GWOU ADMINISTRATIVE RECORD
SECTION TITLE:
GW-400-403-1.04

#90604

SEP 14 2001

Mr. Dan Wall
Project Manager
Superfund Division
U.S. EPA
Region VII
901 N. 5th Street
Kansas City, Kansas 66101

Dear Mr. Wall:

REMEDIAL DESIGN/REMEDIAL ACTION (RD/RA) WORK PLAN FOR THE INTERIM REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT (GWOU) (REV. 0)

Enclosed is a copy of the subject document. This work plan is the primary document used in defining the design and implementation of the selected interim remedial action for the Groundwater Operable Unit. This plan has been prepared in accordance with the *Federal Facility Agreement* between the Department of Energy and the Environmental Protection Agency and the *Comprehensive Environmental Response, Compensation, and Liability Act of 1986*. This plan is intended to fulfill the requirements for both the remedial design and the remedial action work plans for the implementation of the *Interim Record of Decision for Remedial Action for the Groundwater Operable Unit at the Chemical Plant Area of the Weldon Spring Site* (September 2000).

This plan was issued draft on February 14, 2001. Comments were received from the Missouri Department of Natural Resources (MDNR) dated April 11, 2001. Responses and the draft final RD/RA work plan were issued on May 11, 2001. Additional comments were received from MDNR dated July 10, 2001. DOE responded to these comments in a letter dated July 30, 2001. This letter also indicated that the work plan would be revised to incorporate updated information regarding changes in schedule and cost. As you are aware, our initial efforts to solicit competition on this project resulted in non-responsive bids. The solicitation is being revised and the final specifications will be transmitted to you under separate cover. We had previously sent you and MDNR the 30/60% design specifications on March 23, 2001, and the 90% design specifications on April 12, 2001. We have also sent the bench scale reports on May 7, 2001. This is in keeping with our commitment to closely coordinate the development of the In-Situ Oxidation work and to assure that the mutually agreed to one-week review period on the specialty subcontractor's detailed design can be met.

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#90604

Due to the changes in the cost and schedule not previously seen by EPA or MDNR, we are opening an additional 30-day review period for the agencies on the attached Rev. 0 workplan.

If you have any questions or comments regarding this report, please contact Tom Pauling at (636)441-8978.

Sincerely,

ORIGINAL SIGNED BY
PAMELA THOMPSON

Pamela Thompson
Project Manager

Enclosure:
As stated

cc w/enclosure:
Larry Erickson, MDNR
Brandon Doster, MDNR
Ben Moore, MDNR
Myrna Rueff, MDNR/DGLS
Rick Hampel, Weldon Spring Citizens Commission (4 copies)
Dan Mroz, US Army COE
Mike Schroer, MDOC
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cc w/o enclosure:
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EM-95:TPauling:x7051:emh:9/13/01 (m:RD/RA Workplan for GWOU)

CONCURRENCES/ REVIEWED BY:	
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INITIALS/SIG.	TPauling
DATE	9/14/2001
CONCURRENCE: RTG SYMBOL	EM-95
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DATE	9/14/2001
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DOE/OR/21548-882
CONTRACT NO. DE-AC05-86OR21548

REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN FOR THE INTERIM REMEDIAL ACTION FOR THE GROUNDWATER OPERABLE UNIT

WELDON SPRING SITE REMEDIAL ACTION PROJECT
WELDON SPRING, MISSOURI

SEPTEMBER 2001 **REV. 0**

U.S. Department of Energy
Oak Ridge Operations Office
Weldon Spring Site Remedial Action Project

Prepared by MK-Ferguson Company and Jacobs Engineering Group

083001

MORRISON KNUDSEN CORPORATION MK-FERGUSON GROUP Weldon Spring Site Remedial Action Project Contract No. DE-AC05-86OR21548	
	Rev. No. 0
PLAN TITLE: Remedial Design/Remedial Action work Plan for the Interim Remedial Action for the Groundwater Operable Unit	

APPROVALS

Groundwater Operable Unit Coordinator	9-4-01 Date
Environmental Safety and Health Manager	9-5-01 Date
Engineering Manager	9-5-01 Date
Project Quality Manager	9/6/2001 Date
Deputy Project Director	9/6/01 Date

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DOE/OR/21548-882

Weldon Spring Site Remedial Action Project

Remedial Design/Remedial Action Work Plan for the Interim Remedial Action for the Groundwater Operable Unit

Revision 0

September 2001

Prepared by

MK-FERGUSON GROUP, INC.
and
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7295 Highway 94 South
St. Charles, Missouri 63304

Prepared for

U.S. DEPARTMENT OF ENERGY
Oak Ridge Operations office
Under Contract DE-AC05-86OR21548

ABSTRACT

The *Interim Record of Decision for Remedial Action for the Groundwater Operable Unit* specifies in situ chemical oxidation treatment of trichloroethylene (TCE) in groundwater at the chemical plant area. This in-place treatment process is expected to reduce trichloroethylene (TCE) concentrations to the maximum contaminant level (MCL) of 5 µg/l. The remaining contaminants of concern (nitrate, nitroaromatic compounds, and uranium) will be addressed in a final Record of Decision that will be issued at a later date.

