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**FMPC ADMINISTRATIVE RECORD
MANAGEMENT PLAN
DECEMBER 1989**

12/01/89

**WMCO/DOE-FMPC
12
PLAN**

FMPC Administrative Record Management Plan

December 1989

Introduction

In accordance with the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Sections 113(j) and 113(k), National Oil and Hazardous Substance Pollution Contingency Plan (NCP) Subpart I (proposed rule) and the Interim Guidance on Administrative Records for Selection of CERCLA Response Actions issued March 1, 1989, this document sets forth the plan to establish and maintain administrative records (ARs) for CERCLA response actions at the Feed Materials Production Center (FMPC). The purpose of these ARs are two fold: first, to accurately document the basis for response actions since any judicial review is limited to the AR and second, to provide a vehicle for public participation in the selection of response actions.

1. Type and Number of ARs

A site-wide AR file has been established at the FMPC consisting of documents that have been considered in the FMPC RI/FS process. It serves as the repository for historical and general information up to and including the decisions to break-out the FMPC remedial actions into six operable units and to implement several removal actions. Since this site-wide AR file no longer supports a specific remedial action Record of Decision (ROD) or removal action memorandum, all documents in this AR file will be incorporated into separate response action AR files.

Six remedial action and five removal action ARs are currently being planned (the exact number of response actions is expected to change throughout the restoration process). In order to reduce the need for redundant copies of documents that are considered in more than one response action, the physical filing location of each document will be determined by a separate filing structure (see Attachment I). Each AR file will consist of an indexed listing of documents that are not necessarily physically contiguous. In this way, the volume of documents will be reduced, each document will be safely stored and easily retrieved and, if required for judicial review, each AR can be compiled, certified and/or duplicated in its entirety.

1.1 Remedial Actions - The goal of these administrative records is to independently support each ROD. Six operable units for FMPC CERCLA response actions were proposed in a DOE letter to the USEPA dated February 3, 1989 and verbal concurrence with this proposal was subsequently received from the USEPA. Since six RODs will be issued for remedial actions, six ARs are required.

The six FMPC operable units are:

- Operable Unit #1 Waste Storage Units
- Operable Unit #2 Solid Waste Units
- Operable Unit #3 Facilities and Suspect Areas
- Operable Unit #4 Special Facilities
- Operable Unit #5 Environmental Media
- Operable Unit #6¹ South Plume

1.2 Removal Actions - The goal of these ARs is to independently support each Action Memorandum documenting the lead agency's decision(s) for action. Currently, two AR files of this type have been established at the FMPC for Manhole 180 Soils and Removal of Contaminated Water Under FMPC Buildings removal actions.

The current list of FMPC removal actions include:

- Removal of Contaminated Water Under FMPC Buildings (Plant 6, etc.)
- Waste Pit Area Stormwater Run-Off Control
- South Groundwater Contamination Plume
- K-65 Silos
- Manhole 180 Soils

2. Location of Administrative Record and Copies

2.1 Control Copy - Documents included in the AR files will be kept at the FMPC under the control of the FMPC Administrative Record Coordinator (ARC). These documents will constitute the record copy from which additional copies will be made and against which other copies will be audited for completeness. Where available, these documents will be signed originals. Should the need arise, this will be the set of documents to be certified as the official Administrative Record for judicial review purposes.

2.2 Publicly Available Copies - Two complete copies of each AR file will be made available to the public. The first copy will be located at the FMPC site. This is the "office of the lead agency" copy required by the proposed NCP and is currently in the FMPC Reading Room. The second copy will be located in the general vicinity of the FMPC. This is the "at or near the site" copy and is currently located in the Lane Library in Hamilton, Ohio.

2.3 Other Locations - A complete, computer-generated index of each administrative record will be maintained at all AR sites (i.e. FMPC site, Lane Library in Hamilton, Ohio and EPA Region V offices in Chicago, Illinois). This index will include the location of each document. Many documents such as sampling and testing data, guidance documents, publicly

¹Operable Unit 6 is being considered for deletion in the current Section 120 Agreement negotiations and may be folded into Operable Unit 5.

available technical literature and/or documents included in the confidential portion of the record files will not be physically filed at each site. All included documents, except the confidential documents, will be available to the public, although special arrangements may be required to view some types of documents.

