4227

PROJECT SPECIFIC PLAN FOR AREA 3A/4A EXCAVATION CHARACTERIZATION AND PRECERTIFICATION

SOIL AND DISPOSAL FACILITY PROJECT

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO

APRIL 9, 2002

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LIST OF ACRONYMS AND ABBREVIATIONS

ALARA	as low as reasonably achievable
ALS	Analytical Laboratory Services
ASCOC	area-specific constituent of concern
ASL	analytical support level
AWWT	Advanced Wastewater Treatment (Facility)
CDL	Certification Design Letter
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
COC	constituent of concern
CU	certification unit
DCE	1,1-dichloroethene and 1,2-dichloroethene
DNAPL	dense non-aqueous phase liquids
DOE	U.S. Department of Energy
DQO	Data Quality Objective
ECDC	Engineering/Construction Document Control
EMS	Excavation Monitoring System
EPA	U.S. Environmental Protection Agency
FACTS	Fernald Analytical Computerized Tracking System
FEMP	Fernald Environmental Management Project
FRL	final remediation level
GC	gas chromatograph
GPS	global positioning system
HPGe	high-purity germanium (detector)
IP	Implementation Plan
IRDP	Integrated Remedial Design Package
LAN	Local Area Network
µg/L	micrograms per liter
mg/kg	milligrams per kilogram
NaI	sodium iodide
OEPA	Ohio Environmental Protection Agency
OSDF	On-Site Disposal Facility
PCBs	polychlorinated biphenyls
PCE	tetrachloroethene
pCi/g	picoCuries per gram
PID	photoionization detector
PPE	personal protective equipment
ppm	parts per million
PSP	Project Specific Plan
PWID	Project Waste Identification Document
QA/QC	Quality Assurance/Quality Control
RI/FS	Remedial Investigation/Feasibility Study
RMS	Radiation Measuring Systems
RSS	Radiation Scanning System
RTIMP	Real-Time Instrumentation Measurement Program
RTRAK	Real-Time Radiation Tracking System
RWP	Radiological Work Permit
SCQ	Sitewide CERCLA Quality Assurance Project Plan
SDFP	Soil and Disposal Facility Project

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LIST OF ACRONYMS AND ABBREVIATIONS

SED	Sitewide Environmental Database
SEP	Sitewide Excavation Plan
SMMP	Soil and Miscellaneous Media Sampling
TCE	trichloroethene
TCLP	Toxicity Characteristic Leaching Procedure
V/FCN	Variance/Field Change Notice
VOA	volatile organic analysis
VOC	volatile organic compound
WAC	Waste Acceptance Criteria
WAO	Waste Acceptance Organization

1.0 INTRODUCTION

This project specific plan (PSP) describes the data collection activities during and subsequent to excavation of Area 3A/4A at the Fernald Environmental Management Project (FEMP) as outlined in the Area 3A/4A Integrated Remedial Design Package (IRDP), including the Area 3A/4A Implementation Plan (IP). The majority of Area 3A/4A background information, nature and extent of contamination, and identification of contaminated soil areas is not repeated in this document since it is fully detailed in the Area 3A/4A IP. This PSP covers sampling and analytical requirements from the start of Area 3A/4A excavation through precertification sampling (real-time only) after all excavation is complete to the designed depth or the revised depth based on the findings from real-time field screening and/or physical sampling.

1.1 PURPOSE

The purpose of this PSP is to provide direction to all organizations responsible for the characterization of primarily post-excavation soil surfaces in Area 3A/4A during and following the remedial action excavation process. The characterization process will determine the concentrations of the constituents of concern (COCs) remaining on the post-excavation soil surfaces for compliance with the On-Site Disposal Facility (OSDF) waste acceptance criteria (WAC) or the final remediation levels (FRLs). This characterization data will be used to guide the excavation contractor. The process of determining WAC and FRL attainment is defined in the Sitewide Excavation Plan (SEP), the WAC Attainment Plan for the OSDF, and the Impacted Materials Placement Plan.

Following removal of each soil lift, the surface (sideslopes and/or excavation floor) will be surveyed with real-time instruments (*in situ* gamma spectroscopy instrumentation) and/or physical sampling to determine if the soil meets the OSDF WAC. If an excavation has been completed to the design depth, then precertification characterization will be performed with *in situ* gamma instrumentation as described in Section 2.0 of this PSP.

There are generally four excavation situations or phases that will require characterization of the excavated soil surface using real-time *in situ* gamma instruments or physical sampling as follows:

- Following the removal of surface concrete, asphalt or gravel/fill material to assess the excavated soil surface for above-WAC and/or above-FRL soil for COCs,

- Following removal of a 3±1 foot horizontal soil lift (floors and/or sideslopes of excavations) in some contamination zones, to assess the excavation surface for above-WAC soil and/or above-FRL soil,

- Following the presumed removal of all above-FRL soil from an excavation area, precertification characterization (real-time only) will be initiated for FRL attainment; this step may be partially fulfilled during the real-time scanning and sampling under the above bullet,

- During and following trench excavations to remove below-grade utilities; purpose of characterization is for both WAC and/or FRL attainment.

This PSP serves an additional purpose for radiological surveys of material in between the lift scans that may indicate potential above-WAC radiological concerns (suspect material, etc.) or safety and health concerns. These areas or objects will be treated as suspect above-WAC material areas and measured with the appropriate real-time *in situ* gamma instrumentation (Section 2.0). Additionally, this PSP covers the collection of water samples from the excavation areas for characterization prior to pumping the water to the Advanced Wastewater Treatment (AWWT) Facility for treatment.

The field execution of this characterization program presents some unique safety issues for the characterization field staff requiring a heightened level of awareness from all field personnel. Section 4.0 describes safe work zones and general personal protective equipment (PPE) requirements that must be followed to maintain worker safety.

As excavation progresses, access to the sides and bottom of the excavation is critical to obtaining reliable characterization data. A safe slope configuration must be maintained in areas requiring access by field personnel on foot or driving motorized scanning equipment.

The use of new scanning equipment to aid in accessing areas is introduced in this PSP. The excavator mounted Excavation Monitoring System (EMS) will be the primary tool for Area 3A/4A characterization [pending submittal to and approval of calibration and specifications by the U.S. Environmental Protection Agency (EPA) and Ohio Environmental Protection Agency (OEPA)] based on its ability to:

- Reach across radiation boundaries to access radiological controlled areas without physically placing equipment or personnel in these areas, thus reducing the potential for equipment contamination,

- Maneuver in deep excavations where other real-time equipment cannot access, and
- Scan trenches without placing personnel or equipment inside the trench;

thereby facilitating the application of as low as reasonably achievable (ALARA) principles by reducing the exposure of personnel in contamination areas.

The use of the field portable gas chromatograph is also introduced in this PSP. This equipment will allow rapid turn-around time for organic analysis results [i.e., 1,1- and 1,2-dichloroethene (DCE), trichloroethene (TCE), and tetrachloroethene (PCE)], thus minimizing delays for the excavation contractor. Section 2.6.5 provides a description of this equipment.

1.2 SCOPE

Area 3A/4A comprises approximately 48 acres in the eastern half of the Former Production Area and is generally bounded by 1st Street to the south, "E" Street to the east, the Impacted Material Haul Road to the north, and "B" Street to the west (Figure 1-1). Most of the buildings in this area have been dismantled. The remaining structures will be decontaminated and dismantled prior to commencement of work in the specific occupied area.

The scope of this PSP includes the characterization requirements that will be necessary from the start of excavation in Area 3A/4A through completion of excavation and precertification (real-time only) of the final grade soils. The characterization activities will include real-time *in situ* gamma measurements combined with physical sampling as necessary to determine the final disposition of soils. The results of this characterization process will determine the classification of soils for disposition or further treatment within the following categories that will be transported to the OSDF or placed in stockpiles:

- Above-WAC for radiological COCs
- Above-WAC for organic COCs
- Below-WAC for organic COCs but possibly above-Toxicity Characteristic Leaching Procedure (TCLP) criteria material, hereafter referred to as TCLP material
- Below-WAC for radiological and organic COCs (destined for the OSDF).

Additionally, the *in situ* gamma methods described in this PSP will be used to determine if the planned final excavation grade is below the FRLs through a precertification process. If the final excavation grade is not below-FRL, additional excavation will occur until below-FRL levels are achieved.

Contaminants detected by real-time field screening for this area include total uranium, thorium-228, thorium-232, radium-226 and radium-228 (thorium-228 and radium-228 are inferred concentrations). Technetium-99 concentrations are determined via physical sample analysis performed at the on-site laboratory. DCE, TCE, and PCE concentrations of organic compounds are determined using the field portable gas chromatograph. Aroclor-1254 and Aroclor-1260 concentrations will be determined via physical sample analysis performed offsite.

The schedule for implementation of this PSP is expected to begin in the spring of 2002 and continue through 2003. Soil and material identified as above-WAC, from a TCLP area, or contaminated with organics (DCE, TCE, or PCE) will be targeted for removal as early as possible to minimize cross contamination. DOE-0172-02 letter, attached as Appendix B, addresses the excavation of contaminated soil from the Maintenance Building and Incinerator Pad areas which was started early in 2002 and will continue into 2002. A summarization of the sampling requirements for the Maintenance Building and Incinerator Pad areas discussed in this letter is also provided in Appendix B.

Field conditions may arise during the excavation of Area 3A/4A, which warrant a different decision process for defining the extent of contamination or for verifying that soil is below-WAC or-FRL concentrations. Factors that will be considered under special circumstances include safety of the workers, cost effectiveness, the need for a timely response and impending weather conditions. In the event that a change in the characterization approach is needed, the Characterization Lead will document the change and requirements through the Variance/Field Change Notice (V/FCN) process in accordance with Section 3.4.

1.3 KEY PERSONNEL

The team members responsible for coordination of work in accordance with this PSP are listed in Table 1-1.

TABLE 1-1
KEY PERSONNEL

Title	Primary	Alternate
DOE Contact	Robert Janke	Kathi Nickel
Area 3A/4A Project Manager	Rich Abitz	Jyh-Dong Chiou
Characterization Lead	Frank Miller	Krista Blades
RTIMP Lead	Rich Abitz	Brian McDaniel
Field Sampling Lead	Tom Buhrlage	Jim Hey
Surveying Lead	Jim Schwing	Andy Clinton
WAO Contact	Linda Barlow	Christa Walls
Construction Lead	Lee McDaniel	Frank Flack
Laboratory Contact	Denise Arico	Brenda Collier
Data Validation Contact	Jim Chambers	Erik Corbin
Field Data Validation Contact	Andy Sandfoss	Jim Chambers
Data Management Lead	Krista Blades	Ana Madani
Radiological Control Contact	Corey Fabricante	Mike Schneider
FACTS/SED Database Contact	Cara Sue Schaefer	Susan Marsh
Quality Assurance Contact	Reinhard Friske	Mike Godber
Safety and Health Contact	Debra Grant	Jeff Middaugh

FACTS – Fernald Analytical Computerized Tracking System
RTIMP – Real-Time Instrumentation Measurement Program
SED – Sitewide Environmental Database
WAO – Waste Acceptance Organization

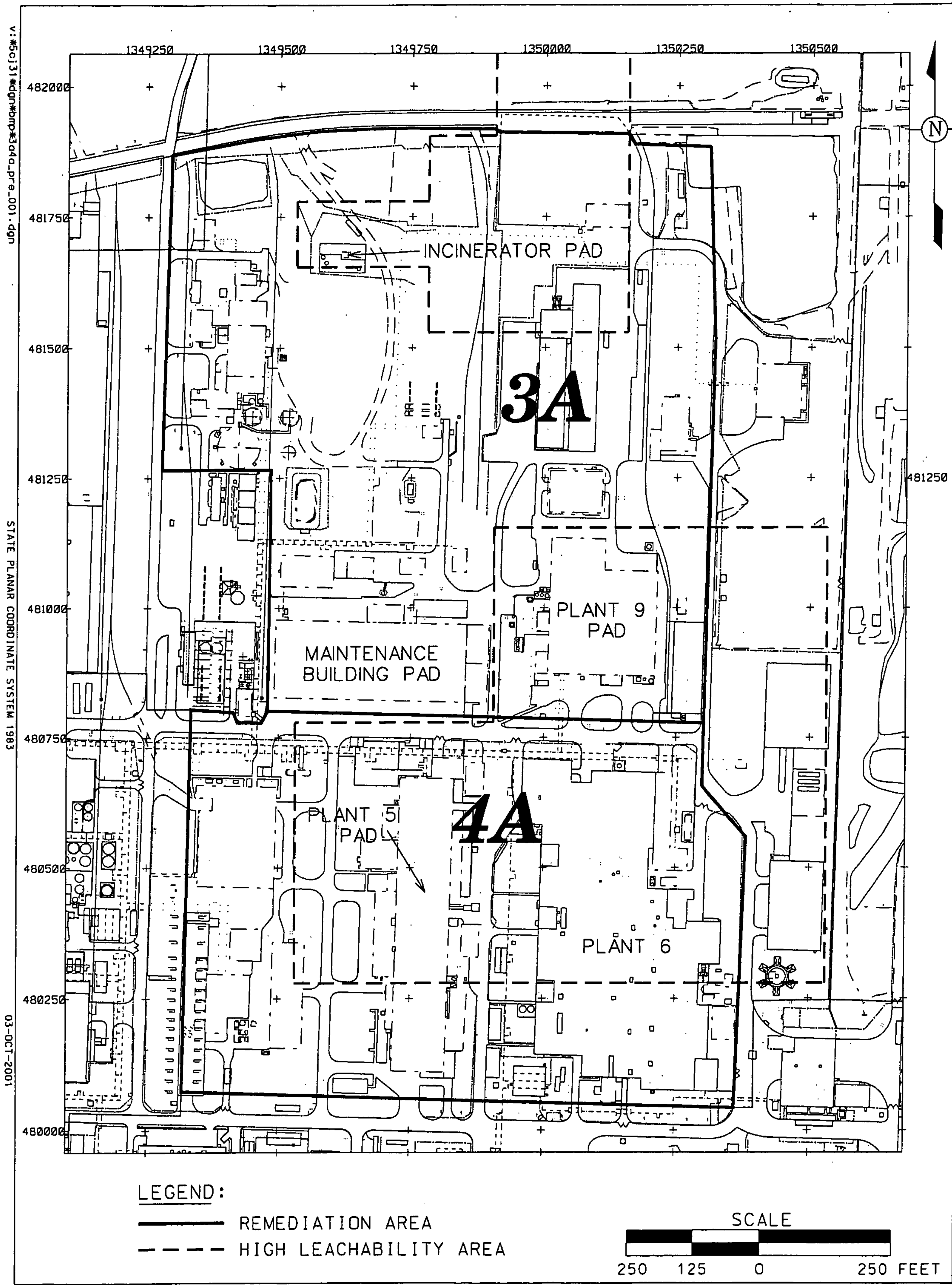

FIGURE 1-1. AREA 3A/4A

2.0 EXCAVATION CHARACTERIZATION PROGRAM

This section addresses the characterization approach, the sampling and monitoring requirements unique to specific contamination zones and the specific equipment and instrumentation methods to be utilized under this PSP. Sections 2.2 through 2.5 provide the sampling and monitoring requirements for each type or phase of excavation (e.g., sequential excavation of soil lifts, utility trenches below the design grade, etc.) anticipated for Area 3A/4A. Section 2.6 addresses the general methods and specific requirements common for the sampling and monitoring operations including the *in situ* gamma spectrometry equipment, the field portable gas chromatograph, methods for systematic grid sampling, and physical sampling methods.

2.1 AREA-SPECIFIC CONSTITUENTS OF CONCERN

The Area 3A/4A IP provides detailed assessment of remedial investigation/feasibility study (RI/FS) and predesign characterization data and the final determination of the COCs. Table 2-1 summarizes the primary and secondary COCs and their WAC and FRL limits. Table 2-2 summarizes the above-WAC areas of soil in Area 3A/4A including the COCs and approximate design depth of excavation as documented in the IP. Figure 1-1 defines the areas of high uranium leachability located in Area 3A/4A. Figure 2-1 defines the above-WAC and above-FRL areas at the Incinerator Pad. Figure 2-2 defines the TCLP area behind the Maintenance Building.

2.2 EXCAVATION CHARACTERIZATION BENEATH FLOORS, ROADS AND FOUNDATIONS

Approximately 20 percent of the surface area of Area 3A/4A was surveyed using *in situ* gamma spectrometry under past predesign investigations as illustrated in Figure 2-8 of the Area 3A/4A IP. Approximately 80 percent of the remaining surface area is covered by existing buildings, concrete pads/floors, and asphalt or gravel roadways. This remaining newly exposed surface soil area must be scanned with *in situ* gamma instruments following removal of this overlying structural material and will be gamma scanned in sections as removal of this overlying material progresses over the course of approximately one year. In particular, gamma scans beneath building foundations and below-grade structures will be performed as individual plant buildings or below-grade structures are scheduled for excavation (e.g., Plant 4, 5, 6 and 9). Near 100 percent coverage will be achieved during the gamma scan in accordance with the User Guidelines, Measurement Strategies, and Operational Factors for Deployment of *In Situ* Gamma Spectroscopy at the Fernald Site (hereafter referred to as the User's Manual).

