365

2-205.2
~~2-301.2~~

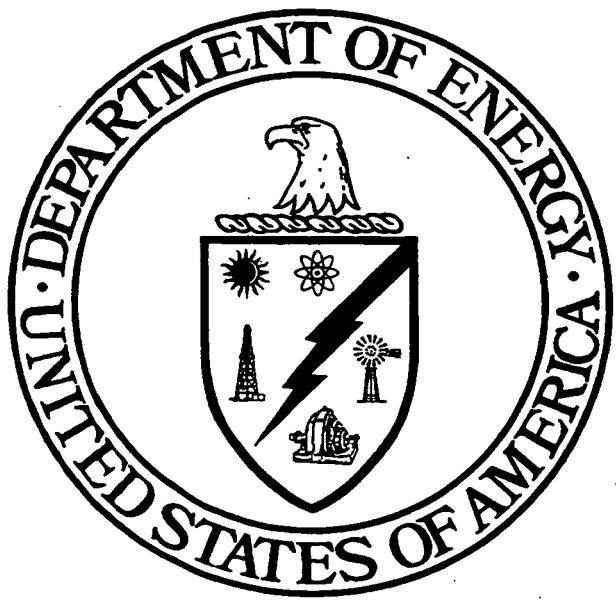
TRANSMITTAL OF ROADS CERTIFIED FOR CONSTRUCTION PACKAGE AND REMEDIAL ACTION WORK PLAN FOR THE HAUL ROAD AND REROUTED NORTH ENTRANCE ROAD - (THIS CONTAINS ONLY THE WORK PLAN)

08/07/96

DOE-1204-96
DOE-FN EPAS
~~25~~ 21
WORK PLAN

DRAFT FINAL REMEDIAL ACTION WORK PLAN FOR THE HAUL ROAD AND REROUTED NORTH ENTRANCE ROAD

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO



AUGUST 1996
REV. 2

U.S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE

2502-WP-0021

DRAFT

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

LIST OF ACRONYMS AND ABBREVIATIONS

ACA	Amended Consent Agreement
ACGIH	American Conference of Governmental Industrial Hygienists
ARAR	applicable or relevant and appropriate requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CRP	Community Relations Plan
dBA	decibel
DOE	United States Department of Energy
DOE-FN	Department of Energy Fernald Area Office
EMP	Environmental Monitoring Program
EPA	United States Environmental Protection Agency
FEMP	Fernald Environmental Management Project
FERMCO	Fernald Environmental Restoration Management Company
FFCA	Federal Facility Compliance Agreement
IEMP	Integrated Environmental Monitoring Plan
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
OAC	Ohio Administrative Code
OEPA	Ohio Environmental Protection Agency
OSDF	on-site disposal facility
OSHA	Occupational Safety and Health Act
OSWER	Office of Solid Waste and Emergency Response
PSHSRM	Project-Specific Health and Safety Requirements Matrix
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RDWP	Remedial Design Work Plan
ROD	Record of Decision
TBC	To Be Considered
USC	United States Code

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

The purpose of this Remedial Action Work Plan (RAWP) is to identify the implementation strategy and schedule for constructing the primary Haul Road and the Rerouted North Entrance Road[1] ("Roads") as identified in the *Final Record of Decision for Operable Unit 2, May 1995* (Operable Unit 2 ROD).

This remedial activity consists of two major components: (1) construction of the Haul Road; and (2) construction of the Rerouted North Entrance Road. The overall purpose of constructing the Haul Road is to provide a safe method of transporting excavated waste material from the operable units to the On-Site Disposal Facility (OSDF). The Haul Road will be approximately 1.6 miles long, will have controlled access, and will be largely utilized by dump trucks hauling material to the OSDF (see Figure 1-1). The overall purpose of constructing the Rerouted North Entrance Road is to provide a safe method of access to the Fernald Environmental Management Project (FEMP) site from the north after the existing North Entrance Road is demolished due to construction of the OSDF. This road will be largely utilized by passenger cars and light truck traffic and constructed in two phases. Phase I will begin near S.R. 126 at the North end of the FEMP and follow the easterly side of the FEMP property for approximately .5 miles, then at an angle to meet the existing North Entrance Road near the Receiving and Incoming Materials Inspection Area. The total length of Phase I is approximately .8 miles. Phase II begins at its interface with Phase I above the existing Sewage Treatment Plant and ties in to the existing North Entrance Road near the FEMP East Parking Lot. Phase II is approximately .7 miles in length (see Figure 1-2).

