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**INACTIVE FLY ASH PILE/SOUTHFIELD DISPOSAL  
AREA REMOVAL ACTION WORK PLAN REVISION  
1 OCTOBER 1991**

10-22-91

**8  
WORK PLAN**

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**INACTIVE FLY ASH PILE/SOUTHFIELD  
DISPOSAL AREA**

**REMOVAL ACTION**

**WORK PLAN**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**REVISION 1**

**October, 1991**

*Prepared by:*

**WESTINGHOUSE ENVIRONMENTAL MANAGEMENT COMPANY OF OHIO  
Cincinnati, Ohio**

*For:*

**THE UNITED STATES DEPARTMENT OF ENERGY  
Oak Ridge Operations Office**

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## I. INTRODUCTION

The Inactive Fly Ash Pile/Southfield Area (IFAP/SF) is located in the southwest corner of the FEMP site and is identified as part of Operable Unit 2, pursuant to the 1990 Consent Agreement (see Figure 1). A Removal Site Evaluation (RSE) has been generated by the Department of Energy (DOE), consistent with 40 CFR 300.410, and it was determined by the DOE, being the lead agency for the Fernald Environmental Management Project (FEMP) CERCLA actions, that a time-critical removal action is necessary. The removal action involves the roping and posting of warning signs around the perimeter of the IFAP/SF to limit human access, which is the objective of this removal action. The removal action is being conducted pursuant to the Consent Agreement between the DOE and the United States Environmental Protection Agency (U. S. EPA) under CERCLA section 120 and 106(a).

The Consent Agreement requires the U. S. EPA review and comment on work plans submitted by the DOE for all removal actions. This work plan satisfies that requirement and those requirements of 29 CFR 1910.120. All activities performed under this work plan will be pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and consistent with the OSWER Directive 9360.0-03B, SUPERFUND REMOVAL PROCEDURES, Rev. 3.

## II. DESCRIPTION/BACKGROUND

### 1.0 Summary of the Potential Threat

A review of the Roy F. Weston, Inc., 1987, "Characterization Investigation Study (CIS), Volume 3: Radiological Survey of Surface Soils" showed levels of radionuclide contamination, which may pose a threat to an individual or individuals casually entering the IFAP/SF area.

### 2.0 Related Actions

Additional sampling for the RI/FS will be conducted in the IFAP/SF consisting of eight borings, four hand augers at two-foot depths, and four machine augers at approximately twenty-foot depths. This additional sampling will be completed prior to the implementation of the IFAP/SF Removal Action and will be conducted under the "Addendum to the OU 2 Sampling and Analysis Plan, April 1991".

A proposal exists to install a pipeline along the access road east of the IFAP/SF for the South Plume Alternate Water Supply Removal Action. This removal action will not interfere with any actions or activities planned for the IFAP/SF and its final remediation.

Another activity that may occur in this area is the removal of the lead from the firing range, which is located northeast of the running track and on the western side of the Southfield. This removal action will not have an impact on the IFAP/SF remedial action.

### **3.0 Roles of the Participants**

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The DOE is the lead agency for all removal actions at the FEMP, and will coordinate and execute this removal action.

The U. S. EPA will review and approve this work plan and provide technical guidance.

The Ohio EPA will participate in the development and review of this work plan and provide technical guidance.

Advanced Sciences Incorporated (ASI), as a contractor to DOE, is conducting the RI/FS program, which includes additional sampling. The additional sampling includes locations in the IFAP/SF. ASI is also providing analytical support through International Technology (IT) Corporation.

Westinghouse Environmental Management Company of Ohio (WEMCO), as the FEMP Management and Operating contractor, is responsible for the implementation of this removal action in a manner consistent with DOE and regulatory guidance.

### **4.0 Removal Action**

The IFAP/SF Removal Action will consist of the roping and posting of signs around areas of known and suspected contamination (see Figure 2). Known areas of contamination have been identified by the CIS.

### **5.0 Integration with the Remedial Action**

This removal action will be completed prior to initiation of the final remedial action for Operable Unit 2. It will mitigate potential exposure of the surrounding population to contaminants at the IFAP/SF.

## **III. SUPPORT ACTIVITIES**

### **1.0 Planning Activities**

Activities to be undertaken prior to the actual site work are planning, training, design, and management of the removal actions. Included in this activity will be the preparation of detailed task listings and delineation of responsibilities to support the schedule given in Attachment I. These activities are required to render the area reasonably free of hazards to personnel and/or the environment until the RI/FS process has been completed.

### **2.0 Design of the Removal Action**

Definitive design documents will be prepared for the removal action construction work.

All personnel working in the implementation of the removal action will be trained in accordance with the Occupational Safety and Health Administration (OSHA) standards found in 29 CFR 1910.120.

IV. FIELD ACTIONS

1.0 Implementation of the Removal Action

Implementation of this removal action will be performed by maintenance or construction personnel, and will include installation and construction-type activities, in addition to the maintenance activities. These activities will be directed by the Operable Unit 2 project engineer in coordination with the maintenance/construction supervisor to ensure all objectives are met.