2.4 **Privileged Documents** - Certain documents, with the consent of DOE legal counsel, may be classified as privileged. These documents may include documentation of deliberative processes, confidential business information, attorney work products, attorney-client communications, personal privacy, state secrets, confidential informants or information exempted by other statutes. These documents will be listed in the AR file indexes but will not be made available to the public without a specific directive from DOE legal counsel.

2.5 **EPA Copies** - A complete set of all documents in the AR files, along with updated indexes, will be forwarded to the Region V office of the USEPA in Chicago, Illinois. The maintenance and control of those documents, once transmitted, will be the sole responsibility of the USEPA. The Ohio EPA will be provided with the monthly updates of AR file indexes only.

3. **Contents**

3.1 **Type of Documents** - The ARs will include all documents considered in or relied on during the selection of response actions. Attachment 2 is a standard list of these documents to be automatically included in the AR files. These documents shall be transmitted to the ARC and inserted in the AR files. Documents not included automatically, but which may potentially require inclusion in the AR file's, shall also be transmitted to the ARC. The ARC will then formally request DOE to make a determination of inclusion in accordance with established procedures. Original, final versions of all documents shall be inserted whenever available.

3.2 **Timing** - FMPC AR files shall be compiled as documents are generated and issued. It is intended to be a contemporaneous explanation of the basis for the selection of the response actions.² Under normal circumstances, all documents shall be added to all copies of the AR files within one month of issuance or generation. All AR file indexes will be updated monthly and reissued to all copy locations if changes have occurred.

3.3 **Quantity** - The total contents of the FMPC AR files is expected to exceed several hundred thousand documents with several million total pages.

3.4 **Index** - A computerized index of each AR file will be maintained. This index will contain, at a minimum, each documents sequential file number,

²For this reason, draft documents may be included using the procedure referenced above. When the final issue of the document is made, the draft document will be replaced as long as "considered" data is not lost.

subject file number, issue date, title, author, recipient and physical location. The sequential file number will be assigned to all documents as they are added to the AR files. Subject file numbers will be assign based on the file structure in Attachment 1. The index will have the capability of searching for and printing lists of documents based on any combination of the above data fields.

4. Organizational Responsibilities and Interfaces

4.1 DOE - As the lead agency, the DOE has overall responsibility for the proper establishment and compilation of the ARs. In addition to actually producing and issuing many documents that require inclusion in the ARs, the DOE is responsible for approval of this Management Plan, various operating procedures and documents to be included in the ARs.

4.2 ASI - As the RI/FS contractor, ASI and its subcontractors will produce documents to be included in the ARs. ASI is responsible for identifying and transmitting to the ARC all documents considered or relied on to produce their various studies and reports. This responsibility extends to all ASI locations and organizations nationwide where FMPC work is being performed. In addition, all community relations and public participation records must be identified and transmitted to the ARC.

4.3 WMCO - As the FMPC Maintenance and Operating Contractor, WMCO is responsible for the management of the AR files. Specifically, this includes the compilation of this Plan and detailed procedures, staffing (including the ARC), physical plant requirements, budgeting, the compilation, copying and distribution of AR documents, training and QA auditing.

5. Staff

All FMPC AR files will be managed within the Restoration Department ERA Project section by the FMPC ARC, reporting to the Manager, ERA Project. Assistants to the ARC will be required to compile and maintain the record files at all locations. In order to establish all required AR files by February 1990, additional temporary assistance may be required to fulfill clerical, computer, legal and managerial needs. Long term AR file maintenance is expected to require one coordinator and at least one assistant indefinitely.

6. Physical Plant

6.1 On-Site - In order to meet immediate needs, approximately 1000 square feet of permanent space or one 12x60 office trailer with full access to the general public is required. This will include space for a public reading area, information repository shelving, copier, clerical work space, coordinator's office and AR filing cabinets and shelving. Additional space requirements will be evaluated as the size of the AR files increases.

