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*July 2006*

Mr. Arthur W. Kleinrath  
Mound Site Manager  
U.S. Department of Energy  
Office of Legacy Management  
955 Mound Road  
Miamisburg, OH 45342

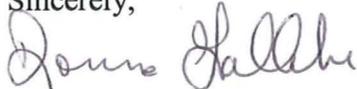
SUBJECT: Contract No. DE-AC01-02GJ79491  
Deliverable - Draft Long-Term Surveillance and Maintenance Plan for the  
Ashtabula Closure Project

Dear Mr. Kleinrath:

In response to the CPAF Deliverable, submittal of the Draft Long-Term Surveillance and Maintenance Plan for the Ashtabula Closure Project is enclosed.

If you have any questions, please call Karen Williams of my staff at (937) 847-8350, Extension 307.

Sincerely,



Donna Gallaher  
Stoller Mound Site Manager

DG/jp

Enclosure

cc: S. Marutzky, Stoller  
K. Williams, Stoller

cc w/o enclosures  
Correspondence Control File (Thru B. Bonnett)





# Long-Term Surveillance and Maintenance Plan for the U.S. Department of Energy Ashtabula Closure Project, Ashtabula, Ohio

July 2006



U.S. Department  
of Energy

## Office of Legacy Management

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## Acronyms

ACP	Ashtabula Closure Project
CBC	Consolidated Business Center
CFR	<i>Code of Federal Regulations</i>
D&D	Decontamination and Decommissioning
DOE	U.S. Department of Energy
DP	Decommissioning Plan
EEOICPA	Energy Employees Occupational Illness Compensation Program Act
EM	Environmental Management
FRC	Federal Records Center
FY	fiscal year
LSRS	LSRS Sharp Remediation Services, LLC
LM	Legacy Management
LTS&M	Long-Term Surveillance and Maintenance
NARA	National Archives and Records Administration
NRC	U.S. Nuclear Regulatory Commission
ODH	Ohio Department of Health
OEPA	Ohio Environmental Protection Agency
RCRA	Resource Conservation and Recovery Act
RMI	RMI Titanium Company
TCE	trichloroethylene
WMU	Waste Management Unit

## 1.0 Introduction

Because of the unique circumstances of the Ashtabula Closure Project (ACP) site, the majority of ten functional areas of the Site Transition Framework will not be performed by the U.S. Department of Energy (DOE). Records management is the primary transition area for the ACP; however, it is important to note that the Office of Legacy Management (LM) will not be assuming custodianship for all ACP records.

The ACP is on an accelerated cleanup schedule with an anticipated physical completion in fiscal year (FY) 2006. Transition and project closeout of the ACP are categorized into three phases:

- Physical Completion is achieved when
  1. LSRS Sharp Remediation Services, LLC (LSRS) performs final status survey(s) of the areas of the Ashtabula site demonstrating that project release criteria have been met for all areas, and
  2. DOE-Environmental Management (EM) provides the services of an Independent Verification Contractor upon LSRS demonstration of release criteria being met.
- Regulatory Completion is achieved when
  1. Ohio Department of Health (ODH) grants license termination in accordance with NUREG-1757, thereby allowing unrestricted release of the site.
  2. RMI Titanium Company (RMI) requests and receives license termination (Resource Conservation and Recovery Act [RCRA] Part B Permit, National Pollutant Discharge Elimination System Permit, etc.)
- Contractual/Financial Closeout involves completion of remaining administrative matters including, but not limited to:
  1. DOE-EM-OH will review obligated funds/payments made to the contractor/and pending invoices under task order DEPR09-045SR22277 and subsequent task order DE-RP-30-05EW04001.
  2. EM-Consolidated Business Center (CBC) closes out the task order contract with RMI and closure contract with LSRS.
  3. Per RMI agreement, completion and sign off of the contract constitutes a full discharge of any and all claims and liability, known or unknown, with regard to decontamination and decommissioning of the Ashtabula site.
  4. DOE completes a Final CD-4 package upon Regulatory Completion and DOE is released of liability for the site.

This Plan documents the activities and operations required to manage the site records post closure and identifies DOE-LM actions that the public and regulatory community can expect.

## 1.1 Purpose and Scope

This Long-Term Surveillance and Maintenance (LTS&M) Plan defines the roles and responsibilities of the DOE-LM for the surveillance and maintenance obligation of the DOE ACP located in Ashtabula, Ohio.

