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**ADDENDUM TO THE RI/FS COMMUNITY RELATIONS PLAN FOR
REMOVAL ACTION NO. 7 - PLANT 1 PAD CONTINUING RELEASE**

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ADDENDUM

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TO THE
RI/FS COMMUNITY RELATIONS PLAN
FOR REMOVAL ACTION No. 7

PLANT 1 PAD CONTINUING RELEASE

Fernald Environmental Management Project
Fernald, Ohio

U.S. Department of Energy
Fernald Field Office

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LIST OF ACRONYMS

AR:	Administrative Record
CERCLA:	Comprehensive Environmental Response, Compensation, and Liability Act [of 1980] (also known as Superfund)
CRP:	Community Relations Plan
DOE:	U.S. Department of Energy
EE/CA:	engineering evaluation/cost analysis
EPA:	U.S. Environmental Protection Agency
FEMP:	Fernald Environmental Management Project (formerly the Feed Materials Production Center)
FMPC	Feed Materials Production Center
FFCA:	Federal Facility Compliance Agreement
NCP:	National Oil and Hazardous Substances Pollution Contingency Plan [of 1990]
RI/FS:	remedial investigation and feasibility study
RSE:	removal site evaluation
SARA:	Superfund Amendments and Reauthorization Act [of 1986]

Introduction

This document was prepared as an addendum to the Fernald Environmental Management Project (FEMP) Remedial Investigation and Feasibility Study (RI/FS) Community Relations Plan (CRP), dated August 1990. This addendum addresses Removal Action No. 7, Plant 1 Pad Continuing Release.

This removal action is being conducted pursuant to the laws, regulations and agreements listed below, and will comply with the provisions of each:

- The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), also known as Superfund, that provides for the investigation and cleanup of uncontrolled hazardous waste sites
- The Superfund Amendments and Reauthorization Act of 1986 (SARA) that renewed and updated CERCLA
- The National Oil and Hazardous Substances Pollution Contingency Plan of 1990 (NCP) that spells out how CERCLA and SARA legislation will be implemented
- The Federal Facility Compliance Agreement of 1986 (FFCA) between the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) that provides for the investigation and cleanup of environmental impacts from past and present activities at the FEMP
- The Consent Agreement of 1990 that amended the FFCA and fostered consistency among the operable unit concept and the current commitments of the RI/FS program without modifying the underlying objectives
- The Amended Consent Agreement of 1991 that establishes definitions and schedules for completion of RI/FS documents for the five operable units and identifies additional specific removal actions at the FEMP

The 1990 Consent Agreement specified four removal actions and provided for the identification of three more; these seven are now referred to as the Phase One Removal Actions. The Amended Consent Agreement for the FEMP, signed on September 20 and effective on December 19, 1991, specified 11 additional removal actions, referred to as Phase Two Removal Actions.

On January 14, 1992 six more removal actions, known as Phase Three Removal Actions, were approved by EPA and three emergency removal actions were initiated. In all, the three phases total 27 separate, sequentially numbered removal actions. DOE may identify additional removal actions each year by January 15, if needed.

Objectives

The objective of removal actions under CERCLA and the NCP is to "...take appropriate action to abate, stabilize, mitigate, or eliminate the release or threat of release..." of hazardous materials or waste in a manner that reduces or eliminates the threat to public health, welfare or the environment. Removal actions are emergency or short-term responses to immediate threats. They differ from remedial actions in that they are generally more limited in scope and cost.

Removal actions can be divided into three general categories: emergency, time critical, and non-time-critical. They are as follows:

- Emergency removal actions call for an immediate response. An Administrative Record file must be established and affected citizens must be notified.
- Time-critical removal actions have a planning period of less than six months. If on-site actions are expected to extend beyond 120 days, then an addendum to the CRP is required based on interviews with community residents and/or public interest groups to identify their concerns and determine ways in which residents would like to become involved.
- Non-time-critical removal actions usually have a planning period of at least six months and dictate the same community relations activities as discussed above. An added requirement is the preparation of an engineering evaluation/cost analysis (EE/CA). In this case, the addendum to the CRP must be completed before the EE/CA approval memorandum is signed.

The objective of Removal Action No. 7, Plant 1 Pad Continuing Release, a time-critical removal action, is to protect human health and the environment from the existing areas of contamination on and around the Plant 1 Pad and control the stormwater runoff from the pad that could result in an increased risk of release of hazardous material to the environment.

A removal site evaluation (RSE) was performed and indicated that runoff could have an adverse impact on human health and the environment, and that a time-critical removal action was appropriate for the Plant

1 pad area. A RSE is an evaluation of present conditions at an area of the site suspected of posing an immediate threat to human health or the environment. It is performed to determine whether a removal action is needed and whether it is time-critical or non-time critical. Usually, the determination is based on the complexity of the problem or the severity of the threat. If the evaluation determines that a removal action is appropriate, a work plan for the removal action is prepared and is submitted to the EPA and the Ohio EPA. For a non-time critical removal action, an EE/CA, which is similar to the RSE but is a more detailed evaluation of the alternatives, is done.