The scope of this remedial action consists of: (1) removing/relocating plant materials and existing utilities so that the Roads can be constructed; and (2) constructing the Roads. Removing/relocating of plant materials essentially includes the moving of existing material from the work limits where the Roads are to be constructed. Removing/relocating of utilities includes moving any utilities (e.g., telephone or fiberoptic lines, water lines, electric) that exist in the areas of the Roads construction. Actual construction of the Roads includes mobilizing the subcontractor(s), installing traffic controls, and preparing the subgrades, ditches and shoulders, and paving the roadways.

---

[1] The *Final Remedial Design Work Plan for Remedial Actions at Operable Unit 2* referred to the Haul Road and Rerouted North Entrance Road remedial activity as the "Primary Waste Haul Road."

Figure 1-1
Waste Haul Road

Figure 1-2
Rerouted North Entrance Road

Implementing the Roads remedial action project will be in accordance with the strategy set forth in this RAWP, the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereinafter jointly referred to as "CERCLA"), the Resource Conservation and Recovery Act (RCRA) as amended, and the National Environmental Policy Act (NEPA). This remedial action project is being implemented by the United States Department of Energy (DOE), as the lead agency responsible for CERCLA activities at the FEMP.

Consistent with the *Final Remedial Design Work Plan for Remedial Actions at Operable Unit 2* (Operable Unit 2 RDWP), a phased approach is being utilized to accomplish the remediation of Operable Unit 2. The Roads construction is one of these phases. The elements of the selected remedy identified in the Operable Unit 2 ROD will be implemented on an integrated site-wide basis. This integrated approach will not adversely affect the overall Operable Unit 2 remedial design and remedial action summary schedule shown in the Operable Unit 2 RDWP. Note that the OSDF was identified as the major component of the selected remedy for Operable Units 2 and 5; on-site disposal of impacted material is also the preferred remedial alternative for Operable Unit 3 (the ROD for Operable Unit 3 is anticipated in mid 1996). In addition, the material sent to the OSDF by Operable Units 3 and 5 may include contributions from Operable Units 1 and 4, in accordance with their RODs [signed by United States Environmental Protection Agency (EPA) March 1, 1995, and December 7, 1994, respectively].

Construction of the Haul Road and Rerouted North Entrance Road will be conducted in a timely, efficient and cost-effective manner that ensures compliance with all associated applicable or relevant and appropriate requirements (ARARs) while being protective of human health and the environment. This RAWP has been developed in accordance with the requirements of the *Amended Consent Agreement (ACA)*, and is based on the *Superfund Remedial Design and Remedial Action Guidance* [Office of Solid Waste and Emergency Response Directive (OSWER) Directive 9355.0-4A], and *Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potentially Responsible Parties* (OSWER Directive 9355.5-01), and *Guidance on Expediting Remedial Design and Remedial Action* (OSWER Directive 9355.5-02).

1.2 PROJECT BACKGROUND

In July 1986, the DOE and the EPA signed a Federal Facilities Compliance Agreement (FFCA), addressing impacts to the environment associated with federally operated sites (including the FEMP).

The DOE agreed to conduct the FFCA investigation as a remedial investigation/feasibility study in accordance with guidelines of CERCLA. In November 1989, the FEMP site was included on the National Priorities List of the EPA. The FFCA was later amended by the June 1990 Consent Agreement between DOE and EPA which was further modified by amendment in September 1991.

In accordance with the *ACA*, EPA approved and signed the Final ROD for Operable Unit 2 on June 8, 1995; and similarly, the Final ROD for Operable Unit 5 was signed on January 31, 1996. The Final ROD for Operable Unit 3 is anticipated to be signed in mid 1996. The design approach for the Haul Road and Rerouted North Entrance Road is presented in the Operable Unit 2 RDWP, which was submitted to the EPA in August 1995 and subsequently approved in November 1995. The design of the Haul Road and Rerouted North Entrance Road, as currently developed, is presented in the *"Prefinal Design Package, Haul Road and Rerouted North Entrance Road."* Ohio Environmental Protection Agency (OEPA), which has been actively participating throughout the CERCLA response process, also has concurred with the documentation and decisions to date.