The ACP site is being remediated to unrestricted release standards, therefore records management of the ACP inactive records will be the only LST&M responsibility. The use of the site will be returned to RMI upon termination of DOE liability in contract DEPR-09-045SR22277. Although current plans are for DOE-EM to retain access to site for one year for purposes of ground water monitoring, the monitoring is not considered to be LTS&M.

The retention of records and dissemination of information over the long-term is a critical aspect of legacy management. Records management is planned to be the primary LTS&M function for the Ashtabula project; however, it is important to note that LM will not be assuming custodianship for all ACP records.

Because the Ashtabula site will be remediated to unrestricted, resident farmer end use release standards, DOE-LM's primary activity will be custodianship of certain site records.

## 1.2 Legal and Regulatory Requirements

Project records are maintained in full compliance with DOE requirements:

- 36 *Code of Federal Regulations* (CFR) Parts 1220–1238 - National Archives and Records Administration (NARA),
- Title 44, United States Code, Chapter 29 - Records Management by the Archivist of the United States and by the Administrator of General Services,
- Title 44, United States Code, Chapter 31 - Records Management by Federal Agencies, and
- Title 44, United States Code, Chapter 33 - Disposal of Records.

## 1.3 Roles and Responsibilities

The primary stakeholders with an interest in the ACP include DOE, RMI, ODH, and Ohio Environmental Protection Agency (OEPA). These parties have historically shared a vision that allowed for unrestricted use of the site after closure. DOE-Office of Restoration and Waste Management contracted RMI to conduct the site decommissioning project to satisfy DOE's liability by removing all radiological and hazardous contaminant to levels which allow for the facility and adjacent areas to be released for unrestricted use.

### 1.3.1 Role of DOE

DOE-LM has LTS&M responsibility of all DOE remedial action sites, disposal sites, and other sites, as assigned, that (1) have no ongoing DOE mission and (2) are not part of a larger DOE facility. LM was established primarily to provide a separate focus for DOE's long-term commitments and responsibilities at sites without an on-going long-term mission.

Since ownership of the Ashtabula site will remain with RMI; all operational responsibility will remain with RMI. Responsibility for custodianship of the Ashtabula Closure Project records will be assigned to LM.

### 1.3.2 Role of Regulators

The U.S. Nuclear Regulatory Commission (NRC) will provide regulatory oversight in consultation with ODH for NRC activities at the Ashtabula Closure Project.

The ODH adopts the site Decommissioning Plan (DP) describing threatened and endangered species, floodplains, wetlands, regulated streams, cultural resources, and historic sites were evaluated at and proximate to the site.

OEPA, headquartered in Columbus, Ohio, has jurisdiction over the RCRA Waste Management Unit (WMU) at the ACP that contains trichloroethylene (TCE)-contaminated soil and groundwater. OEPA approves site remedies and concurs with their ongoing implementation.

### 1.4 Contacts

<b>POINTS OF CONTACT</b>	
<b>Ashtabula Subject Matter Expert</b> Name: Sandy Reed, DOE Email: <a href="mailto:amy.meyer@fernald.gv">mailto:amy.meyer@fernald.gv</a> Phone:	<b>S.M. Stoller Corp. Subject Matter Expert</b> Name: Cathy Wallace Email: <a href="mailto:Cathy.Wallace@lm.doe.gov">Cathy.Wallace@lm.doe.gov</a> Phone: 937.847.8350 x303
<b>DOE Ashtabula Subject Matter Expert</b> Name: Trina Cesnik – Lata-Sharp/RMI Email: <a href="mailto:amy.meyer@fernald.gv">mailto:amy.meyer@fernald.gv</a> Phone:	<b>DOE Subject Matter Expert</b> Name: Eric Marsh-RMI Email: <a href="mailto:amy.meyer@fernald.gv">mailto:amy.meyer@fernald.gv</a> Phone:
<b>DOE-EM CBC Subject Matter Expert (Records Management)</b> Name: Sue Smiley Email: <a href="mailto:sue.smiley@emcbc.doe.gov">sue.smiley@emcbc.doe.gov</a> Phone: 513.246.0596	<b>DOE Subject Matter Expert</b> Name: Lisa Maul Email: <a href="mailto:lisa.maul@wv.doe.gov">lisa.maul@wv.doe.gov</a> Phone: 440. 993.1944
<b>NARA Dayton FRC Contact</b> Name – Lloyd “Mitch” Mitchell Address: 8801 Kingsridge Drive Dayton, Ohio 45458 Email: <a href="mailto:Lloyd.Mitchell@nara">Lloyd.Mitchell@nara</a>	<b>DOE-LM Subject Matter Expert</b> Name: Art Kleinrath Email: <a href="mailto:Art.Kleinrath@lm.doe.gov">Art.Kleinrath@lm.doe.gov</a> <a href="mailto:amy.meyer@fernald.gv">mailto:amy.meyer@fernald.gv</a> Phone:
<b>DOE Headquarters</b> Name: Abel Lopez, Jr. Email: <a href="mailto:Abel.Lopez@hq.doe.gov">Abel.Lopez@hq.doe.gov</a> Phone: 202.586.5955	<b>DOE-LM Subject Matter Expert (Records Management)</b> Name: Karen Hatch Email: <a href="mailto:Karen.Hatch@netl.doe.gov">Karen.Hatch@netl.doe.gov</a> Phone: 304.285.1397

