

**Department of Energy**

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Fernald Closure Project  
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JUL 28 2005

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0291-05

Mr. Thomas Schneider, Project Manager  
Ohio Environmental Protection Agency  
Southwest District Office  
401 East Fifth Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**RESPONSE TO COMMENTS AND PAGE CHANGE NOTICE FOR THE OPERABLE  
UNIT 3 EAST WAREHOUSE COMPLEX DECONTAMINATION AND  
DISMANTLEMENT PROJECT COMPLETION REPORT**

Reference: Letter, T. A. Schneider to W. J. Taylor, "Re: Comments - Operable Unit 3 East Warehouse Complex Decontamination and Dismantlement Project Completion Report", dated July 18, 2005

In response to the referenced letter, the Ohio Environmental Protection Agency's comments relating to the Operable Unit 3 East Warehouse Complex Decontamination and Dismantlement (D&D) Project Completion Report have been addressed.

This letter transmits the response to comments along with the Operable Unit 3 East Warehouse Complex D&D Project Completion Report Page Change Notice 1 (PCN1). Please remove the existing project completion report pages affected by this change and replace them with the enclosure.

Mr. James A. Saric  
Mr. Thomas Schneider

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DOE-0291-05

If you have any questions or require additional information, please contact Ed Skintik at (513) 246-1369.

Sincerely,

  
for William J. Taylor  
Director

FCP:Skintik

Distribution:

cc:

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ECDC Fluor Fernald Inc./MS52-7 Project Number 1789.1.1



**EAST WAREHOUSE COMPLEX  
DECONTAMINATION AND DISMANTLEMENT  
PROJECT COMPLETION REPORT**

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**DOCUMENT NUMBER 1763-RP-0002 (REV. 0) PCN1**

**PAGE CHANGES**

**INCLUDES:**

**COVER PAGE/RECORD OF REVISION**

**PAGE 5/6**

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# OPERABLE UNIT 3

## PROJECT COMPLETION REPORT

### EAST WAREHOUSE COMPLEX DECONTAMINATION AND DISMANTLEMENT



JULY 2005

FERNALD CLOSURE PROJECT  
FERNALD, OHIO

U. S. DEPARTMENT OF ENERGY  
FERNALD AREA OFFICE  
DOCUMENT CONTROL NO. 1763-RP-0002 (REV.0) PCN1

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**RECORD OF ISSUE/REVISION**

<u>DATE</u>	<u>REVISION NO.</u>	<u>DESCRIPTION AND AUTHORITY</u>
6/16/05	Rev. 0	Issued Final Project Completion Report
7/25/05	PCN1	Per OEPA comment, changed the Table 3-1 results from "Non-detectable" to indicate the detection limits of the various constituents. Example: for Vinyl Chloride, from "Non-detectable" to "< 1.00".

### *Remedial Tasks*

Remediation tasks for Building 79 included the HWMU #37 decontamination activity described in Section 3.1. The Building 79 structure was dismantled using a hydraulic shear. Materials generated during the dismantlement of Building 79 included piping & conduit and structural & miscellaneous steel.

### *Photos*

There were no photos available of the Building 79 demolition activity.

## 2.2.4 Building 82A – Receiving/Incoming Materials Inspection

### *Background*

Building 82A, (Receiving/Incoming Materials Inspection), was a single-level building measuring approximately 100 feet x 100 feet x 17 feet in height. Building 82A consisted of a structural steel frame, metal siding and roofing on a reinforced concrete base.

Building 82A was used to accept and examine the non-radioactive materials and supplies that arrived routinely at the site. There were offices and receiving equipment in the building.

### *Remedial Tasks*

The Building 82A structure was dismantled using a hydraulic shear. Materials generated during the dismantlement of Building 82A included equipment, piping & conduit, and structural & miscellaneous steel.

### *Photos*

Photos 7 and 8 of Attachment 3 show the following activities for the D&D of Building 82A:

- 7 – Building 82A demolition.
- 8 – Building 82A demolition.