If the newly exposed soil surface to be scanned is located in a defined radiologically contaminated area per the IP, then the area must be surveyed to confirm and delineate any above-WAC uranium on the exposed soil/fill surface to determine the proper disposition of the first planned lift of excavated soil. Sodium iodide (NaI) Radiation Measurement System (RMS) will be used to scan the surface soil/fill areas for identification of above-WAC soil boundaries, if any. This equipment includes the Real-Time Radiation Tracking System (RTRAK), GATOR, and Radiation Scanning System (RSS), all of which will utilize the action level of 721 parts per million (ppm) uranium. If the NaI action level is reached, the high-purity germanium (HPGe) detector may be used to acquire additional *in situ* gamma measurements to confirm the potential above-WAC uranium areas, or the area may directly undergo excavation, if other information indicates the area is still above-WAC (such as staining, process residue, etc). The preferred equipment to be used in trenches or areas where access may be limited due to the soil/fill surfaces consisting of walls or steep surfaces left by the removal of footers, foundations, or gravel bases will be the EMS. If the EMS is not available for use in these areas (out of service for an extended period of time), then another RMS, the HPGe tripod, or a combination of equipment will be used for the initial gamma scan for the uranium WAC determination. The HPGe utilizes an action level of 400 ppm uranium as a trigger (at 1 meter height and a 5-minute acquisition time) to identify potential above-WAC uranium areas. Action and trigger levels are discussed in the User's Manual.

If either the NaI action level or HPGe trigger level is reached (721 ppm for NaI and 400 ppm for HPGe), the potential above-WAC uranium area may be confirmed with the HPGe at the 31-cm or 15-cm height, depending on the size of the potential above-WAC area. At either the 31-cm or 15-cm height level of 928 ppm indicates above-WAC uranium. Obtaining confirmation of the suspect above-WAC measurement is at the discretion of the Characterization Lead or designee. The decision process for any unique field condition will be documented in applicable field activity logs and, if determined to be appropriate by the Characterization Lead or designee, with a V/FCN as described in Section 3.4.

If the newly exposed soil surface (after removal of concrete, etc.) to be scanned is located in a below-FRL area for all radiological COCs as defined in the IP, then the newly exposed soil/fill surface will be gamma scanned using NaI and HPGe equipment for precertification (see Section 2.5).

2.3 EXCAVATION LIFT CHARACTERIZATION

As described in the IP, the excavation design for Area 3A/4A involves the removal of several zones of contaminated soils requiring segregation during the excavation process. The excavation will generally proceed in 3±1 feet soil lifts with real-time characterization following the removal of each lift. Regardless of the thickness of the above-WAC zones of contamination (a few zones are ≤ 2 feet), the characterization strategy described in this section will be applied. The excavation strategy relies on *in situ* gamma measurements and physical sampling within these zones to aid in the definition of waste streams. Therefore, this section has been developed to address the unique monitoring and sampling requirements for each type (COCs) of contaminant zone and level of concentration (above-WAC, above-FRLs, TCLP soil, etc.) for a particular lift of soil. Excavation of subsequent soil lifts is expected to be performed only after *in situ* gamma data or analytical results are reviewed and soil disposition is determined.

Table 2-2 lists the known areas of above-WAC soil within Area 3A/4A. As expected, uranium comprises most of the above-FRL zones, which are widespread throughout Area 3A/4A. Many of the above-FRL zones are extensions of the above-WAC uranium areas and are illustrated in Figure 2-21 of the IP.

Appendix B, which includes DOE-0172-02 letter as well as a summary of the letter, addresses the excavation of contaminated soil from the Maintenance Building and Incinerator Pad areas.

2.3.1 General Characterization Approach for All Contamination Zones

The characterization requirements for each type of contaminant zone, including the types of samples and measurements, are summarized in Table 2-3. Table 2-3 is intended to serve as a guide for the characterization strategy. This table specifies when the excavation floor versus sideslopes of each excavation lift needs to be sampled or measured using *in situ* gamma instruments. The purpose of sideslope measurements and/or sampling is to determine if the lateral extent of contamination has been captured with the excavation limits. The excavation floor requires characterization to determine if any areas of above-WAC COCs or above-FRL COCs are present, dependent on the particular type/level of contamination zone, in order to ensure proper segregation of soils during excavation or to ensure that FRLs have been attained.

In Situ Gamma Measurements

As detailed in Table 2-3, scanning with a NaI detector system using one of the mobile RMS units will be performed on either the excavation sideslopes, excavation floor or both for each soil excavation lift, regardless of the type of contamination zone. Moreover, upon reaching the design depth specified in the IP for any contamination zone (above-WAC or above-FRL, organic or radiological), both the excavation floor and sideslopes will require a gamma scan. The GATOR is capable of providing coordinate (X and Y) and elevation (Z) data so that design grade depth can be confirmed.

The RMS NaI equipment includes the RTRAK, RSS, GATOR, and EMS. The EMS consists of an excavator equipped with a NaI detector for scanning measurements (or an HPGe for static measurements), laser range finder, and global positioning system equipment and will be used in areas not accessible by other RMS units. For identification of above-WAC uranium (1,030 ppm), an action level of 721 ppm is utilized for the NaI detection systems to trigger additional *in situ* gamma measurements for confirmation or further delineation of above-WAC uranium areas.

If the RMS equipment is unavailable and therefore, cannot be used to perform the initial gamma scan, then HPGe tripod measurements will be employed to provide maximum coverage (goal of 99.1 percent in accordance with the User's Manual) of the excavation sideslopes and/or floor as required.

If the NaI scans or the static HPGe measurements indicate below-WAC but above-FRL concentrations of uranium in the soil, further confirmation and delineation with the HPGe may be required. This confirmation and delineation process is documented in the User's Manual (Section 3.4). Confirmation measurements are made to verify above-FRL radiological COC concentrations are present, and delineation measurements are made to determine the boundary of the above-FRL area. Confirming and delineating the extent of contamination with HPGe measurements is at the discretion of the Characterization Lead or designee. Conditions may arise which warrant a different decision process for defining the extent of contamination. The decision process for the unusual condition will be documented in applicable field activity logs and, if determined to be appropriate by the Characterization Lead or designee, with a V/FCN as described in Section 3.4.

Physical Sampling for Specific COCs

As summarized in Table 2-3, physical sampling as part of the excavation monitoring process is required in above-WAC technetium-99 zones, in volatile organic contamination zones, and in areas where polychlorinated biphenyls (PCB) contamination has been found. Physical samples are required on the excavation sideslopes, excavation floor, or both, depending on the zone of contamination. The collection of physical samples will be documented in applicable field logs and with a V/FCN. Additionally, the Data Group Form, FS-F-5157 will be generated per Procedure EW-1021, Preparation of the Project Waste Identification and Disposition (PWID) Report, following the generation of data from the analysis of physical samples. The specific requirements for each type of physical sample being collected are described below.

2.3.2 Characterization of Above-WAC Organic Soil and TCLP Soil Zones

Table 2-2 summarizes the locations of the above-WAC organic soil zones defined in the Area 3A/4A IP. These zones are limited to the Incinerator Pad (Figure 2-1), the Maintenance Building Pad (Figure 2-2), and an area around the eastern side of Plant 6. Appendix B addresses the specific requirements of the Incinerator Pad and Maintenance Building Pad areas.

In these areas, the sideslopes of each excavation lift will be surveyed using a photoionization detector (PID). If the action level for the PID is exceeded, then a physical sample for field gas chromatograph (GC) analysis may be collected and analyzed to determine if the soil contains above-WAC organic COCs or is 20 times the TCLP limit for the area-specific constituent of concern (ASCOC). The PID survey methodology and action level is described in Section 2.6.8. PID surveying of the bottom (floor) of each lift is not necessary until excavation has reached the design grade of the above-WAC organic or TCLP soil zone.

Additionally, in the Incinerator Pad area, Maintenance Building Pad area, and the area around the eastern side of Plant 6, physical samples will be collected from the sideslopes for portable GC analysis. The physical GC samples will be collected at a frequency of one sample every 20 linear feet along the perimeter of the excavation lift, a minimum of one sample per sideslope, resulting in a minimum of four samples being collected per excavation lift. Prior to collecting the physical sample, a PID reading will be obtained at each sample location. These co-located measurements will support the development of a correlation between PID readings and actual soil VOC concentrations.

If results from the GC analyses (collected due to a PID action level exceedance or as one of the four minimum samples) indicate the presence of above-WAC organics or 20 times the TCLP limit for the ASCOC, then the sideslopes of the excavation will be expanded. Additional surveying, sampling, and excavation will occur until the results indicate that the soil is below-WAC or is less than 20 times the TCLP limit for the ASCOC. Commencement of excavation of another lift will occur following confirmation that the sideslopes of the excavation are below-WAC or is less than 20 times the TCLP limit for the ASCOC.

When the excavation design depth in an above-WAC organic area or a TCLP Characteristic zone has been reached, PID surveying of the excavation bottom, as well as the sideslopes corresponding to the final lift elevation will be performed. If the action level for the PID is exceeded, then a physical sample for field GC analysis will be collected and analyzed to determine if the soil contains above-WAC COCs or is 20 times the TCLP limit for the ASCOC. Additionally, physical samples for portable GC analysis will be collected from the excavation bottom and sideslopes (minimum of eight samples) as described in Section 2.6.8. Prior to collecting the physical sample, a PID reading will be obtained at the sample location.

If results from the GC analyses (collected due to a PID action level exceedance or as one of the eight minimum samples) indicate the presence of above-WAC organics or 20 times the TCLP limit for the ASCOC, then the area will be delineated through additional sampling and field GC analysis, and another lift or localized area will be excavated. This excavation and surveying will continue until all above-WAC organic and greater than 20 times the TCLP limit for the ASCOC soil is removed, at which time the excavation will shift to the above-FRL zone, if present.

In order to ensure that no above-WAC uranium is present, NaI scanning will be required on the sideslope and bottom of each excavation lift, as well as the sideslopes and floor at design depth. (Additionally, the NaI data from the floor scan will be evaluated against the FRLs for uranium, radium, and thorium to the extent possible with respect to the NaI detection limits, as described in Section 2.5, Precertification). If above-WAC uranium is detected during NaI scanning, confirmation with HPGe and, if necessary, delineation of the above-WAC uranium will be performed. Excavation of this soil will then be conducted followed by another round of NaI scanning over the newly excavated area.

2.3.3 Characterization of Above-WAC Technetium-99 Zones

Areas and zones contaminated with above-WAC technetium-99 require physical sampling and laboratory analyses for confirmation during and following completion of excavation. Section 2.6.8 provides the methodology for determining sample locations. The samples will be analyzed at the on-site laboratory to determine if the material is above-WAC for technetium-99. At any location where the analytical result for technetium-99 is above WAC, additional excavation will proceed in the direction of the contamination. Re-sampling and analysis will continue at a frequency of one sample every 10 feet until all results indicate that the remaining soil meets the OSDF WAC.

Following the removal of each excavation lift of soil in technetium-99 zones, the sidelopes of the excavation will be sampled per Section 2.6.8 for above-WAC technetium-99 and NaI scanned-for above-WAC uranium. If the results indicate that above-WAC technetium-99 contamination or above-WAC uranium is still present on the sideslopes of any excavation, then the sideslopes of the excavation will be further excavated and expanded. Additional sampling will occur until the laboratory results indicate that the soil is below-WAC for technetium-99, at which time the next excavation lift will be removed.

Once the design depth of the excavation is reached both the excavation floor and sideslopes will be physically sampled for technetium-99 and scanned with the NaI system for above-WAC uranium. If the results from the physical analyses of these samples indicate that the excavation floor (at design grade) has above-WAC technetium-99 results, then another lift or a localized area will be excavated. If additional sampling is required to bound the above-WAC technetium-99 soil, the requirements will be documented through the V/FCN process. The excavation and sampling process will continue until results indicate that above-WAC technetium-99 soil has been removed. If above-WAC uranium is detected during NaI scanning on the sideslopes or excavation floor (at design grade), confirmation with HPGe and, if necessary, delineation of the above-WAC uranium may be performed. Excavation of this soil will then be conducted followed by another round of NaI scanning over the same excavation area.

2.3.4 Characterization of PCB Areas

The area northeast of the Maintenance Building requires physical sampling and laboratory analyses for the PCBs aroclor-1254 and aroclor-1260 during and following completion of excavation. Section 2.6.8.4 provides the methodology for determining sample locations. The samples will be analyzed at an off-site laboratory to determine if the material is above-FRL for aroclor-1254 and aroclor-1260. At any location where the analytical result for aroclor-1254 and/or aroclor-1260 is above FRL, additional excavation will proceed in the direction of the contamination. Re-sampling and analysis will continue at a frequency of one sample every ten feet until all results indicate that the remaining soil meets the FRL.

Following the removal of each excavation lift of soil in the areas where above-FRL material was found, the sidelopes of the excavation will be sampled per Section 2.6.8.4 for above-FRL aroclor-1254 and aroclor-1260 and NaI scanned-for above-WAC uranium. If the results indicate that above-FRL aroclor-1254 and/or aroclor-1260 contamination or above-WAC uranium is still present on the sideslopes of any excavation, then the sideslopes of the excavation will be further excavated and expanded.

Additional sampling will occur until the laboratory results indicate that the soil is below-FRL for aroclor-1254 and aroclor-1260, at which time the next excavation lift will be removed.

Once the design depth of the excavation is reached both the excavation floor and sideslopes will be physically sampled for aroclor-1254 and aroclor-1260 and scanned with the NaI system for above-WAC uranium. If the results from the physical analyses of these samples indicate that the excavation floor (at design grade) has above-FRL aroclor-1254 and/or aroclor-1260 results, then another lift or a localized area will be excavated. If additional sampling is required to bound the above-FRL aroclor-1254 and/or aroclor-1260 soil, the requirements will be documented through the V/FCN process. The excavation and sampling process will continue until results indicate that above-FRL aroclor-1254 and aroclor-1260 soil has been removed. If above-WAC uranium is detected during NaI scanning on the sideslopes or excavation floor (at design grade), confirmation with HPGe and, if necessary, delineation of the above-WAC uranium may be performed. Excavation of this soil will then be conducted followed by another round of NaI scanning over the same excavation area.

2.3.5 Characterization of Above-WAC Uranium Zones

The areas and zones of above-WAC uranium are extensively documented in the IP and summarized in Table 2-2. If the area or zone being excavated contains above-WAC uranium, then the sideslopes of each excavation lift will be scanned, as accessible using the RMS equipment. Section 2.6 provides a description of the NaI scanning methodology. Any sideslope measurements indicating above-WAC uranium will be further excavated and scanned until below-WAC uranium results are achieved, at which time excavation of another lift will occur.

When the design depth is reached, a NaI scan will be performed on both the sideslopes and the excavation floor. Any floor or sideslope measurements indicating above-WAC for uranium will be further excavated and scanned until below-WAC uranium results are achieved.

The preferred equipment to be used in trenches or areas where access may be limited, due to the soil/fill surfaces consisting of walls or steep surfaces, is the EMS. Only if the EMS is not available (out of service for an extended period of time), will another RMS, the HPGe tripod, or a combination of equipment be utilized to obtain as close to complete coverage (per the User's Manual) as possible of the sideslopes and floor where access may be limited.

In terms of the Area 3A/4A excavation control, the remaining, known above-WAC radiological areas are confined to the Incinerator Pad, Plant 6, and Plant 9. The known (based on physical sample results) above-WAC conditions are determined by uranium, technetium-99, and/or PCE. Only the Incinerator Pad area and Plant 6 (based on physical sample results) appear to have distinct uranium-only above-WAC areas. In the Plant 6 area, sufficient predesign characterization data to bound the above-WAC areas are not currently available. During the predesign investigation, the collection of adequate predesign characterization (WAC attainment) data was hampered by the ongoing decontamination and decommissioning activities. As a result, the above-WAC areas were preliminarily drawn largely to the footprint of Plant 6 and/or bounded completely by below-WAC results far away from the suspected source areas. When uranium is the only COC driving the above-WAC excavation [consistent with the Area 3A/4A IRDP (Page 3-12)] in areas where predesign physical sampling was not sufficient to bound the actual above-WAC volumes, real-time monitoring will be used to establish the base of the final above-WAC footprint. No real-time scanning result will ever override a physical sample that exceeds the uranium WAC. All physical sample results that represent above-WAC conditions, even when identified in isolation, will always represent a volume of above-WAC material to be excavated.

2.3.6 Characterization of Above-FRL/Below-WAC Uranium Zones

The vast majority of contaminated soil in Area 3A/4A falls into the category of above-FRL for uranium. If the area being excavated is above-FRL for uranium but below-WAC for uranium, then both the sideslopes and bottom of each excavation lift must be scanned using the RMS equipment. Section 2.6 provides the specifications for conducting the NaI scanning. The NaI scan is designed to ensure that the soil surfaces to be subsequently excavated contain no uranium at above-WAC levels. If above-WAC uranium results are detected on the floor or sideslopes of the lift, then this area must be confirmed and delineated using HPGe detector measurements. If any above-WAC uranium is detected with the NaI scanning equipment, the soil will be excavated and dispositioned as above-WAC uranium soil.