6.2 Off-Site - At a minimum, several large book shelves with an adjacent

reading area and copier are required. This should be in an area that is at least partially "controlled" to optimize record integrity. This could be a library (current situation), school, community center or other off-site office space that is open to the public and in the general vicinity of the plant.

7. Security

The AR files will be protected from loss, theft, tampering, fire, and other disasters using existing FMPC procedures where applicable along with newly developed AR procedures (see Section 10). The control file, containing original documents, will receive a higher level of protection. The control file and the on-site copy will be located in normal FMPC facilities (building or trailer) and under normal FMPC security. The control file will not normally be made available to the public except by special arrangement (see Section 2.3). However, the on-site copy will be open to public inspection but will be under the general supervision of the AR staff. Both the on-site and off-site copies will require auditing to guard against the loss of documents. The security and integrity of the copy of the AR files that is sent to the USEPA regional office, once properly transmitted, will be the sole responsibility of the USEPA.

8. Costs

Cost Summary (Approximate)

	<u>Setup Cost</u>	<u>Cost/Year</u>
Staff Manpower	\$ 60,000	\$ 110,000
Audit Manpower	0	10,000
Expenses	* 40,000	<u>10,000</u>
Total	\$ 100,000	\$ 130,000

* These costs do not include microfilming or other technologies.

9. Work Items

Work items required to establish the AR files include:

- 9.1 Fund and find required on-site facility - probably a trailer
- 9.2 Fund and find required near-site facility - probably a library
- 9.3 Compile documents
- 9.4 Copy Documents
- 9.5 Write procedures
- 9.6 Distribute Documents to Record locations
- 9.7 Advertise AR file availability
- 9.8 Visit other AR file Locations
- 9.9 Identify outside interfaces and resources (i.e. USEPA, OEPA)
- 9.10 Visit off-site record locations (USEPA, OEPA)
- 9.11 Train staff and ERA managers
- 9.12 Maintain computer filing system
- 9.13 Identify and procure required microfilm system and other technologies (optional)
- 9.14 Routine inventories
- 9.15 QA auditing

10. Procedures Required

Various site and/or departmental procedures will be developed during the second and third quarters of FY-90. The following procedures are anticipated:

- 10.1 ARs and ERA-RI/FS Document Control System
- 10.2 ARs, Community Relations Plans (CRP's) and the Information Repository
- 10.3 Establishing and Maintaining an AR file to include:
 - Standard Documents for Inclusion in AR files
 - File Index Structure for AR files
 - Public Access to the AR files
 - Confidential Information in the AR files
 - Document Flow into the AR files
 - Document Inventories
- 10.4 QA Audit of the AR file

11. Training

All personnel within the RI/FS and ERA projects that produce, handle or rely on documents that are or will be contained in the AR files, including DOE, WMCO and ASI and its subcontractors personnel, will require training on the FMPC AR procedures (yet to be developed). Training will vary from 1-2 hour orientations to off-site training for AR personnel.

12. QA

- 12.1 **Internal Audits** - Internal audits will be conducted by the ERA Project staff on a monthly basis. These audits will concentrate on actually counting and validating the various AR files. Due to the extensive nature of these audits,

they will be conducted on a rotating basis, addressing different records and locations each month.

12.2 External Audits - External audits will be conducted annually by the WMCO QA group. These audits will concentrate on general systems issues and reviews of monthly audit reports. Actual counting and validation of records will happen only on an exception basis. The result of these audits will be recommendations for procedural and operational improvements as well as a general status of the records.

13. Schedule

13.1 Remedial Actions - All six operable unit AR files will be established simultaneously and will be open for public inspection in February of 1990 at the on-site and off-site locations. See Attachment 3 for a summary schedule.

13.2 Removal Actions - For non-time-critical removal actions (i.e. more than a six month planning period exists), the AR file will be established and made available to the public prior to, or concurrent with the public comment period for the engineering evaluation/cost analysis (EE/CA). For time-critical removal actions, the AR file will be established and made available for public comment no less than 60 days after initiation of physical removal activity.