1.3 SUMMARY OF WORK PLAN APPROACH

In accordance with the *ACA*, this RAWP identifies the Roads remedial action project specific milestones subject to enforceable deadlines by the EPA. The following identifies the format of this document:

- Section 1.0 discusses project scope and background.
- Section 2.0 discusses the remedial action implementation strategy.
- Section 3.0 discusses project ARARs and permitting requirements.
- Section 4.0 discusses the health and safety plan and the contingency plan.
- Section 5.0 discusses public involvement.

2.0 REMEDIAL ACTION IMPLEMENTATION STRATEGY

This section will discuss the implementation strategy for the Roads remedial activities relative to DOE project requirements and CERCLA guidance.

2.1 PROJECT MANAGEMENT

The governing document for CERCLA response actions at the FEMP is the *ACA* between the DOE and the EPA Region 5, signed in September 1991. As such, ultimate project management responsibility lies with these two agencies as defined by that agreement. As discussed in Section 1.1, the DOE is the lead agency responsible for CERCLA activities at the FEMP. The DOE Fernald Area Office (DOE-FN) is the ultimate authority for ensuring that the remedial action is performed in a manner that meets all project goals, standards, specifications, and requirements of the Operable Unit 2 ROD and this work plan. In addition, the OEPA has been granted regulatory authority over certain RCRA activities. Each agency has engaged contractors to perform identified scopes of work related to their prime areas of responsibility for site remediation.

The DOE Operable Unit 2 Team Leader will provide the overall programmatic direction for this remediation project. DOE-FN will also conduct field oversight through technical leads responsible for construction, engineering, quality assurance and quality control, and health and safety. The DOE Facilities Representative and technical leads will immediately notify the DOE Program Manager of any issues or problems that arise in an effort to seek prompt resolution.

The Fernald Environmental Restoration Management Corporation (FERMCO) On-Site Disposal Facility Project Manager [formerly referred to as the Operable Unit 2 Manager] will provide the overall project management and technical guidance to the Project Team Management. This Team will provide all of the necessary technical, regulatory, and administrative input required for the Roads project and will consist of DOE, the Construction Subcontractor, the Resident Engineer, and FERMCO organizations responsible for support functions (e.g., waste management, remediation support, health and safety).

Stakeholder participation in the remedial action project process will be coordinated through DOE in accordance with the FEMP's *Community Relations Plan* and any subsequent public involvement plans/strategies (see Section 5.0, Community Relations).

2.2 SUBCONTRACT BID/AWARD AND PROCUREMENT STRATEGY

Procurement and subcontract awards for all activities to support and implement the Roads remedial action project will generally be performed through fixed price or unit price subcontracts and will be supported by the appropriate FERMCO division personnel (e.g., Construction). The acquisition system utilized at the FEMP site generally follows requirements of the Federal Acquisition Requirements and is designed to ensure adequate and effective competition among prospective proposers/bidders.

2.3 CONSTRUCTION ACCEPTANCE

As the subcontracted construction nears completion, the Construction Acceptance process begins. Construction Acceptance of construction will be in accordance with applicable FEMP procedures and consists of pre-final inspection/conditional acceptance and final inspection/acceptance. Pre-final inspection will usually result in the conditional acceptance of the facility or work area with a documented list of specific work remaining. Upon completion of the list of work remaining, the final inspection walk-through is conducted. EPA and OEPA, and their respective representatives, will be invited to attend the final inspection. The list will be used as the inspection checklist whereby the acceptance of all listed items will be verified and documented. The checklist is signed by subcontractors, construction, and appropriate project personnel and serves as the final construction acceptance and certification document.

