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**ADDENDUM TO THE RI/FS COMMUNITY RELATIONS PLAN FOR  
REMOVAL ACTION NO. 15 - SCRAP METAL PILES**

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**TO THE**  
**RI/FS COMMUNITY RELATIONS PLAN**  
**FOR REMOVAL ACTION No. 15**  
**SCRAP METAL PILES**

Fernald Environmental Management Project  
Fernald, Ohio

U.S. Department of Energy  
Fernald Field Office

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**LIST OF ACRONYMS**

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

## Introduction

This document is prepared as an addendum to the Fernald Environmental Management Project (FEMP) Remedial Investigation and Feasibility Study (RI/FS) Community Relations Plan (CRP), dated August 1992. This addendum addresses Removal Action No. 15, Scrap Metal Piles.

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 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 removal 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 specific objective of Removal Action No. 15, Scrap Metal Piles, a time-critical removal action, is to protect human health and the environment by eliminating the potential threat of release of contaminants from the Scrap Metal Piles. There are indications that the open storage of the contaminated scrap metal has resulted in contaminant releases to the environment. Elevated uranium concentrations in fugitive airborne releases have been detected near the scrap metal piles.

Routine air monitoring is performed at defined air monitoring locations to determine radiological emission at the boundary of the FEMP. For Air Monitoring Location No. 9, which is located on the Plant 1 Pad in the northwest corner of the site, the airborne uranium readings are about four times higher than the next highest station. This reading indicates that the scrap metal piles on the Decontamination Building Pad may contribute to airborne releases. Weather conditions also may cause hazardous substances, pollutants or contaminants to migrate or be released from the exposed scrap metal piles.

The removal action will be managed in two phases. Phase I will address the scrap ferrous and non-ferrous metal pile and Phase II will deal with the scrap copper pile. Specific treatment and disposition will be determined based on the type, size and contamination level of the metal. The field activities of this removal action will be completed by a qualified subcontractor. The work includes processing and off-site disposal or reuse of approximately 3,300 tons of low-level radioactively contaminated ferrous and non-ferrous scrap metal and the interim packaging, processing and beneficial reuse of approximately 1,400 tons of low-level radioactively contaminated scrap copper. These two piles comprise all of the recoverable scrap metal stockpiled at the FEMP.

The scope of work for the services to be performed in this removal action potentially involves the receipt, transportation, necessary interim storage, processing, packaging and disposition or beneficial reuse of the low-level radioactive scrap metal piles.

### Background

The scrap metal piles were created as a result of demolition projects, removal of abandoned equipment and the upgrade of facilities and vehicles at the FEMP. The scrap metal is contaminated with low-level radioactivity. The copper was generated from the Cascade Improvements/Cascade Upgrades Project at the DOE Gaseous Diffusion plant at Paducah, Kentucky, and initially was sent to the FEMP for shredding and casting. However, the copper casting operations were abandoned because of the lack of options for disposition of the resulting copper ingots with the given uranium concentrations. Uranium concentrations within copper ingots cast from the scrap copper were estimated to be a maximum of 70 pCi/g.

In May, 1987, the FEMP scrap metal inventory on the Decontamination Building Pad was separated into two major groups based on the thickness of the material and its potential for recovery. The recoverable scrap metals make up the scope of this removal action, whereas the refuse metal is being handled under Removal Action No. 9, Removal of Waste Inventories, Part I – Current Low-Level Waste Management. The scrap metal has been categorized in the following way:

- Recoverable Metal, which is any metal that is greater than or equal to 1/4-inch thick and requires only minimal processing prior to being made available for beneficial reuse or unrestricted release, such as I-beams, plate steel and structural components.
- Ferrous Metal, which is scrap carbon steel.
- Non-ferrous Metal, which is generally stainless steel and aluminum.
- High-Count Scrap Metal, which is recoverable scrap metal with gross fixed alpha contamination greater than 200,000 disintegrations per minute (dpm)/window area. The 200,000 dpm/window area level is based on criteria in the FEMP Radioactively Contaminated Metal Segregation Project.
- Low-Count Scrap Metal, which is recoverable scrap metal with gross fixed alpha contamination less than 200,000 (dpm)/window area. The 200,000 dpm/window area level also is based on criteria in the FEMP Radioactively Contaminated Metal Segregation Project.
- Refuse Metal, which is any metal that is less than 1/4-inch thick, is wrapped with non-metallic material (except copper), or material generally requiring extensive efforts to render it available for recovery. (A field decision will be made for this determination.) Generally, refuse metal is comprised of thin gauge material, wire, conduit and piping. Disposal of refuse material is being addressed through Removal Action No. 9, Removal of Waste Inventories, Part I – Low Level Waste Management.

The inventory of scrap metal and scrap copper within the scope of this work plan consists of:

- 238 tons of high-count recoverable ferrous metal
- 2,843 tons of low-count recoverable ferrous metal
- 54 tons of high-count recoverable non-ferrous metal
- 139 tons of low-count recoverable non-ferrous metal
- 1,370 tons of copper

Even though the refuse was segregated from the scrap metal piles in 1987, with approximately 2,400 tons of refuse segregated, the possibility exists of discovering more refuse metal during the removal action. The estimated percentage of non-recoverable metals and other materials anticipated to be encountered during this removal action is less than 10 percent by volume, and will be handled by Removal Action No.

9. Newly generated scrap metal will be addressed under Removal Action No. 17, Improved Storage of Soil and Debris. Therefore, no additional scrap metal will be added to the recoverable scrap metal piles within the scope of this removal action.

### **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; February 25, 1992; July 21, 1992, and November 9, 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 Scrap Metal Piles Removal Action was held from November 4 - December 18, 1992. The announcement ran in three local newspapers. There were no oral or written comments submitted.

### **Highlights of Community Relations Activities**

Community concerns regarding the Scrap Metal Piles Removal Action 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 Scrap Metal Piles 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 and answering key concerns about the Scrap Metal Piles at the FEMP 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 the Scrap Metal Piles Removal Action in the Fernald Project Cleanup Report as needed during the removal action.

4. Offer a roundtable presentation on the Scrap Metal Piles.
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 Scrap Metal Piles Work Plan, which is in the Administrative Record, located at the Public Environmental Information Center. 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 by EPA. Discussions and updates on the status of the removal action will be given at future public meetings.

#### REFERENCES

1. U.S. Department of Energy, "Fernald Environmental Management Project Scrap Metal Piles Removal Action Number 15 Work Plan," January 1992.