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**REMOVAL SITE EVALUATION TRANSITIONAL  
ADDITIONAL CONTRACTOR SPACE (TACOS)  
JUNE 3, 1992**

06-03-1992

**DOE/WEMCO  
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RSE**

REMOVAL SITE EVALUATION

3455

TRANSITIONAL ADDITIONAL CONTRACTOR OFFICE SPACE (TACOS)

Fernald Site Office  
U. S. Department of Energy

June 3, 1992

## REMOVAL SITE EVALUATION

### TRANSITIONAL ADDITIONAL CONTRACTOR OFFICE SPACE (TACOS)

#### INTRODUCTION

This project was developed in response to a request by DOE to provide transitional office space for the new ERM contractor by June 1, 1992, and the need of office space for the relocation of personnel from trailers that are scheduled for decommissioning.

The Transitional Additional Contractor Office Space (TACOS) project will install two (2) ten-plex office trailers with water, sewers, electric power, fire suppression system and telecommunications.

The ten-plexes will be located south of the Southwest Office Trailer's (SWOT) ten-plexes as indicated on Sketch #1.

The project involves excavation for foundation piers and utilities, all soils disturbed shall be replaced into the work area; a pile will not be formed. All soils will be handled according to Site Policy and Procedure SSOP-00441.

This Removal Site Evaluation (RSE) has been completed by the DOE under authorities delegated by Executive Order #12580 under Section 104 of CERCLA and is consistent with Section 300.410 of the National Oil and Hazardous Substance Pollution Contingency Plan (NCP). The RSE has been completed to support the decision as to whether the TACOS project warrants a removal action.

#### SOURCE TERM

Site characterization and historical records review were performed relative to the project work area and soil. The site is an uncontrolled, non-process area, that was being used for overflow parking and has been classified as clean. Environmental Engineering inspected the site and determined that sampling would not be necessary because of the site's history, classification and the fact that information exists from previous sampling done in the area.

## REMOVAL SITE EVALUATION

### TRANSITIONAL ADDITIONAL CONTRACTOR OFFICE SPACE (TACOS)

#### SOURCE TERM (Continued)

Two (2) relevant soil samples used were taken from the sampling done for the SWOT project which is just north of the TACOS project area. They are numbered five (5) and six (6), respectively on Sketch #1.

The other relevant samples were part of the general site surface soil sampling done by ASI. The relevant samples are shown highlighted on Drawing #1 with point "A" being the most relevant since it is located mid-site.

The analytical results of the relevant samples indicate the area to be at very low levels of contamination and all soil a Category I (defined as < 35 pCi/g). The analytical results are listed in Table I of the next section.

#### EVALUATION OF THE MAGNITUDE OF THE POTENTIAL THREAT

The TACOS project involves excavation of RCRA non-hazardous, Category I soil (RCRA determination dated March 12, 1992) for the routing of underground utility mains and foundations for the modular office units. The soil will be returned to the excavations with any excess being distributed over the work area. The potential threat of exposure as a result of suspension of the soil particles in the atmosphere and the potential migration of the contaminants through wind and water erosion is very low as indicated from the soil samples in Table I.

**TABLE I**

Sample Point	Depth (0-8")	Total U pCi/g	Total U Ug/g	Category	Source
5	X	<6.9		I	Sketch #1
6	X	<7.2		I	Sketch #1
A	X		35	I	Dwg. #1
B	X		23	I	Dwg. #1

## REMOVAL SITE EVALUATION

### TRANSITIONAL ADDITIONAL CONTRACTOR OFFICE SPACE (TACOS)

#### ASSESSMENT OF THE NEED FOR REMOVAL ACTION

Consistent with Section 40 CFR 300.410 of the NCP, the Department of Energy shall determine the appropriateness of a removal action. Eight (8) factors to be considered in this determination are listed in Section 40 CFR 300.415(g)(2).

Based on the sampling data presented herein, none of the eight (8) factors listed in the NCP are applicable to the TACOS project.

If it is determined that a response action is appropriate due to the known levels of contaminants, a removal action may be required to address the existing situation.

If a planning period of less than six (6) months exists prior to initiation of a response action, DOE will issue an Action Memorandum. The Action Memorandum will describe the selected response and provide supporting documentation for the decision.

If it is determined that there is a planning period greater than six (6) months before a response is initiated, DOE will issue an Engineering Evaluation/Cost Analysis (EE/CA) Approval Memorandum. This memorandum is to be used to document the threat of public health and the environment and to evaluate viable alternative response actions. It will also serve as a decision document to be included in the Administration Record.

Site characterization activities completed to support the TACOS project indicates that very low levels of hazardous substances are present in the environment at the proposed project. Site Policy and Procedure SSOP-00441 and IH&S-IH-03, will adequately eliminate potential releases associated with the implementation of this project.

Administrative controls will be instituted to prevent wind erosion, dust generation, and stormwater run on/off control.