2.4 PROJECT MILESTONES

The commencement of remedial action for Operable Unit 2 will be marked by the construction of the OSDF test pads, excavation of contaminated soil, and certification of the OSDF foot print. Letting the construction subcontract for the Roads construction activities will contribute to the substantial continuous physical on-site remedial action that is required by CERCLA following commencement of remedial action. The Rerouted North Entrance Road will be constructed to allow the beginning of construction of the OSDF. The Haul Road will be constructed to support initial waste placement in the OSDF. The schedule for OSDF activities is identified in the *Draft Final Remedial Action Work Plan for the On-Site Disposal Facility*.[2] Because the roads must be completed before OSDF milestones can be met, the completion dates for the roads correspond to the OSDF milestone dates. Table 2-1 identifies the milestones for Roads activities.

---

[2] Section 6.3 of the Operable Unit 2 RDWP states that remedial action for Operable Unit 2 will commence upon issuing the contract for construction of the Roads. Commencement of remedial action will actually occur before the letting of the contract with the construction of the test pad, soil excavation, and certification of the OSDF footprint.

TABLE 2-1
ROADS REMEDIAL ACTION PROJECT MILESTONES

ACTIVITY	DATE
Begin construction of Roads (Award of Contract)	October 15, 1996
Complete construction of Roads	by March 27, 1998

Subsection 300.435 (f)(1) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) describes completion of a remedial action as the remedy achieving (in the determination of the EPA) the remedial action objectives and goals stated in the ROD. In accordance with the approved Operable Unit 2 ROD, the integrated site-wide Operable Unit 2 remedial action approach, and CERCLA guidance, remedial action completion for Operable Unit 2 is defined as having achieved the following:

- Construction of the OSDF;
- Excavation of Operable Unit 2 impacted material and cleanup confirmation sampling;
- Transportation of the Operable Unit 2 impacted materials;
- Placement of the Operable Unit 2 impacted materials into the OSDF;
- Grading and restoration of the Operable Unit 2 waste units and support areas; and
- Initiation of OSDF long-term monitoring and maintenance.

However, only the construction of the Haul Road and Rerouted North Entrance Road are discussed in this RAWP.

2.5 CONSTRUCTION SEQUENCING

Construction activities for the Haul Road and Rerouted North Entrance Road will be implemented in a sequence which provides for efficient, safe, and cost-effective operations. The construction can be categorized into removing/relocating plant materials and existing utilities and constructing the Roads. Removing/relocating of Plant materials essentially includes the moving of existing material from the work limits where the Roads are to be constructed. Removing/relocating of utilities includes moving any utilities (e.g., telephone or fiberoptic lines, water lines, electric) that exist in the areas of the Roads construction. Actual construction of the Roads includes mobilizing the subcontractor(s), installing traffic controls, preparing the subgrades and ditches and paving the roadways.

Excess material during construction of the Haul Road shall be stored at existing Removal Action No. 17

stockpiles; excess material from the Rerouted North Entrance Road shall be stored at designated areas identified in the Area 1, Phase I Remediation Project and shown on the construction drawings.

3.0 PROJECT ARARs AND PERMITTING

3.1 PROJECT ARARs

Under CERCLA, remedial actions must achieve standards or levels of control that are consistent with environmental laws or regulations, which are termed ARARs. A discussion of the ARARs and "to be considered" (TBC) criteria were identified in the Operable Unit 2 ROD and RDWP. All activities undertaken as a result of the ROD must comply with the ARARs that pertain to the activity.

3.1.1 Storm Water Management Controls

Erosion and sedimentation controls will be in place before the start of excavation activities in accordance with the FEMP Storm Water Pollution Prevention Plan. This Plan has been developed to prevent the contamination or recontamination of soil, storm water and groundwater as a result of excavation and construction activities. The plan includes methods for controlling sediment and erosion based on the type of activities that will be performed.

3.1.2 Noise Monitoring and Abatement

Federal law mandates that all agencies of the federal government comply with federal, state, interstate, and local requirements respecting control and abatement of environmental noise. The two primary federal laws are the Noise Control Act, 42 United States Code (USC) §4901, et seq., and Noise Pollution and Abatement Act, 42 USC §7641. Executive Order 12088, Federal Compliance With Pollution Control Standards, requires federal agencies to comply with the Noise Control Act.