Once the final design depth is reached for an above-FRL uranium zone, then the entire excavation sideslopes and floor will be scanned with the intent of evaluating the data for both above-FRL levels for uranium (as well as thorium and radium). Any uranium levels above the detection limit of the NaI detector [nominally 246 ppm or three times (3x) the FRL of 82 ppm] may indicate the potential for above-FRL uranium present at the design depth of the excavation. These potential above-FRL hot spots at the design depth will be confirmed and delineated with HPGe if necessary, and excavated. When below-FRL levels for uranium are achieved, then precertification measurements will be commenced per Section 2.5.

2.3.7 Characterization of Above-FRL Organic Zones

The above-FRL organic zones of contamination consist of the Incinerator Pad area, an area around the eastern side of Plant 6, and the Maintenance Building Pad area (possibly surrounding the TCLP soil). These zones will require the use of PID instruments for volatile organic field surveys, physical samples for analysis via field GC, and the EMS system (HPGe or NaI detectors, if approved by EPA and OEPA) or other RMS instruments for radiological scans for above-WAC uranium.

A PID will be used to survey the sideslope and floor of each excavation lift and the sideslope and floor at design depth. The PID survey methodology is described in Section 2.6.8. If the action level of 10 ppm above background for the PID is exceeded, then a physical sample for field GC analysis will be collected and analyzed to determine if the soil contains above-WAC organic COCs. The co-located PID reading will be recorded for the development of a correlation to the GC results.

A minimum of eight physical samples for GC analysis will be collected from the sideslopes and floor of each excavation lift and at design depth. These samples will be analyzed to determine if the soil contains above-WAC organic COCs. The samples will be collected as described in Section 2.6.8. Prior to collecting the physical sample, a PID reading will be obtained at the sample location. The co-located PID reading will be recorded for the development of a correlation to the GC results.

The field GC results will be evaluated to determine if above-WAC organic soil is present. If the soil is found to contain above-WAC organic COCs then these areas will be further excavated until sampling results indicate no above-WAC organic soil remains.

In situ gamma measurements (NaI or HPGe) will be performed on both the sideslopes and floor of each excavation lift as well as at design grade, as accessible. The purpose of this scan is to ensure that no above-WAC uranium levels exist on the surface. As with other excavation zones, any above-WAC uranium area will be excavated and segregated.

2.3.8 Sampling of Excavation Water for Volatile Organic COCs

Excavation water is the mixture of surface water and perched groundwater that collects to create ponded water in the excavation. All excavation water will go through either Phase I or Phase II treatment at the AWWT Facility.

Excavation water will be sampled and analyzed using the portable GC or onsite laboratory to determine if Phase II treatment [> 50 micrograms per liter (μg/L) for any single constituent] is required (as described in Section 3.4 of the IP) in the following situations:

- As identified in the IP, there are three known volatile organic compound (VOC) contamination zones (i.e., Plant 6, Incinerator Pad, TCLP Soil Area 5 near the Maintenance Building). The contaminants are above-WAC PCE at Plant 6, above-WAC PCE and DCE at the Incinerator Pad, and above-WAC TCE at TCLP Soil Area 5 near the Maintenance Building. Excavation water in these zones will be sampled by collecting a water sample from the bottom of the pooled water [COCs are dense non-aqueous phase liquids (DNAPLs) and should pool below the water level] or from a water tank containing water pumped from one excavation lift. This sample will be analyzed on a field GC unit or at the onsite laboratory for PCE, TCE, and/or DCE prior to the discharge event. Table 2-2 summarizes the analytes for each of the affected areas.

- If any of the excavation water exhibits any suspect appearances (e.g., sheen/coloration on the water surface, chemical odor), then this location will be sampled for the VOC COCs.

The VOC water samples will be collected from the bottom (COCs are DNAPLs and should pool below the water level) of the water at the water's edge, near the sideslope known to have contained the highest level of organic contamination based on either PID readings of the sideslopes during excavation or based on the predesign investigation data for pooled water, or from the bottom of the water tank containing water pumped from one lift. Sample collection is performed per Procedure SMPL-02, Liquids and Sludge Sampling. A chain of custody form is not required for portable GC samples since the field analyst operating the portable GC unit is considered part of the field characterizing team. The sample remains in physical possession of the team until it is exhausted or disposed. If the sample must be transferred to a person who is not part of the field characterizing team (e.g., on-site laboratory, radiological technician, etc.) then a chain of custody must be generated per Procedure EW-0002, Chain of Custody/Request for Analysis Record for Sample Control for the GC sample. Table 2-4 summarizes the sample container and preservative requirements. The sampling identification system described in Section 2.6.9 will be followed. The field GC data will be evaluated to determine disposition requirements as defined in the IP.

2.4 UTILITY TRENCH CHARACTERIZATION (BELOW DESIGN DEPTHS)

2.4.1 Applicability

The potential exists for contamination to be located beneath and adjacent to below-grade piping and utility corridors in Area 3A/4A. Approximately 60 percent of the utility lines will remain after the general excavation has reached the design grade. At the design grade, *in situ* gamma measurements will be used to precertify this surface including the soil overlying the below-grade piping. These utilities lie below the design grade (precertified) and will be removed using a backhoe and trenching techniques. Per the IP, *in situ* gamma measurements will be used to determine if the soil and bedding material removed from the trench meet the OSDF WAC and site FRLs. Physical sampling may also be required if suspect soil or utility bedding material is encountered during excavation that may indicate chemical contamination (e.g., organics) as discussed below. Additionally, the surface area above the utilities may be precertified with *in situ* gamma spectroscopy measurements prior to initiating the trench work through the routine process of scanning all design grade surfaces following large-area excavations. Figure 2-3 provides a flowchart of Utility Trenches characterization.

2.4.2 *In Situ* Gamma Measurements of Trench Excavations

The objective of the *in situ* gamma measurements is to determine if the trench pipe bedding material meets the OSDF WAC and if the underlying soil (trench bottom) meets the radiological FRLs for precertification purposes.

The preferred method for gamma measurements of the trench excavations will be the EMS equipped with a NaI detector in a mobile scanning mode. The use of the EMS NaI detector will have the advantage of covering more trench area in less time in comparison to static HPGe. Similarly, the EMS equipped with a HPGe detector will offer safer work practices for detector mobility and trench accessibility. Use of the EMS equipped with either a NaI or HPGe detector in Area 3A/4A will rely on the operating procedure and the User's Manual for operational instructions and guidelines. The EMS will only be used after the calibration and specifications for the equipment are approved by the EPA and OEPA.

As an alternative, only if the EMS NaI or HPGe system is out of service for an extended period of time , the HPGe tripod measurements will be utilized at trench excavations. If the HPGe tripod is used, the excavator will excavate a bucket-load of soil from the pipe bedding material at 50-foot intervals along the trench. This bucket-load of bedding material will be placed next to the trench (downgradient direction) to form a circular pad 3 feet or less in diameter and 6 inches or less in thickness for HPGe measurements at a 15-cm detector height. This same process will be followed for the native soil underlying the bedding material, at the same 50-foot intervals. The HPGe tripod measurement over the formed circular pad (positioned upgradient from the trench) will determine if this soil meets the radiological FRLs. The trench will be backfilled with the material from the circular soil pad pending the results of the HPGe measurement.

2.4.3 Physical Sampling at Utility Trench Excavations

Physical samples will be collected from trench material contained in the excavator bucket. This material will be from the trench base soil, underlying the pipe and bedding material, and possibly from the bedding material. A physical sample (technetium-99 or organic) of bedding material will be required for WAC attainment purposes if significant pipe leakage is evident. After the collection of the physical sample, the material will be returned to the trench. Following assessment by the Characterization Lead, this situation and the associated sampling requirements will be documented in a V/FCN in accordance with Section 3.4. Standard sample collection methods and equipment will be used as identified in Procedure SMPL-01.

2.5 PRECERTIFICATION OF FINAL EXCAVATION GRADES

Precertification using real-time measurements will be performed at the base of all excavations once the design grade elevation has been reached, or a lower elevation if additional above-WAC and/or above-FRL soil areas required additional excavation. Precertification may be performed after the excavation contractor has moved from the general area (to minimize the disturbance of soil following precertification) or precertification may be performed without delay when design grade is reached (to avoid having to pump water that may accumulate in the excavation). The purpose of precertification scanning activities are to: 1) evaluate any patterns of residual surface soil contamination, 2) determine if soil excavation is necessary to pass certification, and 3) provide information to aid in establishing certification unit (CU) boundaries for the future Certification Design Letter (CDL).

If *in situ* gamma measurements indicate COC concentrations are low enough to likely pass certification statistical analysis, then certification sampling will be initiated under a separate PSP. If not, the contaminated soil will be delineated and excavated appropriately prior to the initiation of certification activities.

For all precertification radium-226 measurements (HPGe or NaI equipment) a background radon monitor will be set up to correct the radium-226 measurement per Section 5.3 of the User's Manual. Additionally, a duplicate HPGe field measurement must be obtained for every 20 HPGe measurements obtained in an excavation area for quality control purposes.

2.5.1 Initial Precertification NaI Scan at Base of Design Grade

This section is written based on the presumption that an *in situ* gamma scan for above-WAC detection and above-FRL detection (based on the detection limits for NaI detectors) has been performed followed by any additional delineation and excavation of contaminated soil as follows. As part of the Excavation Lift Characterization phase of this PSP, a gamma scan will have been performed at the final design grade surface, or deeper, of each excavation area to verify that all above-WAC uranium soil was removed. Additionally, any soil having radiological COC concentrations (uranium, thorium, and radium) above the detection limit of the detector system, and thus indicating above-FRL, will also have been delineated and excavated.

If all radiological COC results are below applicable detection limits, then the characterization process will shift to the precertification phase. At this point HPGe measurements will be employed in each excavation area for either near 100 percent coverage or partial coverage (dependent on the uranium FRL for the area) at the areas of highest gross gamma counts based on the gamma scan. The coverage requirements will be based on whether the area has a uranium FRL of 20 ppm (high leachability zone) or 82 ppm (low leachability zone) as described in the sections below.

The precertification strategy relies on all of the NaI or HPGe surface scan data collected from a general excavation area throughout the duration of excavation activities, including the final scan data from the excavation floor as well as the scans performed on the sideslopes as excavation progressed. All of these data batches collected over several days or weeks will be assessed in their entirety to select locations for precertification HPGe measurements. However, it should be noted that the soil surfaces where much of the previous *in situ* gamma readings were collected will likely have been excavated as the excavation progressed deeper in order to maintain safe slopes. Therefore, the previous data should only be used as a guide to select the precertification HPGe locations. Alternatively, the Characterization Lead may determine that the entire sideslope of an excavation be re-scanned with the NaI system in order to initiate the precertification phase for selection of HPGe measurement locations.

2.5.2 Precertification HPGe Measurements in 20 ppm FRL (Uranium) Areas

The high-leachability soil areas where the applicable uranium FRL is 20 ppm will require 99.1 percent coverage with HPGe due to the fact that the NaI systems (RTRAK/RSS) cannot detect this concentration. In accordance with the User's Manual, a triangular grid system will be applied to each area to achieve nearly 99.1 percent coverage using a 1-meter detector height and an acquisition time of 15 minutes (Section 3.3.2 of the User's Manual). At the discretion of the Characterization Lead, a detector height of 31 cm may be used in some areas based on the size and number of elevated total activity zones and/or total uranium locations. If the HPGe identifies a total uranium, thorium-228, thorium-232, radium-226 or radium-228 concentration greater than the 2xFRL, additional readings will be obtained for further investigation as described below under the hot spot delineation discussion (Section 2.5.4).

2.5.3 Precertification HPGe Measurements in 82 ppm FRL (Uranium) Areas

The areas having a uranium FRL of 82 ppm will involve a different precertification strategy than applied in the 20-ppm FRL areas. In the 82-ppm FRL areas, the NaI two-point running average results will be reviewed to determine the highest values to select the locations for precertification HPGe measurements. (This section assumes that any hot spots, using the NaI data that indicated any readings above the detection limits for the instrument, have already been further delineated and excavated as necessary). Since the CU boundaries will not be established under this Area 3A/4A PSP, the number of precertification HPGe measurements in each excavation area will be a function of the excavation area size. The Characterization Lead will make the determination of precertification HPGe locations using the following guidelines. At a minimum, one precertification HPGe measurement will be taken for every 62,500 ft^2 of surface area (the size of a Group 1 CU which is nominally 250 feet by 250 feet). The Characterization Lead will make the determination of where the precertification HPGe measurements will be located and the total number necessary within each 62,500 ft^2 area to adequately precertify the area. This decision will be based on the distribution and range of two-point running average values obtained during the NaI scan, the accessibility and surface condition of the area, and the overall assessment of the NaI scan results with respect to total uranium, thorium-228, thorium-232, radium-226, and/or radium-228 FRLs.

If any precertification HPGe measurement result is 2xFRL (at any detector height) at a 15-minute acquisition time, then the area will be considered a "hot spot" requiring delineation as described below.

2.5.4 Delineating Hot Spots Following Precertification HPGe Measurements

If a hot spot is identified during the precertification HPGe measurements (31-cm and/or 1-meter detector heights), then the area will be further delineated for excavation using the HPGe at a detector height of 15 cm and an acquisition time of 15 minutes. The results of the 1-meter and 31-cm HPGe readings at the hot spot along with surrounding HPGe results will affect how the delineation is carried out as determined by the Characterization Lead; however, the strategy must be consistent with guidelines documented in Section 3.3.3 of the User's Manual. Details of the hot spot delineation will be documented in a V/FCN.

During any hot spot delineation activity using the HPGe involving the determination of radium-226, a background radon monitor (HPGe) will be established near the area at the same elevation grade and detector height per Section 5.3 of the User's Manual.

2.6 MEASUREMENT INSTRUMENTATION AND TECHNIQUES

2.6.1 Sodium Iodide Data Acquisition (RTRAK, RSS, GATOR)

The overall use of this *in situ* gamma spectroscopy equipment for characterization is described in detail in the User's Manual. The RTRAK, RSS, GATOR, and EMS are all platforms for the NaI detector. The EMS is discussed in Section 2.6.3. The RTRAK is a modified diesel powered farm tractor. It is typically utilized for larger (approximately 0.25 acre and larger) flat areas that are readily accessible. The GATOR is a modified diesel-powered six-wheel utility vehicle and is utilized for both larger and smaller areas. The GATOR is capable of determining coordinates (X and Y) and elevation (Z) for measurement locations. The RSS is a modified jogging stroller and is utilized for smaller areas, gradual slopes, or areas not accessible by the RTRAK or GATOR. Each equipment type is equipped with an onboard Global Positioning System (GPS), which is used to obtain positioning information (i.e., northings and eastings) for each spectrum acquired. The RTRAK, RSS, or GATOR will be used to evaluate residual soil contamination.

The NaI detector has a minimum detection concentration (8-sec aggregate of two scans) sufficient to measure 3xFRL for total uranium (at 82 ppm FRL), thorium-232, and radium-226 (thorium-228 and radium-228 concentrations are inferred). The NaI detector is mounted at a fixed height of 31 cm on the various platforms. The NaI equipment single 4-sec measurement action level for total uranium WAC identification is 721 ppm, which requires confirmation and delineation by the HPGe with an acquisition time of 15 minutes.

2.6.2 HPGe Data Acquisition

The HPGe systems include a tripod mount and is expected to include an HPGe equipped EMS, both of which are used in a static mode. The EMS is further described in Section 2.6.3. Heights of this equipment are adjustable, thus allowing adjustment of the field of view for the instrument. HPGe measurements are used in conjunction with GPS northing and easting coordinates and the approximate elevation for each excavation lift. The HPGe detector has a minimum detection concentration of approximately 6 ppm and can measure the COC at 3xFRL for total uranium, thorium-232, and radium-226 (thorium-228 and radium-228 concentrations are inferred). The HPGe equipped EMS will be approved by the EPA and OEPA prior to use, based on calibration results and equipment specifications.

The preferred equipment for use in areas which are difficult to access is the NaI equipped EMS. However, if the EMS is out of service for an extended period of time, the HPGe tripod may be utilized for initial surface scanning. In this case, for the uranium WAC, an action level of 400 ppm at a height of 1 meter requires further confirmation and delineation using the HPGe equipment. At the discretion of the Characterization Lead and RTIMP, these readings may be obtained at the detector height of 31 cm if a smaller field of view is required. The 99.1 percent coverage option (see Section 4.10 of the User's Manual) will be employed for the initial scan of the required area.

If the WAC action level of the NaI equipment (721 ppm) is reached, HPGe measurements at the 1 meter detector height may be performed to confirm the NaI measurement, or the area excavated without further confirmation. If HPGe confirmation measurements are taken and the HPGe measurement meets or exceeds its action level (400 ppm) the area is identified as above-WAC and excavated.