Background

In response to the FFCA and consistent with the Consent Agreement signed by DOE and EPA in June 1990, a RI/FS is in progress pursuant to CERCLA, as amended by SARA. The technical strategy adopted for the RI/FS is to issue distinct RI/FS reports for each of the five identified operable units at the FEMP. As a result of recent DOE/EPA Consent Agreement renegotiations, Operable Unit 3 now includes the former production area and additional suspect areas, and specifically includes facilities, buildings, equipment and above or below ground improvements within these areas. The Plant 1 Pad is within the purview of Operable Unit 3; Operable Unit 3 includes the former production area and all of the production-related facilities.

Plant 1 was the "sampling plant" for large amounts of uranium metal process residues and waste materials during the production era at the FEMP. The concrete storage pad associated with Plant 1 has been used as a drum storage location to support the Plant 1 operations since 1952. The Plant 1 Pad and its adjacent unpaved area comprise approximately 12 acres on the northwest side of the FEMP's "process" area.

Approximately 45,000 drums are now stored on the pad. Some of these drums have deteriorated as a result of being exposed to the elements. Sections of the pad have no curbs or sumps for containing or controlling the stormwater runoff, resulting in an increased risk of release of hazardous material to the environment. Additionally, the pad has a number of cracks and joints which may serve as a route of contamination release to underlying soils and groundwater.

The following drummed waste management practices have been initiated in preparation for implementation of the Plant 1 Pad Continuing Release Removal Action to reduce the risk of further releases of contamination from the pad:

- Drum Management -- Includes characterization of waste materials in the drums, prioritization of leaking containers, movement of drums containing hazardous waste to indoor storage, daily leak inspections on the pad, overpacking of deteriorated drums,

expedited repairs to the concrete surface of the pad, and erection of a temporary cover over a portion of the pad

- Sampling and Analysis -- Includes surface soils, subsurface soils, and groundwater
- Air Monitoring -- Ensures detection of any airborne threat

Removal actions, as described in the NCP, are intended to abate, minimize, stabilize, mitigate, or eliminate a release or a threat of release prior to a final action if there is a threat to public health or welfare or the environment. The Plant 1 Pad Continuing Release Removal Action will mitigate the threat of release of contaminants from the Plant 1 Pad to the environment prior to the final remedial action for Operable Unit 3.

Due to past storage and operational activities, sampling results show there are existing areas of contamination on and around the Plant 1 pad. Materials containing varying amounts of uranium metal and thorium as well as drums of barium salts, waste oils, and lead have been, and still are, stored on the pad. Without corrective action, there is a risk of continued releases of these contaminants to the surrounding environment.

Presently, there are several pathways for potential contaminants from the Plant 1 Pad to enter the environment. Rainwater runoff can penetrate the cracks in the pad and seep to the soils below. The runoff can also flow directly into the storm sewer system or onto the soils adjacent to the pad. In addition, airborne releases of dried material can reach the environment.

Overview of Community Concerns

In preparing this addendum, transcripts of community meetings held on: January 31, 1989; May 15, 1989; October 24, 1989; February 20, 1990; May 22, 1990; September 25, 1990; December 11, 1990; March 19, 1991; July 16, 1991; and October 29, 1991, and February 25, 1992 were reviewed. Also reviewed were transcripts from the RI/FS Environmental Impact Statement scoping meetings held on June 12 and 13, 1990.

A 45-day public comment period for the Plant 1 Pad Continuing Release Removal Action was held from May 27 - July 11, 1992. The announcement ran in three local newspapers. There were no oral or written comments submitted.

Highlights of Community Relations Activities

Community concerns regarding Removal Action No. 7 suggest an active FEMP community relations effort with the following objective:

- Maintain an active effort to keep interested community members informed throughout the implementation of the Plant 1 Pad Continuing Release Removal Action.

The following specific activities have been identified to support the community relations objective for this removal action:

1. Prepare one or more fact sheets or updates for the purpose of providing information about the removal action answering key concerns and distribute them at the quarterly public meetings.
2. Devote some portion of future community meetings to this issue; update the RI/FS exhibit to include new information as it becomes available. (Community meetings are held at regular intervals on dates selected by DOE.)
3. Include coverage about Removal Action No. 7 in the Fernald Project Cleanup Report as needed during the removal action.
4. Offer a roundtable presentation on the subject.
5. Provide a 24-hour phone line at the FEMP so concerned citizens can contact a FEMP representative during a time of alarm. The number is 513-738-6295, which is FEMP Security.
6. Make appropriate additions to the Administrative Record and publicize their availability at the Public Environmental Information Center, JAMTEK Building, 10845 Hamilton-Cleves Highway, Harrison, Ohio, 45030.

Timetable

The preparation of materials for all community relations activities will be tied to the removal action schedules. For a complete list of schedule dates and activities, please see the Plant 1 Pad Continuing Release Work Plan, which is in the Administrative Record, located at the PEIC. The activities will be scheduled to provide the maximum flexibility and information to the public. The work plan for this removal action has been approved EPA.

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Discussions and updates on the status of the removal action will be given at future public meetings.