



Department of Energy  
Ohio Field Office  
Fernald Environmental Management Project  
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MAY 16 2003

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0378-03

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

Dear Mr. Saric and Mr. Schneider:

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE AGREEMENT/  
FEDERAL FACILITY AGREEMENT/REMEDIATION INVESTIGATION/FEASIBILITY STUDY/  
CONSENT DECREE MONTHLY REPORT FOR THE PERIOD OF APRIL 1, 2003 THROUGH  
APRIL 30, 2003, INCLUDING ANTICIPATED WORK FOR THE PERIOD OF MAY 1, 2003  
THROUGH MAY 31, 2003**

This letter transmits the Consolidated Consent Agreement/Federal Facility Compliance Agreement/Federal Facility Agreement/Remedial Investigation/Feasibility Study/Consent Decree Monthly Report for the period April 1, 2003 through April 30, 2003, including anticipated work for the period of May 1, 2003 through May 31, 2003. This report is formatted to reflect the proposal presented in the letter, DOE-0395-96, J. Reising to J. A. Saric and T. Schneider, "Phase VII Removal Actions and Reporting Requirements under the FEMP Legal Agreements," dated January 16, 1996, and agreed to by the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA).

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

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Reising

Enclosures: As Stated

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DOE-0378-03

Mr. James A. Saric  
Mr. Tom Schneider

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cc w/enclosures:

N. Hallein, EM-31/CLOV  
G. Jablonowski, USEPA-V, SR-6J  
V. Dastillung, FRESH  
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AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

R. Greenberg, EM-31/CLOV  
F. Bell, ATSDR  
M. Shupe, HSI GeoTrans  
D. Carr, Fluor Fernald, Inc./MS1  
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T. Poff, Fluor Fernald, Inc./MS65-2  
ECDC, Fluor Fernald, Inc./MS52-7

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE  
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STUDY/CONSENT DECREE MONTHLY REPORT FOR THE PERIOD OF APRIL 1, 2003 THROUGH  
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This report describes actions at the Fernald Closure Project (FCP) from April 1, 2003 through April 30, 2003, including anticipated work for the period of May 1, 2003 through May 31, 2003. The report has been revised to reflect the proposal presented in the letter, DOE-0395-96, J. Reising to J. A. Saric and T. Schneider, "Phase VII Removal Actions and Reporting Requirements under the FEMP Legal Agreements," dated January 16, 1996, and agreed to by USEPA and OEPA.

**OPERABLE UNIT 1 - WASTE PITS REMEDIAL ACTION PROJECT**

April 2003

- Enforceable Milestones Completed
  - None
- Work Initiated/Continued/Completed
  - Loaded 12,598 tons of material from waste pits
  - Shipped 120 railcars (UT80 and UT81) of material for disposal at Envirocare

May 2003 (Anticipated)

- Enforceable Milestones To Be Completed
  - None
- Work To Be Initiated/Continued/Completed
  - Load 18,938 tons of material from waste pits
  - Ship 180 railcars (UT82, UT83 and UT84) of material for disposal at Envirocare

**OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY AND SOIL CHARACTERIZATION AND EXCAVATION PROJECT (Additional OU2 soils-related activities may be reported under OU5/Soils Characterization and Excavation Project)**

April 2003

- Enforceable Milestones Completed
  - On-Site Disposal Facility (OSDF) - None
  - Soils Characterization and Excavation Project (SCEP) - None
- Work Initiated/Continued/Completed
  - On-Site Disposal Facility (OSDF)
    - Continued Title III and CQC services for OSDF Construction
    - Continued Site Prep for Cell 6 liner
    - Completed receiving Cap 2 rock and stone
    - Completed Site Prep for Cap 2
    - Started placement of contouring layer Cell # 2 Cap
    - Started transite placement in Cell # 4
    - Started Cell # 5 liner 2 ft select impacted layer

