



Department of Energy

**Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246**



JUL 6 2006

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-0160-06

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:

**REQUEST FOR EXTENSION OF OPERABLE UNIT 5 SOIL REMEDIATION
MILESTONE DATE - SUBMITTAL OF CERTIFICATION REPORT FOR THE SILO 3
CONCRETE STRUCTURES, RADON CONTROL SYSTEM MISCELLANEOUS
STRUCTURES AND SELECTED AREA 6 AND AREA 7 CONCRETE STRUCTURES**

- References:
- 1) Letter, T. Schneider to J. Reising, "Approval - CDL and Certification PSP for Concrete in the RCS and Silo 3 Project Area," dated April 13, 2006
 - 2) Letter DOE-0115-06, J. Reising to J. Saric and T. Schneider, "Transmittal of Responses to the U.S. Environmental Protection Agency Comments and the Revised Certification Design Letter and Certification Project Specific Plan for Concrete in the Radon Control System and Silo 3 Project Area," dated April 26, 2006
 - 3) Letter DOE-0116-06, J. Reising to J. Saric and T. Schneider, "Transmittal of the Response to the Ohio Environmental Protection Agency Comment and Change Pages to the Revised Certification Design Letter and Certification Project Specific Plan for Selected Area 6 and Area 7 Concrete Structures," dated April 26, 2006
 - 4) Letter DOE-0121-06, J. Reising to J. Saric and T. Schneider, "Request for Extension of Operable Unit 5 Soil Remediation Milestone date - Submittal of the Certification Report for Selected Area 6 and Area 7 Concrete Structures," dated May 8, 2006

- 5) Letter, T. Schneider to J. Reising, "Approval - RTCs and Change Pages to the CDL and Certification PSP for Selected A6 and A7 Concrete Structures," dated May 11, 2006
- 6) Letter, J. Saric to J. Reising, "RTC and Revised Radon Control System and Silo 3 Concrete Structures CDL and Certification PSP," dated May 22, 2006

The purpose of this letter is to request your approval to extend the date for submittal of the Certification Report for certification data collected under two Certification Design Letters (CDLs) and Certification Project Specific Plans (PSPs). The two CDL/PSPs under which the samples were collected and the established Certification Report milestone dates are as follows:

- 1) Concrete in the Radon Control System and Silo 3 Project Area with a milestone date of June 30, 2006, and
- 2) Area 6 and Area 7 Concrete Structures with a milestone date of July 19, 2006.

The milestone date for the Area 6 and 7 Concrete Structures Report is a revised milestone date that was requested in Letter DOE-0121-06 to the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency dated May 8, 2006 that is pending concurrence. However, the U.S. Department of Energy (DOE) proposes to combine the results from both of the aforementioned CDL/PSPs into one Certification Report to be submitted on or before August 3, 2006 for the following reasons.

The demolition process for the Silo 3 remediation structures and the treatment of Silo 1 and 2 wastes were completed later than the anticipated completion date, which formed the original basis for the estimated submittal date for the certification report. Due to the longer duration of these projects, some of the concrete could not be scanned and sampled on the original schedule due to the continuation of either waste storage or demolition operations in the areas of interest including the Silos Project Trailer Staging Area and the Silo 3 area.

At this time, all of the preliminary data has been received from the laboratories and reviewed for certification criteria for both of the CDL/PSPs. However, the final data results from the two CDL/PSPs are not expected to be reported from the laboratory and validated until July 26, 2006 (due to the in-growth period for radium-226). Therefore, DOE requests a revised milestone date of August 3, 2006 for submittal of this combined Certification Report covering both CDL/PSPs.

The consolidation of the two CDL/PSPs into one certification report should streamline both the preparation and review process compared to processing separate reports. The total number of samples to be included in the Certification Report is 124 and 128, respectively, for the Concrete in the Radon Control System and Silo 3 Project Area CDL/PSP and the Area 6 and Area 7 Concrete Structures CDL/PSP.

Note that all of the preliminary data has been received and determined to pass certification criteria, based on preliminary results, for the clean concrete debris that has been placed in the Southern Waste Units area for the future creation of the amphibian habitat. A reduction in the

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scope of the concrete in the CDL/PSP for the Radon Control System and Silo 3 Project Area should also be noted. Due to the proximity of the Radon Control System structural concrete to the demolition of other Silo 1 and 2 remediation structures and the work sequencing, it was not feasible to attempt to certify the Radon Control System concrete. Also, the Silo 3 Excavator Room walls were not sampled or scanned for certification due to the sequence and schedule of demolition. This concrete was dispositioned as contaminated concrete debris. Therefore, the remaining scope for this specific CDL/PSP is limited to the Silo 3 project area slabs.

For the reasons detailed above, DOE believes "good cause," as consistent with Section XVIII of the Amended Consent Agreement, exists to extend the milestone date. The combined Certification Report for the aforementioned two CDL/PSPs, with the reduced scope as noted above, is anticipated to be complete and submitted to the Regulatory Agencies on or before August 3, 2006.

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

Sincerely,



Johnny W. Reising
Director

cc:

J. Desormeau, DOE-OH/FCP
G. Jablonowski, USEPA-V, SRF-5J
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