



## Department of Energy

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



NOV 2 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-0042-07

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:

### **STRUCTURES TO REMAIN IN PLACE AFTER DECLARATION OF CLOSURE**

The Restored Area Maintenance Building (Component 12G) was identified as a structure for dismantlement in the final Miscellaneous Small Structures (MSS) Phase II Implementation Plan for Above-Grade Decontamination and Dismantlement (D&D). The Dissolved Oxygen Facility Substation (Component 16K), Dissolved Oxygen Building Warehouse (Component 18P), South Plume Interim Treatment Building (Component 18Q), Outfall Line Pit (Component 18R), and FEMP Telecommunications Building (23B) were identified as structures for dismantlement in the MSS Phase II Implementation Plan (Amendment #1). The Paddys Run Train Trestle was identified as a structure for dismantlement in the MSS Phase II Implementation Plan (Amendment #4). These seven MSS structures have since been identified as "Post Closure" structures which means they will remain in place upon completion of site D&D activities.

Likewise, the Silos 1 and 2 Warehouse (Component 94K) was identified as a Silos 1 and 2 Remediation Facility structure for dismantlement in Table 2-4 of the Operable Unit 3 (OU3) Integrated Remedial Design/Remedial Action (RD/RA) Work Plan. This structure has since been identified as a "Post Closure" structure and will remain in place upon completion of site D&D activities. All of these structures have been identified in the Operable Unit 3 fact sheet for beneficial reuse of clean buildings and structures.

These structures have been deleted from Table 2-4 of the OU3 Integrated RD/RA Work Plan with the change being identified as Page Change Notice 12 (PCN12). Please remove the existing RD/RA pages affected by PCN12 and replace them with the enclosure.

Mr. James Saric  
Mr. Thomas Schneider

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DOE-0042-07

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

Sincerely,



Johnny W. Reising  
Director

Enclosure

cc w/enclosure:

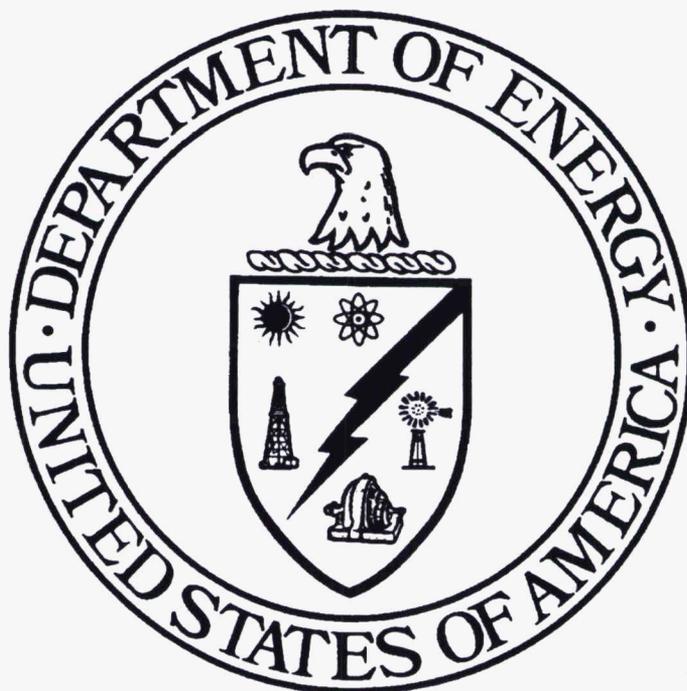
J. Skintik, DOE-OH/FCP  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
G. Jablonowski, USEPA-V, SRF-5J  
M. Cullerton, Tetra Tech  
M. Shupe, HSI GeoTrans  
S. Helmer, ODH  
AR Coordinator, Fluor Fernald, Inc./MS6

cc w/o enclosure:

F. Johnston, Fluor Fernald, Inc./MS12  
C. Murphy, Fluor Fernald, Inc./MS1  
P. O'Neill, Fluor Fernald, Inc./MS1  
T. Terry, Fluor Fernald, Inc./MS1

# **OPERABLE UNIT 3**

## **INTEGRATED REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**



**SECTIONS 1-7, APPENDICES A through F**

**OCTOBER 2006**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**U. S. DEPARTMENT OF ENERGY  
FERNALD AREA OFFICE**

**FINAL**

**Document Control No. 2503-WP-0023 (REV. 0) PCN12**

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**RECORD OF REVISIONS**  
**OPERABLE UNIT 3 REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN**  
**2503-WP-0023, REV. 0**