**POINTS OF CONTACT**

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(FOIA/Privacy Act)**

Name: Marian Wilcox  
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**DOE-LM Subject Matter Expert (FOIA/  
Privacy Act)**

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Email: Sheila.Dillard@hq.doe.gov  
Phone: 202.596.1311

**DOE General Counsel, Legal Support**

Name: Steven R. Miller  
Email: Steven.Miller@hq.doe.gov  
Phone: 202.586.2925

## **2.0 Site Background and Status Information**

### **2.1 Site Description**

The ACP is a DOE-EM decontamination and decommissioning (D&D) and RCRA project on the Ashtabula Site. RMI is a commercial extrusion plant with an NRC license. The site is owned and operated by RMI, who holds the licenses and permits governing cleanup of the site, as well as storage and disposal of all wastes generated as a result of D&D work.

The current end state, defined by the DP and RCRA permit, requires clean-up to meet unrestricted, resident farmer end use. The site DP has served as the driver for the Ashtabula Closure Site since 1997, when it was approved by the NRC and subsequently adopted by the ODH. The OEPA has jurisdiction over the RCRA WMU.

The end state requires compliance with maximum contaminant levels where groundwater contamination exists. To accomplish this, eleven of thirteen remaining facilities will be removed along with associated infrastructure and approximately 42,000 tons of soil contaminated with TCE and radionuclides. DOE's liability will be satisfied after remediation of radiological and hazardous materials from previous operations is completed and verification that cleanup criteria is met.

#### **2.1.1 Location**

The ACP site is located at 600 State Road, at the intersection of State Road and 21<sup>st</sup> Street in Ashtabula Township. The City of Ashtabula is adjacent to the western boundary of the site. Ashtabula Township is located approximately 55 miles east of Cleveland. The site consists of 27 acres of privately owned property.

#### **2.1.2 Land Use**

The ACP is located in a highly industrialized portion of Ashtabula County and is zoned for heavy industrial use. Adjacent properties include a chemical production plant, a commercial scrap recycling facility, the former RMI metals reduction plant, a trucking firm, the Fields Brook floodplain (a remediated National Priorities List site) and several tracts of undeveloped land, which are zoned for industrial (M-2) or central business (C-3) usage.

Ashtabula Township has a population of 23,239. The population of Ashtabula County is 103,152. The closest residential area is on Columbus Avenue, approximately 1,800 feet west of site (Ref. ACP DP). The St. John and Paul Elementary School is the closest school to the site and is located on East 21<sup>st</sup> Street, approximately 1,400 feet west of the site.

### **2.2 Operational History**

Beginning in 1962, the Atomic Energy Commission contracted with RMI to manufacture metallic uranium tubes and rods, forged uranium parts, and experimental quantities of thorium metal for use in the Hanford and Savannah River weapons program reactors. The uranium was extruded into rods, tubes, or other shapes as an intermediate step in the production of nuclear fuel elements at other DOE sites. RMI also extruded depleted uranium under an NRC license and

extruded non-radioactive metals, primarily copper based, for the commercial sector. The plant discontinued operations in 1988.

### **2.3 Final Physical Site Conditions**

The expected site conditions at transfer are:

- The site will be remediated for unrestricted use, including soil, groundwater, and structures.
- All uncontaminated foundations and concrete will be removed from the site.
- The final status surveys will be complete.