13.3 Schedule - See Attachment 3 for summary schedule.

Filing Index for Response Action Administrative Records

1.X.0 INDEX [FIRST DOCUMENT]

1.X.1.0 SITE IDENTIFICATION

- 1.X.1.1 Background - RCRA and other information
- 1.X.1.2 Notification/Site Inspection Reports
- 1.X.1.3 Preliminary Assessment (PA) Report
- 1.X.1.4 Site Investigation (SI) Report
- 1.X.1.5 Previous Operable Unit Information

1.X.2.0 REMOVAL RESPONSE

- 1.X.2.1 Sampling and Analysis Plans
- 1.X.2.2 Sampling and Analysis Data/Chain of Custody Forms
- 1.X.2.3 EE/CA Approval Memorandum (for non-time-critical removals)
- 1.X.2.4 EE/CA
- 1.X.2.5 Action Memorandum
- 1.X.2.6 Amendments to Action Memorandum

1.X.3.0 REMEDIAL INVESTIGATION (RI)

- 1.X.3.1 Sampling and Analysis Plan (SAP)
- 1.X.3.2 Sampling and Analysis Data/Chain of Custody Forms
- 1.X.3.3 Work Plan
- 1.X.3.4 RI Reports

1.X.4.0 FEASIBILITY STUDY (FS)

- 1.X.4.1 ARAR Determinations
- 1.X.4.2 FS Reports
- 1.X.4.3 Proposed Plan
- 1.X.4.4 Supplements and Revisions to the Proposed Plan

1.X.5.0 RECORD OF DECISION (ROD)

- 1.X.5.1 ROD
- 1.X.5.2 Amendments to ROD
- 1.X.5.3 Explanations of Significant Differences

1.X.6.0 STATE COORDINATION

- 1.X.6.1 Cooperative Agreements
- 1.X.6.2 State Certification of ARARs

Filing Index for Response Action Administrative Records**1.X.7.0 ENFORCEMENT**

- 1.X.7.1 Enforcement History
- 1.X.7.2 Endangerment Assessments
- 1.X.7.3 Administrative Orders
- 1.X.7.4 Consent Decrees
- 1.X.7.5 Affidavits
- 1.X.7.6 Documentation of Technical Discussions with PRPs on Response Actions
- 1.X.7.7 Notice Letters and Responses

1.X.8.0 HEALTH ASSESSMENTS

- 1.X.8.1 ATSDR Health Assessments
- 1.X.8.2 Toxicological Profiles

1.X.9.0 NATURAL RESOURCE TRUSTEES

- 1.X.9.1 Notices Issued
- 1.X.9.2 Findings of Fact
- 1.X.9.3 Reports

1.X.10.0 PUBLIC PARTICIPATION

- 1.X.10.1 Comments and Responses
- 1.X.10.2 Community Relations Plan
- 1.X.10.3 Public Notice(s) Availability of the Administrative Record File, Availability the Proposed Plan, Public Meetings)
- 1.X.10.4 Public Meeting Transcripts
- 1.X.10.5 Documentation of Other Public Meetings
- 1.X.10.6 Fact Sheets and Press Releases
- 1.X.10.7 Responsiveness Summary
- 1.X.10.8 Late Comments

1.X.11.0 TECHNICAL SOURCES AND GUIDANCE DOCUMENTS

- 1.X.11.1 EPA Headquarters Guidance
- 1.X.11.2 EPA Regional Guidance
- 1.X.11.3 State Guidance
- 1.X.11.4 Technical Sources

NOTE: In order to reduce repetitive numbering systems, the "1" in the first level of all ARs indicates that the ARs are the first section of the larger ERA Project file numbering system. The "X" indicates the AR file number (e.g. 1.3 would indicate Operable Unit #3 remedial action AR and 1.7 would indicate Manhole 180 Soils removal action AR).