This plan is intended to provide the transition from the environmental documentation phase to final design and implementation of the interim remedial action. This plan describes the criteria, design activities, and construction activities for the in situ chemical oxidation process. An overall project schedule and a summary of costs are included for the major components of this action.

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1. INTRODUCTION

The Groundwater Operable Unit (GWOU) is the second of two operable units established for the chemical plant area of the Weldon Spring site. The Chemical Plant Operable Unit, which was the first operable unit, addressed the treatment of sludges, excavation of soil, and placement of these materials and the quarry bulk wastes, treated sludge, contaminated soils, buildings, drums, process equipment, and debris in the on-site engineered disposal cell. The GWOU addresses contaminated groundwater and springs in the chemical plant area.

The *Interim Record of Decision* provides for the remediation of trichloroethylene (TCE)-contaminated groundwater at the chemical plant. The contaminants determined to be of concern (nitrate, nitroaromatic compounds, and uranium) will be addressed, in a final Record of Decision (ROD) that will be issued at a later date. This approach allows for TCE to be remediated in the near-term while further studies are planned and conducted to determine the effectiveness and practicability of remediating the remaining groundwater contaminants.

1.1. Purpose and Scope

This plan is intended to fulfill requirements for both the remedial design and the remedial action work plans for implementation of the *Interim Record of Decision for Remedial Action for the Groundwater Operable Unit at the Weldon Spring Site* (Ref. 1). The U.S. Environmental Protection Agency (EPA) and the U.S. Department of Energy (DOE) signed the *Interim Record of Decision* on September 29, 2000. The State of Missouri concurred with the proposal to implement this interim remedial action.

This *Work Plan* is the primary document used in defining the design and implementation of the selected interim remedial action for the GWOU. This plan has been prepared in accordance with the *Federal Facilities Agreement* between the DOE and the EPA (Ref. 2) and the *Comprehensive Environmental Response, Compensation, and Liability Act* of 1986 (CERCLA).

This *Work Plan* provides the following:

- The design strategy for the selected interim remedy.
- The implementation approach for this activity.
- The major deliverables that will define the design and construction activities of the selected remedy.
- The overall schedule under which the remedial design and remedial action activities will be conducted.

- General cost estimates for this activity.

1.2. Background

The *Interim Record of Decision* presents the selected interim remedial action for the GWOU. The action was selected following the requirements of CERCLA. The selected action specifies in-place treatment of TCE in groundwater at the chemical plant area. Information presented in the *Remedial Investigation/Feasibility Study Work Plan* (Ref. 3), the *Remedial Investigation* (Ref. 4), the *Baseline Risk Assessment* (Ref. 5), the *Feasibility Study* (Ref. 6), the *Supplemental Feasibility Study* (Ref. 7), and the *Proposed Plan* (Ref. 8) prepared for the operable unit was used to develop the selected action.

The objective of the *Feasibility Study* and *Supplemental Feasibility Study* was to identify technologies and develop an alternative that could reduce or remove the groundwater contaminants at the chemical plant to the extent practicable. Seven of the nine preliminary alternatives were retained for detailed analysis in the *Feasibility Study* (Ref. 6). Since the *Interim Record of Decision* addresses only TCE contamination, only the six remedial actions applicable to remediation of TCE were retained for evaluation.

1.3. Document Organization

The remaining sections of this document are:

Section 2 DESIGN CRITERIA –discusses the design criteria for the development of the selected interim remedial action.

Section 3 ENGINEERING DESIGN ACTIVITIES – discusses the design phases for development of the selected interim remedial action.

Section 4 CONSTRUCTION ACTIVITIES - provides a summary and construction specifications for the activities which will be undertaken to implement the selected remedy.

Section 5 PROJECT SCHEDULE - provides an overall schedule for design and implementation of the different activities discussed in this plan.

Section 6 SUMMARY OF PROJECT COSTS – summarizes the costs for design and construction of the selected remedy.

Section 7 QUALITY ASSURANCE PROGRAM PLAN - provides a brief abstract of the project quality assurance program plan.

Section 8 CONTINGENCY PLAN - provides a brief abstract of the project emergency preparedness plan.

Section 9 POST-ROD DOCUMENTS - provides a summary of the primary and secondary documents that will be prepared for the remedial design and remedial action phases of the GWOU.