If the area is small in size, confirmation measurements may be acquired using a HPGe detector height of 31 cm or 15 cm with a spectral acquisition time of 5 minutes at the suspect above-WAC location. If either the 31-cm or 15-cm confirmation measurement exceeds the action level of 928 ppm, then the area exceeding the action level shall excavated.

Confirming an above-WAC area with 15-cm and 31-cm HPGe measurements is at the discretion of the Characterization Lead or designee. Conditions may arise which warrant a different decision process for defining the extent of contamination (i.e., cost effectiveness, need for timely response, obvious discoloration in the soil, brown/clear glass, process residue or other suspect above-WAC material may require immediate excavation). The decision process for the unusual condition will be documented in applicable field activity logs and, if determined to be appropriate by the Characterization Lead or designee, with a V/FCN as described in Section 3.4.

Use of the HPGe during Precertification activities is described in Section 2.5.

2.6.3 Excavation Monitoring System

The Excavation Monitoring System (EMS) consists of either a NaI detector or an HPGe detector mounted to the boom of an excavator. The boom has an approximately 30 foot reach and can be used to allow the detector access into areas that would otherwise be inaccessible or difficult to access (e.g., trenches, deep holes) using the conventional mobile NaI or HPGe tripod equipment. The EMS is equipped with an on-board GPS to allow for speed and location determination (i.e., northings and eastings) as well as a laser range finder for distance measurements to the surface being measured. Calibration results and equipment specifications must be submitted to and approved by EPA and OEPA prior to the use of the EMS for characterization purposes.

2.6.4 Radon Monitor

A background radon monitor will be set up in the vicinity of the area in which HPGe and NaI measurements are to be obtained, if radium-226 measurements will be determined. This monitor will be used to obtain background radon information from the time data collection begins until after the final measurement is completed. The monitor will be placed in one location for the day, where it will be set at the same height as the detector being used to collect the soil radiation measurements. The background radon data will be used per Section 5.3 of the User's Manual to correct the radioum-226 data.

2.6.5 Field Portable Gas Chromatograph

A field portable GC will be utilized in Area 3A/4A for analysis of the volatile organic COCs in the organic soil contamination areas as well as excavation water samples. The field GC will allow for rapid analytical turnaround, typically within a few hours of receipt in the field lab, which will minimize contractor delays regarding additional excavation or removal of excavation water as necessary. A manual headspace method analysis will be used in this application that involves the introduction of water to the soil sample of known mass, followed by mixing and controlled heating then withdrawal of the headspace gas which is injected directly to the instrument.

The on-site laboratory's method, Analytical Laboratory Services (ALS) Method 6549, Analysis of VOCs in Field Samples by Manual Headspace using a Field Portable GC, will be utilized for all analyses. Specifically, a PerkinElmer Voyager® portable GC will be used in conjunction with the ALS method.

This method is intended to result in Analytical Support Level (ASL) B level data once the hard copy of analytical data is produced through an interface with a computer and the stored data can be downloaded and printed utilizing the appropriate software programs (e.g., *SiteChart*® software created by PerkinElmer Photovac). The analytical results will be provided to the Characterization Lead immediately following the field analyses through the use of either a laboratory logbook or instrument data form generated in the field.

The field GC procedure is specifically designed for the following four volatile organic COCs:

- 1,1-Dichloroethene (1,1-DCE)
- 1,2-Dichloroethene (cis and trans isomers)
- Trichloroethene (TCE)
- Tetrachloroethene (PCE).

The detection limits for soil samples will vary based on the amount of soil analyzed, but are generally expected to be around 0.20 mg/kg. For water samples, a detection limit of 50 μg/L for each COC is expected. "Validation Report: Volatile Organic Analyses Using the Voyager Field Portable Gas Chromatograph Via Method 6549.0, Fluor Fernald Analytical Laboratory Services, October 2001"and ALS Method 6549 both discuss detection limits, precision, and accuracy for the portable GC.

Quality control (QC) practices for the field GC will consist of an instrument calibration twice daily (start and end of day) and several prepared control samples. These QC samples include the analysis of a calibration verification check standard, a matrix spike, laboratory duplicate, and method blank sample for every ten field samples analyzed or daily if there are less than ten sample analyses per day.

Potential interference for the operation of the field GC includes exhaust from combustion engines and any other sources of volatile organic compounds in the ambient air. The method blank will serve to detect these interferences if present.

2.6.6 Surveying

Fluor Fernald Construction personnel will inform the Characterization Lead or designee when excavation of a lift area is complete and ready for *in situ* gamma spectroscopy measurements. The Characterization Lead will coordinate with the Surveying Lead to survey the defined lift area and its boundary, determine the elevation, and coordinate with the RTIMP Lead for the deployment of the appropriate real-time equipment. Northing (Y), Easting (X), and elevation (Z) coordinate values (Ohio South Zone, #3402) will be determined using standard survey practices and standard positioning instrumentation (electronic total stations and GPS receivers). An average elevation will be generated for the excavation lift area scanning footprint. This average elevation will normally include only the horizontal areas of the lift, not sideslopes. Actual topographical contours will be used for the surface scan at final excavation grade to demonstrate below-WAC attainment. Field locations (i.e., lift area boundaries, measurement locations, grid points, above-WAC delineation if necessary) will be marked in a manner easily identifiable by all field personnel using survey stakes or flags. Survey information (coordinate data) will be downloaded at the completion of each survey job (or at the end of each day) and transferred electronically to the Survey Lead. This information will be forwarded to the RTIMP and Characterization Leads or designees.

2.6.7 Surface Moisture Measurements

Surface moisture measurements are used to correct *in situ* gamma spectroscopy measurement data in order to report data on a dry weight basis prior to mapping. Surface moisture measurements will be collected with an *in situ* moisture measurement instrument (i.e., Troxler® moisture gauge or Zeltex® Infrared Moisture Meter) within eight hours of the collection of the *in situ* gamma spectroscopy measurement data. Moisture measurements may be taken more frequently if ambient weather or soil moisture conditions change or are expected to change (including watering for dust control). Field conditions (such as weather) will be noted on the applicable electronic field worksheet.

In addition, at least one surface moisture measurement will be collected for each excavation lift that is approximately 0.5 acre (100 feet by 200 feet) in size or smaller. More than one moisture measurement can be collected for each lift if the surface moisture appears visibly different over the lift area. If more than one moisture measurement is obtained, the average of the measurements will be used to correct NaI real-time data for the lift. If a large difference in measurements is noted by the RTIMP Lead or designee, the data will be re-evaluated. When the HPGe is being used for confirmation, delineation or suspect above-WAC materials or areas, one surface moisture measurement will be collected and recorded at each HPGe measurement location.

If conditions prevent the use of a field moisture instrument, a default moisture value of 20 percent (which will overcorrect data in dry conditions and undercorrect data in wet conditions) may be used. The percent moisture information will be used to correct RTIMP data. Field moisture measurements and moisture-corrected data are discussed in detail in Sections 3.8 and 5.2 of the User's Manual.

2.6.8 Physical Sampling Approach and Methods

The PID will be used to survey the sideslopes of each excavation lift and the bottom and sideslopes at design depth grade of the excavation in above-WAC organics contamination and TCLP Characteristic zones. In above-FRL organics contamination zones, the PID will be used to survey the sideslopes and bottom of each excavation lift as well as the sideslopes and bottom at reaching design depth. These requirements are described in Table 2-3. In these areas, the collection of a physical sample for analysis with the field GC will be required when the PID action level of 10 ppm above background is exceeded. An action level of 10 ppm above background was selected because the level is a distinguishable concentration above background, indicating elevated organic material, yet is near the instrument's detection limit. This methodology is described in Section 2.6.8.1 for above-WAC organics and TCLP Characteristic areas and Section 2.6.8.2 for above-FRL organics areas.

Physical samples for GC analysis are required from the sideslopes of each excavation lift and from the floor and sideslopes at design depth in the above-WAC organics contamination and TCLP Characteristic zones. The methodology for this sampling is described in Section 2.6.8.1.

Physical samples from the sideslopes and floor of each excavation lift and at design depth are required for field GC analysis in the above-FRL organics contamination zone. The results of this GC analysis are to determine that the soil is above WAC for the COCs. Section 2.6.8.2 describes this approach.

Section 2.6.8.3 describes the collection of physical samples for technetium-99 analysis. Section 2.6.8.4 describes the collection of physical samples for aroclor-1254 and aroclor-1260 analyses.

The location of any physical samples will be surveyed. The collection of these physical samples will be documented by the Characterization Lead with a V/FCN as described in Section 3.4.

Appendix B provides a detailed description of the monitoring and sampling requirements for the Incinerator Pad and Maintenance Building areas. Additional requirements regarding the intervening material between above-WAC zones in a column are detailed in this appendix.

2.6.8.1 Sample Collection for Above-WAC Organics and TCLP Characteristic Zone Determination

In above-WAC organic and TCLP Characteristic areas designated as requiring PID surveying in Table 2-3, the sideslopes of each excavation lift and the bottom and sideslopes at design depth grade of the excavation will be surveyed using a PID. No grid layout is necessary for this screening, however the technician will utilize a method for tracking the area surveyed at their discretion, and, as best as achievable, the entire surface will be scanned. All PID measurements during the walkover survey will be taken at a height of three inches or less above the surface of the soil being monitored. As a general rule, the walkover survey rate will be equivalent to covering a 20-foot by 20-foot area in approximately five minutes. If the WAC action level for the PID of 10 ppm above background is exceeded, then a physical sample for field GC analysis will be collected from the location (within the top three inches of soil surface) which exceeded the PID's action level. The location and value of the PID survey result exceeding the action level sample will be documented on the appropriate field log. The location where the physical sample was collected due to the PID action level exceedance will be documented on the appropriate field log and surveyed for coordinates and elevation. This physical sample will be analyzed to determine if the soil contains above-WAC COCs or 20 times the TCLP limit for the ASCOC. Further excavation may be required based on the results of the field GC per Section 2.3.2 and Section 2.3.6.

In above-WAC organic and TCLP Characteristic areas, a physical GC samples will be collected from the sideslopes of each excavation lift and the bottom and sideslopes at design depth grade of the excavation. The physical sample for portable GC analysis will be collected from the sideslope at a frequency of one sample every 20 linear feet along the perimeter of the excavation lift at a minimum of one sample per sideslope. If discolored soil is noted, the sample will be collected from the discolored area for that location. At design depth a systematic grid (20 feet by 20 feet blocks) will be laid out either by land survey methods or by manual field measurement methods over the excavated floor area. The intersection points of each block will be marked. A physical sample will be collected from the center of the grid block unless a discoloration of the soil is noted in that grid block. If the floor of the excavation is less than 40 feet in any direction, then two samples at representative spacing will be collected. If discolored soil is noted, the sample will be collected from the discolored area instead of from the centerpoint of the grid block. Prior to collecting the physical sample for any GC analysis, a PID reading will be obtained at the sample location. These readings will be used to develop a correlation of PID readings to actual soil organics concentrations.

If results of the portable GC analysis indicate the soil is above WAC or is 20 times the TCLP limit for the ASCOC, the excavation will be expanded laterally in the direction of the contamination. The area will be re-sampled at a frequency of one sample every 10 feet (minimum of two samples per sideslope). PID measurements for the newly excavated area are required as described above. The excavation is considered complete when all above-WAC and/or all TCLP Characteristic materials above 20 times the TCLP limit for the are-specific constituent of concern have been removed.

PID surveying will be done in accordance with Procedure EQT-04. GC samples will be collected in accordance with Procedure SMPL-01 except requirements concerning generation of the chain of custody. A chain of custody form is not required for GC samples since the field analyst operating the portable GC unit is considered part of the field characterizing team. The sample remains in physical possession of the team until it is exhausted or disposed. If the sample must be transferred to a person who is not part of the field characterizing team (e.g., on-site laboratory, radiological technician, etc.) then a chain of custody must be generated per Procedure EW-0002, Chain of Custody/Request for Analysis Record for Sample Control, for the GC sample. The volatile organic analyses (VOA) of the samples using the field GC will be done in accordance Section 2.6.5 and the referenced methods.

2.6.8.2 Sample Collection for Above-FRL Organics Determination

In the above-FRL organic areas designated as requiring PID surveying for above-WAC determination in Table 2-3, the sideslopes and floor of each excavation lift and the bottom and sideslopes at design depth grade of the excavation will be surveyed using a PID. No grid layout is necessary for this screening, however the technician will utilize a method for tracking the area surveyed at their discretion, and, as best as achievable, the entire surface will be scanned. All PID measurements during the walkover survey will be taken at a height of three inches or less above the surface of the soil being monitored. As a general rule, the walkover survey rate will be equivalent to covering a 20-foot by 20-foot area in approximately five minutes. If the WAC action level for the PID of 10 ppm above background is exceeded, then a physical sample for field GC analysis will be collected from the location (within the top three inches of soil surface) which exceeded the PID's action level. The location and value of the PID survey result exceeding the action level sample will be documented on the appropriate field log. The location where the physical sample was collected due to the PID action level exceedance will be documented on the appropriate field log and surveyed for coordinates and elevation. This physical sample will be analyzed to determine if the soil contains above-WAC COCs. Further excavation may be required based on the results of the field GC per Section 2.3.2 and Section 2.3.6.

The sideslopes and floor of each excavation lift, as well as the sideslopes and floor at design depth require the collection of physical samples for field GC analysis. A minimum of four samples must be collected from the sideslopes (one from each sideslope) and a minimum of four samples must be collected from the floor. Prior to collecting the physical sample, a PID reading must be recorded at the sample location.

The physical samples for portable GC analysis will be collected from the sideslopes at a frequency of one sample every 20 linear feet along the perimeter of the excavation lift at a minimum of one sample per sideslope. If discolored soil is noted, the sample will be collected from the discolored area for that location. Prior to collecting the physical sample for GC analysis, a PID reading will be recorded at the sample location.

The physical samples for portable GC analysis will be collected from the floor of the excavation by laying out a systematic grid (20 feet by 20 feet blocks) either by land survey methods or by manual field measurement methods over the excavated floor area. The intersection points of each block will be marked. A physical sample will be collected from the center of the grid block unless a discoloration of the soil is noted in that grid block. If the floor of the excavation is less than 40 feet in any direction, then two samples at representative spacing will be collected. If discolored soil is noted, the sample will be collected from the discolored area instead of from the centerpoint of the grid block. Prior to collecting the physical sample for GC analysis, a PID reading will be obtained at the sample location.

If results of the portable GC analysis indicate the soil is above WAC for the ASCOC, the excavation will be expanded laterally in the direction of the contamination. The area will be re-sampled at a frequency of one sample every ten feet (minimum of two samples per floor). PID measurements for the newly excavated area are required as described above. The excavation is considered complete when all above-WAC for the ASCOC have been removed.

Due to the anticipated difficulty in accessing some excavated areas (steep and possibly wet side slopes), it is essential that only a limited number of field personnel enter the area to minimize the risk of injury. Therefore, the method for establishing the systematic grid within the excavation area will be determined on a case-by-case basis. The grid may be established and laid out by the land survey team, using the appropriate grid block size as directed by the Characterization Lead, using GPS, total station or other type survey instruments and procedures. Alternatively, the sampling team may lay out the grid using conventional or physical distance measurements (wheel measurement or tape measure) which will provide adequate accuracy for confirmatory grid sampling purposes. If this approach is used, the sampling team will create a field sketch of the excavation area and approximate location of the grid across the area. At a minimum, the sample points that exceed the WAC limit will be surveyed to record the northing and easting coordinates and elevation.

PID surveying will be done in accordance with EQT-04. GC samples will be collected in accordance with Procedure SMPL-01 except requirements concerning generation of the chain of custody. A chain of custody form is not required for GC samples since the field analyst operating the portable GC unit is considered part of the field characterizing team. The sample remains in physical possession of the team until it is exhausted or disposed. If the sample must be transferred to a person who is not part of the field characterizing team (e.g., on-site laboratory, radiological technician, etc.) then a chain of custody must be generated per Procedure EW-0002. The VOA of the samples using the field GC will be done in accordance Section 2.6.5 and the referenced methods.

2.6.8.3 Sample Collection for Technetium-99 Determination

Since technetium-99 cannot be measured with the HPGe, physical samples must be obtained from areas where technetium-99 is a COC. Areas requiring technetium-99 sampling may include sideslopes of each lift and sideslopes and bottom when design depth is reached. See Section 2.3.3 and Table 2-3 for applicability of technetium-99 sampling.

Physical samples for technetium-99 analysis will be collected from the sideslopes of the excavation lift and the sideslopes at design depth at a frequency of one sample every 20 linear feet (0 to 6-inch depth) along the perimeter of the excavation lift at a minimum of one sample per sideslope.