There are several federal regulations implementing various parts of the Noise Control Act. Construction equipment noise standards are set forth at 40 Code of Federal Regulations (CFR) §204.1, et seq. Transportation equipment noise standards are set forth at 40 CFR §205.1, et seq.

Environmental noise monitoring will be performed in conjunction with implementation of the on-site health and safety program during remediation, in lieu of having a regulatory environmental standard available. Health and safety protocol in the field will be used for workers to ensure that occupational and environmental exposures to noise do not exceed Occupational Safety and Health Act (OSHA) and American Conference of Governmental Industrial Hygienists (ACGIH) limits. Therefore, an administrative action level of 85 decibels (dBA) in the vicinity of field personnel will also be established as an environmental action level. Measurements will be made by health and safety field personnel using

noise monitoring instruments accepted for use in health and safety occupational noise monitoring, and as specified in the project-specific requirements matrix.

Components of noise monitoring will include establishing background levels in the Roads areas before remediation activities and monitoring during implementation of remedial action. Details on the frequency of noise monitoring will be established in the project-specific health and safety requirements matrix (PSHSRM). If background noise levels are within 10 dBA of the 85 dBA (i.e., at a 75 dBA level) then a new administrative environmental action level may be established for a given area before remediation is initiated. If the administrative environmental action level falls within 5 dBA of the action level (i.e., 80 dBA), health and safety field personnel will contact the project field manager to begin noise abatement efforts. Abatement of noise will include proper maintenance of all vehicles or machinery to be used in the Roads areas and may include reorganizing the times that loud machinery is used during the day. No remediation activities are expected to be performed after sunset during Roads construction.

3.1.3 Fugitive Emission Monitoring and Abatement

Emissions produced from Roads construction activities will be attenuated through standard abatement procedures. The abatement procedures will, at a minimum, comply with the ARARs defined in the Operable Unit 2 ROD. These ARARs are expected to be met through the use of visual monitoring. Any visible fugitive emissions occurring during Roads construction other than those described below will serve as an action level for abatement. Some Roads construction activities are expected to produce short-term fugitive emissions. These include excavation, transportation, soil spreading, soil compaction, and soil staging. Regulatory limits [Ohio Administrative Code (OAC) 3745-17-07 (B)(4),(5), and (6)] for these activities include the following:

- No visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute period
- No visible emissions from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period
- No visible particulate emissions from any material storage piles except for a period of time not to exceed 13 minutes during any 60-minute period.

In addition, several federal regulatory standards on the release of radionuclides to air will be monitored through two processes. They include the continuous site-wide air monitoring program discussed below in Section 3.1.4 and the occupational exposure monitoring to be performed during remedial action. Occupational monitoring will invoke action levels relative to the potential hazard level indicated for fugitive dust with potentially hazardous contaminants in a given remediation area. Occupational monitoring will be conducted using direct reading instruments or other accepted occupational exposure sampling methods.

The EPA has identified applicable technologies for controlling the air release of particulate matter. These controls are also effective for volatile organic compounds, gravel, and debris. The controls identified for use in the Roads project are as follows:

- Covers and Physical Barriers - If trucks are used to transport material from an excavated area, the trucks will have workable and effective covers for the beds. If needed, the covers will be deployed immediately after loading operations are complete and before trucks are moved from a loading point. Covers, if necessary, will not be removed until a truck reaches the on-site destination point.

  Efforts will be employed in soil staging areas to prevent windblown emissions as well as protection from precipitation, and may include such controls as dust suppressants, plastic sheeting, etc.

- Water Spray - Water will be sprayed, as necessary, to control dust in all areas of an exposed excavation, and excavation area roadways.

- Crusting Agents - The use of crusting agents (e.g., surfactant) will be considered when water proves ineffective or when a particular area will not be disturbed for a long period of time.

- Operational Controls - Operational controls are measures taken to limit potential emissions by limiting activities that may contribute to the generation of emissions, or procedural measures taken to limit emissions. For example, an operational control could be limiting the dumping of excavated soil to days when wind velocities are minimal. A procedural measure may include locating more highly contaminated soil at the base of a soil pile.

- Wind Screens - Wind screens may be used on occasions when wind velocities necessitate additional protection.

