

1039

**FMPC EXCAVATION AND DEMOLITION CERCLA
INTEGRATION PLAN**

XX/XX/XX

DOE-FMPC/WMCO

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ENCLOSURE

ENCLOSURE A

FMPC Excavation and Demolition CERCLA Integration Plan

The following guidelines are to be followed for excavation or demolition activities at the FMPC consistent with the revised National Contingency Plan (see attached flow-chart).

- This FMPC Excavation and Demolition CERCLA Integration Plan applies to all excavation and demolition as defined. Excavation is defined as any disturbance of soil, gravel, concrete or other surface materials or any stockpiling of soil, gravel, concrete or other materials. Demolition is defined as removal of constructed materials or stockpiles of scrap metal (i.e., ferrous, metal, copper, etc.) or construction rubble.
- Any planned excavation or demolition activity in an area exhibiting above background concentrations of hazardous substances has the potential for release of hazardous substances to the environment.
- A Removal Site Evaluation (RSE) as defined in 40 CFR 300.410 shall be completed for all excavation/demolition activities which involve the removal of one cubic yard of material or more.
- Excavation or demolition activities involving a movement of less than one cubic yard of materials do not pose a significant potential for release of hazardous substances to the environment. The engineering controls in revised FMPC-720 pertaining to the handling of these materials still apply.
- DOE will review each Removal Site Evaluation and determine if the procedures and controls specified in FMPC-720 are adequate to address the threat of release.
- If DOE determines that revised FMPC-720 adequately addresses the threat of release as defined by the Removal Site Evaluation, (RSE), in accordance with 40 CFR 300.410e, then the project will proceed and not be defined as a removal action. The RSE and the DOE determination shall be included in the Administrative Record.
- If DOE determines that revised FMPC-720 does not adequately control the threat of release, as defined by the RSE, then the excavation/demolition will require additional controls. If additional controls are not available or practicable a removal action is necessary. The RSE and the DOE determination should be included in the Administrative Record.
- If DOE determines that a Removal Action is necessary, an Action Memorandum and the RSE will be submitted to Ohio EPA and U.S. EPA for review and comment.
- Excavation or demolition activities associated with emergency and spill response actions are not subject to these requirements beyond the use of the best available controls to the extent practicable.

The following are the proposed changes to FMPC-720

- 1) Incorporate provisions requiring completion of a scoping evaluation for Capital Projects to: 1) assess whether the proposed action is consistent with the projected final remedial actions; and 2) assess whether alternate sites have been considered to avoid the disturbance of hazardous substances currently in the environment. Additionally, a siting cost-benefit analysis shall be performed to evaluate the relative cost of construction and hazardous waste management for alternative construction site locations.
- 2) Incorporate provisions for pre-excavation/demolition site characterization. The site characterization shall employ protocols and procedures consistent with the approved RI/FS Work Plan. These procedures shall stress quality assurance/control and recoverability and be generally consistent with EPA SW-846, 3rd Edition.
- 3) Incorporate the minimum controls to be employed during excavation/demolition to minimize or abate the release or threat of release of hazardous substances to the environment. These controls shall focus on all phases of the activity where hazardous materials are anticipated to be encountered including site characterizations, excavations, demolition, staging of removed material, and final disposition or stabilization of removed materials.
- 4) Incorporate provisions to complete a Removal Site Evaluation (RSE) for each excavation/demolition activity involving the movement of greater than one cubic yard of material. The RSE shall examine the type and concentration of hazardous substances in the affected area and the type of controls to be employed during excavation/demolition to minimize the potential for release. The RSE shall be submitted to DOE for purposes of making a determination consistent with 40 CFR 300.410e before the start of the excavation/demolition activity.
- 5) Incorporate provisions for the completion of a post excavation site verification program. This verification program shall employ direct field measurements and the collection of discrete samples. The sampling protocols and procedures shall be consistent with the approved RI/FS Work Plan and shall stress quality assurance/control and recoverability. These procedures shall be consistent with SW-846, 3rd Edition.
- 6) Incorporate provisions for the completion of a final report documenting the following: 1) the results of the pre-excavation and post-excavation characterization programs; 2) the quantity of materials removed during the excavation/demolition operation and the final disposition of these materials; and 3) the effectiveness of the engineering controls employed during the project to minimize the potential for release of a hazardous substances. This report should be transmitted to DOE for incorporation into the Administrative Record and the RI/FS database.

FMPC CERCLA COMPLIANCE FLOW CHART FOR EXCAVATION AND DEMOLITION ACTIVITIES

