



Department of Energy

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APR 22 2002

Mr. Gene Jablonowski, Remedial Project Manager
U.S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0442-02

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

Dear Mr. Jablonowski and Mr. Schneider:

**COMMINGLING OF DEBRIS FROM CATEGORY I WITH CATEGORY A, B, D, AND
INCIDENTALLY GENERATED E FOR THE ADMINISTRATION COMPLEX
DECONTAMINATION AND DISMANTLEMENT PROJECT**

Reference: OU3 Administration Complex Implementation Plan for Above-Grade
Decontamination and Dismantlement, FINAL dated February 2002

The purpose of this letter is to transmit to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) the enclosed changes of the Operable Unit 3 (OU3) Administration Complex Implementation Plan for your review and approval.

Section 2.3.4 and Appendix C (Demolition Closure Contract Specifications 01789-TS-0001, Revision 2, Section 01120 3.3.A.4) of the referenced document require that Debris Category I shall be segregated and containerized separately from Debris Categories A, B, D, and incidentally generated E. This requirement is based on radiological requirements relating to the stockpiling of Category A, B, D, and E debris prior to placement into the On-Site Disposal Facility (OSDF). On the contrary, Category I debris of the same radiological nature must remain in roll-off boxes (prior to OSDF placement) to prevent insulation and drywall degradation due to wind and weather.

As described in the referenced document, the Administration Complex Decontamination and Dismantlement (D&D) project does not have significant radiological drivers generally associated with other site D&D projects. The Administrative Complex D&D debris is planned to be placed in roll-off boxes for direct placement into the OSDF. As such, we

APR 22 2002
DOE-0442-02Mr. Gene Jablonowski
Mr. Tom Schneider

-2-

request approval to commingle Category I debris with the Category A, B, D, and E debris for the Administration Complex D&D project. Debris commingling will only be permitted during the OSDF's seasonal operating period.

Section 2.3.4 and Appendix C (Section 01120 3.3.A.4) of the referenced document have been updated to incorporate this change. A copy of the document pages affected by this change is enclosed for insertion to the Administration Complex Implementation Plan, FINAL document. Please remove the existing pages affected by this change and replace them with the enclosure.

If you have any questions relating to this matter, please contact Anand Shah at (513) 648-3146.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Shah

Enclosure: As Stated

cc w/enclosure:

R. Greenberg, EM-31/CLOV
J. McCloskey, EM-31/CLOV
J. Trygier, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosures)
J. Saric, USEPA-V, SRF-5J
F. Bell, ATSDR
M. C. Wojciechowski, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./MS2
T. Hagen, Fluor Fernald, Inc./MS65-2
M. Stevens, Fluor Fernald, Inc./MS44-0
ECDC, Fluor Fernald, Inc./MS52-7

ADMINISTRATION COMPLEX IMPLEMENTATION PLAN

DOCUMENT NUMBER 1789-PL-0002 (REV. 0) PCN1

PAGE CHANGES

INCLUDES:

COVER PAGE/RECORD OF REVISION

PAGE 11/12

PAGE 13/14

PAGE 15/16

APPENDIX C, REV. 3, COVER PAGES 1 THRU 4

APPENDIX C, SECTION 01120, REV. 2, PAGES 1 THRU 10