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- Continue restoration of Borrow Area 1 and 2
- Started and completed backfill of Sed Basin # 1
- Started new water well construction
- Started receiving Geotextile, GML, and GCL materials for Cap # 2 and Cell # 6 Liner
- Soils Characterization and Excavation Project (SCEP)
  - Continued Concrete Breaking/Crushing in Area 4A
  - Continued AWAC excavation in Area 3A and 4A
  - Completed excavation at Fire Training Facility
  - Started Site Prep for Solid Waste Landfill
  - Continued Restoration work in Southern Waste Units and Northern Pines
  - Continued maintenance of Organic Soil stockpile
  - Continued Predesign WAC and FRL Attainment sampling for Areas 3B/4B
  - Completed Pre-certification of Area 6 Phase I
  - Continued Pre-certification of Area 8 Phase III North
  - Started and completed hot spot removal in Area 9 Phase II
  - Completed certification sampling in Area 9 Phase II

May 2003 (Anticipated)

- Enforceable Milestones To Be Completed
  - On-Site Disposal Facility (OSDF) - None
- Soils Characterization and Excavation Project (SCEP)
  - Submit Area 8 Phase III CDL to EPA, May 31, 2003
- Work To Be Initiated/Continued/Completed
  - On-Site Disposal Facility (OSDF)
    - Continue Title III services and CQC Services for OSDF Construction
    - Complete restoration of Borrow Area 1 and 2
    - Continue transite placement in Cell # 4
    - Complete Site Prep for Cell 6 liner
    - Start receiving Cell # 6 Liner drainage layer material
    - Complete receiving Geotextile, GML, and GCL materials for Cap 2 and Liner 6
    - Complete contouring layer for Cap 2 and start placement of 2 ft clay layer
    - Complete Cell # 5 liner 2 ft select impacted layer
    - Complete new water well construction
    - Start screening operation in Borrow Area
    - Complete excavation of topsoil for Cell # 6 Liner and prepare for compacted clay liner
  - Soils Characterization and Excavation Project (SCEP)
    - Continue concrete breaking/crushing in Area 4A
    - Continue AWAC excavation of Area 3A and Area 4A
    - Start excavation for Solid Waste Landfill
    - Complete staging of F-listed soil in AR3-007 footprint
    - Continue Restoration work Southern Waste Units and Northern Pines
    - Continue maintenance of Organic Soil Stockpile
    - Submit Response to Comments Area 2 Phase II IRDP

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- Continue Predesign WAC and FRL Attainment sampling for Areas 3B/4B
- Submit Area 6 Phase I CDL/PSP
- Start Area 6 Phase I certification
- Submit Area 7 Phase I As-built Report
- Start and complete Radium 226 hotspot in Area 8 Phase III north
- Complete Area 8 Phase III Pre-certification
- Submit Area 8 Phase III North CDL/PSP
- Submit Final Area 9 Phase II CDL/PSP
- Start Area 2 Phase II Radium Hot Spot excavation
- Remove soil from Silos 1,2,3 and stockpile for cell placement
- Submit Organic Soil Treatment Plan
- Submit OU1/SP-7 Predesign PSP
- Start Sitewide Predesign/Excavation Control PSP development
- Start Stream Corridors/Silo Area Predesign PSP development

**OPERABLE UNIT 3 - FACILITIES CLOSURE AND DEMOLITION PROJECT**

April 2003

- Enforceable Milestones Completed
  - None
- Work Initiated/Continued/Completed
  - Plants 2,3,8,GS (Task 1):
    - 2A - Equipment/system removal for all three areas; shearing tanks on the north side of 2A; exterior transite removal of electrical enclosure #3; interior transite removal 1st and 2nd floors of Digestion area
    - 3J - Tank sizing and acid brick removal; material processing in the general sump area
    - 8A - Removal of interior transite on 1<sup>st</sup> and 2<sup>nd</sup> floors, process and non-process equipment removal, beryllium contamination removal, asbestos removal; built vestibule
    - 8G - Non-process equipment/system removal (oxidation furnace)
    - 18D - clean release survey
    - General - Process Piping Inspections
  - Lab (Task 6):
    - Building 15A -Asbestos abatement center west, center east, and southwest areas; building preparation and maintain seal. Mastic removal southeast; perchloric and standard fume hood wash down and verification
  - Liquid Storage & Pilot Plant (Task 2/3):
    - Building 13A - Phase I south prep for wash down/lockdown survey; Phase II north gross wash down
    - Building 54A - Equipment/system removal in the reactor tower area; release, clean and lockdown south area
  - Utility Redistribution/Facilities Shutdown:
    - Continued utility isolations for Excavation areas 3B and 4B. Performing 13.2 Kv system redistribution for T-57, T-58 & WPRAP. Planning redistributions

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required for the Liquid Storage Complex.

