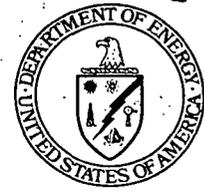




Department of Energy

Ohio Field Office
Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
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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-0050-04

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

Dear Mr. Saric and Mr. Schneider:

FUTURE USE OF SCRAPERS FOR SOIL EXCAVATION ACTIVITIES

Reference: Letter DOE-0507-03 from G. Griffiths to J. Saric and T. Schneider, "Request for Use of Scrapers in Excavation of Remaining Impacted Soil in Area 3A/4A," dated September 5, 2003

The purpose of this letter is to request your concurrence to the process for future requests for use of scrapers to excavate areas of impacted soil that meet the waste acceptance criteria (WAC) for the On-Site Disposal Facility (OSDF) per the reference above. During a trial period from mid-August 2003 to mid-October 2003, two CAT627 scrapers were used to excavate 1,960 loads of soil in Area 3A/4A from locations where most of the debris and all known above-WAC soils had previously been removed. Fluor Fernald experienced production benefits from the scrapers, primarily faster loading times at the excavations and thinner spreading of material as it was placed at the OSDF.

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. The following items were discussed and agreed to as variations on initial conditions in the letter referenced above:

- Depending on soil conditions, scrapes may vary from six to twelve inches.

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Mr. Tom Schneider

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- While a bulldozer may be used to push a scraper through a wet area, no additional soil should be pushed.
- Scraper operators must ensure that the Waste Acceptance Organization (WAO) has opportunity to safely walk down a scraper pass before proceeding with the next scrape.
- WAO may utilize the streamlined manifesting process for scrapers. This should resolve remaining WAO safety issues as well as the timing of walkdowns.
- Additional areas identified for scraper excavation should be large volume, below-WAC soil areas from which all known utilities, debris and above-WAC soil have been removed.
- Contact both EPA and OEPA in the weekly conference call for verbal approval prior to use for new source locations, followed by a letter to document the approval.

At this juncture, your concurrence is requested for the general conditions and approval process described above. Specific sources for utilizing scrapers 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:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
D. Pfister, OH/FCP
J. Reising, OH/FCP
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
R. Abitz, Fluor Fernald, Inc./MS64

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L. Barlow, Fluor Fernald, Inc./MS41
T. Beasley, Fluor Fernald, Inc./MS60
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M. Jewett, Fluor Fernald, Inc./MS52-5
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D. Powell, Fluor Fernald, Inc./MS64
B. Zebick, Fluor Fernald, Inc./MS60
~~AR Coordinator, MS78~~
ECDC, Fluor Fernald, Inc./MS52-7