



Department of Energy

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AUG 31 2007

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

EMCBC-00733-07

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:

ELEVATED TOTAL URANIUM CONCENTRATION LEVELS IN SURFACE WATER WEST OF FORMER WASTE PIT 3

During sampling of surface water locations west of the former Waste Pit 3 area in late 2006 and early 2007, elevated total uranium concentrations were observed.

The location in question is a series of small shallow pools and drainage ditches due west of the center of former Waste Pit 3, which drain generally south to a depression near the former cement pond. The overall size of this area is roughly ½ acre. Uranium concentrations observed to date indicate the highest concentrations at the northern end of the swale adjacent to the northern brush pile and diminishing to the south. There is no direct outlet of this drainage swale to Paddys Run. The soils in the area are generally poorly draining based on the 1993 Wetland Delineation.

This area underwent the rigorous soil certification process. All certification samples from this area were well below the soil certification FRL. In January of 2007, a leachability study was developed for the soils in this area. The study was conducted in February, and the results were shared with the EPAs in March 2007. The results of the study confirmed DOE's theory that the residual uranium in this area has greater leachability than anticipated; however, it is less than the high-leach area identified within the former production area. The study also confirmed the soil certification data was valid, and the source of the higher leachability uranium is in the upper six inches of the soil. It appears the limited mass in the soil in this area is being washed away with each successive precipitation event.

Mr. James Saric
Mr. Thomas Schneider

- 2 -

EMCBC-00733-07

Subsequent groundwater data were obtained using a Geoprobe© that indicated this area was having little impact on the total uranium concentration in the groundwater of the area. In addition, it was determined that any potential impact that this area may have on the aquifer is being captured by adjacent groundwater extraction wells.

DOE has made a good faith effort to continue monitoring, conduct studies and evaluations, and keep the EPAs and stakeholders informed relative to this condition. It is DOE's position that we are in compliance with the requirements of the Records of Decision.

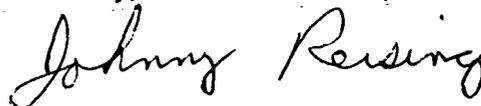
The EPAs have continued to be concerned relative to this area and the occasional increase in the total uranium surface water concentrations. As a result and as continued good faith, DOE is willing to treat this situation as overall maintenance similar to other operation and maintenance activities within the institutional controls process.

In order to alleviate these concerns, DOE commits to, as part of ongoing maintenance and erosion control in the waste pits area, removing approximately six inches of the surface of the certified area suspected as being the source of the higher leachability uranium. This material will be transported to a "high spot" in a nearby area and distributed sufficiently to facilitate more rapid dissipation of the residual uranium. All the areas will be graded to reduce or eliminate future ponding, treated with lime or phosphate, and adequately revegetated. The water that may continue to pond below this area of soil removal, near the former cement pond, will continue to be monitored on a quarterly basis. This scraped and regraded area, similar to all areas at the FCP, will be properly maintained for the intended post remediation land use. It is anticipated that this activity will take place late summer-fall of this year, weather permitting. This letter will serve as documentation of the DOE commitment to conduct this ongoing maintenance activity.

This proposal is also intended to address the outstanding comments related to the single remaining soil certification package. It will enable the EPAs to approve the "Area 6 Waste Pits 1, 2 and 3, the burn pit, the clearwell, and the areas west and north of the waste pits" soil certification package that was submitted February 21, 2007. Subsequently, DOE will submit for review and approval the interim Operable Unit 5 Remediation Action Report.

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

Sincerely,



Johnny W. Reising
Director

Mr. James Saric
Mr. Thomas Schneider

- 3 -

EMCBC-00733-07

cc:

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