REV	PCN	DATE	PURPOSE
0	N/A	June 1997	Initial issuance of Revision 0 <i>Operable Unit 3 Integrated Remedial Design/Remedial Action Work Plan</i> (2503-WP-0023)
0	1	March 1998	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and pp.6-7/6-8.
0	2	July 1998	Amendment to OU3 Integrated RD/RA Work Plan for placement of transite panels in the OSDF; p.3-60. (to reflect that transite panels will not be size reduced before disposal in the OSDF and to clarify the fact that transite panels will generally be packaged in 1.5-foot bundles, but those bundles may be stacked to a maximum height of four feet if desired by the OSDF contractor.
0	3	December 1998	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and 6-7/6-8 (resulting from Plant 1 Pad Consolidation Change Proposal).
0	4	June 1999	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp 6-3/6-4 and 6-7/6-8 (resulting from Nuclear Materials Dispositioning Milestones/Extension, USEPA letter dated June 9, 1999).
0	5	February 2003	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4, 6-7/6-8 and complex remediation sequence p. 2-15/2-16 (resulting from the addition of Miscellaneous Small Structures Phase II D&D activities and revision of completed D&D activities to date).
0	6	April 2003	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and 6-7/6-8 (resulting from the combination of OU4 Phase I and Phase II into one D&D activity and the revised submittal date of May 28, 2004 for the OU4 Implementation Plan).
0	7	April 2004	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 2-15/2-16, 6-3/6-4 and 6-7/6-8 (resulting from the creation of separate OU4 D&D Implementation Plans for Silo 3 D&D activity and the Silos 1 & 2 D&D activity. Revised submittal dates of July 9, 2004 and December 16, 2004 for the OU4 Silo 3 and Silos 1 & 2 Implementation Plans respectively).
0	8	February 2005	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 2-15/2-16, 6-3/6-4 and 6-7/6-8. The amendment incorporates the addition of the Advanced Wastewater Treatment (AWWT) Facility as a complex scheduled for decontamination and dismantlement (D&D).
0	9	March 2005	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 6-3/6-4 and 6-7/6-8. The amendment incorporates the addition of the Silos 1&2 D&D Implementation Plan Revision 1 as a regulatory milestone.
0	10	March 2005	Amendment to OU3 Integrated RD/RA Work Plan regulatory milestones; pp. 2-15/2-16, 6-3/6-4 and 6-7/6-8. This amendment incorporates two implementation plans for the OU4 Silos 1&2 Complex. One plan covers the two concrete silo structures and the Silo 1&2 Bridges. The other plan covers the Silos 1&2 Remediation Complex
0	11	September 2005	Amendment to OU3 Integrated RD/RA Work Plan pp. 2-15/2-16. Add Building 94J in Table 2-4 as one of the Silo 1&2 Remediation Facility structures to be demolished under that facility implementation plan. Add Building 94X in Table 2-4 as one of the Silo 3 structures to be demolished under that implementation plan. Deleted remaining Component 22E in Table 2-4 as one of the Silo 1&2 structures to be demolished under that implementation plan. The remaining Component 22E will be demolished by the Fluor Fernald Soil Disposal Facility Project and will be covered under the Excavation Plan for Area 7 Silos and General Area
0	12	October 2006	Amendment to OU3 Integrated RD/RA Work Plan pp 2-15/2-16. Deleted Building 94K in Table 2-4 as one of the Silo 1&2 Remediation Facility structures to be demolished under that facility implementation plan. Deleted Components 12G, 16K, 18P, 18R, 23B and 28J in Table 2-4 as MSS Phase II structures to be demolished under that implementation plan.