Section 10 REFERENCES - provides a summary of the reference documents used for preparation of this plan.

2. DESIGN CRITERIA

The selected interim remedy provides for active remediation of the trichloroethylene (TCE)-contaminated groundwater via in situ chemical oxidation as described in Alternative 9 of the *Feasibility Study* (Ref. 6). The in situ process will be performed as the remedial action to reduce the levels of TCE in groundwater to the maximum contaminant level (MCL) of 5 µg/l. This interim remedial action will comply with the *Interim Record of Decision (ROD) for Remedial Action for the Groundwater Operation Unit* (Ref. 1).

2.1. Siting Criteria

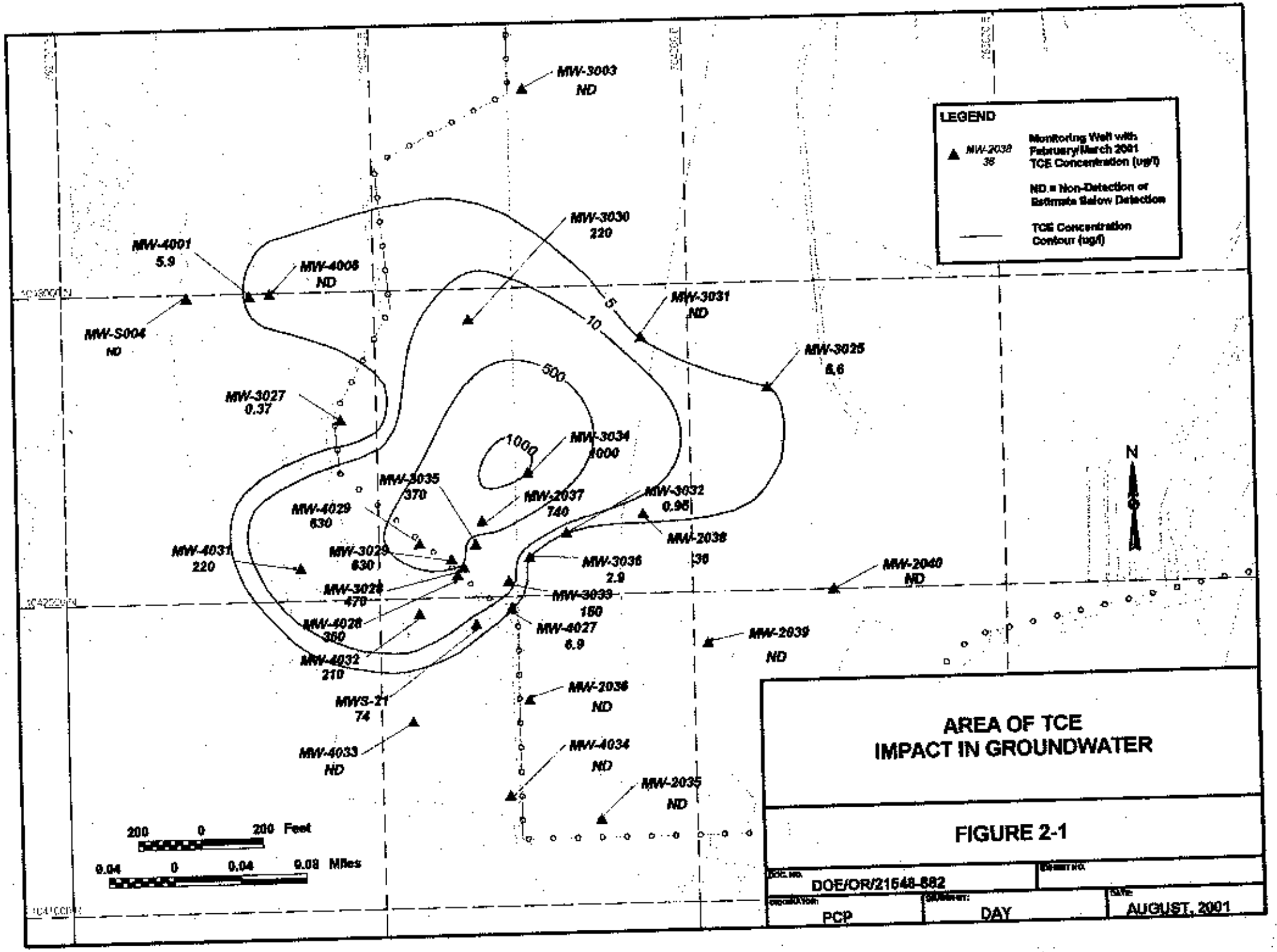
The in situ chemical oxidation process will be applied in the area of TCE impact at the chemical plant, primarily Zones 1 and 2 at the chemical plant site (Figure 2-1). The treatment will be applied in the shallow aquifer, which is comprised of weathered Burlington-Keokuk Limestone. Analytical data indicate that the TCE impact is limited to this portion of the shallow aquifer.