- Seeding - After construction, much of the disturbed area will be reseeded and stockpiled.

These standard abatement procedures, used alone or in combination with air monitoring, will minimize fugitive emissions as deemed necessary.

3.1.4 Continuous Site-Wide Air Monitoring

Two existing environmental programs will support this RAWP for monitoring of air emissions and fugitive dust: the site-wide Environmental Monitoring Program (EMP) and the Occupational Air Monitoring Program. The PSHSRM will be the basis for the required monitoring and will identify the action levels that will ensure personnel safety by limiting exposure. Both programs will be implemented throughout the scope of this RAWP. Radiological environmental monitoring will continue under the site-wide EMP for the frequency specified in the Integrated Environmental Monitoring Program (IEMP), which will encompass and integrate monitoring requirements for all environmental media at the FEMP.

Data will be collected during the implementation of the remedial action from air monitoring stations located on site, near the fence line, and at several locations in nearby communities. The monitoring program has been developed in response to DOE Orders 5400.1 and 5400.5, and is presented in the IEMP. Some air monitoring locations will require relocation to accommodate these remediation activities. These location-based modifications will be addressed in the IEMP.

3.1.5 Personnel Monitoring

The monitoring of personnel during the construction activities will be in compliance with OSHA, 29 CFR 1926, and the PSHSRM for this work.

3.1.6 Historic and Cultural Resource Protection

Section 110 of the National Historic Preservation Act (NHPA) requires that historic data be recorded before the destruction of any archaeological site that is eligible for listing on the National Register of Historic Places. Section 106 of the NHPA requires DOE to consider and consult with the Advisory Council on Historic Preservation and the Ohio Historic Preservation Office regarding the effects of remedial activities on archaeological sites that are eligible for listing on the National Register of Historic Places. Section 3 of the Native American Graves Protection and Repatriation Act requires the repatriation of certain Native American cultural items excavated or discovered at the FEMP to the appropriate federally recognized Native American tribes. The following paragraphs describe the archaeological activities being conducted for this RAWP.

A Phase I archaeological investigation, which consists of controlled surface collections using shovel tests, has been completed for the Roads construction areas. A Phase II investigation is conducted on areas

identified in Phase I where more study is justified. If culturally significant properties are delineated during the Phase II investigation and if they will be affected by construction or excavation, those sites will undergo data recovery (Phase III investigation) before any remedial excavation activities occur. A Phase II investigation will begin in late Fall 1996 at potential sites in the proximity of the haul road; however, preliminary investigations indicate that the Roads project will not impact these sites. All Roads excavation areas have the possibility of an unexpected discovery of cultural resources occurring (human remains or associated funerary objects, unassociated funerary objects, sacred objects, or objects of cultural patrimony) which may result in work stoppages of up to 30 days. Any unexpected cultural resource discoveries will be managed according to FEMP Site Procedure EP-0003 "Unexpected Discovery of Cultural Resources."

3.2 PROJECT PERMITTING

CERCLA Section 121(e)(1) states that no Federal, State, or local permit shall be required for the portion of any removal or remedial action conducted entirely on site, where such action is selected and carried out in compliance with Section 121. While an on-site action is exempted from complying with the administrative requirements associated with a permit (e.g., administrative reviews, reporting and recordkeeping requirements), it is not exempt from complying with the substantive requirements that would have been imposed by each permit.

To determine if a permit is required for a remedial action, an evaluation must be made as to whether the action is "conducted entirely on site," as stated at Section 121 (e)(1) of CERCLA. Discussions with the EPA and OEPA have established a consensual strategy for permitting activities at the FEMP. EPA and OEPA have determined that air releases, fill/dredging of wetlands, and construction and operation of the OSDF are considered "on-site activities" and not subject to the administrative requirements of a permit; further, that waste water and storm water discharges to the Great Miami River and Paddys Run are considered "off-site" activities subject to both the administrative and substantive requirements of the National Pollutant Discharge Elimination System (NPDES) permit. Roads remedial activities will take place entirely on site and, except for storm water runoff, will not be subject to the administrative permit requirements. Any storm water discharges from this remedial action are considered to be already covered under the FEMP Site NPDES Permit 1IO00004*ED through the implementation of the permit-required FEMP Storm Water Pollution Prevention Plan.