- Completed Bldg. 26A underground mechanical isolations
- Started cooling tower isolation
- Removed hold-up material found in Plant 2/3 tanks

May 2003 (Anticipated)

- Enforceable Milestones To Be Completed
  - None
- Work To Be Initiated/Continued/Completed
  - Plants 2,3,8,GS (Task 1):
    - 2A - Equipment/system removal for Denitration and Extraction, roof tanks asbestos abatement, Digestion area interior transite removal shearing tanks on the north side of 2A
    - 3J - Tank sizing; material processing in the general sump area
    - 8A - Building maintenance; asbestos abatement; remove interior transite on 1<sup>st</sup> and 2<sup>nd</sup> floors; process and non-process equipment removal, beryllium contamination removal, asbestos removal; HWMU # 14 wash down; NaOH tanks prep.
  - Lab (Task 6):
    - Building 15A - Building maintenance and maintain seal; North building demolition; asbestos abatement center west; thorium cleanup
  - Liquid Storage & Pilot Plant (Task 2/3):
    - Building 13A - Remove Phase II process/non-process piping; interior transite removal
    - Building 54A - Reactor tower area equipment/system removal
  - Utility Redistribution/Facilities Shutdown:
    - Continue utility isolations for Excavation areas 3B and 4B. Continue redistributions required for the Liquid Storage Complex.

OPERABLE UNIT 4 - SILOS PROJECT

April 2003

- Enforceable Milestones Completed
  - None
- Work Initiated/Continued/Completed
  - Submitted response to comments and Draft Final Remedial Design (RD) Package for Silos 1 and 2 to USEPA/OEPA.
  - Received approval of the draft Final Proposed Plan for Silo 3 from USEPA and OEPA. Prepared Final PP in preparation for formal public comment period.
  - Prepared revisions to the Silo 3 design to incorporate conditioning for dispersability and metals mobility.
  - Received final approval of the RD Package for the Accelerated Waste Retrieval (AWR) Project from OEPA

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- Initiated second test run of the Radon Control System (RCS) 4/25/03, in preparation for the initiation of continuous Phase 1 operation.
- Completed pouring of the concrete equipment deck above the Transfer Tank Area
- Completed sheet piling installation and began silo berm excavation for the Silos 1 and 2 bridge foundations and bridge laydown area.
- Continued construction for the Silo 3 and Silos 1 and 2 Remediation facilities.

May 2003 (Anticipated)

- Enforceable Milestones To Be Completed
  - None
- Work To Be Initiated/Continued/Completed
  - Conduct formal public review (4/30 - 5/30) and public hearing (5/13/03) of Final PP for Silo 3. Initiate preparation of draft ROD Amendment.
  - Prepare draft revised RD Package for the Silo 3 Project
  - Draft Explanation of Significant Differences (ESD) for Silos 1 and 2.
  - Initiate continuous Phase 1 operation of the RCS
  - Continued construction for the Silo 3 and Silos 1 and 2 Remediation facilities.

OPERABLE UNIT 5 - AQUIFER RESTORATION AND WASTEWATER PROJECT

April 2003

- Enforceable Milestones Completed
  - Submitted monthly NPDES Discharge Monitoring Report for March to the OEPA on April 17.
  - Submitted the NPDES Noncompliance Report for March 2003 to the OEPA on April 17.
- Work Initiated/Continued/Completed
  - Submitted amended NPDES Permit Renewal Applications to the OEPA on April 22.
  - Continued treatment plan ion exchange resin regeneration/replacement in order to maintain regulatory discharge limits.
  - Maintained compliance with the 30-ppb monthly average uranium limit for discharges to the Great Miami River.
  - Determined that wastewater with high total dissolved solids (TDS) is causing the poor uranium removal performance in the AWWT Phase II treatment system.
  - Continued implementing measures to mitigate the effects of high TDS wastewater on the AWWT Phase II treatment system.
  - Increased groundwater extraction rate to the desired rate in most of the extraction wells.
  - Resumed re-injection at rates up to 1000 gallons per minute during portions of the month.
  - Received US EPA and Ohio EPA approval to conduct additional direct push sampling in the off-property portion of the South Plume in late March.
  - Continued direct push sampling in the off-property portion of the South Plume.
  - Completed installation of replacement Extraction Well 21A in late March and completed development of the well in April.

