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**ADDENDUM TO THE RI/FS COMMUNITY RELATIONS PLAN FOR
REMOVAL ACTION NO. 17 - IMPROVED STORAGE OF SOIL AND
DEBRIS**

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TO THE
RI/FS COMMUNITY RELATIONS PLAN
FOR REMOVAL ACTION No. 17
IMPROVED STORAGE OF SOIL AND DEBRIS

Fernald Environmental Management Project
Fernald, Ohio

U.S. Department of Energy
Fernald Field Office

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LIST OF ACRONYMS

ARAR:	applicable or relevant and appropriate requirement
CERCLA:	Comprehensive Environmental Response, Compensation, and Liability Act [of 1980] (also known as Superfund)
CRP:	Community Relations Plan
CFR:	Code of Federal Regulations
DOE:	U.S. Department of Energy
EPA:	U.S. Environmental Protection Agency
EE/CA:	engineering evaluation/cost analysis
FEMP:	Fernald Environmental Management Project (formerly the Feed Materials Production Center)
FFCA:	Federal Facility Compliance Agreement
NCP:	National Oil and Hazardous Substances Pollution Contingency Plan [of 1990]
PCB:	polychlorinated biphenyl
PEIC:	Public Environmental Information Center
RI/FS:	remedial investigation and feasibility study
ROD:	Record of Decision
RSE:	removal site evaluation
SARA:	Superfund Amendments and Reauthorization Act [of 1986]
SSOP:	Site Standard Operating Procedure

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 1990. This addendum addresses Removal Action No. 17, Improved Storage of Soil and Debris.

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, which are referred to as Phase Two Removal Actions.

On January 14, 1992 six more removal actions, known as the 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 the remedial actions being pursued in the RI/FS 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 goal of Removal Action No. 17, Improved Storage of Soil and Debris, a non-time-critical removal action, is to establish a site-wide management concept for soil and debris presently at the FEMP and for soil and debris that will be generated during future cleanup. Specific objectives of this removal action are to: (1) minimize the potential for contaminant release from soil and debris to the environment; (2) contribute to efficient performance of interim response actions and other FEMP activities; (3) support the future implementation of the final remediation activities; (4) minimize future soil and debris waste

volumes and (5) comply with federal and state applicable or relevant and appropriate requirements (ARARs) to the maximum extent practicable.

The removal action will consist of two phases. In broad terms, Phase I will entail identifying contaminated soil and debris, reducing the potential for contaminant release through a variety of actions and building appropriate storage facilities. Phase II will involve storing the soil and debris in these improved storage facilities until the final remedial actions are selected.

If the soil is contaminated only with uranium and not with any other regulated substance, it will either be stockpiled or covered with tarpaulins, as determined by total uranium activity concentrations. Soil with a uranium concentration of 100 pCi/g or less will be put in stockpiles. Soils with uranium readings exceeding 100 pCi/g will be stored temporarily under tarpaulins until the improved storage facilities are constructed. However, soil containing hazardous waste or polychlorinated biphenyls (PCBs) that exceed regulatory standards will be put into containers and stored in designated storage facilities at the FEMP.

Whenever possible, debris will be decontaminated and recycled. The debris that can be recycled will be stored under tarpaulins before being decontaminated. The radiologically contaminated debris that cannot be reused will be put into containers for off-site disposal, if possible. If the contaminated debris cannot be shipped off-site, then it will be kept in containers and stored in the improved storage facilities. Any uncontaminated debris that cannot be shipped off site to an industrial solid waste landfill will be kept in uncovered piles, separated from the contaminated material.

For a detailed account of removal action activities, refer to the "Improved Storage of Soil and Debris Removal Action Work Plan, March 1992." The Work Plan has been entered into the Administrative Record, which is located at the DOE Public Environmental Information Center (PEIC), JAMTEK Building, 10845 Hamilton-Cleves Highway, Harrison, Ohio, 45030.