Physical samples for technetium-99 analysis will be collected from the floor of the excavation at design depth by laying out a systematic grid (20 feet by 20 feet blocks) either by land survey methods or by manual field measurement methods over the excavated floor area. The intersection points of each block will be marked. A physical sample will be collected from the 0 to 6-inch depth from the approximate center point of each grid block. If the floor of the excavation is less than 40 feet in any direction, then two samples at representative spacing will be collected.

At any location where the analytical result for technetium-99 is above WAC, additional excavation will proceed in the direction of the contamination. Re-sampling and analysis will continue at a frequency of one sample every 10 feet until all results indicate that the remaining soils meet OSDF WAC.

Due to the anticipated difficulty in accessing some excavated areas (steep and possibly wet side slopes), it is essential that only a limited number of field personnel enter area to minimize the risk of injury. Therefore, the systematic grid will be laid out by the sampling team using conventional or physical distance measurements (wheel measurement or tape measure), which will provide adequate accuracy for confirmatory grid sampling purposes. The final sample collection points (center point of each grid) will be surveyed to record the coordinate location. Alternatively, if a particular excavated area is sufficiently dry and accessible with minimal risk, the land surveying and mapping personnel may determine the center point sample locations in lieu of manual field distance measurements.

The sample collection methods detailed in Procedure SMPL-01 will be followed for the collection of these samples. A chain of custody must be generated per Procedure EW-0002 for technetium-99 samples. The container and sample handling requirements for technetium-99 are summarized in Table 2-4. Sample identification for these technetium-99 samples will follow the system described in Section 2.6.9.

2.6.8.4 Sample Collection for Aroclor-1254 and Aroclor-1260

Areas requiring aroclor-1254 and aroclor-1260 sampling include sideslopes of each lift and sideslopes and bottom when design depth is reached. See Section 2.3.4 and Table 2-3 for applicability of aroclor-1254 and aroclor-1260 sampling.

Physical samples for aroclor-1254 and aroclor-1260 analysis will be collected from the sideslopes of the excavation lift and the sideslopes at design depth at a frequency of one sample every 20 linear feet (0 to 6-inch depth) along the perimeter of the excavation lift at a minimum of one sample per sideslope.

Physical samples for aroclor-1254 and aroclor-1260 analyses will be collected from the floor of the excavation at design depth by laying out a systematic grid (20 feet by 20 feet blocks) either by land survey methods or by manual field measurement methods over the excavated floor area. The intersection points of each block will be marked. A physical sample will be collected from the 0 to 6-inch depth from the approximate center point of each grid block. If the floor of the excavation is less than 40 feet in any direction, then two samples at representative spacing will be collected.

At any location where the analytical result for aroclor-1254 and/or aroclor-1260 is above FRL, additional excavation will proceed in the direction of the contamination. Re-sampling and analysis will continue at a frequency of one sample every 10 feet until all results indicate that the remaining soils is below FRL for aroclor-1254 and aroclor-1260.

Due to the anticipated difficulty in accessing some excavated areas (steep and possibly wet side slopes), it is essential that only a limited number of field personnel enter area to minimize the risk of injury. Therefore, the systematic grid will be laid out by the sampling team using conventional or physical distance measurements (wheel measurement or tape measure), which will provide adequate accuracy for confirmatory grid sampling purposes. The *final sample collection* points (center point of each grid) will be surveyed to record the coordinate location. Alternatively, if a particular excavated area is sufficiently dry and accessible with minimal risk, the land surveying and mapping personnel may determine the center point sample locations in lieu of manual field distance measurements.

The sample collection methods detailed in Procedure SMPL-01 will be and a chain of custody must be generated per Procedure EW-0002 for these samples. The container and sample handling requirements for aroclor-1254 and aroclor-1260 are summarized in Table 2-4. Sample identification for these samples will follow the system described in Section 2.6.9.

2.6.9 Measurement Identification

All excavation monitoring measurements (both real-time monitoring and physical samples) will be assigned a unique identification for data tracking purposes. There are three essential components in the numbering scheme:

- Excavation area
- Measurement Instrumentation
- Measurement type.

These components, combined with additional designators and differentiated by their location (northing, easting, and elevation) and time, will allow for unique identification. Following is a list of components and associated designators that will be used in some combination for all WAC, FRL, and precertification measurements.

1.	Excavation area:	3A = Remediation Area 3A 4A = Remediation Area 4A
2.	Measurement Instrumentation:	RSS = NaI Gamma scan by RSS RTK = NaI Gamma scan by RTRAK GTR = NaI Gamma scan by GATOR EMN = Excavation Monitoring System (with NaI detector) EMH = Excavation Monitoring System (with HPGe detector) HPG = Gamma scan by High Purity Germanium Detector G = Portable Gas Chromatograph OSL = On-site/off-site laboratory GC (non-portable GC) LTC = Laboratory technetium-99 analysis RDN = Radon monitor
3.	Location:	**(Not applicable for water samples**, see Section 4, Measurement, below, reference "WA", "WB", "WC") I = Incinerator Pad M = Maintenance Building P4 = Plant 4 P5 = Plant 5 P6 = Plant 6 P7 = Plant 7 P9 = Plant 9
4.	Measurement:	SF = Scanning or sampling done at the surface or following Type: removal of surface concrete, asphalt or gravel L = Lift or additional grade sequence (designates the lift, additional grade below design grade, or additional trench floor excavation sequence with the first completed lift, additional grade, or additional trench floor excavation starting as 1 and the following as 2, etc.) SS = Side Slope DG = Design Grade AG = Additional Grade (if further excavation required beyond design grade, and before final grade) FG = Final Grade (following any excavation required beyond design grade) PC = Precertification (following evaluation of design grade or final grade data) TW = Trench Wall TM = Trench Bedding Material TA = Additional excavation below trench bedding material (if required) TF = Trench final grade SM = Special Material WA = Excavation water from Incinerator Pad area WB = Excavation water from Maintenance Building area WC = Excavation water from Plant 6 area

5.	HPGe, EMH, GC, Radon, Tc-99, or SM Measurement Number:	Designates the sequential numbering of High-Purity Germanium Detector, Excavation Monitoring System (with HPGe detector), field-portable Gas Chromatograph, Radon Monitor, laboratory Tc-99, or Special Material measurements from the excavation. The first measurement in each category taken from within the excavation area is -1 (dash precedes the number) and any subsequent measurements in the same category and excavation area are numbered sequentially (-2, -3, -4, etc.)
6.	RMS Batch Number (if applicable):	Sequential numbering of RMS analytical runs. Separate sequence numbering will apply to each NaI scanning system, including RSS, RTRAK, GATOR, and EMS (when equipped with NaI detector)
7.	Quality Designators (as necessary):	D = duplicate measurement

Using these guidelines, the unique identification scheme for the various measurement techniques is as follows:

A) Area 3A RTRAK surface measurement identification using designation categories 1, 2, 4 and 6.

Example: 3ARTKSF-3481, where:

3A = Excavation Area
RTK = NaI Gamma scan by RTRAK
SF = Surface area (or area formerly covered with gravel, asphalt, or concrete)
3481 = RTK batch number

B) Area 4A RSS slope surface measurement identification using designation categories 1, 2, 4 and 6.

Example: 4ARSSSSL2-3491, where:

4A = Excavation Area
RSS = Gamma scan by RSS
SS = Side slope area, following:
L2 = second lift from surface elevation
3491 = RSS batch number

C) Area 3A HPGe design grade measurement identification using designation categories 1, 2, 4 and 5.

Example: 3AHPGDGL4-21, where:

3A = Excavation Area
HPG = Gamma scan by HPGe
DG = Design grade surface, following:
L4 = fourth lift from surface elevation
21 = twenty-first HPGe measurement of 3A excavation area

D) Area 4A Excavation Monitoring System scan with HPGe detector measurement of trench wall using designation categories 1, 2, 4, 5 and 7.

Example: 4AEMHTW-8 D, where:

4A = Excavation Area
EMH = Excavation Monitoring System scan using HPGe detector
TW = Trench wall
8 = eighth EMS HPGe measurement of 4A excavation area
D = duplicate measurement

E) Area 3A field portable GC measurement of trench bedding material using designation categories 1, 2, 4 and 5.

Example: 3AGTM-12, where:

3A = Excavation Area
G = Portable gas chromatograph measurement
TM = Trench bedding material
12 = twelfth gas chromatograph measurement of 3A excavation area

F) Area 4A physical laboratory technetium-99 final grade measurement identification using designation categories 1, 2, 3, 4 and 6.

Example: 4ALTCMFG-9, where:

4A = Excavation Area
LTC = Laboratory measurement for technetium-99
M = Maintenance Building
FG = Final grade of excavation area
9 = ninth laboratory technetium-99 measurement in 4A excavation area

G) Area 4A special material measurement identification using designation categories 1, 2, 4 and 5.

Example: 4AHPGSM-5, where:

4A = Excavation Area
HPG = Gamma scan with High Purity Germanium detector
SM = Special material
5 = fifth HPGe measurement in 4A excavation area

H) Area 3A Radon Monitoring measurement identification using designation categories 1, 2 and 5.

Example: 3ARDNA-3, where:

3A = Excavation Area
RDN = Radon monitor measurement
A = 100 cm detector height (B = 31 cm, C = 15 cm detector height)
3 = third radon monitor measurement in 3A excavation area

I) Area 3A Excavation Water measurement identification using designation categories 1, 2, 4 and 5.

Example: 3AGWCL2-6, where:

3A = Excavation Area
G = Portable gas chromatograph measurement
WC = Excavation water from Plant 6
L2 = second lift
6 = sixth portable GC measurement in 3A excavation area.

J) Area 4A subsurface soil organics sample using designation categories 1, 2, 3, 4 and 5.

Example: 4AGIL3-84, where:

4A = Excavation Area
G = Portable gas chromatograph measurement
I = sample is collected from the Incinerator Pad area
L3 = third soil lift from surface elevation
84 = eighty-fourth portable GC measurement within the 3A excavation area

K) Area 4A subsurface soil organics sample using designation categories 1, 2, 3 and 4.

Example: 4AOSLML2-1, where:

4A = Excavation Area
OSL = on-site laboratory GC
M = Maintenance Building
L2 = second soil lift from surface elevation
1 = first laboratory measurement in 4A excavation area

2.7 DATA MAPPING

As the Survey and RTIMP Teams acquire measurements, the data will be electronically loaded into mapping software through manual file transfer or Ethernet. A set of maps or HPGe data summary printouts will be generated for the RTIMP and Characterization Leads or designees. Maps will be generated depicting the following, unless otherwise specified by the Characterization Lead or designee:

2.7.1 Surface Scan Coverage Map(s)

- RMS Total Uranium Map (single spectra coverage) – used for WAC determination
- RMS Total Counts Map (single spectra coverage) – used to determine where HPGe measurements will be taken for FRL determination

- COCs Concentration Maps – radium-226 and thorium-232 (2-point NaI running average to determine potential hot spots exceeding 3xFRL) depicting 1xFRL, 2xFRL, and 3xFRL concentrations in all areas. Total uranium concentrations will be depicted at 1xFRL, 2xFRL, and 3xFRL inside and outside the high leachability areas

- HPGe Location Map (bubble map showing field of view and number for each HPGe measurement) – including summary data printout for each HPGe measurement.

Note: HPGe location map can be combined with the previous maps if needed.

2.7.2 HPGe Confirmation/Delineation Map(s)

- HPGe Location Map (bubble map showing field of view and number for each HPGe measurement) – including summary data printout for each HPGe measurement.

2.7.3 Hot Spot Post Removal Map(s)

- HPGe Location Map (bubble map showing field of view and number for each HPGe measurement) – including summary data printout for each HPGe measurement.

The map and/or HPGe Data summary printouts will be used to provide the Characterization Lead or designee with information to determine if additional scanning or confirmation measurements are required.

TABLE 2-1
LIMITS FOR AREA 3A/4A EXCAVATION CONTROLLING COCS

Area 3A/4A COCs[a]	COC Category	WAC Maximum Concentration	FRL
Total Uranium (inside a high-leachability area)	Primary	1,030 mg/kg	20 mg/kg
Total Uranium (outside a high-leachability area)	Primary	1,030 mg/kg	82 mg/kg
Thorium-228	Primary	N/A	1.7 pCi/g
Thorium-232	Primary	N/A	1.5 pCi/g
Radium-226	Primary	N/A	1.7 pCi/g
Radium-228	Primary	N/A	1.8 pCi/g
Technetium-99	Secondary	29.1 pCi/g	30 pCi/g
Tetrachloroethene (PCE)	Secondary	128 mg/kg	3.6 mg/kg
Trichloroethene (TCE)	Secondary	128 mg/kg	25 mg/kg
1,1-Dichloroethene (DCE)	Secondary	11.4 mg/kg	0.41 mg/kg
1,2-Dichloroethene (DCE)	Secondary	11.4 mg/kg	0.16 mg/kg
Aroclor-1254	Secondary	N/A	0.13 mg/kg
Aroclor-1260	Secondary	N/A	0.13 mg/kg

[a] A separate, complete list of COCs will be used for certification sampling. This COC list will be documented in a separate PSP addressing certification sampling for the Production Area.

TABLE 2-2
AREA 3A/4A ABOVE-WAC AREAS, TCLP SOIL AREAS AND COCS

Location	Contaminant	Depth Interval
Area 3A		
Northeast Corner – South of Haul Road	Total Uranium	0-2 feet
Southeast Corner Plant 9	Total Uranium Technetium-99	0-12 feet
Between Plant 9 and Plant 6	Total Uranium Technetium-99	0-2.5 feet
Incinerator Pad – Northwest Upper Corner	Total Uranium	0-5 feet
Incinerator Pad – Southwest Upper Corner and Technetium-99 Corner	Total Uranium Technetium-99	0-1 foot
Incinerator Pad – Shallow Above-WAC Organic Area	1,2-Dichloroethene 1,1-Dichloroethene Tetrachloroethene	0-2 feet
Incinerator Pad - Deep Above-WAC Organic Area	1,2-Dichloroethene 1,1-Dichloroethene Tetrachloroethene	6-14 feet
Incinerator Pad - North and East	Total Uranium Technetium-99	0-2 feet
Maintenance Building – Storage Pad (TCLP Soil)	Trichloroethene	2-9 feet
Northeast of the Maintenance Building	Aroclor-1254 and Aroclor-1260	2-5.5 feet
Area 4A		
Northeast Plant 6	Total Uranium Technetium-99	0-6 feet
North Central Plant 6	Total Uranium Technetium-99	0-2 feet
South Plant 6	Total Uranium Technetium-99	0-11 feet
East Plant 6	Total Uranium Technetium-99 Tetrachloroethene	0-11 feet
Shallow East Plant 6	Total Uranium	0-2 feet

TABLE 2-3
EXCAVATION MONITORING/SAMPLING REQUIREMENTS

Type of Contamination Zone	Types of Samples/Measurements and Data Use		
	Sideslope of Each Excavation Lift	**Floor of Each Excavation Lift**	**Floor/Sideslope at Design Depth for Contamination Zone**
Above-WAC Organics (TCLP Area)	• PID (for WAC)** • Physical VOC Sample (GC) • NaI for Uranium WAC	• NaI for Uranium WAC*	• PID (for WAC)** • Physical VOC Sample (GC) • NaI for Uranium WAC*
Above-FRL Organics	• PID (for WAC)** • Physical VOC Sample (GC) • NaI for Uranium WAC	• PID (for WAC)** • Physical VOC Sample (GC) • NaI for Uranium (WAC)	• PID (for WAC)** • Physical VOC Sample (GC) • NaI for Uranium WAC*
Above-WAC/FRL Tc-99	• Physical Tc-99/Lab (for WAC) • NaI for Uranium WAC	• None	• Physical Tc-99/Lab (for WAC) • NaI for Uranium WAC*
Above-WAC Uranium	• NaI for Uranium WAC	• None	• NaI for Uranium WAC
Above-FRL Uranium	• NaI for Uranium WAC	• NaI for Uranium (WAC)	• NaI for Uranium WAC/FRL*
Above-FRL Aroclor-1254 and Aroclor-1260	• Physical aroclor/Lab (for FRL) • NaI for Uranium WAC	• None	• Physical aroclor/Lab (for FRL) • NaI for Uranium WAC*

* During NaI uranium WAC scan, the data collected will be evaluated later for precertification purposes by reviewing concentrations of thorium-232 and radium-226, as well as thorium-228 and radium-228 based on equilibrium, in comparison to their respective FRLs.

** If the 10-ppm above-background action level for the PID is exceeded, then a physical sample for field GC analysis will be collected at that location to determine if the soil contains above-WAC COCs. Further excavation may be required depending on the results of the field GC analysis.

