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Fernald Environmental Management Project  
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SEP 05 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-0505-03

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:

**REQUEST TO STREAMLINE MANIFESTING PROCESS BETWEEN SPECIFIC IMPACTED MATERIAL SOURCE AREAS IN AREA 3A AND THE ON-SITE DISPOSAL FACILITY**

The purpose of this letter is to request your concurrence to streamline the manifesting process between two specific impacted material source areas in Area 3A and the On-Site Disposal Facility (OSDF). The proposed process will improve both the Waste Acceptance Organization (WAO) functional efficiency and effectiveness in these areas.

Currently, each load of impacted material that enters the OSDF is accompanied by a manifest. These manifests are prepared and signed by WAO personnel at the excavation on a truck-by-truck basis and placed into a carrier tube attached to the exterior of the truck cab. Upon arrival of a truck at the OSDF entrance, WAO retrieves the manifest from the carrier tube and verifies that the Profile reflects a Waste Acceptance Criteria (WAC)-compliant load. WAO then releases the truck to proceed to an appropriate grid for placement. WAO subsequently coordinates with GeoSyntec to record the location at which the load was placed (e.g., cell, grid, lift).

The manifests serve a dual purpose: 1) a tracking mechanism that generates a cradle-to-grave record for excavated soil that is placed in the OSDF, and 2) a hold point that prevents a truckload from entering the OSDF without WAO approval. Fluor Fernald plans to retain the current manifesting approach for roll-off boxes, because they originate from various projects sitewide and are frequently staged at interim locations prior to

Mr. James A. Saric  
Mr. Tom Schneider

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delivery to the OSDF, thus increasing the risk that meets-WAC and exceeds-WAC roll-off boxes may be confused in absence of associated manifests. WAO also plans to retain the current manifesting approach for excavated material that has special tracking, placement or health and safety requirements (e.g., asbestos). However, Fluor Fernald is considering a revised approach that eliminates the truck-by-truck manifest for loads of excavated material that have no special requirements, and originate from source locations that are nearby and/or in the line of sight from the OSDF entrance. This revised approach would streamline the flow of trucks from excavations to the OSDF, since they would not have to stop for WAO to insert and remove manifests from a carrier tube. It also would free WAO personnel from the administrative burden of completing hundreds of manifests per day, and instead allow them to focus primarily on visual inspection of soils for prohibited materials.

Under the revised approach, a large, numbered placard would be affixed to both the front and sides of each truck. As each truck is loaded at the excavation, the material would be visualized by WAO for absence of prohibited material. If a load meets WAC requirements, WAO would utilize a dedicated radio channel to contact their counterpart at the OSDF entrance and identify the truck number and the OSDF category number, which both parties would record on a log. When the truck arrived at the OSDF, WAO would check off the truck number. In the event that a truck arrived at the OSDF entrance that had not been called in, it would be stopped and the WAC status confirmed before allowing it to proceed.

At the excavation, WAO would compile a record that associates each truck number with the appropriate profile number (which includes the OSDF category number) and source location. At the OSDF, WAO would compile a record that associates each truck number and OSDF category number with the placement location provided by GeoSyntec. At the end of each day, WAO would merge and reconcile their excavation and OSDF truck records, and prepare one manifest with a total volume for each unique combination of profile number, source location and placement location. Information from the manifests would continue to be entered to the Integration Information Management System (IIMS) database.

As previously stated, this revised approach would be limited to loads of excavated material that originate from source locations that are nearby and/or in the line of sight from the OSDF entrance. With your concurrence, Fluor Fernald would like to move ahead with implementation at two source locations in Area 3A that fit this criteria, specifically the crushed concrete pile and the lime sludge/soil pile as shown in the attached figure. We will also meet with you to review the lessons learned from this new approach at the end of the 2003 Construction Season.

Mr. James A. Saric  
Mr. Tom Schneider

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If you have any questions or need further information, please contact Johnny Reising at (513) 648-3139.

Sincerely,



Glenn Griffiths  
Acting Director

FCP:Reising

Enclosure: As Stated

cc w/enclosure:

R. Greenberg, EM-31/CLOV  
N. Hallein, EM-31/CLOV  
D. Pfister, OH/FCP  
J. Reising, OH/FCP  
J. Sattler, OH/FCP  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
G. Jablonowski, USEPA-V, SR-6J  
F. Bell, ATSDR  
M. Cullerton, Tetra Tech  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
AR Coordinator, MS78

cc w/o enclosure:

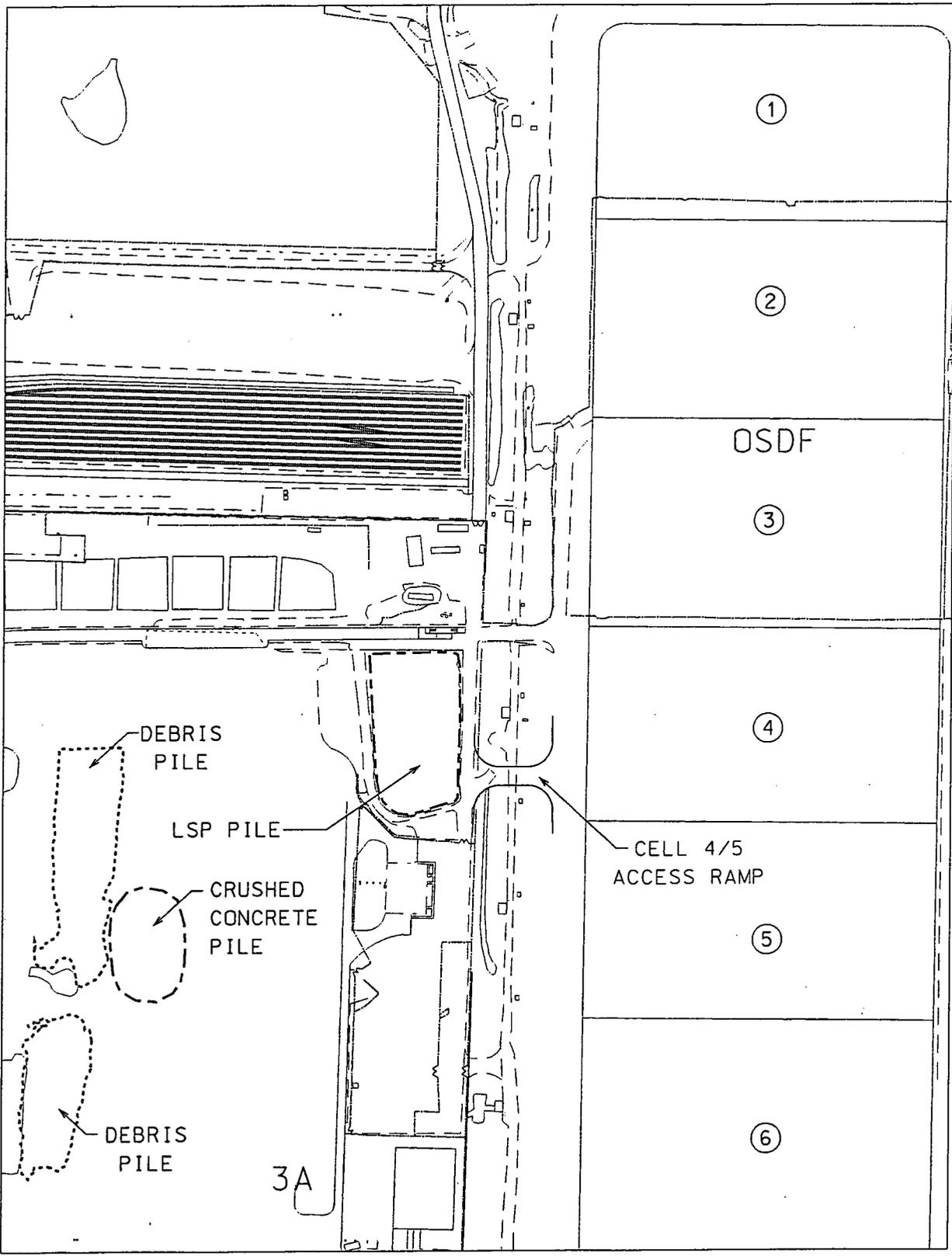
R. Abitz, Fluor Fernald, Inc./MS64  
L. Barlow, Fluor Fernald, Inc./MS41  
T. Beasley, Fluor Fernald, Inc./MS60  
J. Chiou, Fluor Fernald, Inc./MS64  
R. Friske, Fluor Fernald, Inc./MS64  
T. Hagen, Fluor Fernald, Inc./MS1  
U. Kumthekar, Fluor Fernald, Inc./MS64  
S. Lorenz, Fluor Fernald, Inc./MS41  
F. Miller, Fluor Fernald, Inc./MS64  
T. Poff, Fluor Fernald, Inc./MS65-2  
D. Powell, Fluor Fernald, Inc./MS64  
R. Reynolds, Fluor Fernald, Inc./MS64  
B. Zebick, Fluor Fernald, Inc./MS60  
ECDC, Fluor Fernald, Inc./MS52-7



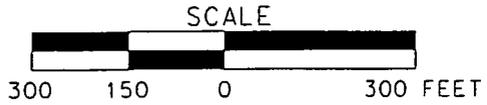
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STATE PLANAR COORDINATE SYSTEM 1983

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LEGEND:



CRUSHED CONCRETE PILE AND LSP PILE IN AREA 3A