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**INTEGRATED REMEDIAL PLANNING**

10/11/95

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LETTER



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**Department of Energy**  
**Fernald Environmental Management Project**  
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OCT 11 1995

DOE-1567-95

**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:

**INTEGRATED REMEDIAL PLANNING**

- Reference:
- 1) Letter, Jack R. Craig to James A. Saric and Tom Schneider, "Proposal for Integration of Site-Wide Remedial Planning," dated August 18, 1995.
  - 2) Letter, Thomas A. Schneider to Jack Craig, "Hamilton County Integrated Site-Wide Planning," dated September 8, 1995.
  - 3) Letter, James A. Saric to Jack R. Craig, "Site-Wide Remedial Planning," dated September 15, 1995.

During our September 11, 1995, meeting on accelerated cleanup, you requested certain clarifications related to the proposal in the above referenced letter to you (1) on integrated remedial planning. This letter serves to provide the requested clarifications and also to respond to the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) letters referenced above. It is our understanding that you continue to support the integrated remedial planning concept and that your requested actions are simply to enhance the ability to "track" remedial activities against the operable unit-specific Records of Decision (ROD).

There are two primary areas of issue. The first relates to consolidation of all design related to soil remediation within the Operable Unit 5 (OU5) process. The second relates to the consolidation of design related to Decontamination and Demolition (D&D) of all site structures within the scope of the Operable Unit 3 (OU3) process. Consistent with our referenced August 18, 1995, letter, the OU5 Remedial Design Work Plan (RDWP) will

describe the design deliverables for site-wide soil remediation and site restoration (i.e., regrading, natural resources management, etc.) with associated deliverable schedules. Upon approval of the OU5 RDWP, change pages will be issued for the Operable Unit 1 (OU1), Operable Unit 2 (OU2), and Operable Unit 4 (OU4) RDWPs explicitly clarifying the scope of activity required by the respective RODs that will be provided for in the OU5 Remedial Design (RD) process. The change pages will also specify the submittal dates of the related OU5 RD deliverables. The D&D of existing and remedial structures within OU1 and OU4 will be addressed by Implementation Plans issued pursuant to the OU3 Remedial Design/Remedial Action process. When the above referenced change pages to the OU1 and OU4 RDWPs are issued, they will also describe this integrated D&D concept and provide the schedule for submittal of the associated Implementation Plans.

Relative to OEPA's concern on integration of cell operation and material staging with waste generation activities, explicit detail on these issues will be included within the OU2, OU3, and OU5 RD deliverables. Specific to OEPA's concerns relative to D&D of the K-65 Silos, the Department of Energy, Fernald Area Office (DOE-FN) agrees that Silos 1 and 2 are not typical of most OU3 materials. The DOE-FN further agrees that a waste-specific disposition evaluation must be made above and beyond the general discussions in the OU3 Remedial Investigation/Feasibility Study. The Implementation Plan for the K-65 Silos will present this evaluation. This evaluation will specifically consider the appropriateness of an administrative decision to dispose off-site the Silo 1 and 2 materials. The U.S. EPA expressed concern about the structural stability of the K-65 Silos. It is the DOE-FN's intent to initiate D&D of these structures immediately after completion of vitrification activities. It should also be noted that the OU4 RD will provide contingency provisions for management of silo debris if structural integrity concerns surface during removal of silo residuals.

The DOE-FN looks forward to working with U.S. EPA and OEPA to most effectively implement the integrated remedial planning concept.

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

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

**cc:**

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