Department of Energy

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Fernald Environmental Management Project
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JUN 19 2003

DOE-0407-03

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

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

Dear Mr. Jablonowski and Mr. Schneider:

ADDENDUM TO THE IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT OF THE PLANT 1 COMPLEX- PHASE II PROJECT

This letter transmits an addendum to the Plant 1 Complex- Phase II Implementation Plan (Final) for Above-Grade Decontamination and Dismantlement (D&D) to the United States Environmental Protection Agency (USEPA) and Ohio State Environmental Protection Agency (OEPA) for your comments and approval.

As stated in Section 3.7 of the Plant 1 Complex - Phase II Implementation Plan, a strategy to address the decontamination of TS-006 would be submitted as an addendum. In this enclosed addendum, the decontamination strategy of TS-006 is described.

If there are any questions concerning this subject, please contact John Trygier at (513) 648-3154.

Sincerely,

Glenn Griffiths

Glenn Griffiths
Acting Director

FCP:Shah

Enclosure: As Stated

Recycled and Recyclable

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cc w/enclosure:
J. McCloskey, EM-31/CLOV
A. Shah, OH/FEMP
E. Skintik, OH/FEMP
J. Trygier, OH/FCP
P. Harris, OEPA-Dayton
P. Pardi, OEPA-Dayton
T. Schneider, OEPA-Dayton (three copies of enclosure)
J. Saric, USEPA-V, SR-6J
F. Bell, ATSDR
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cc w/o enclosure:
R. Greenberg, EM-31/CLOV
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M. Stevens, Fluor Fernald, Inc./MS87
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ADDENDUM #1
IMPLEMENTATION PLAN FOR THE PLANT 1 COMPLEX – PHASE II D&D PROJECT
MAY 2003

This addendum to the Plant 1 Complex - Phase II Implementation Plan provides a strategy for addressing decontamination requirements for Tension Support Structure Number 6 (TS-006). TS-006 is a "Sprung Structure" located along the northern boundary of the Plant 1 Pad (Hazardous Waste Management Unit Number 20). The unit provides covered storage for containerized low-level radioactive, polychlorinated biphenyls (PCB) and hazardous waste. TS-006 is identified as a component of Plant 1 Pad in the Fernald Closure Project's (FCP) Resource Conservation and Recovery Act (RCRA) Part A/B Permit Application since it is used for greater than ninety day storage of containers of hazardous waste with and without free liquids.

TS-006 was constructed as part of the Plant 1 Pad Upgrades completed under Removal Action 7. Prior to constructing TS-006, a clean layer of concrete, sealed between two impermeable barriers, was installed over the existing pad. A twelve-inch curb and centrally located trench drain and sump were constructed to provide secondary containment. The concrete base and trench drains were sealed with a chemically resistant coating.

The FCP began storing containers of hazardous waste in TS-006 in 1994. A review of facility release reports indicates that 84 releases of hazardous waste have been reported in TS-006 since the unit was first used to store hazardous waste. One of these releases occurred in 1999 when approximately 650 gallons of hazardous waste (characterized as D039) leaked from a metal box into the TS-006 sump. The remaining 83 releases involved a total quantity of approximately 1.7 gallons of hazardous waste. This includes 4 spills, totaling 19 ounces, of mixed/PCB waste.

Based on process knowledge and a review of facility release reports, it has been determined that decontamination of the secondary containment area in TS-006 will not be required. After the 1999 release, the surface of the trench drain in TS-006 was abrasion-blasted and resealed with an elastomeric coating and the sump was filled in with concrete. Any hazardous constituents remaining from this spill would have been removed with the abrasive blasting. The remaining spills recorded in TS-006 were of very low volumes (ranging from 2 grams to 16 ounces, 57 of 83 spills were one ounce or less) and were promptly cleaned up. In addition, 19 of these spills (4 mixed/PCB spills and 15 spills of corrosive wastes) totaling 0.4 gallons, would not have released waste onto the floor since these containers are stored on Herculite sheeting/diking. Since there is minimal potential for the presence of hazardous waste constituents in the secondary containment area, no decontamination of TS-006 will be required prior to dismantling this unit.

The above-grade structural components of TS-6 will be dispositioned in the On-Site Disposal Facility. Disposition of the concrete pad and excavation of the underlying soils will be addressed by the Soils Project as part of the remediation of Area 3B.