**TABLE 2-4 Complex Remediation Sequence**

Remediation Complex*	Components
Building 4A	4A
Plant 1 Complex – Phase 1	1A, 30B, 56B, 56C, 66, 67, 72, TS-007
High & Low Nitrate Tanks	18K, 18L
Boiler Plant/Water Plant Complex	10A, 10B, 10C, 10E, 20B, 20C, 24A
Thorium/Plant 9 Complex	9A, 9B, 9C, 9D, 9E, 9F, 32A, 32B, 69, 78, 81
Maintenance/Tank Farm Complex	12A, 12B, 12C, 12D, 19A, 19C, 19D, 19E, 20H, 64, 65
Plant 5 Complex	4B, 5A, 5B, 5C, 5D, 5E, 5G, 55A, 55B
Multi- Complex	2A, 2B, 2C, 2D, 2F, 3A, 3D, 3E, 3H, 3J, 3K, 3L, 8A, 8B, 8C, 8D, 8E, 8G, 8H, 18B, 18D, 18H, 20G, 22B, 22E, 22D, 26A, 26B, 28D, 39A, 45A, 80
Sewage Treatment Plant Complex	25A, 25B, 25E, 28F, 39D
Plant 6/East Warehouse Complex	6A, 6B, 6C, 6D, 6E, 6F, 6G, 20D, 77, 79, 82
Plant 1 Complex – Phase II	1B, 20A, 30A, 56A, 71, TS-004, TS-005, TS-006
Pilot Plant Complex	13A, 13B, 13C, 13D, 37, 54A, 54B, 54C
Administration Complex	11, 14A, 14B, 20K, 53A, 53B, 31A, 46
Laboratory Complex	15A, 15B, 15C, 68
OU1 Complex	18G, 91A, 91B, 91C, 91D, 91E, 91F, 91G, 91H, 91J, 91K
OU4 Complex – Silo 3	35B, 94H, 94M, 94N, 94P, 94Q, 94X
OU4 Complex – Silos 1&2 Components 34A, 34B and Silos 1&2 Bridges	34A, 34B, G-008 Silos 1&2 bridge, F34-4
OU4 Complex – Silos 1&2 Remediation Facility	94A, 94B, 94C, 94D, 94E, 94G, 94J, 94L, 94R, 94S, 94T, 94Y
Advanced Wastewater Treatment Complex	51A, 51B, 51C Note: Component 51A has been scaled down and currently operates as the Converted Advanced Wastewater Treatment Facility (CAWWT).
Miscellaneous Small Structures	2E, 2G, 3B, 3C, 3F, 3G, 5F, 8F, 10D, 18M, 22A, 24B, 28A, 28B, 28N, 34C, 38A, 38B, 39B, 39C, 45B, 62, 63
Miscellaneous Small Structures – Phase II	12E, 12F, 16A, 16B, 16C, 16D, 16E, 16F, 16G, 16H, 16J, 16L, 16M, 16N, 16P, 18J, 18Q, 18U, 18Y, 18Z, 19B, 20E, 20F, 21A, 21C, 22C/31B, 22G, 23A, 24C, 24D, 25C, 25J, 25K, 26C, 26D, 26E, 26F, 28E, 28G, 28H, 28K, 28L, 28M, 35A, 50, 52A, 52B, 60, 61, 82B, 93A, TS-008, TS-009, TS-010, TS-011, TS-012, TS-013, TS-014, G-007 Trailers and G-001 Railroad Tracks. Note: Component 18Q has been scaled down but continues to operate a Groundwater Valve House.

\*G-coded components (utility lines, process/non-process trailers & pipe bridges) will be dismantled according to availability status or association with the nearest remediation complex. Gray-shaded components indicate demolition is complete.

A colored illustration of OU3 complexes are shown in Figure 2-2.

In addition to the prioritization and sequencing functions of the PSR, it also served as the mechanism for supplanting the OU3 Facility Utilization Report and for providing the regulatory agencies with any schedule updates. Sections 4.4 and 6 of this work plan incorporate those requirements into the OU3 integrated remedial action.

Since the PSR was updated and submitted to the regulatory agencies in August 1996, the component listing for several complexes have been further revised; however, the overall schedule for completion of OU3 remedial action was not revised. The major revision to the complex listing was the assignment of all components previously defined for the Miscellaneous Complex, except the general components ("G" coded), to appropriate complexes. The general components (e.g., railroad tracks, roads, pipe bridges, non-process trailers), cannot be assigned to individual OU3 complexes as whole entities due to their extensive distribution throughout the FEMP and, as a result, are still discussed as the Miscellaneous Complex. Since the Miscellaneous Complex serves only to reserve the "general" components in somewhat of a queue for future dismantlement, the complex will not be scheduled individually for remediation. The Miscellaneous Complex has therefore been removed from the complex remediation sequence. All components that comprise the Miscellaneous Complex will be remediated under one of the defined complexes. The above-referenced Miscellaneous Complex reassignments include: components 16H, 16J, 23, 25J, 28E, and 28G being placed in the Administration Complex; 18G being placed in the OU1 Complex; and 28D being placed in the Liquid Storage Complex. Other complexes revised include: P-005 (coal pile) will be removed for reuse; and since 28C was previously removed under an independent O&M activity (in 1991), it was deleted from the list.

## **2.6 Summary of the OU3 Record of Decision for Final Remedial Action**

The OU3 Record of Decision for Final Remedial Action identified the selected remedy as the "Selected Material Treatment, On-Property Disposal, and Off-Site Disposition" of material generated by the OU3 interim remedial action and OU3 removal actions. Specifically, the OU3 Final Action ROD states that the OU3 selected remedy consists of the following elements:

- Provides for unrestricted/restricted release of materials, as economically feasible, for recycling, reuse, or disposal;
- Permits treatment of materials to meet the on-site disposal facility and/or off-site disposal facility waste acceptance criteria;
- Requires off-site disposal of process residues, waste product materials, and process-related metals;
- Requires off-site disposition of acid brick and concrete from specific locations and any other materials exceeding the OSDF WAC;
- Permits disposal of remaining OU3 wastes in the OSDF;