areas from which all known above-WAC material has been removed, or for previously excavated, verified material that has been stockpiled.
- Allow use for sources in and around the Former Production Area that may not be completely within line of sight from the OSDF entrance but with travel routes that can be monitored by WAO personnel along the way to the OSDF, if they meet the above criteria.
- Contact EPA and OEPA for verbal approval in the weekly conference calls prior to use for a new source location, followed by a letter to document the approval.
- In the event of a discrepancy between the number of trucks radioed to the OSDF and the number of trucks received at the OSDF without paper manifests, take the following actions:
 - Obtain load counts from truck drivers for the affected period and compare to the WAO tally sheets.
 - Verify with WAO at the OSDF that only trucks bearing black-on-white numbered placards (in addition to category placards) were received without manifests.

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- Verify with WAO at above-WAC excavation areas that no trucks bearing black-on-white numbered placards were loaded.
- Notify both EPA and OEPA to discuss any necessary corrective actions.
- Complete any field corrective actions, as necessary [e.g., removing material, high-purity germanium detector (HPGe) sampling].
- Place documentation associated with the discrepant event and it's resolution in the WAO Operating Record.

At this juncture, your concurrence is requested for the general conditions described above. Specific sources will be identified to both EPA and OEPA on a case-by-case basis as they are selected, prior to field implementation.

If you have any questions or concerns, please contact Johnny Reising at (513) 648-3139.

Sincerely,


William J. Taylor
Director

FCP:Reising

cc:

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cc:

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