



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

JAN 29 2004

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-0127-04

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

Dear Mr. Saric and Mr. Schneider:

**SUMMARY OF DEBRIS DISCOVERED IN POST-EXCAVATION AREAS IN AREA 1, PHASE II  
 AND THE AREA 6 FORMER FIRE TRAINING FACILITY**

This letter is to inform you about several occurrences of debris being unearthed during site preparation excavation activities for the construction of Cells 7 and 8 liners of the On-Site Disposal Facility (OSDF) and utilities being detected around the excavated former Fire Training Facility (FTF).

In mid-December 2003, while excavating the ditch south of the future OSDF Cell 8, a previously unknown burn pit was discovered (see enclosed Figure 1) that contained various pieces of burned debris (e.g., pieces of a drum, wood, metal fence, and twisted metal rope). The burn pit extended north of the ditch line and varied in depth from one to four feet below ground surface. Throughout the excavation of the burn pit routine radiological surveys were performed and the only detected result above background of any survey was 15,000 dpm, which was associated with a piece of metal thought to be part of a drum. All material related to this burn pit was removed and dispositioned at the OSDF according to all applicable procedural guidelines. This excavation generated approximately 63 cubic yards of contaminated material. Upon completion of this removal, the area was scanned using Real-Time monitoring equipment with results presented in a variance to the Area 1, Phase II (A1PII) Certification Sampling Project Specific Plan (PSP, Variance 20710-PSP-0009-24). Additionally, the area was immediately sampled under the same

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variance for the Area Specific Constituents of Concerns (ASCOC) that are applicable to the specific certification unit (CU), S3-HR-04, described in the Certification Design Letter for A1PII Certified for Reuse Areas, Trap Range, Sector 2C, and Sector 3, dated February 2000. The results of the physical sampling are not available at this time. However, the results of the Real-Time scan indicate the radiological parameters are well below the Final Remediation Levels (FRL) for A1PII.

Subsequent to the discovery of buried debris in December 2003, a pipe was uncovered along the same ditch line as the supposed burn pit approximately 250 feet east of the burn pit still within A1PII (see enclosed Figure 1). This pipe was roughly 4-feet long with a 90-degree elbow at the midpoint. A radiological survey of the pipe was performed, which yielded approximately 45,000 dpm. There was loose soil-like material within the pipe that was surveyed as well with no counts being detected above background. This pipe was also taken to the OSDF for disposal. The area that the pipe was found was scanned using Real-Time monitoring equipment as discussed in another variance to the A1PII Certification Sampling PSP (Variance 20710-PSP-0009-25). A physical sample was collected at the location where the pipe was found and analyzed for the same ASCOCs as the previous samples. The results for this sample are not available at this time either. However, the results of the Real-Time scan indicate the radiological parameters are well below the FRLs for A1PII. Both of these findings were outside of the former Sewage Treatment Plant (STP) area, which was scanned with a magnetometer as a result of discovering debris within the STP footprint. Therefore, the area that these recent findings were located being an open field was not scanned by the magnetometer. Once the data from the physical samples in both areas have been received, they will be included with the historical certification data from CU S3-HR-04 and a new set of certification statistics will be generated and appended to the A1PII Certification Report that was originally submitted in September 2000.

Lastly, as a result of post-excavation magnetometer scans at the former FTF, several underground utilities were identified to be present around the edge of the excavated area but inside of the boundaries of the proposed Certification Area as described in the Area 6, Phase I - Part One Certification Report, dated December 2003. These utilities are located within CU 1 and CU 2 and lead out of the proposed Certification Area to the south and west (see enclosed Figure 2). All utilities have been removed from CU 1, however, CU 2 is still impacted due to the remaining utilities. The utilities were excavated to a point that resulted in minimal impact to ongoing operations at the rail facility and that could be safely performed to avoid impacting a live utility that runs east to west along the southern portion of the area. The remaining portions of the utilities will be removed at a later date once the area operations have been completed. Samples have been taken along the excavated portions of the area as described in a variance to the Area 6, Phase I Certification Sampling PSP (Variance 20600-PSP-0004-5) and analyzed for the list of ASCOCs relative to CUs 1 and 2. The results of the sampling will be included with the future certification reports for this area.

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To minimize similar occurrences in the future, we are committed to performing magnetometer scans in excavated areas that contained underground utilities, performing a more thorough utility abandonment, and follow up with red-lined as-built surveys as we reclaim and pull out of these excavated areas.

