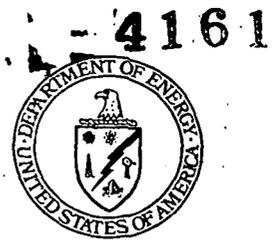




Department of Energy

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JAN 29 2002

Mr. Phillip C. Harris
Division of Hazardous Waste Management
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0271-02

RECORD

Dear Mr. Harris:

REVISIONS TO THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT'S HAZARDOUS WASTE MANAGEMENT UNIT INSPECTION PROGRAM

This letter provides information regarding the Fernald Environmental Management Project's (FEMP) request to discontinue inspections of nine Hazardous Waste Management Units (HWMU) and to revise the inspection requirements for Waste Pits 4 and 5 (HWMU #27 and 42). Initial approval for these revisions to the HWMU inspection program was received from the Ohio Environmental Protection Agency (OEPA) in a January 4, 2002 e-mail with a request for a follow-up letter to transmit this information.

Enclosure 1 identifies the nine HWMUs that will no longer require inspection. Access to these HWMUs is restricted due to Decontamination and Demolition (D&D) activities occurring at Plants 2, 3, 6, and 8. Current inspection frequencies for these units range from monthly to annually.

Six of these HWMUs are currently undergoing remediation as part of the D&D of Plants 2 and 3 under the Multi-Complex Implementation Plan. The FEMP will permanently discontinue inspections of these units due to access restrictions that will remain in effect until the units are closed under the Integrated Resource Conservation and Recovery Act/Comprehensive Environmental Response, Compensation, and Liability Act (RCRA/CERCLA) process.

The three remaining HWMUs (#17 - Plant 8 East Drum Storage Pad, #18 - Plant 8 West Drum Storage Pad, #36 - Storage Pad North of Plant 6) have underlying soil contamination and are planned to be closed by the Soils Project. The FEMP will discontinue inspection of these units due to access restrictions that will remain in effect until D&D activities are completed. The types and frequencies of inspections required for these HWMUs will require re-evaluation once access restrictions have been removed due to changing conditions around these units.

Enclosure 2 contains the revised inspection forms for Waste Pits 4 and 5. Several items have been eliminated from these forms including signs ("Danger-Authorized Personnel Only," "No Smoking or Open Flame," "Emergency and Prior to Entry Contact"), boundary markers and Safety Equipment/Emergency and Spill Response Equipment. The first two items are no longer required due to access restrictions already in place for the Waste Pits Remedial Action Project (WPRAP). The third item can no longer be inspected since there is currently no spill response/emergency equipment specifically assigned to these units in the FEMP's RCRA

Mr. Phillip C. Harris

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Contingency Plan, although spill response equipment is maintained at the project control point in accordance with WPRAP procedures. As a result, inspections of the waste pit HWMUs will focus on items relevant to maintaining unit integrity. The FEMP will continue to inspect these units on a monthly basis until the initiation of remedial activities. This is currently planned for spring 2002 for both Waste Pits 4 and 5 at which point these inspections would be permanently discontinued.

If you have any questions or require additional information, please contact Ed Skintik at (513) 648-3151.

Sincerely,



Johnny W. Reising,
Fernald Remedial Action
Project Manager

FEMP:Skintik

Enclosures: As Stated

cc w/enclosures:

J. Buckley, Fluor Fernald, Inc./MS52-3
M. Cherry, Fluor Fernald, Inc./MS52-1
T. Poff, Fluor Fernald, Inc./MS65-2
RCRA Operating Record, Fluor Fernald, Inc./MS28

cc w/o enclosures:

D. Lewis, OH/FEMP

HAZARDOUS WASTE MANAGEMENT UNITS FOR WHICH THE FEMP WILL DISCONTINUE INSPECTIONS

| HWMU NO. | DESCRIPTION | LOCATION | CURRENT INSPECTION FREQUENCY |
|----------|--|--|------------------------------|
| 10 | NAR System Components | Eight components located inside Plant 2; Tank F1-24 located outside - Southwest of Plant 2 | Monthly |
| 14 | Box Furnace | Outside - North of Plant 8 | Annual |
| 15 | Oxidation Furnace No. 1 | Inside Plant 8 | Annual |
| 17 | Plant 8 East Drum Storage Pad ¹ | Outside - East of Plant 8 | Quarterly |
| 18 | Plant 8 West Drum Storage Pad ¹ | Outside - West of Plant 8 | Quarterly |
| 36 | Storage Pad North of Plant 6 ¹ | Outside - North of Plant 6 | Quarterly |
| 47 | UNH Tanks | Outside - North of Plant 2 | Annual |
| 48 | UNH Tanks | Outside - Southeast of Plant 2 | Annual |
| 49 | UNH Tanks | Inside Plant 2 | Annual |

¹ Requirements for inspecting these units will be re-evaluated once D&D activities have been completed and access restrictions have been removed. These units have underlying soil contamination and will be closed by the Soils Project.

Note: The FEMP will also discontinue inspections of Waste Pit No. 4 (#27) and Waste Pit No. 5 (#42) beginning in Spring 2002 once remedial activities have been initiated for these units.

Enclosure 2

HWMU 27, WASTE PIT NO. 4 - MONTHLY INSPECTION RECORD

| | | |
|--------------------------------|----------|------------|
| Inspector's Name / Signature: | Badge #: | Date/Time: |
| Supervisor's Name / Signature: | Badge #: | Date/Time: |

NOTE:

The Waste Pit area is being remediated under the CERCLA process in accordance with EPA approved Remedial Design and Remedial Action packages for the Waste Pit Remedial Action Project (WPRAP). The waste pits are in a restricted area with access limited to personnel who have completed, at a minimum, a health and safety briefing of the project. Activities taking place for those waste pits not under active remediation include removal of fencing, clearing of surrounding areas, limited sampling for material handling, etc. As a result of these activities, inspections of Waste Pits 4 and 5 have been limited to items that ensure the integrity of the unit has not been breached in such a way that the surrounding environment, including the aquifer, would be adversely affected. **Once remedial activities commence within Waste Pit 4, this inspection will no longer be applicable.**

| Item No. | Item Description | Acceptable | Unacceptable | Observations/Corrective Actions to be Completed |
|----------|--|------------|--------------|---|
| 1. | Check the dikes and trenches (run on, run off controls) around the unit for deterioration and/or erosion. - Condition of Soil at Edge of Flexible Membrane Liner (FML) (soil erosion should not expose FML below grade) - Condition of Anchor Trenches (FML should be securely anchored in trench) | | | |
| 2. | Inspect the FML condition for: - Field Seams (tears) - Factory Seams (tears) - FML Panels (Holes) - Hold-Down Pillows (secure) | | | |

Comments: _____

HWMU 42, WASTE PIT NO. 5 - MONTHLY INSPECTION RECORD

| Inspector's Name / Signature: | | Badge #: | Date/Time: | |
|--|---|------------|--------------|---|
| Supervisor's Name / Signature: | | Badge #: | Date/Time: | |
| <p>NOTE: The Waste Pit area is being remediated under the CERCLA process in accordance with EPA approved Remedial Design and Remedial Action packages for the Waste Pit Remedial Action Project (WPRAP). The waste pits are in a restricted area with access limited to personnel who have completed, at a minimum, a health and safety briefing of the project. Activities taking place for those waste pits not under active remediation include removal of fencing, clearing of surrounding areas, limited sampling for material handling, etc. As a result of these activities, inspections of Waste Pits 4 and 5 have been limited to items that ensure the integrity of the unit has not been breached in such a way that the surrounding environment, including the aquifer, would be adversely affected. Once remedial activities commence within Waste Pit 5, this inspection will no longer be applicable.</p> | | | | |
| Item No. | Item Description | Acceptable | Unacceptable | Observations/Corrective Actions to be Completed |
| 1. | Check the dikes and trenches (run on, run off controls) around the unit for deterioration and/or erosion. - Dead vegetation which could lead to erosion - Cracks, breaks, slumped areas or other damage | | | |
| 2. | Inspect the liner for rips, tears, and seam separation. | | | |
| 3. | Bottom Material Exposed | | | |

Comments: _____