Rope will be placed around the perimeter of the IFAP/SF to limit human access, which is the primary objective of this removal action. The type of roping material will be determined during the design phase. The type of material will be determined by both cost, material integrity, and long-term maintenance needs. The rope will be attached to support posts made of steel. The approximate ground-to-rope height will be three feet.

Warning signs approximately 75 feet apart will be posted around the perimeter of the roped-off contaminated area.

Any banner, rope, or other similar materials shall be installed so not to cause or create a safety hazard. Flagging or some other means shall be employed to reduce this hazard.

2.0 Maintenance

The roping and warning signs will be maintained by the facility owner. This activity will begin at the completion of this removal action and will continue until the remedial action for the IFAP/SF begins.

V. SAMPLING AND ANALYSIS PLAN

There will not be any samples taken for laboratory analysis, since there will not be any material removed. However, if it is determined during the implementation of the removal action that sampling is needed, a sampling and analysis plan will be developed.

**VI. HEALTH AND SAFETY PLAN**

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The work to be performed will be in accordance with the Health and Safety Plan prepared for this removal action. The plan identifies, evaluates, and controls all safety and health hazards. The plan is consistent with 29 CFR 1910.120 and the FEMP Site Health and Safety Plan. Safety documentation will be prepared according to FEMP-2116 Topical Manual, "Implementing FEMP Policies and Procedures for System Safety Analysis and Review System" and DOE/OR-901, "Guidance for Preparation of Safety Analysis Reports".

**VII. QUALITY ASSURANCE**

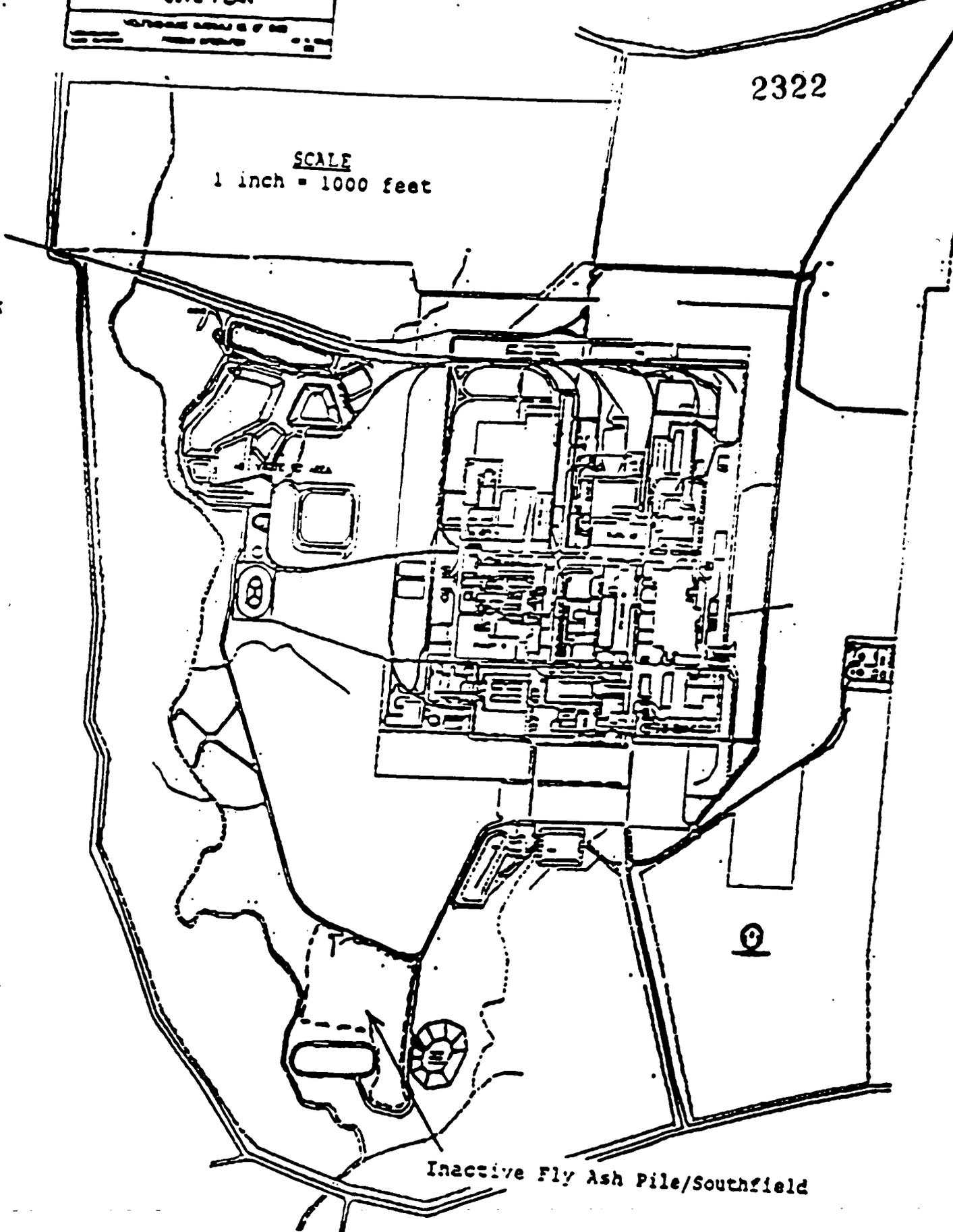
The Inactive Fly Ash Pile/Southfield Removal Action will be conducted according to requirements of the overall quality assurance program at the FEMP, which is described in the site-wide and RI/FS Quality Assurance Project Plan (QAPP). Specific quality assurance requirements will be incorporated into personnel training. The FEMP will conduct a periodic surveillance to verify compliance with the QAPP.

