



**Department of Energy**  
**Ohio Field Office**  
**Fernald Environmental Management Project**  
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MAR 08 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-0183-04

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 THE REVISED ADDENDUM 2 OF THE ON-SITE DISPOSAL FACILITY  
 IMPACTED MATERIAL PLACEMENT PLAN**

- References:
- 1) Email, T. Schneider to J. Reising/J. Chiou, "Bagged Asbestos Placement," dated March 3, 2004
  - 2) Letter DOE-0459-02, J. Reising to J. Saric/T. Schneider, "Disposing Previously Containerized Debris Wastes in On-Site Disposal Facility," dated May 9, 2002
  - 3) Letter, T. Schneider to J. Reising, "Approval to Dispose Previously Containerized Waste in the On-Site Disposal Facility," dated August 20, 2002

Enclosed for your review and approval is the revised Addendum 2, Specialized Placement Plan for Thorium, Bagged and Non-Bagged Impacted Material, of the Impacted Material Placement Plan for the On-Site Disposal Facility. This revision allows bagged impacted debris and material to be placed using the grid approach as specified in the original Addendum 2. In general, the intent of this approach is to achieve acceptable compaction without causing visible emission of content from the bags by covering the bags with sufficient amount of soil before driving compaction equipment indirectly on top of the placed bags of materials.

Mr. Saric  
Mr. Schneider

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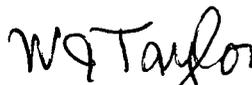
When approved, DOE plans to place bagged asbestos containing material (ACM) in sealand containers following this approach. However, due to the difficulties experienced during the placement of a tightly packed sealand container on March 2, 2004 in Cell 6 under verbal approvals from the U.S. Environmental Protection Agency (EPA) and Ohio Environmental Protection Agency (OEPA) of Request for Clarification of Information (RCI) 20105-005R, as noted in OEPA's email (Reference 1), at this time DOE only seeks your approval to apply this approach to a portion of the sealand inventory that are not tightly packed. It is expected that the current approach and regular heavy equipment can safely handle these sealand containers.

Waste Acceptance Organization (WAO) field personnel were present during material preparation and loadout of all sealands of ACM that currently are staged for OSDF placement. WAO prepared a manifest for each sealand at the time it was filled, entered the manifest information to the IIMS tracking database, and kept the hardcopies in a file to be used when the subject sealands are taken into the OSDF for dumping and placement of the ACM. The majority of the ACM was generated, processed and packaged for OSDF disposal by the Demolition Project, and is tightly packed in the sealands due to the use of heavy equipment for loading (e.g., Loadall). A portion of the sealands (43 of approximately 200 total as enclosed list) contain ACM that was part of the Plant 1 Pad inventory. OEPA approval was received August 20, 2002 (References 2 and 3) for Waste Management to empty, segregate, size and reload the Plant 1 Pad ACM inventory for OSDF disposal, with WAO oversight and documentation. Waste Management used primarily hand labor to reload the Plant 1 Pad ACM to sealands, so it is more loosely packed than those loaded by the Demolition Project. Consequently, ACM sealands loaded by Waste Management and tracked by WAO under Project Waste Identification and Disposition (PWID) #608 (ACM Repackaging Project) are good candidates for initial placement of ACM by the grid method using regular equipment.

DOE will develop a safer and more efficient approach for unloading and placement of ACM in the remaining more tightly packed sealand containers. A separate correspondence describing the approach will be submitted for your review and approval at a later date. By continuing to work on safe placement of these sealand containers, it will allow us to recycle these sealand containers for shipping of Silo 3 material to the Nevada Test Site later this year.

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

Sincerely,



William J. Taylor  
Director

FCP:Akgündüz

MAR 08 2004

Mr. Saric  
Mr. Schneider

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Enclosures: As Stated

cc w/enclosures:

N. Akgündüz, OH/FCP  
J. Reising, OH/FCP  
T. Schneider, OEPA-Dayton (three copies of enclosures)  
G. Jablonowski, USEPA-V, SR-6J  
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M. Shupe, HSI GeoTrans  
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AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

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T. Hagen, Fluor Fernald, Inc./MS1  
W. Hooper, Fluor Fernald, Inc./MS64  
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D. Powell, Fluor Fernald, Inc./MS64  
ECDC, Fluor Fernald, Inc./MS52-7