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**ADDENDUM TO THE RI/FS COMMUNITY RELATIONS PLAN FOR  
REMOVAL ACTION NO. 28 - CONTAMINATION AT THE FIRE  
TRAINING FACILITY - DECEMBER 1993**

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**TO THE**  
**RI/FS COMMUNITY RELATIONS PLAN**  
**FOR REMOVAL ACTION No. 28**  
**Contamination at the Fire Training Facility**

**Fernald Environmental Management Project**  
**Fernald, Ohio**

**U.S. Department of Energy**  
**Fernald Field Office**

**December 1993**

**000001**

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## LIST OF ACRONYMS

|         |                                                                                                              |
|---------|--------------------------------------------------------------------------------------------------------------|
| CERCLA: | Comprehensive Environmental Response, Compensation, and Liability Act [of 1980]<br>(also known as Superfund) |
| CRP:    | Community Relations Plan                                                                                     |
| 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]                                   |
| RI/FS:  | remedial investigation and feasibility study                                                                 |
| SARA:   | Superfund Amendments and Reauthorization Act [of 1986]                                                       |

## **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. 28, Contamination at the Fire Training Facility.

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 I 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 II Removal Actions.

On January 14, 1992 six more removal actions, known as Phase III Removal Actions, were approved by EPA and three emergency removal actions were initiated. On January 14, 1993 three more removal actions, known as Phase IV Removal Actions, were approved by EPA; however, in May 1993 DOE requested that two of the original Phase IV Removal Actions be eliminated and one removal action recently initiated, be added. EPA approved this recommendation and the four phases now total 29 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 objective of Removal Action No. 28, Contamination at the Fire Training Facility, is to achieve surface contaminant source control at the Fire Training Facility in a manner that meets regulatory requirements and minimizes the risk to human health and safety and to the environment.

The Fire Training Facility is an area that was used from 1966 to 1990 for fire response training. Fire departments from both the Fernald site and the local community used the facility to conduct training exercises for fighting fires and for mutual aid response training. Materials such as gasoline, solvents (e.g. paint thinners, metal cleaning fluids), used oil, and used household furniture were burned at the Fire Training Facility to simulate fire conditions. While many of these materials came from the Fernald site, some of the local fire teams also provided combustible materials.

The scope of the Fire Training facility Removal Action will encompass the following: 1) conduct site preparations and stage equipment; 2) surface water removal; 3) removal of structures; 4) removal of contaminated surface soils; 5) soil sampling and analysis for verification of contaminant removal; and 6) backfill of excavated areas.

Some of the materials from on-site sources burned at this site were contaminated with radionuclides, based on radiation surveys conducted in May 1989 and January 1993. Radiological surveys combined with soil borings indicate that radionuclides (primarily uranium and thorium) are present in the surface soil at low levels but elevated above background (naturally occurring) concentrations. The soil borings indicate some organic compounds (e.g. gasoline, paint thinners, cleaning fluids) are also present in elevated concentrations. In addition, shallow wells show that drinking water standards are exceeded by some contaminants in the shallow perched water directly beneath the Fire Training Facility.

Additional sampling and analysis projects were undertaken to determine the nature and extent of chemical and radiological contaminants in the area. Radiological surveys of the structures and equipment in the area indicate that there is localized elevated contamination inside the building and on the confined space entry training device. The open top tank has high levels of fixed contamination also.

A soil gas survey was conducted to determine the nature and extent of volatile organic compounds (VOC) in the surface soils of the Fire Training Facility. VOCs include chemicals such as benzene which is a gasoline additive, chemicals used in paint thinners (xylene, toluene), and metal cleaning fluids. The results of this survey indicate that the VOCs are in very low concentrations and limited to the immediate areas where they had previously come into contact with the ground.

A radiological survey was performed in June 1993 to determine the location and extent of radiological contaminants in the surface soils. Data from this survey will be used to identify the surface soils to be removed during the removal action.

## Background

Prior to 1951, the land encompassing the Fire Training Facility (as well as the rest of the Fernald site) was undisturbed farm land. During the period 1951 to 1954, an unpaved parking lot and small buildings were constructed at the present location of the Fire Training Facility. The parking lot was constructed for temporary offices located along the northern fence line of the Fernald site (then designated the FMPC) 500 feet south of the Fire Training Facility. The temporary office facilities were demolished in 1954. No known activities occurred at the Fire Training Facility from 1954 to 1965.

In 1966 the Fire Training Facility was constructed as a training facility for the Fernald Site fire department. The facility was operated from 1966 to 1990. During this period, the site was also routinely used for training exercises by fire departments from surrounding communities. In its operational life, the facility was used intermittently for exercises which lasted several days to several weeks. The Fire Training Facility was used an average of 60 days per year by both the Fernald Site fire department and off-site fire departments.

Various types of combustible substances were burned at the Fire Training Facility to practice fire fighting techniques. A list of some of the combustible substances thought to have been burned or stored are as follows:

- Waste oil
- Kerosene
- Gasoline
- Wooden pallets
- Straw (from off-site source)
- Vehicle(s)
- Damaged office furniture
- Unusable household furniture
- Rubber tires
- Metallic sodium
- Magnesium
- Waste solvents (paint thinners, metal cleaning fluids)

DOE identified the Fire Training Facility as a Phase IV removal action in January 1993. The removal action work plan was submitted to EPA on June 30, 1993. A thirty-day public comment period was held from July 7 - August 7; no public comments were received.

### 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; October 29, 1991; February 25, 1992; July 21, 1992; November 9, 1992; February 23, 1993; and June 22, 1993 were reviewed. Also reviewed were transcripts from the RI/FS Environmental Impact Statement scoping meetings held on June 12 and 13, 1990.

A 30-day public comment period for the Contamination at the Fire Training Facility Removal Action was held from July 7, 1993 to August 7, 1993. The announcement ran in three local newspapers. There were no oral or written comments submitted.

### Highlights of Community Relations Activities

Community concerns regarding the Contamination at the Fire Training Facility 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 Contamination at the Fire Training Facility 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 Contamination at the Fire Training Facility at the FEMP and distribute them at the 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 Contamination at the Fire Training Facility Removal Action in the Fernald Project Cleanup Report as needed during the removal action.
4. Offer a roundtable presentation on the Contamination at the Fire Training Facility 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 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 Contamination at the Fire Training Facility 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. (the work plan and any other documents used for information)