Background

Soil and debris are generated at the FEMP during construction and demolition projects, removal actions, environmental response actions, routine maintenance, and other operation or remediation activities. Current activities have produced approximately 20 on-site soil piles that will require handling and storage. (See Attachment 3 of the "Improved Storage of Soils and Debris Work Plan" for a current list of existing piles.) Additional soil and debris will continue to be generated in the future as a result of these same activities. All future contaminated soil and debris will be managed according to this plan. The final disposition of these waste materials will be determined through the Superfund process.

Because FEMP soil and debris are now stored in piles or containers, primarily in outdoor piles, there is a potential for contaminants to be released into the environment via airborne and surface water/groundwater pathways. A removal site evaluation (RSE), or evaluation of present conditions at an area of the site, was performed and indicated that contaminant migration from the soil and debris piles could have an adverse impact on human health and the environment.

The following are the regulatory definitions for soil and debris.

Soil

In general, soil that must be addressed by this removal action will result from excavation and demolition activities. The EPA has defined soil (in 40 Code of Federal Regulations [CFR] Part 268 (55 FR 55172)) as unconsolidated earth material composing the surficial geologic strata, consisting of clay, silt, sand, or gravel-size particles (sizes as classified by the U.S. Soil Conservation Service). Soil will also include a mixture of the above-mentioned materials with other liquids, sludges, or solids that are inseparable by simple mechanical removal processes.

The FEMP has defined soil in "Controlling the Generation of Construction/Maintenance Waste" (Site Standard Operating Procedure-00441, Westinghouse Environmental Management Company of Ohio, 1991e) as dirt or gravel particles with maximum dimensions of 2 inches.

Debris

Debris at the FEMP will consist primarily of process equipment and scrap building materials that will be generated during decontamination and decommissioning activities. The EPA has defined debris (in 40 CFR Parts 148, 260, 261, and other regulatory changes [57 FR 9831]) as solid materials that have been manufactured or processed (excluding treatment residuals). Debris also includes natural geologic material that exceeds a 9.5-mm-sieve size such as gravel, cobbles, and boulders, or is an inseparable mixture of such materials with soil, liquid, sludge, or other solid waste materials. The EPA also classifies plant or animal matter as debris.

The FEMP has defined debris in SSOP-00441 as materials such as concrete block, stone, asphalt paving, and similar material that cannot be reused and varies in size from broken fragments of masonry or stone to large structures like tank pads or walls that are scheduled for demolition.

The specific types of contamination that may be present within the soil and debris associated with this removal action are: (1) CERCLA hazardous substances, (2) hazardous wastes, (3) radioactive waste, (4) mixed waste, (5) underground storage tank waste, (6) asbestos, (7) petroleum products, and (8) PCBs.

The schedule for Removal Action No. 17, Improved Storage of Soils and Debris, calls for a 12-month completion time with construction of the initial structures scheduled to begin in mid-July 1993, and construction of the last structures for the removal action ending in June 1994.

Overview of Community Concerns

In preparing this addendum, transcripts were reviewed 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. Transcripts from the RI/FS Environmental Impact Statement scoping meetings, which were held June 12 and 13, 1990, also were examined.

A 45-day public comment period for Removal Action No. 17, Improved Storage of Soil and Debris, 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. 17, Improved Storage of Soil and Debris, 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 Removal Action No. 17, Improved Storage of Soils and Debris

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 about the improved storage of soil and debris, and distribute them at the quarterly public meetings.

2. Devote some portion of future community meetings to this issue; update the 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 Improved Storage of Soil and Debris Removal Action in the Fernald Project Cleanup Report as needed during the removal action.
4. Offer a roundtable presentation on the removal action.
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 PEIC.

Timetable

The preparation of materials for all community relations activities will be tied to the removal action schedule, which provides 12 months for completion. For a complete list of schedule dates and activities, please see the Improved Storage of Soil and Debris 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 was submitted to EPA for approval in March 1992. 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, Fernald, Ohio, "Improved Storage of Soil and Debris Removal Action Number 17 Work Plan", March 1992.
2. 40 Code of Federal Regulations - Protection of Environment
3. Westinghouse Management Company of Ohio, Fernald Environmental Management Project, Fernald, Ohio, "Controlling the Generation of Construction/Maintenance Waste," SSOP-00441, November 27, 1991.