2.2. Delivery System

The delivery system (i.e., wells, probes, injection points) will be located in the weathered portion of the Burlington-Keokuk Limestone. Efforts will be made to limit drilling into the unweathered portions of this unit to prevent downward migration of contaminants. The delivery system will be constructed to facilitate introduction of oxidant into the saturated thickness of the weathered unit. The system will be optimally located to intersect the permeable portion of the shallow aquifer to provide rapid delivery of oxidant into the aquifer system. Injection points will be placed at sufficient intervals to maximize the efficiency of oxidant delivery throughout the TCE-impacted groundwater. Materials used for the construction of the delivery system will be compatible with the oxidant used.

2.3. System Operation

The oxidant concentration and dose will be sufficient to reach the target performance goal of 5 ppb. The actual dose and rate of oxidant delivery will be determined from bench-scale and pilot-scale testing. The concentration of oxidant and the rate of delivery will be set high enough to deliver sufficient oxidant to satisfy both the target contaminant (TCE) demand and natural oxidant demand of the aquifer to ensure degradation of TCE. Testing and operation of the system will not cause excessive migration of TCE beyond the boundaries of known contamination or cause conditions within the aquifer that may result in migration or formation of other contaminants of concern. Operation of the system will not result in excessive residual reagents or otherwise adversely affect the water chemistry of the aquifer in a way that would make conventional water treatment more difficult.


LEGEND
MW-2038
38
Monitoring Well with February/March 2001 TCE Concentration (ug/l)
ND = Non-Detection or Estimate Below Detection
TCE Concentration Contour (ug/l)
MW-3003
ND
MW-3030
220
MW-4001
5.9
MW-4006
ND
MW-S004
ND
MW-3031
ND
MW-3025
6.6
MW-3027
0.37
MW-3034
1000
MW-3035
370
MW-2037
740
MW-3032
0.95
MW-4029
630
MW-2038
38
MW-4031
220
MW-3029
630
MW-3036
2.9
MW-2040
ND
MW-3028
470
MW-3033
150
MW-4028
360
MW-4027
6.9
MW-2039
ND
MW-4032
210
MWS-21
74
MW-2036
ND
MW-4033
ND
MW-4034
ND
MW-2035
ND
5
10
500
1000
N
200 0 200 Feet
0.04 0 0.04 0.08 Miles
AREA OF TCE
IMPACT IN GROUNDWATER
FIGURE 2-1
DOC. NO.
DOE/OR/21548-882
PCP
DAY
AUGUST, 2001

Modifications to the oxidant concentration and delivery rate may be made after fieldwork has begun if it is determined that the system is not performing optimally. Modifications that involve a substantial increase in oxidant concentration and/or delivery rate will be carefully evaluated prior to implementation to ensure that the oxidant will not migrate beyond the treatment area.

2.4. Performance Monitoring

The oxidant delivery system will be closely monitored to ensure adequate operation. The treatment area will be monitored to ensure that the system does not produce off-gasses or hazardous conditions that would endanger the health and safety of workers or the environment. System maintenance will be performed to ensure efficient operation.

2.5. Verification Monitoring

Sampling and analysis of the groundwater will be performed to monitor the remedial effectiveness of the treatment system. Effectiveness will be based on TCE levels in those monitoring wells exhibiting detectable concentrations of TCE (Figure 2-1). These wells have been used to delineate the extent of the contaminant in groundwater. Samples will be collected before and after injections.

3. ENGINEERING DESIGN ACTIVITIES

The engineering approach for the in situ chemical oxidation of trichloroethylene (TCE) in groundwater is to provide performance-based specifications to a specialty subcontractor for the design and implementation of a treatment strategy at the chemical plant. The conceptual design and final design submitted by the specialty subcontractor will be referred to as the Preliminary and Final Design Submittals, respectively.

3.1. Preliminary Design Submittal

A conceptual design will be submitted as part of the subcontractor bid package for Work Package 568 – *In Situ Chemical Oxidation of TCE in Groundwater*. This design will be prepared based on the results of the bench-scale testing and site-specific information provided to each subcontractor. The design will consist of the pilot-scale testing approach and a conceptual full-scale design.

The pilot-scale test design should provide specific information on the proposed pilot-scale testing, including testing objectives, injection method, and injection point configuration. Installation of the injection point will be specified. A discussion of the general layout of the oxidant delivery system, oxidant mixing methods, amounts, application rates, and testing duration will be included. Performance monitoring for the pilot-scale system will be defined.

