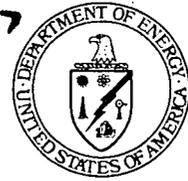




Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



SEP 22 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-0408-04

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

Dear Mr. Saric and Mr. Schneider:

**REQUEST TO SEND TWO IMPACTED SOIL PILES STAGED IN AREA 1, PHASE IV TO THE ON-SITE DISPOSAL FACILITY**

This letter is to request your approval to send the two soil piles that are located in the southern, non-certified portion of Area 1, Phase IV (A1PIV) to the On-Site Disposal Facility (OSDF). As discussed during a walkdown with the Ohio Environmental Protection Agency (OEPA) of the area on September 14, 2004, the larger pile is comprised primarily of soil from A1PIV and a small amount from Area 7 while the smaller soil pile is from Area 6. While A1PIV is governed under an approved Integrated Remedial Design Package (IRDP) and Project Waste Identification and Disposition (PWID) Report, Area 6 and Area 7 are not. Therefore, an approval by your response to this letter is one of the requirements per Waste Acceptance Organization's (WAO) procedure to send these materials to the OSDF.

The majority of the large pile, consisting of approximately 100 cubic yards, was created during a scrape of the southern portion of A1PIV during construction of a drainage channel that is located just south of the OSDF Cell 8. However, it was necessary to install a 20-foot culvert pipe beneath "F" Street and extends into a portion of Area 7 to tie the drainage channel into Sediment Basin 2, located just east of the east parking lot. The schedule for installation of the culvert pipe did not permit the collection of physical samples from the Area 7 portion of the work area and there was insufficient room to spread the soil in the area; therefore, soil that was excavated during the placement of the

Mr. Saric  
Mr. Schneider

-2-

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culvert pipe in Area 7 was added to the pile of A1PIV soil, which is less than 20-feet from the culvert. Additionally, the excavation was performed without WAO personnel present to visually inspect the soil for above Waste Acceptance Criteria (WAC) conditions as it was removed. Following the commingling of Area 7 soil with the A1PIV soil, physical samples were collected. The samples were analyzed for total uranium and technetium-99 (Tc99) to provide supplemental data for OSDF WAC. These data demonstrate the concentrations of both total uranium and Tc99 associated with the soil pile is well below the OSDF WAC (as well as the final remediation levels).

The smaller pile located in the southern portion of A1PIV is from Area 6. Approximately 10 cubic yards was excavated from an area between certified Area 1, Phase II and the Former Production Area (FPA) fence where the OSDF temporary leachate line used to be located. Excavation of unsuitable soil in the area was necessary to allow for the construction of a ramp leading from the FPA to the OSDF Cells 6 and 7. Again, it was decided to stage the excavated Area 6 soil in the southern portion of A1PIV, being careful to not commingle the Area 6 soil with the A1PIV and Area 7 soil pile that had recently been sampled. Immediately after staging of the Area 6 soil pile, physical samples were collected and analyzed for total uranium and Tc99. These data also demonstrated the concentrations of both total uranium and Tc99 to be well below the OSDF WAC (as well as the final remediation levels). A figure of the areas discussed above and a table of the newly collected total uranium and Tc99 data from both soil piles are enclosed.

While WAO was not present during the excavation of soil from Area 7, they were present for the excavation of soil from Area 6, and the soil was visually inspected as it was removed. Following approval to haul the soil piles to the OSDF, WAO will be present to visually inspect the soil as it is loaded into vehicles for transport to the OSDF and as each load is placed in the OSDF. Notably, the soil in each of these piles originates from areas that are not expected to contain any above-WAC material.

Upon your concurrence, the above process will be implemented. If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,



*for*  
William J. Taylor  
Director

FCP:Reising

Enclosures: As Stated

Mr. James A. Saric  
Mr. Tom Schneider

cc w/enclosures:

- D. Pfister, OH/FCP
- W. Taylor, OH/FCP
- G. Jablonowski, USEPA-V, SR-6J
- F. Bell, ATSDR
- M. Cullerton, Tetra Tech
- M. Shupe, HSI GeoTrans
- R. Vandegrift, ODH
- AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

- N. Akgündüz, OH/FCP
- K. Johnson, OH/FCP
- R. Abitz, Fluor Fernald, Inc./MS64
- K. Alkema, Fluor Fernald, Inc./MS01
- D. Arico, Fluor Fernald, Inc./MS64
- L. Barlow, Fluor Fernald, Inc./MS41
- T. Beasley, Fluor Fernald, Inc./MS60
- C. Carney, Fluor Fernald, Inc./MS52-1
- J. Chiou, Fluor Fernald, Inc./MS64
- M. Frank, Fluor Fernald, Inc./MS64
- R. Friske, Fluor Fernald, Inc./MS52-3
- K. Harbin, Fluor Fernald, Inc./MS60
- W. Hooper, Fluor Fernald, Inc./MS60
- G. Johnson, Fluor Fernald, Inc./MS60
- S. Lorenz, Fluor Fernald, Inc./MS41
- F. Miller, Fluor Fernald, Inc./MS64
- C. Murphy, Fluor Fernald, Inc./MS01
- D. Nixon, Fluor Fernald, Inc./MS01
- T. Poff, Fluor Fernald, Inc./MS65-2
- D. Powell, Fluor Fernald, Inc./MS64
- M. Stumbo, Fluor Fernald, Inc./MS60
- B. Zebick, Fluor Fernald, Inc./MS64
- ECDC, Fluor Fernald, Inc./MS52-7

TABLE 1

Area 1, Phase IV and Area 7 Soil Pile Sampling Results

Boring	Parameter	Lab Res	LQ	Units
A1P4-SP-1	Uranium, Total	10.5		mg/kg dry
A1P4-SP-2	Uranium, Total	4.93	U	mg/kg dry
A1P4-SP-3	Uranium, Total	7.33		mg/kg dry
A1P4-SP-4	Uranium, Total	8.26		mg/kg dry
A1P4-SP-1	Technetium-99	1.7		pCi/g dry
A1P4-SP-2	Technetium-99	1	U	pCi/g dry
A1P4-SP-3	Technetium-99	-0.049	U	pCi/g dry
A1P4-SP-4	Technetium-99	0.69	U	pCi/g dry

Area 6 Soil Pile Sampling Results

Boring	Parameter	Lab Res	LQ	Units
A1P4-SP-5	Uranium, Total	17.4		mg/kg dry
A1P4-SP-6	Uranium, Total	11.2		mg/kg dry
A1P4-SP-7	Uranium, Total	12.7		mg/kg dry
A1P4-SP-8	Uranium, Total	10		mg/kg dry
A1P4-SP-5	Technetium-99	-0.47	U	pCi/g dry
A1P4-SP-6	Technetium-99	0.37	U	pCi/g dry
A1P4-SP-7	Technetium-99	0.82	U	pCi/g dry
A1P4-SP-8	Technetium-99	-0.39	U	pCi/g dry

Where:

LQ = lab qualifier

U = non-detect