TABLE 2-4
ANALYTICAL REQUIREMENTS FOR PHYSICAL SAMPLES SUMMARY TABLE

Analysis (ASL B) [a]	Method	Sample Matrix	Lab	Preserve	Holding Time	Container Type [b]	Sample Mass (wet)
Technetium-99	Gross Beta	Solid	On-site	None	12 months	120 ml (glass or plastic)	50 grams
VOCs: 1,1- and 1,2-Dichloroethene (DCE) Trichloroethene (TCE) Tetrachloroethene (PCE)	Field GC	Solid	Field GC	Cool 4°C	14 days	1 - 60-ml glass with Teflon-lined lid	Fill to minimize headspace
VOCs: 1,1- and 1,2-Dichloroethene (DCE) Trichloroethene (TCE) Tetrachloroethene (PCE)	Field GC	Water	Field GC	Cool 4°C	7 days	2 - 40-ml glass with Teflon-lined septa	80 ml
Aroclor-1254 and Aroclor-1260	GC	Solid	Off-site	Cool 4°C	14 days	1-250ml glass with Teflon lined lid	100 grams

[a] A separate, complete list of COCs will be used for certification sampling. This COC list will be documented in a separate PSP addressing certification sampling for the Production Area.

[b] Container volumes and types are for guidance only, substitutions may be made, as needed, per SCQ specifications.

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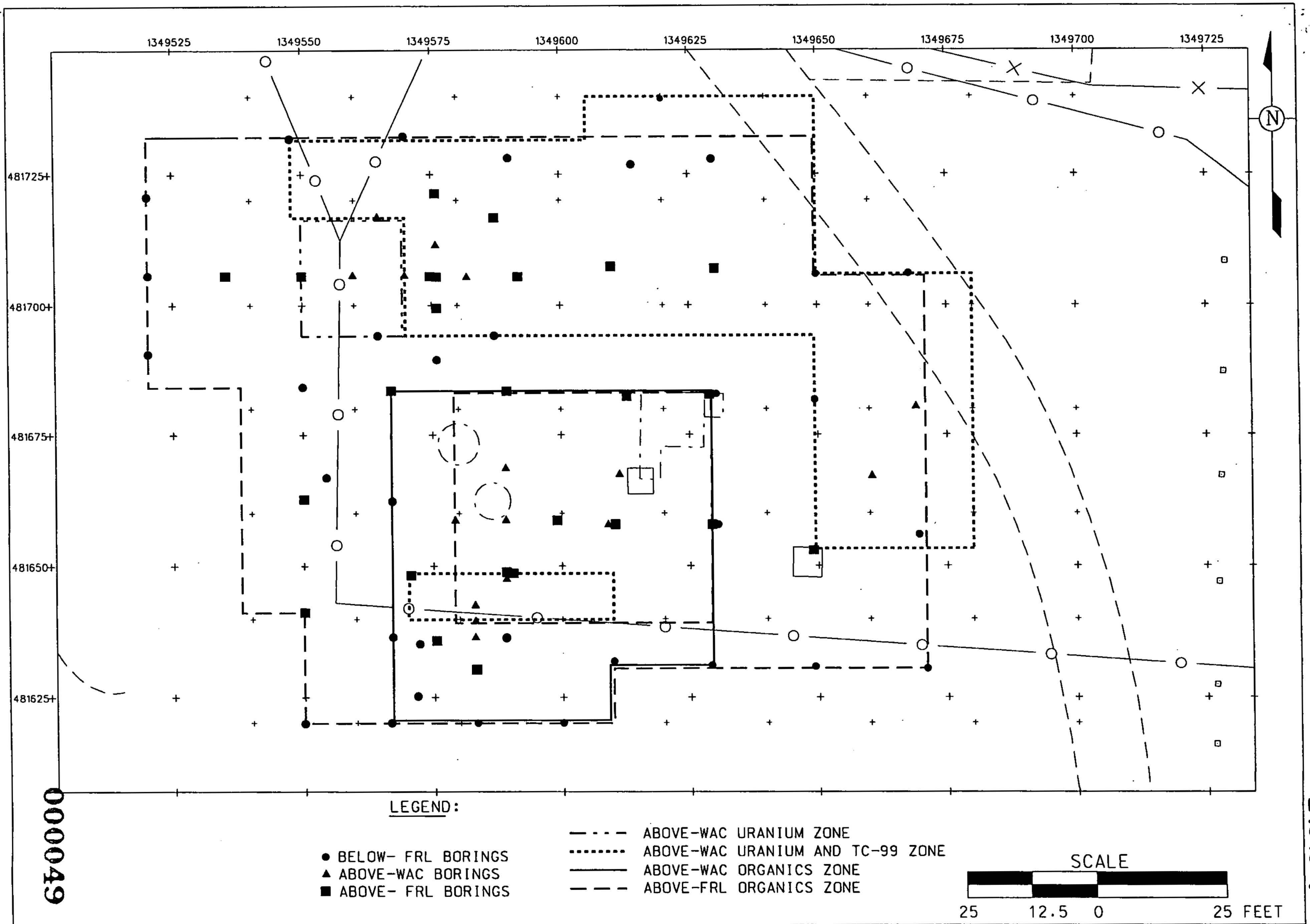

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v:*5cj31*dgn*bmp*3a4a_pre_002.dgn
STATE PLANAR COORDINATE SYSTEM 1983

FIGURE 2-1. ABOVE-WAC AND ABOVE-FRL AREAS AT THE INCINERATOR PAD

21-SEP-2001

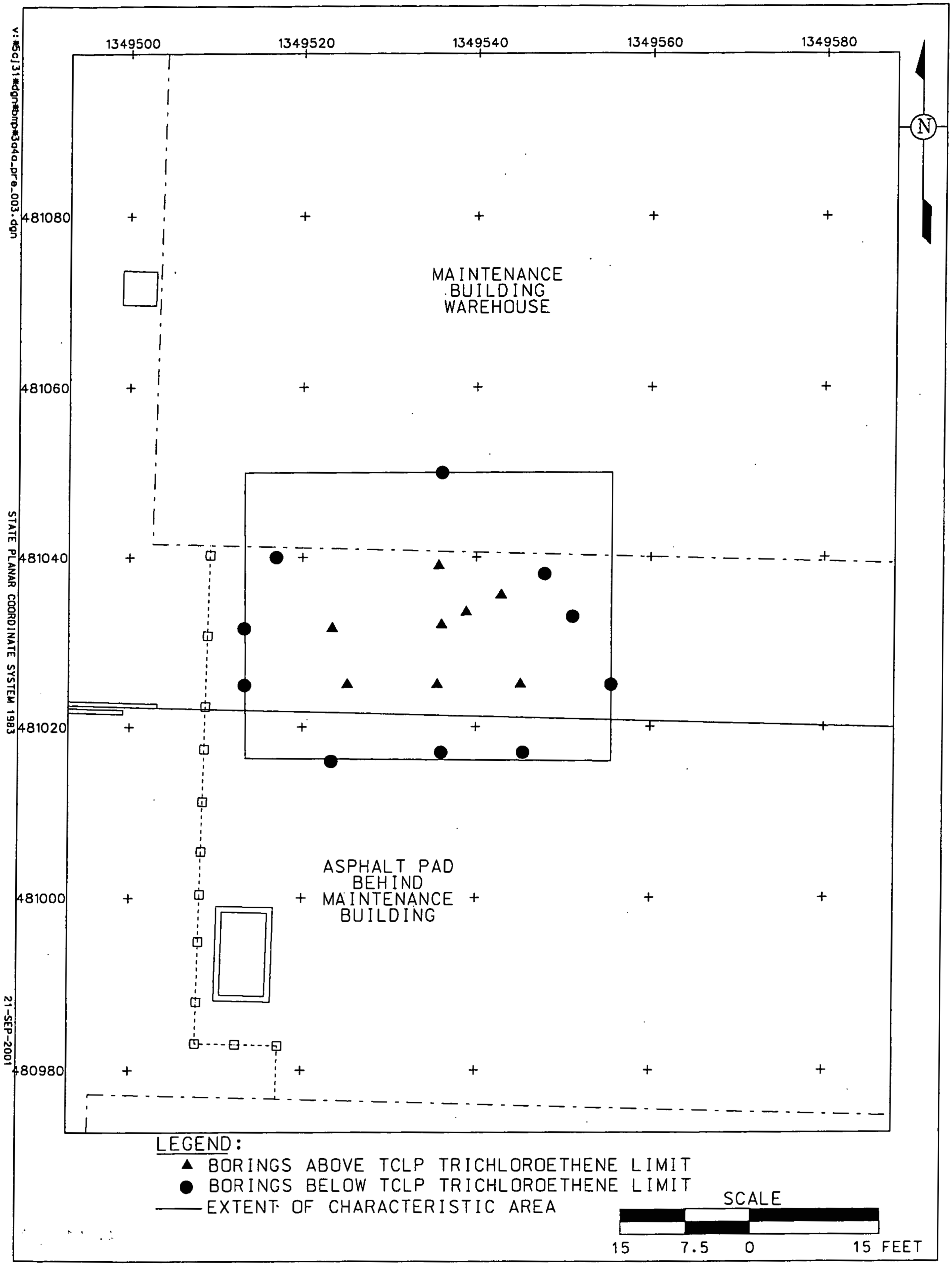
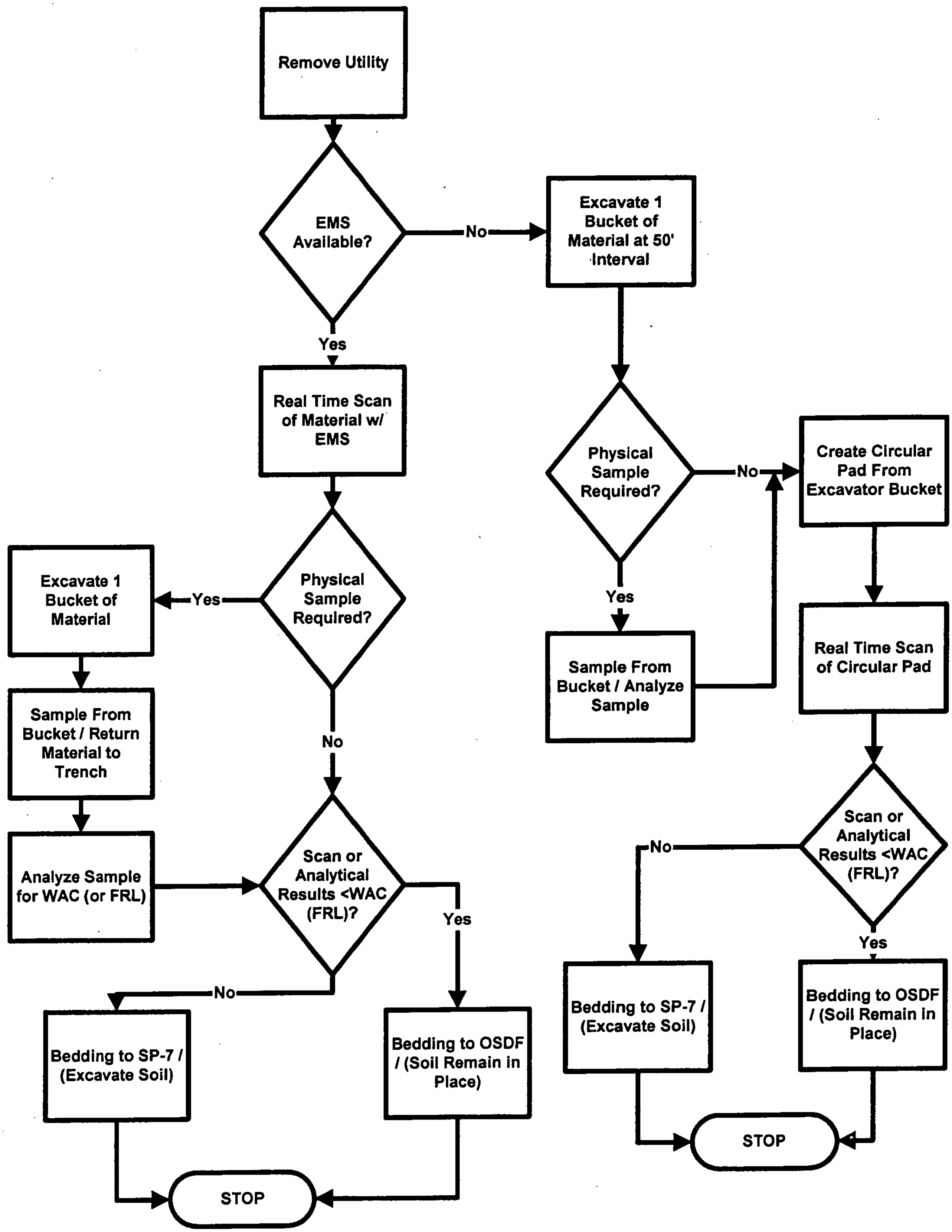


FIGURE 2-2. EXTENT OF THE CHARACTERISTIC AREA BEHIND THE MAINTENANCE BUILDING



* Physical Sample Required for:
- Visible Contamination
- Tc99 or Organic Defined Areas

Figure 2-3 Utility Trench Characterization Flowchart

3.0 QUALITY ASSURANCE/QUALITY CONTROL REQUIREMENTS

3.1 *IN SITU* GAMMA MEASUREMENTS AND SAMPLING

One duplicate HPGe measurement will be collected for every 20 HPGe measurements performed. The duplicate will be collected immediately after the initial measurement at the same acquisition time and detector height. In accordance with Data Quality Objectives (DQO) SL-056, Revision 0, and SL-055, Revision 0 (Appendix A), all precertification and all WAC attainment real-time measurements will be classified as ASL A.

For physical sampling for volatile organic COCs and technetium-99, one field duplicate sample will be collected for every 20 samples. The field duplicate will be collected using a co-located sampling point within 6 inches of the corresponding field sample location. Refer to Section 2.6.5 for laboratory quality control sample description for volatile organic COCs. No rinsates are required for any field sampling equipment, however, all equipment shall be decontaminated by Level II methods as outlined in procedures SMPL-01, Solids Sampling and SMPL-02, Liquids and Sludge Sampling.

3.2 APPLICABLE DOCUMENTS, METHODS AND STANDARDS

Excavation characterization activities described in this plan shall follow the requirements outlined in the following documents, procedures, and standard methods (including the latest revision of each document):

- ALS Method 6549, Analysis of VOCs in Field Samples by Manual Headspace using a Field Portable GC
- ALS 5507, Drying and Grinding Solid Samples in Preparation for Laboratory Analysis
- ALS 9503, Processing Samples through the Sample Processing Laboratory
- ALS 9505, Using the FACTS Database to Process Samples
- ALS 7532, Analytical Laboratory Services Internal Chain of Custody
- ADM-02, Field Project Prerequisites
- EQT-04, Photoionization Detector
- EW-0002, Chain of Custody/Request for Analysis Record for Sample Control
- EW-1021, Preparation of the PWID Report
- EW-1022, On-Site Tracking and Manifesting of Bulk Material
- RTIMP Administrative Manual, RTIMP-M-001
- RTIMP Field Manual, RTIMP-M-002
- SMPL-01, Solids Sampling
- SMPL-02, Liquids and Sludge Sampling
- Implementation Plan for Area 3A/4A
- Sitewide Excavation Plan (SEP)
- User Guidelines, Measurement Strategies, and Operational Factors for Deployment of *In-Situ* Gamma Spectroscopy at the Fernald Site (User's Manual)

- Sitewide Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Quality (SCQ) Assurance Project Plan
- *In-Situ* Gamma Spectroscopy Addendum to the Sitewide CERCLA Quality Assurance Project Plan
- RTIMP Quality Assurance Plan
- OSDF Impacted Materials Placement Plan
- WAC Attainment Plan for the OSDF
- DQO SL-048, Delineating the Extent of Constituents of Concern in Pre-Design Investigation and Remediation Sampling
- DQO SL-054, Real Time Precertification Monitoring

3.3 SURVEILLANCES

Project management has ultimate responsibility for the quality of the work processes and the results of the scanning activities covered by this PSP. The FEMP Quality Assurance (QA) organization may conduct independent assessments of the work process and operations to assure the quality of performance. The assessment encompasses technical and procedural requirements of this PSP and the SCQ. Independent assessments may be performed by conducting surveillances.

3.4 IMPLEMENTATION OF FIELD CHANGES

If field conditions require changes or variances, a V/FCN will be developed and approved by the Characterization Lead, QA Representative, and WAO. In the event that changes need to be implemented expeditiously, verbal approval will suffice followed by the written approvals on the V/FCN within seven working days of the verbal approval. Changes to the PSP will also be noted in the applicable Field Activity Logs. Additionally, V/FCNs that are considered to be significant will require approval from the regulatory agencies in accordance with Soil and Disposal Facility Project (SDFP) agreements.

4.0 SAFETY AND HEALTH

Personnel will conform to precautionary surveys by FEMP personnel representing the Utility Engineer, Industrial Hygiene, Occupational Safety, and Radiological Control. All work performed on this project will be performed in accordance with applicable Environmental Monitoring project procedures, RM-0020 (Radiological Control Requirements Manual), RM-0021 (Safety Performance Requirements Manual), Fluor Fernald work permits, Radiological Work Permit (RWP), penetration permits, and other applicable permits. All personnel in the performance of their assigned duties require concurrence with applicable safety permits.