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

Sincerely,

  
William J. Taylor  
Director

FCP:Reising

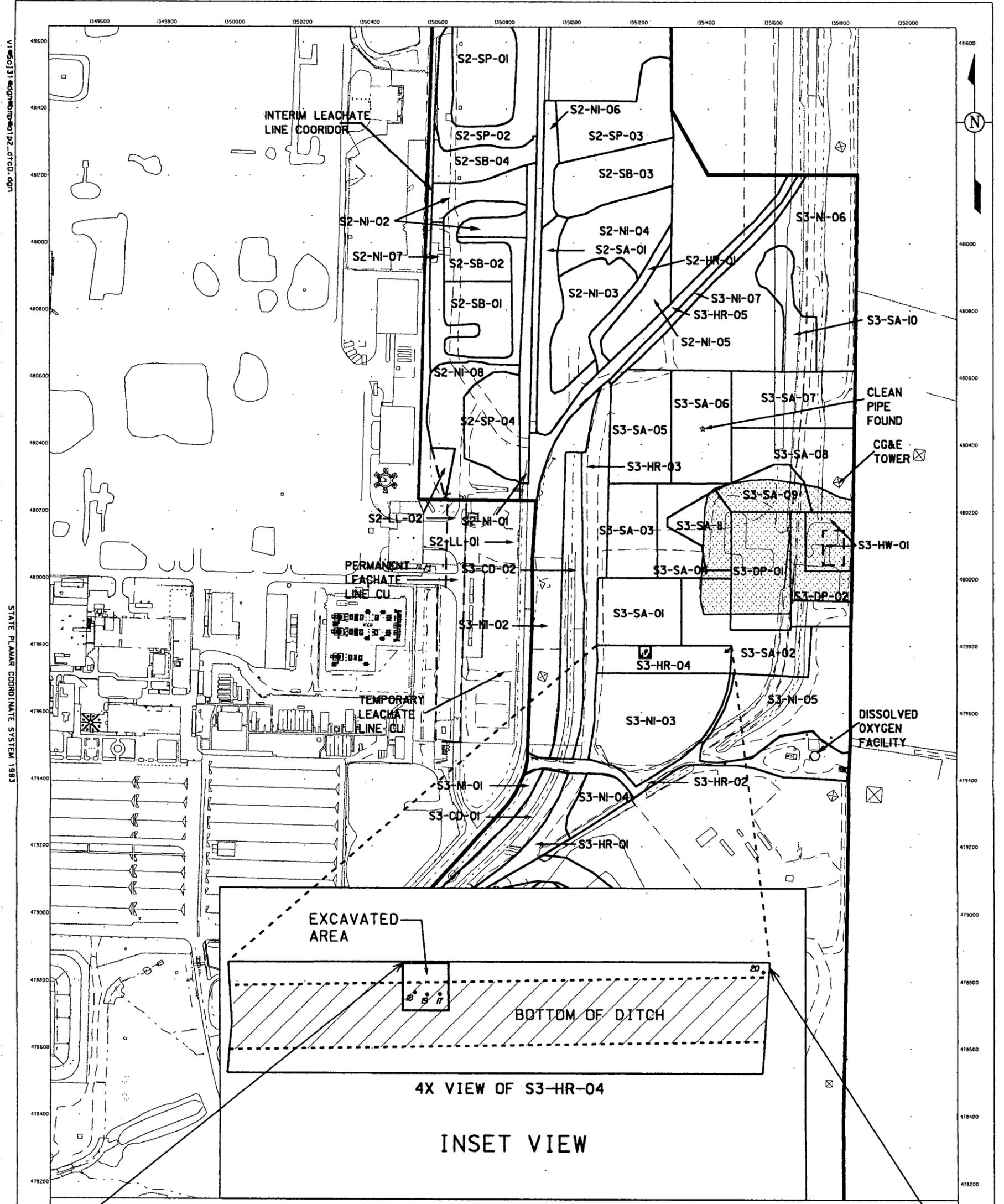
Enclosures: As Stated

cc w/enclosures:

D. Pfister, OH/FCP  
J. Reising, OH/FCP  
T. Schneider, OÉPA-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, MS78

cc w/o enclosures:

R. Abitz, Fluor Fernald, Inc./MS64  
D. Arico, Fluor Fernald, Inc./MS64  
J. 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  
K. Payne, Fluor Fernald, Inc./MS64  
T. Poff, Fluor Fernald, Inc./MS65-2  
D. Powell, Fluor Fernald, Inc./MS64  
ECDC, Fluor Fernald, Inc./MS52-7



DEBRIS FOUND	
DEPTH	1' TO 4'
DESCRIPTION	BURNED MATERIAL INCL. PIECES OF A DRUM, WOOD, METAL FENCE, & TWISTED METAL ROPE
APPROX VOLUME	63 C.Y.
MAG SCAN	NO
PHYSICAL SAMPLES ANALYZED*	U, Ra-226, Ra-228, Th-228, Th-232, As, Pb
REAL TIME SCAN	<FRL U, Ra-226, Th-232
DIRECT FRISK	HIGHEST DPM ON CONTACT = 15,000

PIPE FOUND	
DEPTH	~ 1'
DESCRIPTION	4' SECTION OF 4" DIA. METAL PIPE WITH 90° ANGLE (2' ON EITHER SIDE OF 90° ANGLE)
APPROX VOLUME	N/A
MAG SCAN	NO
PHYSICAL SAMPLES ANALYZED*	U, Ra-226, Ra-228, Th-228, Th-232, As, Pb
REAL TIME SCAN	< FRL U, Ra-226, Th-232
DIRECT FRISK	HIGHEST DPM ON CONTACT = 45,000