4.0 HEALTH AND SAFETY AND CONTINGENCY PLAN

4.1 HEALTH AND SAFETY PLAN

The health and safety of the Roads project work force will be administered through the use of a PSHSRM and contract language. The PSHSRM will be written following the guidelines of FEMP site procedure SH-0001, "Developing Project-Specific Health and Safety Plans." The primary focus of the PSHSRM is to ensure worker safety.

The Roads PSHSRM will be included in the subcontract solicitation package and will provide the Construction Subcontractor with information related to the possible hazards and the safety requirements to execute each task from which the Construction Subcontractor can develop their specific Safe Work Plans. The PSHSRM may be revised after reviewing the Construction Subcontractors' proposed Safe Work Plans, as tasks and/or associated hazards and mitigators are identified, added, or deleted. The DOE proposes to submit the PSHSRM(s) to the EPA for informational purposes only as specifically requested by the agency. The PSHSRM, as well as the detailed Safe Work Plans, will be maintained at the project site, with controlled copies in the project document control files.

4.2 CONTINGENCY PLAN

The contingency plan for the Roads remedial action project activities is covered by the existing *FEMP Emergency Plan (PL-3020)*. That plan describes the emergency preparedness program that complements the engineered safety features of the FEMP facility, details the procedures to be followed at the FEMP in the event of an accident or emergency, and is the document which governs the spill response actions at the FEMP. Communications, site assessment, fire, medical, monitoring equipment, and all necessary emergency phone numbers are also provided in that plan. The FEMP Emergency Plan is distributed to participating mutual aid organizations and other local organizations such as local fire departments, hospitals, etc., in the general vicinity of the FEMP.

The FEMP's established emergency organization is available 24 hours a day to respond to all emergencies and abnormal events. The emergency organization includes FEMP personnel and resources as well as those of the local community. This group of trained personnel can be quickly expanded and reinforced as necessary, through existing mutual aid agreements with local fire, ambulance, law enforcement, and medical services. Members of this extended emergency organization undergo a formal training program including participation in sitewide drills and exercises conducted under that plan. These drills and

exercises present simulated emergency conditions formulated to allow this extended emergency organization to practice, maintain, test and refine the effectiveness of emergency plans, procedures, training, and response capabilities.

The Emergency Preparedness and Public Affairs groups at the FEMP maintain several ways to inform state and local groups about emergency preparedness and response. Meetings between the state, county, and local government agencies, emergency response personnel and FEMP personnel are held on a regular basis at Cooperative Planning and Training Committee meetings hosted by the FEMP Emergency Preparedness organization. These meetings provide a forum for these agencies to discuss issues related to response, communications, information sharing, available training, drills and exercises. An emergency planning brochure is distributed annually to the Emergency Planning Zone population on what to expect and what to do in the event of an emergency at the site.

5.0 COMMUNITY RELATIONS

The FEMP's *Community Relations Plan (CRP, PL-3045, Revision 4)* was revised in September/October 1994, and approved by OEPA in December 1994 and by EPA in January 1995. The *CRP* complies with the public participation requirements of all applicable laws and regulations, including CERCLA, FFCA, NEPA, and the NCP, and also reflects EPA guidance in *Community Relations in Superfund: A Handbook* (January 1992).

The *CRP* provides details about how management will involve the public in decisions related to the site during the remedial action phase of CERCLA response action at the FEMP. Required activities are summarized below.

Required Public Involvement Activities During Remedial Action

- Provide a public briefing upon completion of the final engineering design and prior to the beginning of the remedial action [NCP 300.435].
- Publish in a local newspaper of general distribution a *Notice of Availability* of documents submitted to the EPA under the remedial action [DOE commitment/directive].

Information related to the Roads project will be integrated with the OSDF public involvement activities. When practicable, the DOE has and will continue to offer public involvement opportunities — surpassing regulatory requirements — throughout the remedial action phase of site cleanup.

Throughout the duration of FEMP remediation activities, the *CRP* may be revised to reflect changing community concerns, as well as changes in the law, regulations or regulatory agreements.