



Department of Energy

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



FEB 3 2006

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-0067-06

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

Dear Mr. Saric and Mr. Schneider:

CONCURRENCE FOR REMOVAL OF GRANULAR ACTIVATED CARBON (GAC)

The purpose of this letter is to seek concurrence for DOE to remove granular activated carbon (GAC) as a unit operation of the Converted Advanced Wastewater Treatment (CAWWT) facility. Removing GAC will enhance our ability to increase flow rates through the CAWWT system, which in turn will enable storm water to be treated in a more efficient and timely manner.

The CAWWT Functional Requirements/Design Basis, Stage 1, Revision 0 indicated that activated carbon would be retained at the CAWWT facility in accordance with past agreements with the regulatory agencies. Activated carbon was first introduced at the Fernald Closure Project at the Plant 8 Volatile Organic Compound (VOC) treatment system installed under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action No. 3. The Plant 8 system was specifically installed to remove organics from perched groundwater.

The design of the Advanced Wastewater Treatment (AWWT) facility, which began operation in January 1995, included GAC in the treatment train dedicated to the treatment of process and remediation wastewaters (AWWT Phase II). While the primary purpose of GAC in the AWWT Phase II treatment process was to protect the ion exchange resin from the detrimental effects of organic chemicals on ion exchange performance, GAC also served to provide the necessary treatment for VOC contamination related to the several Hazardous Waste Management Units on-site as well as for areas of known VOC contaminated perched water zones within the former production area and known VOC contamination associated with the Operable Unit 1 waste pits.

Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0067-06

The CAWWT Phase 1 design included GAC to ensure that any VOC contaminated wastewater generated from remaining VOC contamination sources would be adequately treated. All sources of organic contamination have been removed thus eliminating the need for GAC as a CAWWT unit operation. No VOCs have been detected in the remaining wastewater streams, therefore, GAC is no longer required to meet previous agency commitments nor is it required to achieve National Pollutant Discharge Elimination System (NPDES) discharge limits.

Your timely consideration of this request is appreciated. Please contact me at (513) 648-3139 if you have any questions regarding this request.

Sincerely,



Johnny W. Reising
Director

cc:

G. Jablonowski, USEPA-V, 5HRE-8J
M. Murphy, USEPA-V, AE-17J
T. Schneider, OEPA-Dayton
M. Cullerton, Tetra Tech
M. Shupe, HIS GeoTrans
R. Vandergrift, ODH
D. Riley, DOE/FCP
J. Chiou, Fluor Fernald, MS88
B. Hertel, Fluor Fernald, MS12
F. Johnston, Fluor Fernald, MS12
D. Powell, Fluor Fernald, MS64
Administrative Record, MS6