\* RESULTS NOT AVAILABLE AS OF 1/20/04

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**LEGEND:**

- A1P2 BOUNDARY
- SAMPLE POINTS
- MAGNETOMETER SCANNED AREA

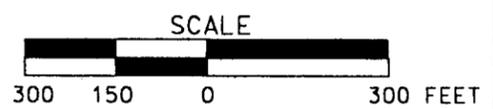


FIGURE 1. BORING LOCATIONS FOR V/FCNS20710-PSP-0009-24 AND -25

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STATE PLANNING COORDINATE SYSTEM 1983

22-JAN-2004

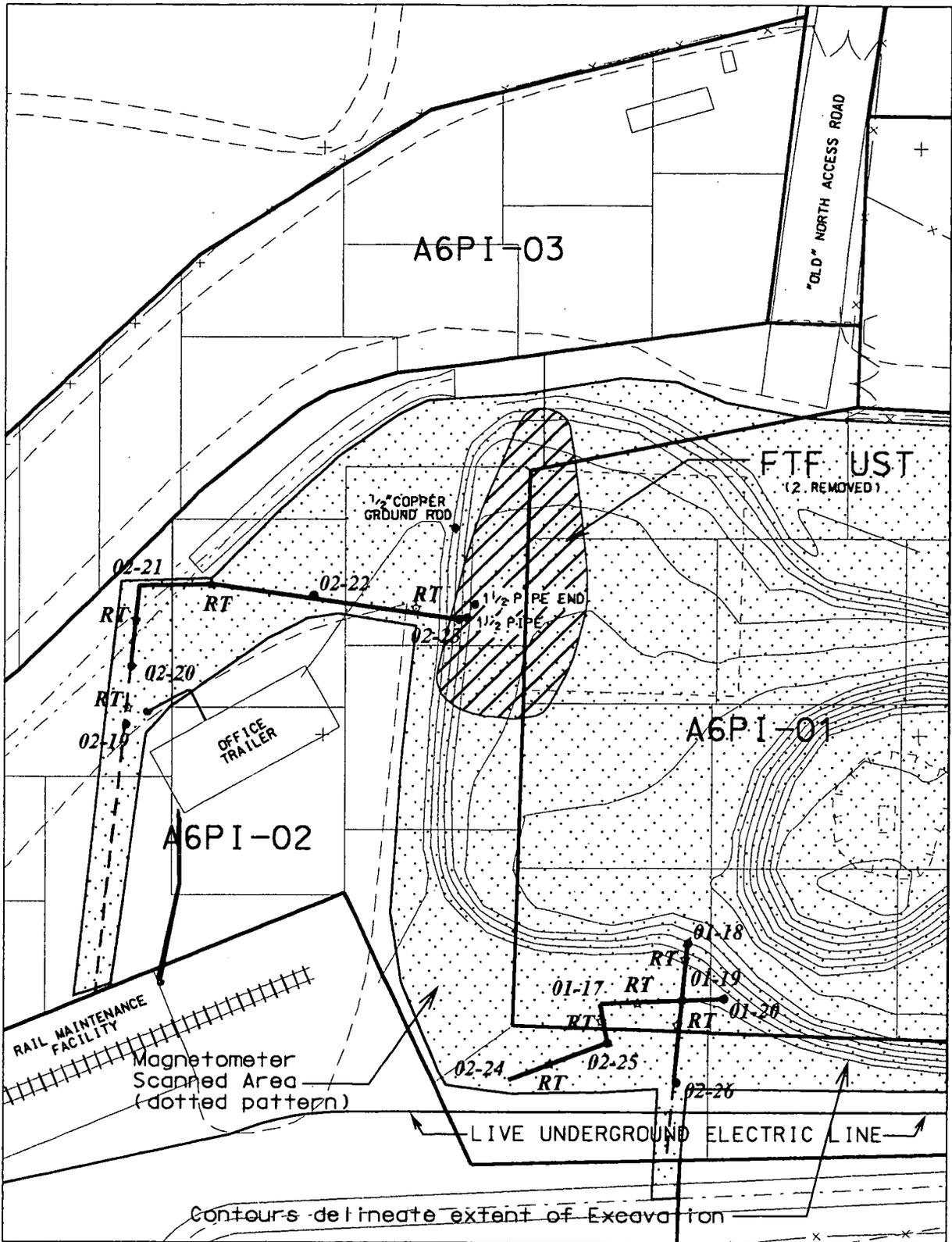
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STATE PLANAR COORDINATE SYSTEM 1983

22-JAN-2004



LEGEND:

- 01-17 • CERTIFICATION SAMPLING LOCATIONS
- RT ☆ REAL-TIME PRECERTIFICATION LOCATIONS
- EXCAVATED AREAS (TO EXPOSE UTILITIES)

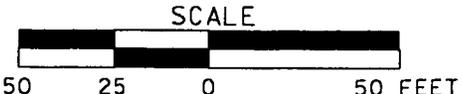


FIGURE 2. REMAINING UTILITIES AT THE FTF