

**Department of Energy**

**Ohio Field Office
Fernald Closure Project
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Springdale, Ohio 45246
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JAN 25 2005

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V-SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0136-05

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

Dear Mr. Saric and Mr. Schneider:

FINAL FERNALD WASTE PITS REMEDIAL ACTION PROJECT SAMPLING AND ANALYSIS PLAN FOR WASTE PIT MATERIALS (REVISION 0, JULY 28, 1999)

The purpose of this letter is to request your agency approval of a modification to the Final Fernald Waste Pits Remedial Action Project (WPRAP) Sampling and Analysis Plan (SAP) for Waste Pit Materials (Revision 0, July 28, 1999) to eliminate analysis for TCLP and PID measurements in waste pit wastes shipped to Envirocare of Utah. In reviewing project data on waste characterization that has accumulated through the remediation of the Fernald waste pits, the DOE has concluded that measurements for TCLP and PID are no longer needed.

To reiterate the data objectives stated in the approved SAP, which are:

“To satisfy the requirements of the Operable Unit 1 Record of Decision (ROD) for additional Resource Conservation and Recovery Act (RCRA) testing of WPRAP materials as part of project implementation.

To satisfy Envirocare’s requirements for waste generators to adequately complete the Radioactive Waste Profile Record (EC-0230) and characterize their waste materials prior to shipment to the Envirocare facility.

To satisfy a managerial need for key “risk management” sampling, where such sampling is considered appropriate, to further reduce the possibility or ramifications of material rejection upon its arrival at Envirocare.”

Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0136-05

Specifically reviewing each of these basic data objectives noted in the SAP:

Additional information for RCRA characterization is no longer needed. Insitu sampling of the waste pits together with measurements achieved through the six years of operational data have demonstrated no failures of these parameters. To date, approximately 870,000 tons out of a project total of 950,000 tons of waste pits materials have been excavated, representatively sampled, loaded into railcars and shipped for offsite disposal without any failures. Further, the waste pits materials that are remaining will predominately be comprised of pit liner and soils which is more homogeneous and much less contaminated than the waste pit wastes, like raffinates, which have already been shipped. Continuing to measure for this objective is likely unnecessary.

The presentations of known characterization information submitted to Envirocare has adequately addressed the requirements of their Radioactive Waste Profile Record. As a 'Generator' with less than 10% of the waste left, the waste pits materials have become fully characterized prior to shipment to the Envirocare facility. Recent discussions with Envirocare on this subject has also gained their technical concurrence on the elimination of these measurements. The WPRAP has collected enough information based on process knowledge and past sampling results to assure that the remaining waste materials shipped to Envirocare will not contain hazardous waste.

Finally, considering the elimination of these analyses, a re-evaluation of managerial risk connected with a shipment that might be rejected at Envirocare, and resulting ramifications, is acceptable. Radiological and physical properties (e.g. moisture) will continue to be measured.

The SAP was written as a "living" document. After obtaining concurrence from Envirocare, revisions are to be submitted to your agency for approval.

Should you have any questions on this subject, please contact Dave Lojek at (513) 648-3127.

Sincerely,



for

William J. Taylor
Director

FCP:Lojek

Mr. James A. Saric
Mr. Tom Schneider

-3-

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cc:

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