The conceptual approach for full-scale implementation will be discussed with respect to the proposed pilot-scale testing. It should include a general approach for implementation of a full-scale system, such as injection locations, oxidant delivery system, and monitoring system.

3.2. Final Design Submittal

The final design submittal will be prepared after performance of the pilot-scale testing. The specialty subcontractor will modify the conceptual design previously submitted based on the results of the pilot-scale test. The final design will discuss the results of the pilot-scale testing and present the modifications required for full-scale operation of the system.

The final design will describe the injection system, including number, location, configuration, and installation method for the injection points. The layout of the oxidant delivery system, including method of application, mixing, and storage will be specified. Application rates and duration of treatment to attain the performance milestones will be defined. A schedule for implementation of the full-scale treatment will also be included.

Details of the performance monitoring program, including sample analyses, monitoring locations, data interpretation, and trigger for system optimization will be included in the final design. The monitoring program will focus on ensuring adequate operation of the system.

3.3. Groundwater Monitoring Program

Sampling and analysis of the groundwater will be performed by the Contractor to monitor the effectiveness of the in situ chemical oxidation treatment during and after subcontract performance period. The specifics of this sampling will be provided in a subsequent sampling plan. This section provides a summary of the major components that will be evaluated to verify the performance of the interim remedial action.

Verification of the remediation of TCE in groundwater will be based on samples collected from the wells used to identify the area of groundwater impact (Figure 2-1). TCE data from these wells will be evaluated to determine if the MCL of 5 µg/1 has been statistically attained in the area of impact. The methodology presented in *Methods for Evaluating the Attainment of Cleanup Standards – Volume 2: Groundwater* (Ref. 12) was used as a guideline in the development of the evaluation method for the data. The groundwater will be judged to attain the MCL if the TCE concentrations in all the wells are statistically less than 5 µg/1. The attainment objective for this remedial action is that the 90th percentile of the data collected during the 3-month post-cleanup evaluation period is below the MCL of 5 µg/1 for TCE.

Samples from surrounding monitoring wells and springs may also be sampled to ensure that TCE and/or treatment products are not migrating undetected beyond the boundaries of the TCE impact or off-site through preferential pathways. Ancillary parameters will be selected to monitor potential impact to the aquifer due to the treatment process. The selection of these parameters will be made after the selection of a subcontractor and will be dependent on the treatment process used.

4. CONSTRUCTION ACTIVITIES

At the Weldon Spring Site Remedial Action Project (WSSRAP), construction tasks are summarized and implemented as work packages. Work packages contain all the specifications, construction drawings, and quality control guidance for the implementation of each project. A safe work plan, bonding, insurance, substance abuse program, subcontractor quality assurance/quality control program, work sequencing forecast, and schedule are required as initial submittals to the Project Management Contractor (PMC) before the subcontractor is given notice to proceed with the work.

Activities associated with the performance of the in situ chemical oxidation of trichloroethylene (TCE) in groundwater are:

- Bench-Scale Testing.
- Pilot Scale-Testing
- Full-Scale System Installation
- Full-Scale Operation
- Performance Monitoring

The bench scale portion of this work will be performed by several specialty subcontractors in order to evaluate the different oxidation methods available. The tasks will be detailed in a statement of work. Samples will be supplied to several specialty subcontractors for analysis at the facilities of their choice. Bench scale testing will not require on-site activities. After completing the bench-scale testing, each subcontractor will present a summary of the results from the testing and a discussion of the applicability of their suggested method of in situ chemical oxidation at the Weldon Spring site.

Work Package 568 will be prepared as performance-based specifications that define the requirements the specialty subcontractor must incorporate into the design and operation for pilot-scale testing and full-scale implementation for the remedial system. Only those subcontractors demonstrating that their suggested method is applicable to the Weldon Spring site will be eligible to bid on the pilot-scale/full-scale portion of the project. The following is an initial list of specifications for Work Package 568, *In Situ Chemical Oxidation of TCE in Groundwater*:

