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Department of Energy

**Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246
(513) 648-3155**



OCT 13 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-0012-05

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

REQUEST TO SEND IMPACTED SOIL PILE AWT-008 STAGED IN AREA 7 SOUTHEAST OF THE ADVANCED WASTEWATER TREATMENT FACILITY TO THE ON-SITE DISPOSAL FACILITY

This letter is to request your approval to send one soil pile that is located in Area 7, just southeast of the Advanced Wastewater Treatment (AWWT) Facility, to the On-Site Disposal Facility (OSDF). The pile is comprised of soil that was excavated from an area just south of the AWWT, and to the west of where the pile is currently situated. Area 7 is not governed under an approved Integrated Remedial Design Package (IRDP) and Project Waste Identification and Disposition (PWID) Report. Therefore, an approval by your response to this letter is one of the requirements per Waste Acceptance Organization's (WAO's) procedure to send this material to the OSDF.

In September 2003, WISE Construction generated this pile, which consists of approximately 3,000 cubic yards, during the excavation of an area just south of the AWWT in order to facilitate the construction of the dioctyl phthalate (DOP) Shop concrete pad. The soil pile was created with the concurrence and by the visual inspection of WAO personnel. Following placement of the soil pile, a rope, silt fence, and WAO signs were posted around it. The pile was designated as AWT-008 and documented in the periodic WAO Stockpile Report and associated Stockpile Locations Map. Physical samples were also collected and 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 are well below the OSDF WAC. Although the pile was created in September 2003, it was difficult for construction to access the pile and haul it to the OSDF at that time.

A figure of the area discussed above and a table of the total uranium and Tc99 data from the soil pile are enclosed.

Mr. James A. Saric
Mr. Tom Schneider

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Following approval to haul the soil pile 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.

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

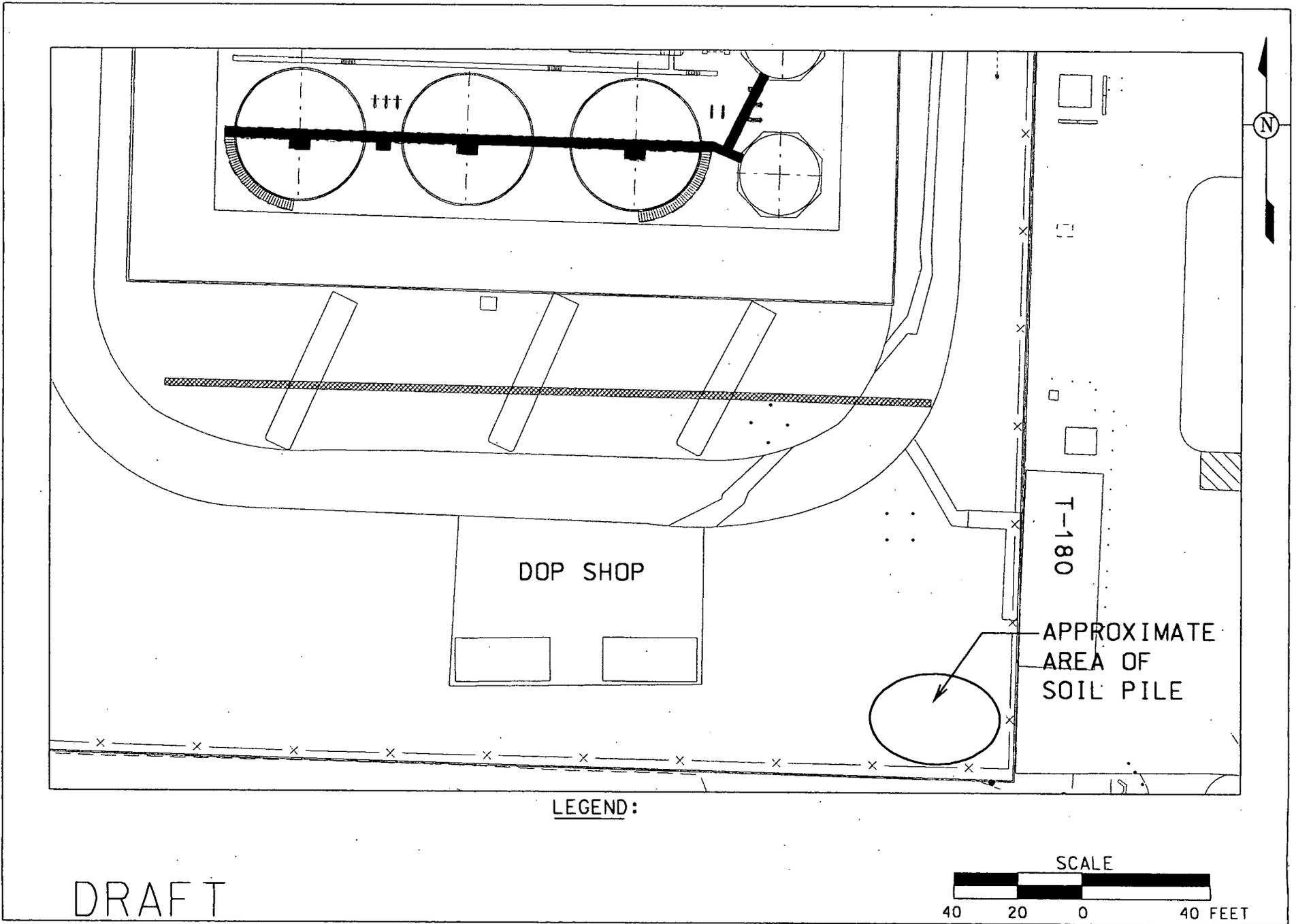
Enclosure: As Stated

cc w/enclosure:

D. Pfister, OH
J. Reising, OH
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 enclosure:

R. Abitz, Fluor Fernald, Inc./MS64
K. Alkema, Fluor Fernald, Inc./MS01
D. Arico, Fluor Fernald, Inc./MS64
L. Barlow, Fluor Fernald, Inc./MS52-3
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./MS52-3
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
B. Zebick, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS52-7



DRAFT

FIGURE 1. AREA 7 SOUTH OF THE AWWT FACILITY

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TABLE 1

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Area 7 Soil Pile Southwest of AWWT Sampling Results

| Boring Name | Parameter | Lab Res | LQ | Units |
|--------------------|------------------|----------------|-----------|--------------|
| A7-WISESP1 | Uranium, Total | 16.8 | | mg/kg dry |
| A7-WISESP2 | Uranium, Total | 6.82 | | mg/kg dry |
| A7-WISESP3 | Uranium, Total | 9.77 | | mg/kg dry |
| A7-WISESP4 | Uranium, Total | 5.49 | | mg/kg dry |
| A7-WISESP1 | Technetium-99 | 1.16 | U | pCi/g dry |
| A7-WISESP2 | Technetium-99 | 0.528 | U | pCi/g dry |
| A7-WISESP3 | Technetium-99 | 1.04 | U | pCi/g dry |
| A7-WISESP4 | Technetium-99 | -0.416 | U | pCi/g dry |

Where:

LQ = lab qualifier

U = non-detect



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OCT 19 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-0019-05

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

Dear Mr. Saric and Mr. Schneider:

**REQUEST TO SEND IMPACTED CONCRETE FROM BUILDING 79, KC-2
WAREHOUSE, AND THE QUONSET HUT SLABS WITHIN AREA 6 TO THE
ON-SITE DISPOSAL FACILITY**

The purpose of this letter is to request your approval to send the concrete from Building 79, KC-2 Warehouse, East Water Tower foundations, and the Quonset Hut slabs to the On-Site Disposal Facility (OSDF) following proper Hazardous Waste Management Unit (HWMU) closure protocol, if applicable. These slabs are within the Area 6 footprint, which is not currently covered under an approved Integrated Remedial Design Package. 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 OSDF.

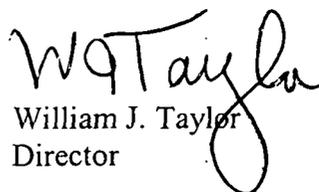
As discussed in the August 24, 2004 Conference Call and in the subsequent September 21, 2004 meeting with the Ohio Environmental Protection Agency (OEPA), most of these slabs were associated with Resource Conservation and Recovery Act (RCRA) activities. Both the KC-2 Warehouse slab and the Building 79 slab are listed as HWMUs. The easternmost Quonset Hut was used to stage and treat RCRA listed waste that also exhibited a hazardous characteristic. The KC-2 Warehouse (HWMU #34) was clean closed with documentation in the Task Order #432 Project Completion Report submitted to OEPA on October 28, 1999 by the Decontamination and Dismantlement Project. Building 79 (HWMU #37) will be clean closed in the same manner; however, the slab will undergo additional rinsing with water and rinsates samples will be collected to meet OEPA closure guidance levels. The RCRA listed and characteristic soil that was staged on the easternmost Quonset Hut slab was successfully

treated to remove the hazardous characteristic, as demonstrated through the toxicity characteristic leaching procedure (TCLP). Results of these soil analyses were submitted to the regulatory agencies on August 31, 2004 and approved for disposal in the OSDF on September 9, 2004. Based on all of the available information, it is DOE's judgment that these slabs do not have any additional special requirements for disposition in the OSDF from a RCRA perspective. The disposition of each of these slabs will be handled in accordance with the Waste Acceptance Criteria (WAC) Attainment Plan for the OSDF regarding debris WAC such as visual inspection during excavation.

Once the concrete has been removed from the surface and pushed into a working pile, the underlying soil will be scanned using real time instrumentation. These real time data of the soil will supplement surrounding historical physical sample information that demonstrates the underlying soil meets the OSDF WAC. Once the real time measurement data confirms the soil meets WAC, the concrete will be sent to the OSDF. As always, WAO will visually inspect the concrete from these slabs for above-WAC conditions as it is pushed, as it is loaded to vehicles for transport to the OSDF, and as it is placed in the OSDF.

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

Sincerely,


William J. Taylor
Director

FCP:Reising

Mr. James A. Saric
Mr. Tom Schneider

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DOE-0019-05

cc:

D. Pfister, OH/FCP
J. Reising, OH/FCP
E. Skintik, DOE/OH
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
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