### 3.0 Long-Term Surveillance and Maintenance Requirements

Long-term surveillance and maintenance requirements for the Ashtabula, Ohio, Site are as follows:

- Managing site records,
- Responding to stakeholder inquiries.

The following *are not required* at the site:

- Monitoring: on or off site,
- Site surveillance or inspection,
- Site physical property maintenance.

Following remediation, DOE certified that the site complied with applicable cleanup and/or decontamination criteria and standards and released the property for unrestricted use. There are no supplemental limits, institutional controls, permits, or agreements in effect at the site.

### 3.1 Records Management

The retention of records and dissemination of information over the long-term is a critical aspect of legacy management. While records management is the primary LTS&M function for the Ashtabula project; it is important to note that DOE-LM will not be assuming custodianship for all ACP records.

Records will be managed as follows:

- As negotiated by the DOE-EM (CBC), RMI corporate/confidential records will be identified and retained by RMI upon closure of the ACP.
- ODH under and Agreement with the NRC and to satisfy regulatory requirements under the ODH license (11900040004).
- DOE-LM will assume custodianship of DOE-EM-OH project records after contract closeout.
- Contract closeout activities by DOE-EM-CBC are anticipated in fiscal year 2007, and these records will be dispositioned to a Federal Records Center (FRC) or to a designated DOE-LM records storage facility and ownership/custody transferred to DOE-LM as that time.
- The ongoing management of the Energy Employees Occupational Illness Compensation Program Act (EEOICPA) responsibilities will transfer to DOE-LM.
- DOE-LM will assume custodianship of the DOE-EM-CBC project records after contract closeout in February 2007. The ongoing management of the EEOICPA responsibilities will transfer to DOE-LM.
- DOE-LM will have assumed responsibility for EEOICPA claims associated with the RMI and LSRS contracts.

- DOE-EM-CBC will retain records needed for ongoing litigation and business/financial closeout. These records will be transferred to the appropriate FRC or to a designated DOE-LM records storage facility.
- DOE-EM-CBC will have inventoried and dispositioned DOE project files to a FRC or designated DOE-LM records storage facility.
- DOE-LM will have assumed custodianship of DOE project files stored at the FRC or designated DOE-LM records storage facility.
- DOE-EM (CBC) will inventory, disposition and transfer custodianship of contract files associated with closure contract DEPR-30-05EW04001, with LSRS a FRC or designated DOE-LM records storage facility.

### 3.1.1 LTS&M Records and Data Collection

The ACP site is being remediated to unrestricted release standards, therefore no engineered controls or operations and maintenance activities are required; thus, no records associated with this aspect of LTS&M activities will be developed.

### 3.1.2 Pre-LTS&M Records and Data Collection

Inactive or retired site records will be stored at a FRC. The Regional Records Center designated archive facility for Miamisburg temporary records created during the operation and remediation of the site is the federal records repository is located in Dayton Ohio. The Regional Records Center designated archive facility for Miamisburg permanent records created during the operation and remediation of the site is the federal records repository is located in Chicago Illinois. To facilitate retrieval of records after site operations cease, and because the greatest repository of site knowledge will reside with the site steward, DOE-LM will obtain copies of box and file indices and Records Transmittal and Receipt forms (SF 135) and destruction certificates for the site. These indices, SF 135s and destruction certificates will be retained to access the surveillance and maintenance collection, and will remain in DOE-LM custody.

In addition, DOE-LM will have custody of site documents residing in the FRC and will be notified prior to the destruction of any temporary records. Original real property records will be dispositioned by DOE-EM to the FRC and custody will be transferred to DOE-LM. Federal real property specialists may have access to these records.

### 3.1.3 Specific Records Management Topics

- **Scheduled Records:** The DOE-EM CBC Records Officer will ensure that NARA approved records schedules are used to schedule ACP records. Permanent and temporary records will be transferred at the appropriate time to a FRC or designated DOE-LM records storage facility.
- **Unscheduled Records:** ACP must schedule and disposition all records appropriately. If records exist without an applicable schedule, ACP must complete the required SF 115 to obtain an approved schedule. DOE-LM will not accept any unscheduled records.
- **Finding Aids:** At the time of transition, all finding aids will be turned over to DOE-LM.