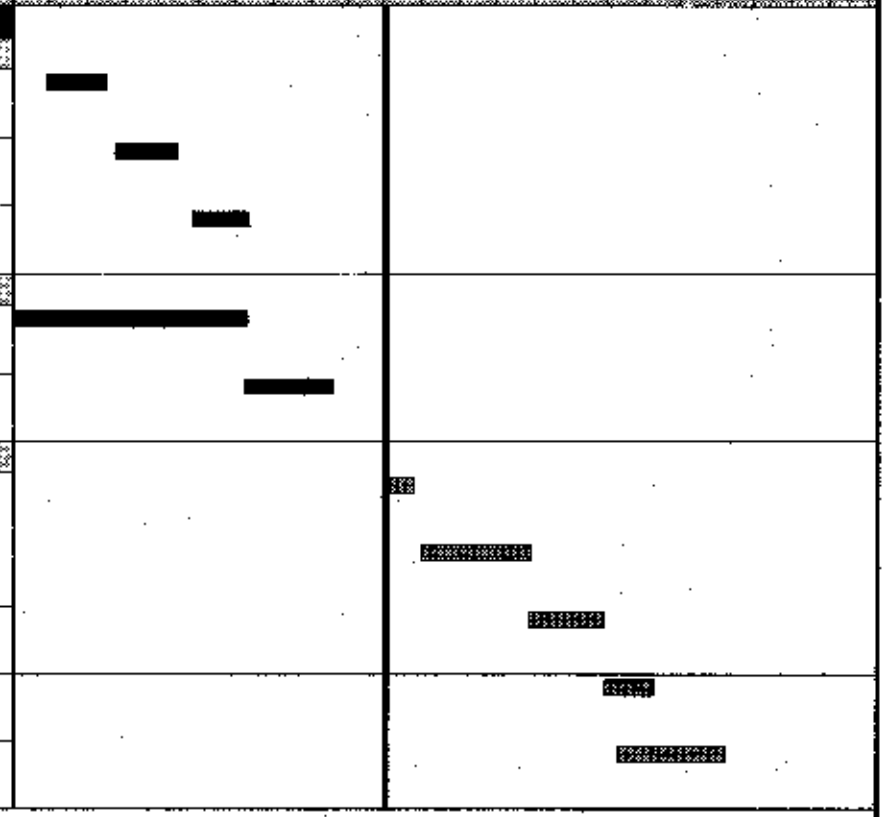
01010	Summary of Work
01025	Measurement and Payment
01300	Submittals
01400	Quality Assurance and Quality Control
01420	Hold and Witness Points
01500	Temporary Utilities
01503	Equipment Decontamination
01600	Material Storage and Handling

02050 In Situ Chemical Oxidation
02733 Well Installation

5. PROJECT SCHEDULE

The schedule (Figure 5-1) associated with the design, procurement, construction, and operation of the bench-scale and pilot scale activities are provided in this section. The schedule for the full-scale implementation will be provided in the final design submitted.

Activity Description	Early Start	Early Finish
Ground Water Operable Unit		
GWOU - Bench Test Purchase Orders WP550A		
WP-550A Bench Scale - Engineering	27NOV00A	16JAN01A
WP-550A Bench Scale - Procurement	23JAN01A	14MAR01A
WP-550A Bench Scale - Testing	27MAR01A	10MAY01A
Site Groundwater Remediation WP550		
WP-550 Pilot / Full Scale - Engineering	01OCT98A	09MAY01A
WP-550 Pilot / Full Scale - Procurement	09MAY01A	19JUL01A
Revised ICO WP 568		
WP-568 Pilot Scale - Engineering	04SEP01	24SEP01
WP-568 Pilot Scale - Procurement	02OCT01	28DEC01
WP-568 Pilot Scale - Construction	28DEC01	27FEB02
WP-568 Pilot Scale - Treatment	28FEB02	08APR02
WP-568 Pilot Scale - Data Evaluation	10MAR02	07JUN02



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© Primavera Systems, Inc.

IN SITU CHEMICAL OXIDATION OF TCE IN GROUNDWATER

PROJECT SCHEDULE

FIGURE 5 - 1

DOE/OR/21548/882

6. SUMMARY OF PROJECT COSTS

Costs associated with the design, construction, and performance of the bench-scale and pilot-scale projects are provided in the following sections. Costs are provided for the following components:

- Development of specifications
- Testing and design
- Installation
- Operation

Table 6-1 summarizes the costs associated with design and construction for in situ chemical oxidation system. The costs associated with the construction and implementation of the full-scale project will be provided with the final design submittal.

Table 6-1 Summary of Costs for In Situ Chemical Oxidation

PROJECT	TASK	COST
Bench Scale Testing for In Situ Chemical Oxidation of TCE	Design	$17,000
	Testing	$80,000
In Situ Chemical Oxidation of TCE in Groundwater	Specifications	$60,000
	Pilot Scale Design	$10,200
	Pilot Scale Construction	$1,208,000
	Pilot Scale Testing	$390,000
	Full Scale Design	$27,100
	Full Scale Construction	TBD
	Full Scale Operation	TBD

7. QUALITY ASSURANCE PROGRAM

The Project Management Contractor (PMC), as obligated by Department of Energy (DOE) Order 414.1A, *Quality Assurance*, has developed the *Project Management Contractor Quality Assurance Program* (QAP) (Ref. 9). This plan describes not only the overall quality assurance program implemented at the Weldon Spring Site Remedial Action Project (WSSRAP), but also includes requirements for personnel training, quality improvement, documents and records, work processes, design, procurement, inspection and acceptance testing, and a routine assessment program.