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May 2003 (Anticipated)

- Enforceable Milestones To Be Completed
  - Submit monthly NPDES Discharge Monitoring Report to the OEPA.
- Work To Be Initiated/Continued/Completed
  - Continue to perform maintenance/rehabilitation on injection and extraction wells.
  - Continue construction activities for the installation of the infrastructure phase of the South Field Extraction System Phase II project.
  - Continue to operate groundwater extraction system at a reduced flow rate in order to maintain regulatory discharge limits.
  - Continued treatment plan ion exchange resin regeneration/replacement in order to maintain regulatory discharge limits.
  - Begin tie-in of replacement Extraction Well 21A (pending Davis-Bacon labor determination).

**WASTE MANAGEMENT**

April 2003

- Enforceable Milestones Completed
  - None
- Work Initiated/Continued/Completed
  - Incinerator Liquids
    - Batch 13 TSCAI application packet awaiting lab information pertaining to one TSACI comment prior to TSCAI approval and submittal to the State of Tennessee. Planning for Batch 14 bulking operations activities initiated with development of TSCA 1035.
  - AWWT Liquids
    - Treated 4,158 pounds of aqueous waste at AWWT
  - Sample Disposition
    - 24 containers of samples were processed, bringing the total processed to 132 containers. 188 containers now remain in the inventory to be processed.
  - Hazardous Waste Project
    - Shipped 1 container (160 pounds) of photochemical waste to Safety Kleen on 4/14. Sorted and segregated 39 drums of PCB and non-PCB light ballasts and repackaged for shipment. Completed the 4/30 packaging of labpacks to be shipped to Heritage Environmental Services.
  - Organic Treatment Project
    - Completed the processing of approximately 500 SWIFTS-identified oily sludge containers on 4/4. An additional 33 containers of OTP waste were dispositioned through WPRAP for a total of 243 containers (3,426 cubic feet).

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- Inorganic Treatment Project
  - Macroencapsulation
    - No activity this month
  - Mercury
    - No activity this month
  - Soils, Sludges, Debris (SSD)
    - Resumed processing and packaging inventory associated with those inorganic, low concentration organic waste streams in the OTP that are destined for Waste Control Specialists (WCS). Completed packaging of 82 of 171 containers to date. Shipped 7 containers of NPDS treated waste that is LDR compliant to Envirocare on 4/21.

May 2003 (Anticipated)

- Enforceable Milestones To Be Completed
  - None
- Work To Be Initiated/Continued/Completed
  - Incinerator Liquids
    - Expect TSCA Incinerator (TSCAI) approval and TSCAI submittal of the Batch13 application to the State of Tennessee for approval during the week of 5/5. Continue planning for Batch 14 inventory and bulking operations activities.
  - AWWT Liquids
    - Continue global BOA activities for the 4 AWWT 1022 sulfuric acid containers to ship containers off-site for disposition in June.
  - Sample Disposition
    - Continue sample processing activities in Building 68.
  - Hazardous Waste Project
    - Scheduling the shipment of 110 excess clean and contaminated compressed gas cylinders to the Integrated Environmental Services, Incorporated facility for early May. Review shipping schedule and request copies of the SCP&RDs for the waste that is scheduled for shipment. Complete labpack shipment scheduled for 5/7 to Heritage Environmental Services.
  - Waste Minimization/Pollution Prevention
    - Coordinating the mid May shipment of approximately 200 containers of electrical waste, originally from the lab and other areas of the site, that are now in the clean side locker and clean side sealand. Complete recycle/disposition activities for the 5 sealands of used tires at the Building 82 staging area.
  - Organic Treatment Project
    - Complete work packages to process & package both the 242 containers and

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the 172 containers as needed for shipment. Schedule FTF soil shipments. Await completion of Vacuum Thermal Desorption (VTD) System Operability Test (SOT). Complete the May shipment of 136 containers of FDF Soils to Envirocare.