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



DEC 04 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-0075-04

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

Dear Mr. Saric and Mr. Schneider:

**REQUEST FOR RESEQUENCING AND EXTENSION OF OPERABLE UNIT 5 SOIL  
REMEDiation MILESTONE - SUBMITTAL OF AREA 3A CERTIFICATION DESIGN LETTER**

The purpose of this letter is to request your approval to extend the date for submittal of the Area 3A Certification Design Letter (CDL) from December 31, 2003 to July 1, 2004. This milestone date was established in the final Implementation Plan for Area 3A/4A, dated May 2001. Consistent with Section XVIII of the Amended Consent Agreement, the Department of Energy, Fernald Closure Project (DOE-FCP) believes good cause exists for extending this milestone date due to the extenuating circumstances encountered during the course of the excavation work.

Area 3A represents the area of the FCP that is the northeast quadrant of the former Production Area. It includes the footprints of the former Boiler Plant, Incinerator Pad, Maintenance Building, Plant 9, Building 64/65, and several other miscellaneous structures. Early in Fiscal Year 2002, remedial excavation began and has continued to the present date. On November 5, 2003, a Technical Information Exchange (TIE) meeting was held between DOE-FCP, United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) where DOE-FCP presented the conceptual Certification Design for Area 3A and included Area 4A, the southeastern quadrant of the former Production Area, as well. This approach, which encompassed the majority of Area 3A and 4A, maintained a haul route through the center of the two areas, stretching from west to east along Second Street, thus creating two distinct "islands" of certified areas. The haul route is necessary to facilitate the transport of impacted material from the western side of the FCP to the On-Site Disposal Facility, which is located on the eastern

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side of the FCP. However, this haul route presents a risk of recontamination to Areas 3A and 4A due to the nature of the work. Along with this potential risk, both the USEPA and OEPA noted in the TIE meeting that a significant risk of recontamination was also present from an excessive amount of stormwater that would need to be controlled during any significant storm events. With these risks noted, the USEPA and OEPA recommended that the certification of Areas 3A and 4A should not be done in this manner or at this time. The suggestion discussed was to potentially certify Areas 3A and 3B, the northwestern quadrant of the former Production Area, to avoid the creation of two separated and relatively small islands of certified areas and only produce a single large area of certification with an easier stormwater management situation if possible.

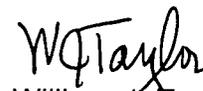
It was also noted that during the excavation of Area 3A, concrete crushing was initiated and concrete debris was staged in the southern and central portion of Area 3A, which was central to the source of the impacted material. This successful operation prevented access to the below-grade utilities underneath the footprint of the crusher and its associated source pile until the end of November 2003, which caused a delay in completing the excavation and precertification of Area 3A until later this year.

In spite of the strong efforts by the FCP to remediate Area 3A, the excavation activities have not been completed for the footprint under the concrete crushing operations in time to support the original milestone date of December 31, 2003. Therefore, this extension request is needed to complete the necessary excavation work in Area 3A and reconfigure the certification sequence within the Production Area. Consistent with Section XVIII of the Amended Consent Agreement, "good cause" exists, given the efforts discussed above, for an extension request. The combined Area 3A and Area 3B CDL is anticipated to be complete and submitted to the USEPA and OEPA on or before July 1, 2004, which is one year and three months ahead of the Area 3B CDL submittal commitment date.

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

Sincerely,

FCP:Reising

  
William J. Taylor  
Director

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Mr. Tom Schneider

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## cc:

K. Johnson, OH/FCP  
D. Pfister, OH/FCP  
J. Reising, OH/FCP  
J. Sattler, 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  
D. Arico, Fluor Fernald, Inc./MS64  
D. Carr, Fluor Fernald, Inc./MS1  
J. D. Chiou, Fluor Fernald, Inc./MS64  
K. Flaugh, Fluor Fernald, Inc./MS64  
M. Frank, Fluor Fernald, Inc./MS64  
T. Hagen, Fluor Fernald, Inc./MS1  
G. Lupton, Fluor Fernald, Inc./MS64  
F. Miller, Fluor Fernald, Inc./MS64  
T. Poff, Fluor Fernald, Inc./MS65-2  
D. Powell, Fluor Fernald, Inc./MS64  
AR Coordinator, Fluor Fernald, Inc./MS78  
ECDC, Fluor Fernald, Inc./MS52-7