7.1. Purpose

The PMC develops, implements, and maintains a written QAP. The QAP describes the organizational structure, functional responsibilities, levels of authority, and interfaces for those managing, achieving, and assessing adequacies of work. The QAP describes the management system, including planning, scheduling, and cost control considerations.

The QAP satisfies the requirements of:

- Morrison Knudsen Corporation Management
- Jacobs Engineering Group, Inc. Management
- DOE Order 414.1A, *Quality Assurance*
- 10 CFR 830.120, *Quality Assurance*

American Society of Mechanical Engineers (ASME) NQA-1, U.S. Environmental Protection Agency (EPA) documents, and the American National Standards Institute/American Society for Quality (ANSI/ASQ) - E4 were also used as guidance documents, with the applicable sections being incorporated as appropriate.

7.2. Description

The PMC QAP reflects the mission, policies, and objectives for the WSSRAP. The program is a broad-based program that applies to every aspect and employee of the WSSRAP.

The QAP identifies mechanisms necessary for planning, implementation, and assessment of quality-affecting activities. These mechanisms are applied using a graded approach, which takes into account that not all items, processes, or services have the same impact on the quality, safety, or reliability of an activity. Mechanisms outlined in the QAP are:

- Personnel indoctrination and training
- Quality improvement
- Documents and records

- Work processes
- Design
- Procurement
- Inspection and acceptance testing
- Management assessment
- Independent assessment

7.3. Implementation

The PMC Project Quality Manager and his designees conduct independent assessments of the performance of the project in relation to the requirements of the QAP and departmental standard operating procedures and instructions. These assessments are performed in accordance with the QAP.

The QAP, together with implementing procedures and instructions, form an integrated management system that ensures compliance with specified standards, personnel safety, and protection of the environment. The significant features of the QAP are:

- Quality verification and overview of activities that demonstrate the completeness and appropriateness of achieved quality.

- Assurance that activities are performed to specified requirements.

- Assurance that structures, systems, and components will perform as intended.

Quality is achieved by ensuring that managers at all levels are responsible and accountable for achieving and improving upon quality. All PMC personnel are responsible for the quality of work at the WSSRAP.

The quality assurance/quality control (QA/QC) requirements for specific tasks performed under the scope of this work plan will be addressed in future documents. The QA/QC requirements for construction activities will be presented in the technical specifications for the appropriate work packages. The QA/QC requirements for sampling and characterization activities will be addressed in the appropriate sampling or monitoring plans.

8. CONTINGENCY PLAN

8.1. Purpose

The Project Management Contractor (PMC) has prepared the *Emergency Plan* (Ref. 10), which establishes the planning, preparedness, and response concepts for operational emergencies and other emergencies at the Weldon Spring Site Remedial Action Project (WSSRAP). The emergency management response measures established by the *Emergency Plan* are intended to afford protection for the health and safety of on-site personnel and the public, limit damage to facilities and equipment, minimize impact to on-site operations, and limit adverse impacts on the environment. The plan is implemented whenever an emergency situation is declared or conditions exist that constitute, or could result in, an operational emergency at the WSSRAP. Appropriate parts of the plan may be implemented by a responsible authority for emergencies that do not reach the severity of an Operation Emergency, but require a structured response pursuant to environmental or health and safety regulations or sound management practices. The plan also outlines the interfaces and coordination with off-site private organizations, and Federal, State, and local government agencies with roles in emergency response.

8.2. Description

The *Emergency Plan* is designed to address planning for all categories of emergencies arising at or as a result of, operations conducted by the WSSRAP that could affect people, property, or the environment. The scope and extent of the planning is commensurate with the hazards present at the WSSRAP.

The *Emergency Plan* addresses specific categories of events and defines basic response actions to be followed for each type of incident. Topics discussed are:

- WSSRAP emergency response organization.
- Off-site response interfaces.
- Emergency event classification.
- Notification and communication.
- Hazard assessment process.
- Protective actions.
- Medical support.
- Reentry and recovery.
- Public Information.
- Emergency facilities and equipment.
- Training.
- Drills and exercises.
- Emergency management program administration.

This plan implements the requirements of 40 CFR 264 and 10 CSR 25-7.264 for a *RCRA Contingency Plan*. This plan also incorporates the requirements of 40 CFR 112 for a *Spill Prevention Control and Countermeasures Plan*, and 29 CFR 1910.120 and 29 CFR 1926.65 for an *Emergency Response Plan*. Outside agency hazardous material incident notification guidance is contained in the *WSSRAP Reportable Release Notification Guide* (Ref. 11).