## 3.0 HWMU CLOSURE TASKS

### 3.1 HWMU #37 – Plant 6 Warehouse

The Plant 6 Warehouse was classified as a HWMU (HWMU No. 37) because it had been used to store RCRA hazardous wastes (characteristic and listed) for greater than ninety days (OAC 3745-66-70 and 40 CFR 265.170).

Facility records document that 117 spills of hazardous waste had occurred in this HWMU. These records indicate that the spills occurred after the application of the sealant coatings to the three bay containment areas; they were low volumes (the total quantity of waste released from these spills was approximately 33 gallons); and they were promptly cleaned up. The largest quantity of waste spilled was nineteen gallons of sludge characterized as D005 (barium) and D008 (lead) that occurred in 1989. Two spills involving a total quantity

of two ounces of PCB wastes have been documented for this unit. These spills were also promptly cleaned up.

Contaminants of concern relating to the Plant 6 Warehouse included arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, benzene, carbon tetrachloride, chlorobenzene, cresol, chlordane, 1,4-dichlorobenzene, pyridine, hexachlorobutadiene, hexachlorobenzene, 1,2-dichloroethane, 1,1-dichloroethylene, 2,4-dinitrotoluene, hexachloroethane, nitrobenzene, 2,4,6-trichlorophenol, tetrachloroethylene, trichloroethylene, vinyl chloride and methyl ethyl ketone.

The HWMU #37 decontamination activity included both a dry and wet vacuuming process. Each bay containment area was dry vacuumed using a shop vacuum with HEPA filtration to remove surface residues. Each bay containment area was then water rinsed using a high-pressure washer. Rinseate was contained within the six-inch high concrete curb, wet-vacuumed and containerized in three 55-gallon drums. Table 3-1 shows the analytical results confirmed compliance with OEPA Closure Guidance Standards for HWMU #37.

PCN1 **TABLE 3-1: HWMU #37 – ANALYTICAL RESULTS**

CONSTITUENT	CLOSURE GUIDANCE LIMIT (PPB)	PLANT 6 WAREHOUSE BAY 1 (PPB)	PLANT 6 WAREHOUSE BAY 2 (PPB)	PLANT 6 WAREHOUSE BAY 3 (PPB)
Arsenic	750	5.97	5.33	8.03
Barium	1000	85.4	48.5	226
Cadmium	75	1.94	< 0.313	6.27
Chromium	1000	103	40.6	132
Lead	600	206	46.5	461
Mercury	30	.312	.368	2.4
Selenium	750	4.31	6.13	9.12
Silver	1000	< 0.835	1.13	1.16
Benzene	75	< 1.00	1.01	< 1.00
Carbon tetrachloride	75	< 1.00	< 1.00	< 1.00
Chlorobenzene	1000	< 1.00	< 1.00	< 1.00
Cresol	1000	< 5.00	< 5.00	11.4
Chlordane	3	< 0.020	< 0.020	< 0.020
1,4-Dichlorobenzene	1000	< 5.00	< 5.00	< 5.00
Pyridine	1000	< 5.00	< 5.00	< 5.00
Hexachlorobutadiene	1000	< 5.00	< 5.00	< 5.00
Hexachlorobenzene	15	< 5.00	< 5.00	< 5.00
1,2-Dichloroethane	75	< 1.00	< 1.00	< 1.00
1,1-Dichloroethylene	105	< 1.00	< 1.00	< 1.00
2,4-Dinitrotoluene	1000	< 5.00	< 5.00	< 5.00
Hexachloroethane	1000	< 5.00	< 5.00	< 5.00
2,4,6-Trichlorophenol	1000	< 5.00	< 5.00	< 5.00
Tetrachloroethylene	75	< 1.00	< 1.00	< 1.00
Nitrobenzene	1000	< 5.00	< 5.00	< 5.00
Trichloroethylene	75	< 1.00	< 1.00	< 1.00
Vinyl Chloride	30	< 1.00	< 1.00	< 1.00
Methyl Ethyl Ketone	1000	23.2	36.2	21.7