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PROPOSAL FOR INTEGRATION OF SITE-WIDE REMEDIAL PLANNING

08/18/95

**DOE-1365-95
DOE-FN EPAS
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LETTER**



Department of Energy
Fernald Environmental Management Project
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AUG 18 1995

DOE-1365-95

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

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

Dear Mr. Saric and Mr. Schneider:

PROPOSAL FOR INTEGRATION OF SITE-WIDE REMEDIAL PLANNING

Please find enclosed for your approval, a proposal for integration of site-wide remedial planning. This proposal suggests that remedial planning be completed focusing on common components of the site-wide scope of remedial action rather than on the segregated scopes of action in the individual operable unit Records of Decision. The proposal also recognizes the operable unit-specific requirements of the Amended Consent Agreement.

The enclosed proposal is generally consistent with the presentation given on this subject to the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA). The proposal has been modified slightly based on verbal feedback from both the U.S. EPA and the OEPA.

The proposed strategy has been incorporated into the Draft Operable Unit 2 (OU2) Remedial Design Work Plan (RDWP), and the Draft Operable Unit 4 (OU4) Functional Requirements Document, and Design Criteria Report (FRD/DCR). The approved Operable Unit 1 (OU1) RDWP referenced completion of a Site Restoration Plan. The Department of Energy, Fernald Area Office (DOE-FN) requests that the scope of this design deliverable be deferred from the OU1 remedial design documentation as currently required by the RDWP and instead be addressed in a site-wide plan as discussed in the enclosed proposal. In addition, the approved OU4 RDWP provides for design deliverables related to demolition and decommissioning of the silos and remedial facilities as well as for soil remediation and site restoration (Tasks 4 and 5 in the RDWP). As discussed in the OU4 FRD/DCR and this letter, the DOE-FN requests these activities be deferred from the scope of the OU4 remedial design documentation as currently required in RDWP and instead be addressed as proposed in the enclosed strategy.

If you have any additional questions regarding this matter, please contact Johnny Reising at (513) 648-3139.

Sincerely,



for Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Reising

Enclosure: As Stated

cc w/enc:

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PROPOSAL FOR INTEGRATED REMEDIAL PLANNING

During the RI/FS phase of the Fernald cleanup, identification of distinct operable units allowed a more focused characterization of contaminated media and evaluation of remedial alternatives. However, the degree of site-wide interaction required under the currently planned accelerated remediation scenario, highlights the advantages to integrating remedial planning during the design phase of the project. This proposal suggests that remedial design and associated documentation, be completed focused on common components of the site-wide scope of remedial action rather than on the segregated scopes of action in the individual operable unit Records of Decision. The following elements of the site-wide scope of remedial action would provide the basis for identification of discrete design documentation packages:

- Waste Pit Contents Remediation and Off-Site Disposal (Permitted Commercial Facility)
- OU2 Source Removal and On-Site Disposal Facility Construction and Operation
- D&D of Existing Structures and Planned Remediation Facilities
- Waste Silo Contents Remediation and Off-Site Disposal (Nevada Test Site)
- Contamination Soil/Media Remediation and On-Site Disposal
- Groundwater Restoration and Wastewater Treatment

This proposal fully recognizes the requirements of the Amended Consent Agreement which is structured, and envisions completion of design, against the identified operable units. The following addresses how integrated remedial planning can be accommodated in light of the operable unit - specific requirements in the Amended Consent Agreement. Specifically, this proposal takes the scope of remedial action required in each operable unit's Record of Decision (or Proposed Plan) and generally explains how U.S. EPA and Ohio EPA will receive remedial design documentation under an integrated approach.

OPERABLE UNIT 1:

The OUI design documentation, to be submitted according to the schedule in the approved OUI Remedial Design and Remedial Action Work Plan, will cover aspects of waste pit contents removal, processing/treatment, certification against off-site waste acceptance criteria and transportation to off-site disposal locations.

In clarifying the above, this will include air and personnel monitoring that is directly associated with the waste pit contents excavation, processing/treatment and transportation. The design will also explain the interface with a site-wide environmental monitoring program.

The OUI design will also address stormwater management directly associated with waste pit excavation. In addition, the design would be able to accommodate transportation of other operable unit soils and other materials to be disposed at Envirocare (i.e. materials not meeting on-site disposal WACs).

OUI soil excavation and management, cleanup level confirmation sampling and site restoration will be covered in a site-wide design package submitted pursuant to the OU5 remedial design process (see Operable Unit 5). These activities will be discussed in individual OUI remedial design and/or remedial action planning documents to the extent that this discussion is needed to support OUI remediation activities (eg. to sequence the excavation of the pits).

Planning for D&D of the OUI (and other operable unit) remedial facilities will be completed within the OU3 RD/RA process.

OPERABLE UNIT 2:

The scope of the formal OU2 design would include all aspects of design and operation of the on-site disposal cell to include receiving all site contaminated materials to be placed in the facility. This will require, at a minimum, a description of the interface between staging of contaminated soil and debris, and placement into the cell. This design package will include all environmental monitoring directly associated with construction and operation of the cell. The OU2 design will also provide for the removal of the source units (i.e. inactive fly ash pile, sanitary landfill, etc.) within the operable unit. The design basis for source excavation will be the extent of contamination as defined in the OU2 Remedial Investigation Report and Feasibility Study.

Cleanup level confirmation sampling, any additional required excavation associated stormwater management, and site restoration would be covered in a site-wide design package submitted pursuant to the OU5 design process.

OPERABLE UNIT 3:

The scope of this design and implementation effort will include the D&D of all above-grade site structures, including all to-be-constructed remedial facilities. Included will be related waste minimization and recycling design issues. This will also include staging of debris for placement in the on-site disposal cell or for off site disposal as appropriate. As described above, this critical interface will also be addressed within the OU2 Design Documentation for the disposal cell. The OU3 RD/RA scope would include environmental monitoring directly associated with D&D and would describe/justify any interfaces with the site-wide environmental monitoring program.

OPERABLE UNIT 4:

The scope of the OU4 design effort will include all aspects of silo contents removal, treatment and off site disposal. This will include all environmental monitoring directly associated with the OU4 remedial activities. The OU4 design will describe and justify any required interfaces with the site-wide environmental monitoring program.

The excavation of contaminated OU4 soils, cleanup level confirmation sampling, associated stormwater management material segregation and site restoration would be covered in a site-wide design package submitted pursuant to the OU5 remedial design process. Any aspects of this plan required to complete the OU4 - specific design will be discussed as required within the OU4 design documentation.

The D&D of the empty silos and OU4 remedial facilities will be covered within the scope of the OU3 RD/RA process.

OPERABLE UNIT 5:

The OU5 scope of design will have two principal areas. First, will be all aspects of site-wide groundwater restoration including groundwater extraction and conveyance, treatment (including AWWT expansion) and discharge. This area will also include stormwater and other remedial wastewater treatment and discharge. This design package must describe in detail the interface with the operable unit - specific and site-wide storm and wastewater management plans.

The second area involves excavation, as described above, of all remaining site contaminated soils/sediments, cleanup level confirmation sampling, associated stormwater management and site restoration. Also, included in the scope of this effort will be a site-wide Natural Resources Management Plan.