8.3. Implementation

It is the policy of the U.S. Department of Energy (DOE) and WSSRAP management to conduct operations in a responsible manner so as to be protective of human health and the environment. The primary focus of site management is the prevention of accidents, emergency situations, and other incidents, which could adversely affect on-site personnel, the public, property, or the environment. These objectives are attained through implementation of effective planning and preparedness for emergencies during the initial stages of site activities. Also, protective actions and training maintain an awareness of potential emergencies and the appropriate responses required for prevention or mitigation of problems that could occur.

Specific provisions for responding to emergencies that are unique to individual tasks within the remedial action activities are incorporated into job-specific health and safety plans, safe work plans, and/or task specific safety assessments. For each activity, the health and safety plan is the primary working document that governs initial safety, health, and emergency response requirements. The health and safety plan also provides subcontractors with the process for identifying potential emergency conditions and notifying the appropriate WSSRAP contact.

9. POST-ROD DOCUMENTATION

This section outlines the primary and secondary documents that will be prepared to support design and implementation of the selected interim remedy for the Groundwater Operable Unit (GWOU). Primary documents are those that are major, discrete portions of the remedial design and remedial action activities. Secondary documents are typically feeder documents to primary documents. A secondary document may be finalized in the primary document that it supports or it may be issued as a stand-alone document. The schedule for the documents being prepared in support of the design and construction for this operable unit will be included and updated in the quarterly reports prepared in accordance with the *Federal Facilities Agreement* (Ref. 2).

9.1. Primary Documents

9.1.1. Final Design Submittals

The final design submittal for this work will be the final design provided by the specialty subcontractor performing the treatment of trichloroethylene (TCE). The final design will be prepared after performing the pilot-scale testing. This submittal will also include the project schedule and associated costs for implementing the full-scale project.

9.1.2. Contingency Plan

The Weldon Spring Site's *Emergency Preparedness Plan* (Ref. 10) will be used to fulfill the requirement for the preparation of a contingency plan for the work being performed for the GWOU.

9.1.3. Remedial Action Report

The remedial action report documents the completion of an operable unit. The report indicates that the operable unit has met the objectives of the *Interim Record of Decision* (Ref. 1) and provides summary information for subsequent inclusion in the preliminary and final closeout reports.

9.2. Secondary Documents

9.2.1. Preliminary Design Submittals

The preliminary design submittal for this work will be the conceptual design provided by the specialty subcontractor performing the treatment of TCE. The conceptual design will be prepared after bench-scale testing. This design will define the pilot-scale testing and a general design for full-scale implementation

9.2.2. Construction Progress Reports

The quarterly reports for the Federal Facilities Agreement will fulfill the requirements for the *Construction Progress Report* for this operable unit. Copies of daily, weekly, and monthly reports submitted by the subcontractor, as well as quality control inspections, are maintained at the site. These documents can be made available upon request to the regulators for inspection.

10. REFERENCES

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3. MK-Ferguson Company and Jacobs Engineering Group. *Work Plan for the Remedial Investigation/Feasibility Study for the Groundwater Operable Units at the Chemical Plant Area and the Ordnance Works Area, Weldon Spring Missouri*. Rev. 0. DOE/OR/21548-567. Prepared for the U.S. Department of Energy, Oak Ridge Operations Office. St. Charles, MO. August 1995.

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9. MK-Ferguson Company and Jacobs Engineering Group. *Project Management Contractor Quality Assurance Program.* Rev. 6. DOE/OR/21548-333. Prepared for the U.S. Department of Energy, Oak Ridge Operations Office. St. Charles, MO. November 2000.

10. MK-Ferguson Company and Jacobs Engineering Group. *Emergency Plan.* Rev. 4. DOE/OR/21548-531. Prepared for the U.S. Department of Energy, Oak Ridge Operations Office. St. Charles, MO. March 1999.

11. MK-Ferguson Company and Jacobs Engineering Group. *WSSRAP Reportable Release Notification Guide.* Rev. 5. DOE/OR/21548-218. Prepared for the U.S. Department of Energy, Oak Ridge Operations Office. St. Charles, MO. September 1998.

12. U.S. Environmental Protection Agency. *Methods for Evaluating the Attainment of Cleanup Standards – Volume 2: Groundwater.* EPA 230-R-92-014. Environmental Statistics and Information Division (PM-222), Office of Policy, Planning, and Evaluation. Washington, D.C., July 1992.

Printed in the United States of America. Available from the National Technical Information Service, NTIS, U.S. Department of Commerce, 5285 Port Royal Road, Springfield, Virginia 22161.

NTIS Price Codes - Printed Copy: A03
Microfiche: A01