A walk-down of the area by representatives from SDFP Characterization, RTIMP and the EM/Soil and Miscellaneous Media Sampling (SMMP) groups may be required to determine the type of *in situ* gamma spectroscopy equipment to use and if the excavation lift area is ready measurements or physical sampling (i.e., accessible by RTIMP equipment, boundaries marked or readily visible, no operating heavy duty equipment within 50-foot buffer zone, no excessive moisture or puddles, no soft spots, free of obstructions or depressions that might damage equipment, reasonable grade and slopes).

Three safety work zones will be utilized for the Area 3A/4A excavation activities for the safety of the field characterization staff working in contaminated areas in conjunction with heavy equipment operations:

- Zone 1 - within 25 feet of active loading, dumping operations or potential airborne generating activities; defined in the field by Radiological Control and Safety and Health; requires at a minimum full anti-contamination clothing (anti-Cs), hard hat, traffic safety vest, and steel-toed shoes. The requirement for full-face air purifying respirators will be evaluated by Radiological Engineering and Industrial Hygiene.

- Zone 2 - remainder of 3A/4A contamination area; denoted by Radiological Control with yellow construction type fence and/or yellow rope with radiological control signs; requires at least full anti-Cs, safety glasses, hard hat, traffic safety vest, and steel-toed shoes

- Zone 3 - outside of 3A/4A contamination area but within the 3A/4A construction area (denoted with orange construction fencing) where construction-related activities occur (i.e., equipment maintenance, fueling, unloading of supplies, etc.); defined by Safety and Health; PPE for this zone is activity driven, but generally consists of safety glasses, traffic safety vest, hard hat and steel-toed shoes.

All personnel performing measurements related to this project will be briefed on the Contractor Safe Work Plan or Traveler Package for Area 3A/4A. This briefing will be documented. Personnel who are not documented as having completed this briefing will not participate in the execution of field activities related to Area 3A/4A. All personnel entering the Construction Area will obtain a pre-entry briefing on current activities or hazards that may affect their work. Additionally, prior to entry into an excavation, the Competent Person for Trenching and Excavation shall be contacted to assure that the daily inspection has been completed and the excavation is safe to enter.

RTIMP personnel are to demarcate a minimum of a 50-foot safe work zone for HPGe (tripod) measurement locations and RSS runs in the field using a sufficient number of construction cones to clearly demarcate the work zone. RTIMP personnel operating the HPGe (tripod) and RSS in the construction area are occupied with watching measurement equipment computer screens and maneuvering the equipment. RTIMP personnel may not be aware of construction equipment moving in the field and operators of the construction equipment may not see the smaller HPGe (tripod) and RSS equipment/operator. The cones will be a visible indicator to construction equipment operators of the safe zone perimeter around this equipment. A 50-foot safe work zone does not need to be established for RTRAK, GATOR, and the EMS since this equipment is larger and more visible and it is easier for the driver to watch for approaching equipment.

Section 5.0 of the Area 3A/4A IP provides direction on health and safety documentation requirements (e.g., project-specific Environmental Safety and Health and Training Requirements Matrix, contractor requirements, etc.).

All emergencies shall be reported immediately on extension 911, or to the Site Communications Center at 648-6511 (if using a cellular phone), or using a radio and contacting "CONTROL" on Channel 11.

5.0 DISPOSITION OF WASTES

During completion of physical sampling activities, field personnel may generate small amounts of soil, sediment, water, and contact waste. Management of these waste streams will be coordinated with WAO through the Project Waste Identification Document (PWID) process. Sample material, including archived samples that are no longer needed, will be managed per PWID #555 or 580, as appropriate. Generation of decontamination waters will be minimized in the field, and whenever possible, equipment will be decontaminated at the facility that discharges to the AWWT Facility. Contact waste generation will be minimized by limiting contact with sample media, and by only using disposable materials, which are necessary. This waste stream will be managed with control point waste per PWID.

All soil wastes generated from the field GC analyses will be dispositioned to the above-WAC organic soil pile as directed by the excavation PWID. Any wastes generated from these analyses that may contain laboratory solvents will be taken to the on-site laboratory an added to the appropriate waste stream established for the laboratory. Aqueous liquid waste should be managed with water from excavations or as directed by the excavation PWID.

6.0 DATA AND RECORDS MANAGEMENT

6.1 REAL-TIME

The RTIMP group will provide hard copy maps and/or summary reports to the Characterization Lead and Data Management Contact or designees. All real-time data collection (NaI and HPGe) will be collected and reported at ASL A. All electronically recorded field data will have the RMS or HPGe Data Verification Checklist (Section 5.4 of the User's Manual), which will be completed after each data collection event. Field documentation, such as the Nuclear Field Density/Moisture Worksheet, will be reviewed by the RTIMP.

Electronically recorded data from the GPS, HPGe, and NaI systems will be downloaded on a daily basis to disks or to the Local Area Network (LAN) using the Ethernet connection. The Characterization Lead or designee will be informed by the RTIMP Lead or designee when RTIMP equipment measurements do not meet data quality control checklist criteria. The Characterization Lead or designee will determine whether additional scanning, confirmation, or delineation measurements are required.

Once the electronic data has been placed on the LAN and SED, the Data Management Contact will perform an evaluation of the data. The evaluation may involve a comparison check between the typical information sheet such as the example Excavation Request, electronic data, hard copy maps and summary reports for accuracy and completeness. The evaluation will be documented on the Excavation Monitoring Real-Time Electronic Data Quality Control checklist by the Data Management Contact, dated and signed (see Figure 6-1).

The original completed Excavation Monitoring Form, the real-time map(s), and HPGe summary data (if applicable) will be forwarded to WAO for placement in the WAO project files. Copies of other field documentation may be generated and provided to the Characterization Lead or Data Management Contact upon request and maintained in SDFP project files until archived by Engineering/Construction Document Control (ECDC). RTIMP will maintain all the real-time files and survey data will be maintained by the Survey Lead or designee. All records associated with this PSP should reference the PSP number and eventually be forwarded to ECDC to be placed in the project file.

6.2 TECHNETIUM-99 AND AROCLOR SAMPLES

All physical samples will be collected and reported at ASL B. Field data packages will consist of the chain of custody form, field activity logs, and sample collection logs. All field data packages associated with physical sampling will be independently validated. Standard required information will be entered into the SED. The original field data packages will be filed and controlled by the Sample and Data Management department.

Laboratory analytical data packages will be filed and distributed in accordance with existing data management procedures. A minimum of 10 percent of data packages will be forwarded to the Remediation Data Quality group for validation at ASL B. All analytical data and data validation qualifiers will be transferred (from FACTS) or entered into the SED per existing procedures. The evaluation will be documented by the Data Management Contact or designee by electronic approval within the database and by completion of the Data Group Form.

6.3 FIELD GC SAMPLES

The analyst operating the field GC will provide hard copy printouts of the SiteChart Analysis Report and spreadsheet printouts to the Data Management Contact or designee. All Field GC data will be collected and reported at ASL B.

The Field GC Checklist will be completed by the analyst operating the field GC after each data collection event. Electronically recorded data from the field GC system will be downloaded on a daily basis to disks or to a designated directory LAN. Electronic data will consist of data files to be loaded into the SED and electronic images of printouts in specified format (.pdf). The Characterization Lead or designee will be informed by analyst, if the Field GC equipment measurements do not meet Field GC Checklist criteria. The Characterization Lead or designee will determine whether additional measurements are required.

Associated GPS or survey data for each sample location will be collected by the Survey Lead or designee. Electronic files containing survey data will be placed in a designated directory on the LAN. This survey data will be linked to the GC results prior to being loaded into the SED.

Once the electronic data (data files, electronic images of printouts, and associated GPS or survey data for each sample location) has been placed on the LAN it will be loaded into the SED. Data Management Contact or designee will perform an evaluation of the data. The evaluation may involve a comparison check between electronic data, hard copy and summary reports for accuracy and completeness. The evaluation will be documented by the Data Management Contact or designee by electronic approval within the database and by completion of the Data Group Form.

Field data packages for Field GC data will consist of field activity logs and sample collection logs. All field data packages associated with field GC sampling will be independently validated. The original field data packages will be filed and controlled by the Sample and Data Management department.

The original completed Data Group Form, hard copy printouts of the SiteChart Analysis Report and associated spreadsheet printouts will be forwarded to WAO for placement in the WAO project files. The Survey Lead or designee will maintain survey data. All records associated with this PSP should reference the PSP number and eventually be forwarded to ECDC to be placed in the project file.

PSP/Project #:______________________

Batch Numbers:______________________

HPGe file Numbers:______________________

FIGURE 6-1
EXCAVATION MONITORING REAL-TIME ELECTRONIC DATA QUALITY CONTROL CHECKLIST

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#	ITEM TO BE CHECKED	✔ or No	Modification/Correction with explanation	Date Corrected
1	Receive the Characterization Request form, Excavation Monitoring Form (EMF), coverage maps, real-time verification checklist, and/or HPGe parameter summary report from the Characterization field personnel			
2	Verify the signatures and all blanks on the EMF are complete through Section 6 and complete on the Real-Time Verification Checklist			
3	Check loader to ensure the data transferred from the LAN to the SED (if the data files are in the SED, the loader is working properly)			
4	Check to ensure data transferred into the correct fields by looking at the data on the LAN in comparison with the data transferred to the SED (to verify this, all data fields for a few runs in each file will be reviewed)			
5	Check that the project number is correct and is consistent on the EMF, the LAN, and the SED in both the worksheet files and the results/data files			
6	Check that the EMF, the LAN, and the SED have the correct location identifier in both the worksheet files and the results/data files			
7	Check that worksheet on the LAN and in the SED have the correct elevation documented from the surveying group			
8	Verify northing and easting coordinates, look at the plotted map and the coordinates in the SED and verify the coordinates are within the boundary on the plotted map			
9	Check data files to ensure all files are received			
10	Attach this checklist and documentation for modifications to the EMF, initial and date all forms and documentation		X	X
11	Insert USE into the "QC Field" on the SED after all this has been checked and verified correct		X	X

Sign and Date______________________

PSP/Project #:______________________________

Batch Numbers:______________________________

HPGe file Numbers:______________________________

4227

1. If no, check with the Characterization Lead or designee to get needed forms.

2. If no, contact Characterization Lead and return EMF to be completed and/or signed.

3. If no, check with SED Database Manager (ext. 7544) to find out why.

4. If no, check with the Real-Time Field Lead to see if any additional fields were added. If so, call SED Database Manager (ext. 7544) to have the field added into the SED tables. If not, check with SED Database Manager (ext. 7544) to see why the fields loaded incorrectly.

5. If no, verify the correct project number with the Characterization Lead and insert the project number into the worksheet on the LAN and the worksheet in the SED; attach the documentation to the form.

6. If no, verify with the Characterization Lead the correct identifier and correct the identifier both in the worksheet on the LAN and in the SED; attach the documentation to the form.

7. If no, check with the Surveying group to verify the elevation; If incorrect, change the elevation in the worksheet on the LAN and in the SED and attach the documentation to the form.

8. If no, check with Characterization Lead or designee to resolve the problem.

9. Run query in SED. The number of RTRAK/RSS files can be checked with the number of records (files) listed in the SRDIG directory under Real-Time Lab View files. No sequential gaps are anticipated; if gaps are found, check with the Real-Time Field Lead. The Real-Time Field Lead will verify gaps or will investigate to find out why the files are missing. For HPGe shots, an HPGe Data Verification Checklist is attached to the EMF listing all the files. This Checklist can be used to ensure all the files were received in the SED.

Sign and Date______________________________

APPENDIX A

DATA QUALITY OBJECTIVES
SL-055, REVISION 0 AND
SL-056, REVISION

Control Number ________

Fernald Environmental Management Project

Data Quality Objectives

Title: Real-Time Excavation Monitoring For Total Uranium Waste Acceptance Criteria (WAC)

Number: SL-055

Revision: 0

Final Draft: 6/8/99

Contact Name: Joan White

Approval: ________ Date: 6/8/99
James E. Chambers
DQO Coordinator

Approval: ________ Date: 6/8/99
Joan White
Real-Time Instrumentation Measurement
Program Manager

Rev. #	0						
Effective Date:	6/8/99						

DATA QUALITY OBJECTIVES
Excavation Monitoring for Total Uranium Waste Acceptance Criteria (WAC)

Members of Data Quality Objectives (DQO) Scoping Team

The members of the scoping team included individuals with expertise in QA, analytical methods, field construction, statistics, laboratory analytical techniques, waste management, waste acceptance, data management, and excavation monitoring.

Conceptual Model of the Site

Fernald Environmental Management Project (FEMP) remediation includes the construction of an on-site disposal facility (OSDF) to be used for the safe permanent disposal of materials at or above the site final remediation levels (FRLs), but below the waste acceptance criteria (WAC) for constituents of concern (WAC COCs). The WAC concentrations for several constituents, including total uranium, were developed using fate and transport modeling, and were established to prevent a breakthrough of unacceptable levels of contamination (greater than a specified Maximum Contaminant Level to the underlying Great Miami Aquifer) over a 1000-year period of OSDF performance. The WAC for total uranium and other area-specific WAC COCs as referenced in the Operable Unit 5 (OU5) and Operable Unit 2 (OU2) Records Of Decision (RODs), the Waste Acceptance Plan for the On-Site Disposal Facility (WAC Plan), and the OSDF Impacted Materials Placement Plan (IMPP), must be achieved for all soil and soil-like materials that have been identified for disposal in the OSDF.

The extent of soil contamination requiring remediation was estimated and published in both the Operable Unit 5 and Operable Unit 2 Feasibility Studies (FS). These estimates were based on modeling analysis of available uranium data from soil samples collected during the Remedial Investigation (RI) efforts and from other environmental studies conducted at the FEMP. Maps outlining boundaries of soil contamination were generated for both the Operable Unit 5 and Operable Unit 2 FS documents by overlaying the results of the modeling analysis of uranium data with isoconcentration maps of other COCs. The soil contamination maps were further modified by conducting spatial analysis on the most current soil characterization data.

A sequential remediation plan has been presented which subdivides the FEMP into ten (10) independent remediation areas. Extensive historical sampling has demonstrated that in each of these 10 areas potentially above-WAC concentrations may not be present, may be limited to one WAC COC, or consist of a subset of WAC COCs. According to the Sitewide Excavation Plan (SEP) only WAC COCs with a demonstrated or likely presence in an area will be evaluated during remedial design and implementation. This DQO will be used to define the WAC decision-making process using excavation monitoring instrumentation in areas where soil and soil-like material is being excavated and total uranium is a WAC COC.

1.0 Statement of Problem

Adequate information must be available to demonstrate excavated soils or soil-like material is acceptable or unacceptable for disposal in the OSDF, based on the total uranium WAC.

Available Resources

Time: WAC decision-making information of sufficient quality must be made available to the Project Manager (or designee), characterization representative, and Waste Acceptance Operations representative (decision makers) prior to excavation and disposition of soil and soil-like materials.

Project Constraints: WAC decision-making information must be collected and assimilated with existing manpower and instrumentation to support the remediation schedule. Successful remediation of applicable areas, including excavation and placement of soil and soil-like material in the OSDF, is dependent on the performance of this work.

Summary of the Problem

Excavated soil or soil-like material must be classified as either of the following:

1. Having concentrations of total uranium at or above the WAC, and therefore, unacceptable for disposal in the OSDF, or

2. Having concentrations of total uranium below the WAC, and therefore, acceptable for disposal in the OSDF.

2.0 Identify the Decision

Decision

The WAC decision-making process will result in the classification of defined soil or soil-like material volumes as either meeting or exceeding the 1,030 ppm total uranium WAC.

Possible Results

1. A defined volume of soil or soil-like material has a concentration of total uranium at or above the WAC. This material is classified as unacceptable for placement in the OSDF, and will be identified, excavated, and segregated pending off-site disposition.

2. A defined volume of soil or soil-like material has a concentration of total uranium below the total uranium WAC. This soil is classified as acceptable for placement in the OSDF and is transported directly from the excavation to the OSDF for placement.

3.0 Identify Inputs That Affect the Decision

Required Information

The total uranium WAC published in the Waste Acceptance Criteria Attainment Plan for the OSDF, historical data, pre-design investigation data, and in-situ gamma spectrometry information collected prior to and during excavation are required to determine whether a specified volume of soil or soil-like material meets or exceeds the total uranium WAC.

Source of Informational Input

The list of sitewide OSDF WAC COCs identified in the OU2 and OU5 RODs and the WAC Plan will be referenced. Historical area specific data from the Sitewide Environmental Database (SED) will also be retrieved and evaluated for both radiological and chemical WAC constituents. This information will be utilized to determine area specific WAC COCs.

Non-invasive real-time excavation monitoring in areas where total uranium is a WAC concern will involve measurements collected with mobile and/or stationary in-situ gamma spectrometry equipment. These measurements will be collected from the surface of each excavation lift prior to excavation. Information compiled from this real-time monitoring will be assimilated and reviewed by decision makers to classify lifts or sections of lifts as either acceptable or unacceptable for placement in the OSDF. These measurements may also be collected on soils exposed after the removal of suspect above WAC material to verify its removal.