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From: C. G. Rieman\6828

WEMCO:EM(FME):92-072

Date: March 12, 1992

Subject: RCRA DETERMINATION AND RADIOLOGICAL CHARACTERIZATION FOR THE  
TRANSITIONAL ADDITIONAL CONTRACTOR OFFICE SPACE (TACOS)

To : J. R. Butterfield

- Ref: 1. WEMCO Site Standard Operating Procedure, SSOP-0044I - "Controlling the Generation of Construction\Maintenance Waste", issued February 19, 1992
2. WEMCO: (EMT/FME):92-004, C. S. Waugh to J. Apple, "RCRA Determination and Radiological Characterization for the Waste to be Generated From the Construction Project Multiplex Office Trailers (EPA/Parsons Office Trailers)", dated February 28, 1992
3. Environmental Compliance Spill/Release Incident Tracking Report, dated February 28, 1992
4. Upset Condition Documentation, issued September 18, 1990

This memo transmits the RCRA Determination and Radiological Characteristics for the Transitional Additional Contractor Office Space (TACOS) Project. The waste to be generated includes approximately 8,000 cubic feet of soil weighing an estimated 1,170,000 pounds, and an estimated 5,000 pounds of chain link fencing, and fence posts with concrete.

#### PROCESS KNOWLEDGE

This construction project will be located in the Uncontrolled area of the FEMP, south of the newly installed Multiplex Office Trailers (EPA/Parsons office trailers) designated T-76 and T-77. The project will consist of the installation of 2, 10-plex office trailers and accompanying utilities. Utilities will be domestic water, sanitary, fire protection water, phones, electric and alarm systems.

The area of construction and excavation has never been used for the production of uranium, thorium or used for any other processes. There were no spill/releases in the construction area per Reference Numbers 3, and 4.

The grass area west of the Administration Building Number 14 and south of the Laboratory Building Number 15, was sprayed with Herbicides; however, TCLP analytical results (herbicides/pesticides) summarized in Reference Number 2 show herbicides/pesticides to be well below the regulatory limit. In addition, TCLP analytical results for TCLP Metals from other construction projects in the area summarized in Reference Number 2, are all well below the regulatory limits.

#### **SAMPLING AND ANALYSIS**

Soil samples were collected and analyzed as part of the EPA/Parsons Office Trailer project, Reference Number 2. In addition the EPA/Parsons Office Trailer project RCRA determination included a review of analytical data from other construction projects in the area. The sampling and analysis data collected for the EPA/Parsons Office Trailer project is representative of the soil quality in the area of the TACOS project and therefore no additional sampling and analysis is required.

#### **RADIOLOGICAL CHARACTERIZATION**

Four soil samples were collected from the TACOS construction area as part of the site CERCLA investigation and analyzed for uranium. The location and results of the analysis are shown in Attachment Number I. Uranium was detected at concentrations of 0.034, 0.042, 0.023, and 0.035 ppm at the sample locations. The waste soil to be generated is therefore characterized as Category 1 per Reference Number 1.

The chain link fencing, fence posts with concrete were surveyed by the IRS&T Radiological Safety Department and survey results indicate the above material to be Low Level Waste.

#### **RCRA DETERMINATION**

The construction waste soils to be generated from the TACOS project can be disposed of as RCRA non-hazardous (a.k.a. non-RCRA) in accordance with Reference Number 1. This determination is based upon process knowledge that no uranium, thorium or any other materials were processed in the construction area and upon the results of the EPA/Parsons Office Trailer project RCRA determination (Reference Number 2).

The chain link fencing, fence posts with concrete and miscellaneous metal wire are RCRA non-hazardous (a.k.a. non-RCRA) based upon process knowledge of the waste material.

J. R. Butterfield

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WEMCO:EM(FME):92-072

No materials have been identified that would cause the waste to meet any of the hazardous waste listings under OAC 3745-51 (in lieu of 40 CFR 261, Subpart D) or exhibit any of the hazardous waste characteristics under OAC 3745-21 to 24 (in lieu of 40 CFR 261.21 to 24) or the revised Toxicity Characteristic under 40 CFR 261.24.

**SUMMARY**

The soil waste described above is RCRA non hazardous (a.k.a. non-RCRA), Category 1 waste and may be disposed of in accordance with Reference Number 1. The metal fence, metal fence posts with concrete and miscellaneous wire is RCRA non hazardous low level waste. This determination applies only to the waste listed on the Construction Waste Identification/Disposition (CWID) form dated November 29, 1991 and Revision 1 dated March 4, 1992. If any additional waste is generated from this project, an additional RCRA determination will be required.

If there are any questions, please contact me at extension 6828 or C. S. Waugh at extension 6777.



C. G. Rieman  
Facilities and Materials Evaluation  
Environmental Management

DAL\tmk

w\attachments

c: J. E. Clements  
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F. B. Thompson  
J. L. Trujillo  
T. J. Walsh

Central Files  
FME Files

Central Files



ATTACHMENT NUMBER I

RADIOLOGICAL SAMPLE LOCATIONS AND SAMPLE ANALYSIS





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478

478.00

477.000

476.000

11

WILLEY ROAD

ROUTE 128

PADDY'S

REVISIONS	
1	12/21/81 First Automatic Annotation Center
2	12/21/81 Base Map
3	11/21/81
4	11/21/81
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DWG. #1