- **Records Collections:** ACP and DOE-EM are working together to define the numerous records collections and volumes currently at the site. A chart defining these record collections is requested upon transition from DOE-EM to DOE-LM. Examples of expected records collections are defined below:
  - **Electronic Records**
  - **X-Rays**
  - **Audit Records**
  - **Project Records**
  - **Personnel Records**
  - **Medical Records**
  
- **Records Collections:** ACP and DOE-EM are working together to identify the various types of records currently at the site. The media type will be defined upon transition from DOE-EM to DOE-LM. Examples of expected types of records are defined below:
  - **Audio/Visual Records (Photos, Videos and Maps)**
  - **Microfilm**
  - **Microfiche**
  - **CD/DVD**

<b>Ashtabula Records Closure Chart</b>			
<b>Record Custody</b>	<b>Type</b>	<b>Description</b>	<b>Volume/Application<sup>a</sup></b>
RMI	Inactive	Stored at Iron Mountain <ul style="list-style-type: none"> <li>• Does include Drawlings, photos, and videos.</li> </ul>	1,400 cubic feet (paper)
RMI	Active	On site	200 cubic feet <ul style="list-style-type: none"> <li>• Volumes for photos, drawings videos, microfilm etc. TBD</li> </ul>
DOE	Active	DOE Ashtabula Office	100 cubic feet
Lata-Sharp	Active	On site	TBD
DOE	Database/Application Systems	Finding Aid	Records Inventory
RMI	Database/Application Systems	Finding Aids	<ul style="list-style-type: none"> <li>• CRIDS</li> <li>• LTMS (Laboratory Information management System)</li> <li>• HP Database</li> <li>• SWMM (Storm Water Management Model Software)</li> </ul>

<sup>a</sup> All volumes are approximate at this time.

### 3.1.4 Near Term Transition Records Management Tasks

- **Scheduled Records:** The DOE-EM CBC Records Officer will ensure that NARA approved records schedules are used to schedule ACP records. Permanent and temporary records will be transferred at the appropriate time to a FRC or designated DOE-LM records storage facility.
- **Unscheduled Records:** ACP must schedule and disposition all records appropriately. If records exist without an applicable schedule, ACP must complete the required SF 115 to obtain an approved schedule. DOE-LM will not accept any unscheduled records.

- **Disposal of Records:** ACP will review their records and any records that have reached their retention period will be destroyed prior to DOE-EM-CBC transitioning records to DOE-LM. The DOE-EM-CBC officer will review their records to determine what records will be destroyed prior to transition.

As final transition approaches, DOE-EM and ACP will have active and inactive records. All records must be prepared in accordance with NARA requirements and transferred to a FRC or designated DOE-LM records storage facility.

### **3.2 Public Participation and Communication**

DOE-LM does plan to conduct one public meeting in FY07 to provide information to the public OLM's roles and responsibilities as a Category 1 site. Points of contact for records will be the main topic planned for discussion.

The ACP site is a NRC site managed under an ODH license. RMI, as the license holder, is required to comply with all NRC public participation requirements. Additionally, NRC provides notices of applicants' intentions to file applications that would constitute major licensing actions, as well as current information regarding major licensing and enforcement proceedings undertaken by NRC on their web page. The availability of this information provides opportunities for members of the public to identify any such proceedings for which they may wish to request a hearing or file a petition to intervene.

Contact information for the DOE staff responsible for implementing the LTS&M program will be posted at the ACP Site. That contact is:

- Art Kleinrath,  
Office of Legacy Management  
U.S. Department of Energy  
955 Mound Avenue  
Miamisburg, OH 45342  
937-847-8350 X318
- Website  
<http://www.lm.doe.gov>

### **3.3 Revisions to the LTS&M Plan**

DOE is responsible for the preparation, revision, and implementation of this LTS&M Plan. The document and subsequent revisions can be found on the DOE-LM website, <http://www.lm.doe.gov>.

### **3.4 Emergencies, Contingency Planning, and Corrective Action**

Because the ACP site is being remediated to unrestricted release standards, no engineered controls or operations and maintenance of the remedy will be necessary. Also, the site will remain under ownership of RMI; therefore, DOE is not responsible for any emergency measures that will take place in response to unusual damage or disruption of the site that threatens or compromises the safety or security.

### **3.5 Budgeting and Funding**

DOE will request adequate funds to maintain the remedies specified in the Record of Decisions for this site. DOE will provide appropriated funds to conduct long-term surveillance and maintenance at the Ashtabula Closure Project as part of an annual Congressional appropriation. Approximate total funding to implement the LTS&M program described in this Plan is estimated to be \$85.3K in 2007 dollars.