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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-0142-04

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

Dear Mr. Saric and Mr. Schneider:

**EXTENSION REQUEST FOR SUBMITTAL OF THE DRAFT CERTIFICATION REPORT FOR
AREA 2, PHASE II – SUBAREAS 1, 2, AND 4**

Reference: Letter DOE-0090-04, W. Taylor to J. Saric, "Transmittal of the Final Certification Design Letter and Project Specific Plan for Area 2, Phase II – Subsections 1, 2, and 4 Certification Sampling," dated December 29, 2003

The purpose of this letter is to request your approval to extend the date for submittal of the Area 2, Phase II (A2Pll) – Subareas 1, 2, and 4 Certification Report from February 17, 2004 to April 30, 2004. This milestone date was established in the Certification Design Letter for A2Pll – Subareas 1, 2, and 4, dated December 2003 (referenced above). Consistent with Section XVIII of the Amended Consent Agreement, the Department of Energy, Fernald Closure Project (DOE-FCP) believes good cause exists for extending this milestone date due to the weather and field conditions, which caused the extenuating circumstances encountered during the course of the surveying and sampling in this area, specifically in Certification Units (CU) 1, 6, and 25.

The A2Pll represents the area that contains the pine forest on the southwest portion of the FCP. This area is immediately south of the Silos area, south, southwest, and west of the Advanced Waste Water Treatment Facility, east of Paddys Run, and north of Area 2, Phase I. As described in the A2Pll Implementation Plan (August 2003), Subarea 1 consists of the former Arsenic Area due south of the Silos, Subarea 2 consists of the

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Radium Hotspot on the banks of Paddys Run, and Subarea 4 comprises the remainder of the general area excluding Subarea 3, which is the Infrastructure Area that will be remediated and certified at a later date and addressed in a future submittal.

Surveying of sampling locations in A2P11 began on November 12, 2003 and sampling began on November 13, 2003. Although surveying is now complete, sampling has been performed in 42 out of the 45 CUs, and the analytical activities are ongoing, weather and field conditions have hampered the anticipated pace of the surveying and subsequent sampling activities in several CUs. For the Arsenic Area (CU 1), the recent heavy rain has collected in the excavation footprint to a depth of approximately three feet and has since frozen over due to the extreme low temperatures. Prior to sampling, this area must be drained to allow for the safe access to the planned locations. Pumping of this water has yet to be performed, as the area remains iced over. Similarly, for CU 6, which is due south of the Arsenic Area, the extensive rainfall has made the area extremely swampy and difficult to traverse for the surveying and sampling teams. Likewise, throughout this project, the dense forestry over the majority of the area has increased the duration of surveying activities, which have extended past our optimistic estimates. Lastly, the slopes along the Radium Hotspot coupled with the recent icy conditions have prevented the sampling teams to safely access the sample locations for the CU that encompasses this area (CU 25).

To date, 45 percent of the analytical data has been received. Of these datasets, only five of the CUs exhibited any above-Final Remediation Level (FRL) results. CUs 3, 26, and 31 had a single result above the FRL for arsenic, CU 28 had one result greater than the FRL for arsenic and one for radium-226, and CU 32 had two results above the FRL for arsenic and four results above the FRL for radium-226. None of these above-FRL results were greater than two times the respective FRL, which passes the hotspot criterion for certification. Based on the preliminary statistical analyses, these results will have little to no effect on the certification effort.

It is anticipated that the sampling activities will be completed by March 1, 2004. Therefore, based on analytical turnaround times, all of the data should be available for review, interpretation, validation, and statistical analysis by April 1, 2004. This permits the submittal of the certification report by April 30, 2004.

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

Sincerely,


William J. Taylor
Director

FCP:Reising

cc:

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