Standard Contents of Remedial Action Administrative Records

Excerpted from Preamble to Subpart I of Proposed NCP

1. **Factual Information/Data**
 - 1.1 Sampling plan
 - 1.2 Validated sampling and analysis data
 - 1.3 Chain of custody forms
 - 1.4 Project plan or program plan (QAPP)
 - 1.5 Preliminary assessment report
 - 1.6 Site investigation report
 - 1.7 Inspection reports
 - 1.8 RI/FS final workplan
 - 1.9 Amendments to final RI/FS workplan
 - 1.10 Summary of remedial action alternatives(used in conjunction with early special notice letters)
 - 1.11 Data summary sheets RI/FS Technical studies
 - 1.12 Factual information submitted by the public including PRPs
 - 1.13 Documents supporting the lead agency's determination of imminent and substantial endangerment
2. **Policy and Guidances**
 - 2.1 Memoranda on policy decisions (site-specific and issue-specific)
 - 2.2 Guidance documents
 - 2.3 Technical literature
3. **Public Participation**
 - 3.1 Correspondence
 - 3.2 Public notices
 - 3.3 Public comments
 - 3.4 Community relations plan
 - 3.5 Notice letters to PRPs
 - 3.6 Proposed plan
 - 3.7 Transcript of meeting on RI/FS and proposed plan and waivers under section 121(d) of CERCLA
 - 3.8 Documentation of other public meetings
 - 3.9 Response to significant comments
4. **Other Party Information**
 - 4.1 ATSDR health assessment
 - 4.2 Natural Resources Trustee finding of fact and final reports
 - 4.3 Documentation of State involvement
5. **Decision Documents**
 - 5.1 Record of Decision, including responsiveness summary
6. **Enforcement Documents**
 - 6.1 Administrative orders
 - 6.2 Consent decrees
 - 6.3 Affidavits
 - 6.4 Response to notice letters containing relevant factual information
7. **Index**

Standard Contents of Removal Action Administrative Records

Excerpted from Preamble to Subpart I of Proposed NCP

1. **Factual Information/Data**
 - 1.1 Sampling plan
 - 1.2 Validated sampling and analysis data
 - 1.3 Chain of custody forms
 - 1.4 Preliminary assessment report
 - 1.5 Site investigation report
 - 1.6 Engineering evaluation/Cost analysis report (EE/CA)
 - 1.7 Technical studies performed for the site
 - 1.8 Factual information submitted by the public including PRPs
 - 1.9 Documents supporting the lead agency's determination of imminent and substantial endangerment
2. **Policy and Guidances**
 - 2.1 Memoranda on policy decisions (site-specific and issue-specific)
 - 2.2 Guidance documents
 - 2.3 Technical literature
3. **Public Participation**
 - 3.1 Correspondence
 - 3.2 Public notices
 - 3.3 Public comments
 - 3.4 Community relations plan
 - 3.5 Notice letters to PRPs
 - 3.6 Documentation of other meetings
 - 3.7 Response to significant comments
4. **Other Party Information**
 - 4.1 ATSDR health assessment
 - 4.2 Natural Resources Trustee finding of fact and final reports
 - 4.3 Documentation of State involvement
5. **Decision Documents**
 - 5.1 EE/CA approval memorandum
 - 5.2 Action memorandum
6. **Enforcement Documents**
 - 6.1 Administrative orders
 - 6.2 Consent decrees
 - 6.3 Affidavits
 - 6.4 Response to notice letters containing relevant factual information
7. **Index**

Administrative Record Management Plan Schedule

Description	1989			1990			1991											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR
Establish & Maintain Site-Wide Administrative Record	1																	
Issue Administrative Record Management Plan	2																	
Prepare & Issue Procedures	3																	
Establish & Maintain Removal Action Administrative Records	4																	
Establish & Maintain Operable Unit Administrative Records	5																	
Perform QA Audits	6																	

7 - Operable Units #1 - #6
8 - Annual Audit

4 - South Groundwater Contamination Plume
5 - Waste Pit Area Stormwater Runoff Control
6 - K-65 Removal Action

1 - Establish Site-Wide Admin. Record
2 - MH-180 Soils
3 - Contaminated Water Under FMPC Buildings