**VIII. PERMITS AND REGULATORY CONSTRAINTS**

No permits are required for this removal action.

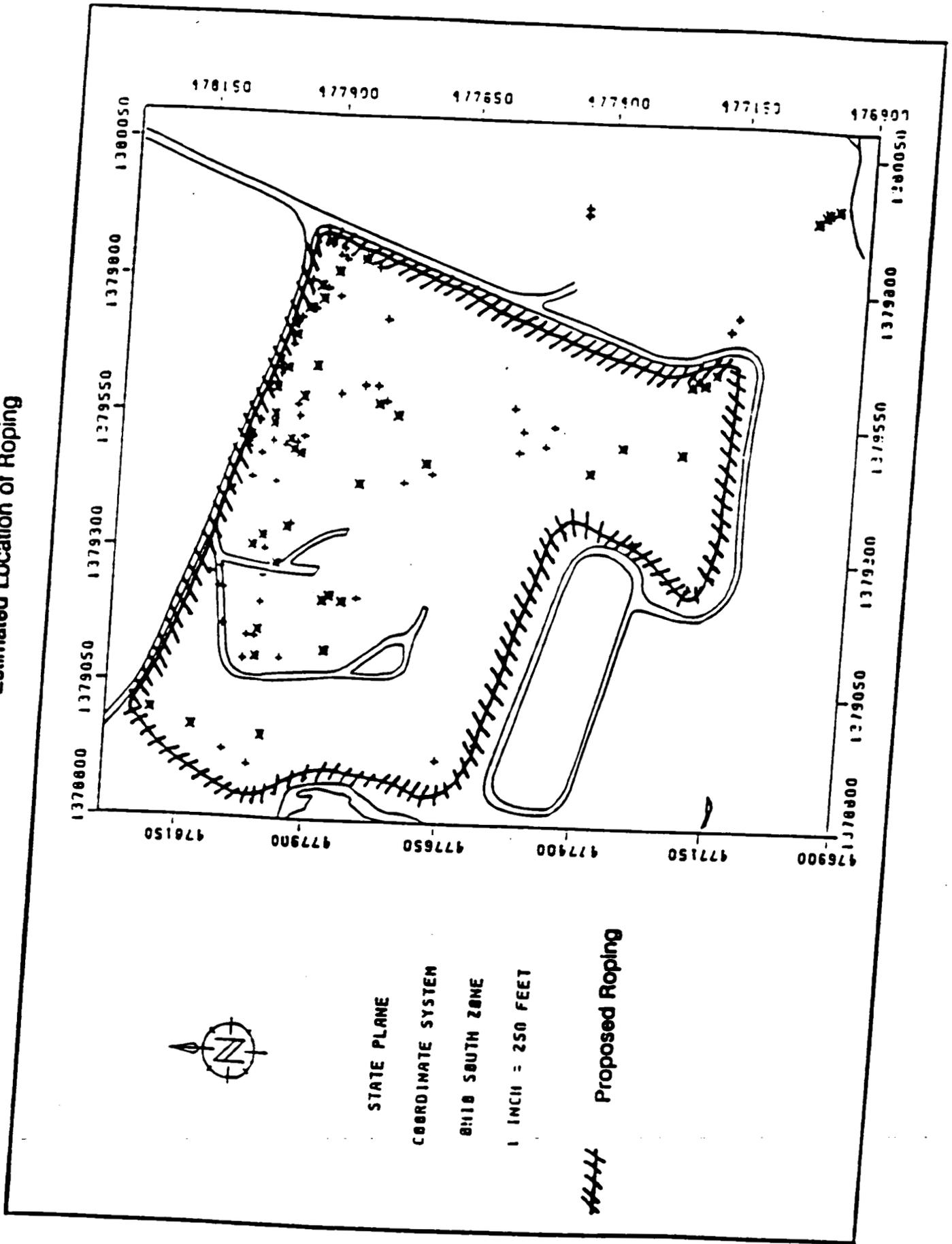
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SCALE  
1 inch = 1000 feet



Inactive Fly Ash Pile/Southfield

Figure 2  
Estimated Location of Roping



STATE PLANE  
COORDINATE SYSTEM  
8110 SOUTH ZONE  
1 INCH = 250 FEET

Proposed Roping