Action Levels

To ensure no above WAC soil or soil-like material is sent to the OSDF, threshold values (trigger levels) have been set for NaI and HPGe Phase 1 and II measurements. These values are significantly lower than the 1030 ppm total uranium OSDF not-to-exceed (NTE) level. The WAC Phase I (detection phase) threshold value is 721 ppm total uranium for NaI instruments (31 cm detector height), and 400 ppm total uranium for the HPGe (1 meter detector height). The WAC Phase II (confirmation and delineation phase) threshold value is 928 ppm total uranium for the HPGe (31 cm and 15 cm detector heights).

Methods of Data Collection

WAC Phase 1 measurements will be collected to obtain as close to complete coverage of the areas of concern as possible using either the NaI Radiation Measurement Systems (RMS) or HPGe equipment to identify potential above WAC total uranium locations. WAC Phase II measurements will be collected with strategically placed HPGe equipment to confirm and delineate Phase I potential above WAC measurements, as needed. The project may decide not to collect Phase II measurements if the potential above WAC area boundary is discernable by visual observation (such as presence of process residue or other OSDF prohibited items, discoloration of soil or soil-like material, or other information).

The project will use the real-time WAC Phase I and Phase II data as ASL A, and will perform no data validation (however the data will be collected with ASL B quality control criteria, for real-time project internal quality control. All measurements will be performed in compliance with operating procedures identified in Section 7.5 of this DQO, the Real-Time User's Manual, and the SEP.

4.0 The Boundaries of the Situation

Spatial Boundaries

Domain of the Decision: The boundaries where excavation monitoring for total uranium will be used is limited to soils and/or soil-like material in remediation areas where total uranium is a WAC COC, excavation is planned, and material is designated for disposition in the OSDF.

Population of Soils:

Includes all at-and below-grade soil and soil-like material impacted with total uranium potentially exceeding the WAC and planned for disposition in the OSDF.

Scale of Decision Making

Areas designated for excavation will be evaluated as to whether the soil or soil-like material is below or above the OSDF WAC for total uranium. Excavation monitoring will be conducted on each excavation lift. Based on the information obtained as a result of reviewing and modeling existing data coupled with newly acquired excavation monitoring information, a decision will be made whether an individual excavation lift, or portion of a lift, meets or exceeds the OSDF WAC for total uranium.

Temporal Boundaries

Time Constraint: Real-time excavation monitoring information must be acquired and processed in time for review and use in decision making prior to excavation and disposition of excavated material. The scheduling of WAC excavation monitoring is directly tied to the excavation schedule. WAC excavation monitoring will be performed and a disposition decision made prior to excavation of each designated lift. Acquired information must be processed and reviewed by the project decision-makers prior to disposition of the lift being monitored. Time limits to complete measurements are specified in the excavation subcontracts.

Practical Considerations: Weather, moisture, field conditions, and unforseen events affect the ability to perform excavation monitoring and meet the schedule. To maintain safe working conditions, excavation and construction activities will comply with all FEMP and project specific health and safety protocols.

5.0 Develop a Logic Statement

Parameter(s) of Interest

The parameter of interest is the concentration of total uranium in soil or soil-like material designated for disposition in the OSDF.

Waste Acceptance Criteria Concentration

The OSDF WAC concentration is 1,030 ppm for total uranium in soil and soil-like materials. This concentration is considered a NTE level for OSDF WAC attainment, and no real-time measurement data point, as defined by the instrument-specific threshold values, can meet or exceed this level in material destined for the OSDF.

Decision Rules

If excavation monitoring results are below the total uranium WAC for a specified volume of soil or soil like material, then that soil is considered acceptable for final disposition in the OSDF. If monitoring results reveal concentrations at or above the total uranium WAC, as indicated by exceeding the instrument-specific threshold level, then the unacceptable soil will be delineated, removed, and segregated pending off-site disposal.

6.0 Limits on Decision Errors

Range of Parameter Limits

The area-specific total uranium soil concentrations anticipated in excavation areas will range from background levels (naturally-occurring soil concentrations) to concentrations greater than the total uranium WAC levels.

Types of Decision Errors and Consequences

Decision Error 1: This decision error occurs when the decision makers decide a specified volume of soil or soil-like material is below the WAC for total uranium, when in fact the uranium concentration in that soil is at or above the WAC. This error would result in soil or soil like material with concentrations above the WAC for total uranium being placed into the OSDF. Since the WAC is a NTE level, this error is unacceptable.

Decision Error 2: This decision error occurs when a volume of soil or soil-like material is identified as above WAC, excavated, and sent for off-site disposition when the material is actually below the WAC for total uranium. This error would result in added costs due to the unnecessary segregation and off-site disposition of material that is acceptable for disposal in the OSDF.

True State of Nature for the Decision Errors

The true state of nature for Decision Error 1 is that the actual concentration of total uranium in a volume of soil or soil-like material is greater than the WAC. The true state of nature for Decision Error 2 is that the actual concentration of total uranium in a volume of soil or soil-like material is below the WAC. Decision Error 1 is the more severe error.

7.0 Design for Obtaining Quality Data

7.1 WAC Attainment Excavation Monitoring

WAC attainment will be based on real-time excavation monitoring using the NaI and

HPGe measurement systems. Phase I (detection phase) measurements are collected with the NaI systems using a spectral acquisition time of 4 seconds, at a detector speed of 1 mile per hour (mph), and a detector height of 31 cm. These parameters achieve the required sensitivity, and are the best compromise of practical considerations such as detector speed and time in the field. In the NaI systems, the presence of thorium contamination can cause interferences which could affect total uranium concentration calculations. Uranium results associated with thorium values greater than 500 net counts per second will be reevaluated. The threshold value (trigger level) for Phase I NaI measurements is 721 ppm for total uranium (70% of the 1,030 ppm WAC concentration for soil, arrived at by agreement with the USEPA). Phase I measurements can also be collected with the HPGe systems using a spectral acquisition time of 5 minutes, and a detector height of 1 meter (the threshold value is lower than the NaI threshold value because of the larger field of view at the HPGe 1 meter detector height). (For more information reference the *RTRAK Applicability Study, 20701-RP-0003, Revision 1, May 1998).*

At the discretion of the characterization lead, Phase II confirmation and delineation measurements may be collected using the HPGe systems with a spectral acquisition time of 5 minutes at both the 31 cm and 15 cm detector heights. The HPGe detector will be placed directly over the zone of maximum activity identified by the Phase I measurements. The threshold value (trigger level) for Phase II measurements is 928 ppm for total uranium at either detector height. Lower (more conservative) threshold values may be defined in the PSP. (For more information reference the *User Guidelines, Measurement Strategies, and Operational Factors for Deployment of In-Situ Gamma Spectrometry at the Fernald Site, 20701-RP-0006, Revision A, May 8, 1998.*)

In the event the monitoring data exceeds the trigger levels (see above), the entire vertical thickness (3 ± 1 foot) of the areal extent of above-WAC material will be removed and segregated pending off-site disposal.

7.2 <u>Interpretation of Results</u>

The results obtained from real-time monitoring for purposes of WAC attainment will be compared to the published OSDF WAC concentration for total uranium. If results are equal to or greater than the WAC concentration (as defined by exceeding the specific threshold value level), the decision makers may take one of the following actions:

- Determine that the entire unit volume or "lift" subjected to excavation monitoring is at or above WAC and requires segregation pending off-site disposal.

- Based on adequacy of existing information (including visual inspection), excavate and segregate the portion of the lift material that is at or above WAC pending off-site disposition.

- Perform additional real-time monitoring to more accurately delineate the areal extent of above-WAC contamination. Using this information, define the extent of removal efforts to be conducted.

7.3 QC Considerations

The following data management requirements will be met prior to evaluation of acquired WAC attainment information:

1) An excavation monitoring form will be completed and reviewed in the field.

2) WAC data and decision-making information will be assigned to respective soil profiles, so characterization and tracking information can be maintained and retrieved.

3) The mobile sodium iodide systems will generate ASL level A data, with no data validation. The HPGe detectors are capable of providing either ASL level A or B data, however for WAC determination only ASL A data will be generated.

4) When using the HPGe detectors, duplicate measurements will be taken at a frequency of one in twenty measurements or one per excavation lift, whichever is greater.

7.4 Independent Assessment

Independent assessment shall be performed by the FEMP QA organization by conducting surveillances. Surveillances shall be planned and documented in accordance with Section 12.3 of the SCQ.

7.5 Applicable Procedures

Real-time monitoring performed under the PSP shall follow the requirements outlined within the following procedures:

- ADM-16, In-Situ Gamma Spectrometry Quality Control Measurements
- EQT-22, High Purity Germanium Detector In-Situ Efficiency Calibration
- EQT-23, Operation of ADCAM Series Analyzers with Gamma Sensitive Detectors
- EQT-32, Troxler 3440 Series Surface Moisture/Density Gauge

- EQT-33, Real Time Differential Global Positioning System
- EQT-39, Zeltex Infrared Moisture Meter
- EQT-40, Satloc Real-time Differential Global PositioningSystem
- EQT-41, Radiation Measurement Systems
- 20300-PL-002, Real Time Instrumentation Measurement Program Quality Assurance Plan
- EW-1022, On-Site Tracking and Manifesting of Bulk Impacted Material

7.6 References

- Sitewide CERCLA Quality Assurance Project Plan (SCQ), May 1995, FD-1000
- Sitewide Excavation Plan, July 1998, 2500-WP-0028, Revision 0
- Waste Acceptance Criteria Attainment Plan for the On-Site Disposal Facility, June 1998, 20100-PL-0014, Revision 0
- Impacted Materials Placement Plan for the On-Site Disposal Facility, January 1998, 20100-PL-007, Revision 0
- Area 2, Phase 1 Southern Waste Units Implementation Plan for Operational Unit 2, July 1998, 2502-WP-0029, Revision 0
- RTRAK Applicability Study, May 1998, 20701-RP-0003, Revision 1
- User Guidelines, Measurement Strategies, and Operational Factors for Deployment of In-Situ Gamma Spectrometry at the Fernald Site, July 1998, 20701-RP-0006 Revision B

Data Quality Objectives
Excavation Monitoring for Total Uranium Waste Acceptance Criteria (WAC)

1A. Task/Description: Waste Acceptance Criteria Monitoring

1.B. Project Phase: (Put an X in the appropriate selection.)

RI ☐ FS ☐ RD ☐ RA ☒ R_vA ☐ OTHER

1.C. DQO No.: SL-055 DQO Reference No.: N/A

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2. Media Characterization: (Put an X in the appropriate selection.)

Air ☐ Biological ☐ Groundwater ☐ Sediment ☐

Soil and Soil Like Material ☒

Waste ☐ Wastewater ☐ Surface water ☐ Other (specify) ________

---

3. Data Use with Analytical Support Level (A-E): (Put an X in the appropriate Analytical Support Level selection(s) beside each applicable Data Use.)

Site Characterization
A ☐ B ☐ C ☐ D ☐ E ☐

Risk Assessment
A ☐ B ☐ C ☐ D ☐ E ☐

Evaluation of Alternatives
A ☐ B ☐ C ☐ D ☐ E ☐

Engineering Design
A ☐ B ☐ C ☐ D ☐ E ☐

Monitoring during remediation activities
A ☐ B ☐ C ☐ D ☐ E ☐

Other Waste Acceptance Evaluation
A ☒ B ☐ C ☐ D ☐ E ☐

4.A. Drivers: Specific construction work plans, Applicable or Relevant and Appropriate Requirements (ARARs) and Operable Unit 2 and Operable Unit 5 Records of Decision (ROD).

4.B. Objective: To provide data for identification of soils and soil-like materials for compliance with Waste Acceptance Criteria.

5. Site Information (Description):

The RODs specify that FEMP soils will be below the WAC for disposal in the OSDF. WAC determination will be necessary for site soils and soil like material that is scheduled for excavation and potential OSDF disposition.

6.A. Data Types with appropriate Analytical Support Level Equipment Selection and SCQ Reference: (Place an "X" to the right of the appropriate box or boxes selecting the type of analysis or analyses required. Then select the type of equipment to perform the analysis if appropriate. Please include a reference to the SCQ Section.)

1. pH ☐
   Temperature ☐
   Specific Conductance ☐
   Dissolved Oxygen ☐
   Technetium-99 ☐
2. Uranium ☒
   Full Radiological ☐
   Metals ☐
   Cyanide ☐
   Silica ☐
3. BTX ☐
   TPH ☐
   Oil/Grease ☐
4. Cations ☐
   Anions ☐
   TOC ☐
   TCLP ☐
   CEC ☐
   COD ☐
5. VOA ☐
   BNA ☐
   Pesticides ☐
   PCB ☐
6. Other (specify) ☒
   ☐ Moisture

6.B. Equipment Selection and SCQ Reference:

ASL A	NaI and HPGe	SCQ Section:	Appendix H
ASL B		SCQ Section:	
ASL C		SCQ Section:	
ASL D		SCQ Section:	
ASL E		SCQ Section:	

7.A. Sampling Methods: (Put an X in the appropriate selection.)

Biased	☐	Composite	☐	Environmental	☐	Grab	☐	Grid	☐
Intrusive	☐	Non-Intrusive	☒	Phased	☐	Source	☐		

DQO Number: SL-055

7.B. Sample Work Plan Reference: The DQO is being established prior to completion of the PSP.

Background samples: SED

8. Quality Control Samples: (Place an "X" in the appropriate selection box.)

8.A. Field Quality Control Samples:

Trip Blanks	☐	Container Blanks	☐
Field Blanks	☐	Duplicate Measurements	☒*
Equipment Rinsate Samples	☐	Split Samples	☐
Preservative Blanks	☐	Performance Evaluation Samples	☐
Other (specify) ______			

*For the HPGe detectors, duplicate measurements will be made every 1 in 20 or one per lift, whichever is greater.

8.B. Laboratory Quality Control Samples:

Method Blank	☐	Matrix Duplicate/Replicate	☐
Matrix Spike	☐	Surrogate Spikes	☐
Other (specify) Per method			

9. Other: Please provide any other germane information that may impact the data quality or gathering of this particular objective, task or data use.

Control Number ________

Fernald Environmental Management Project

Data Quality Objectives

Title: Real Time Final Remediation Level (FRL) Monitoring

Number: SL-056

Revision: 0

Effective Date: 9/01/99

Contact Name: Joan White

Approval: [signature] Date: 9/1/99
James Chambers
DQO Coordinator

Approval: [signature] Date: 9/1/99
Joan White
Real-Time Instrumentation Measurement
Program Manager

Rev. #	0						
Effective Date:	9/01/99						

Data Quality Objectives
Real Time Final Remediation Level (FRL) Monitoring

1.0 Statement of Problem

Conceptual Model of the Site

The general soil remediation process at the Fernald Environmental Management Project (FEMP) includes real-time *in-situ* gamma spectrometry (real-time) measurements and physical sampling during different phases of the remediation process. Initially, pre-design investigations define excavation boundaries. During excavation, real-time measurements and/or sampling for waste disposition issues occurs. After planned excavations are complete, real-time measurements and/or physical sampling precertification activities are carried out to verify that residual contamination is below final remediation levels (FRLs).

This DQO describes the real-time in-situ gamma spectrometry methods used for gamma resolvable Area Specific Contaminants of Concern (ASCOC) FRL monitoring to support remedial design and precertification. Any physical soil samples collected to support remedial design will be collected under a separate DQO. Real-time FRL measurements involve field surveys of the surface soil using mobile and stationary gamma-discernable real-time equipment. Real-time FRL measurements are collected within an area when above-FRL radiological contamination is anticipated to be minimal based on process knowledge or previous investigations.

FRL scanning activities must follow the guidelines established in the *Sitewide Excavation Plan* (SEP) and the most current version of the document *User Guidelines, Measurement Strategies, and Operational Factors for Deployment of In-Situ Gamma Spectrometry at the Fernald Site* (hereinafter referred to as the Real Time Users Manual). As discussed in these documents, FRL measurements are conducted in two separate activities:

- FRL Phase I includes a mobile sodium iodide (NaI) detector scan of as much of the area as accessible at a 31 cm detection height at 1 mile per hour. If parts of the area of interest are inaccessible to the mobile NaI detectors, then the stationary High Purity Germanium (HPGe) detector will be used to obtain measurements in those areas. Target parameters for FRL Phase I NaI measurements are gross gamma activity and 3-times the FRL (3x FRL) values of total uranium, radium-226 and/or thorium-232, as calculated by a moving two-point average of consecutive measurements, or as indicated by 2x FRL in single measurements using the HPGe detectors at a 1 meter detector height.

- FRL Phase II includes stationary HPGe "hot spot evaluation" measurements at Phase I locations where the two-point average of total uranium, radium-226 and/or thorium-232 has identified resolvable ASCOC concentrations greater than 3-times the FRL (3x FRL) using the RMS systems, or where single HPGe measurement from Phase I are greater than 2x FRL. Target parameters for FRL Phase II are all gamma resolvable radiological ASCOCs.

Available Resources

Time: FRL investigation of remediation areas or phased areas must be accomplished by the field team of real-time instrumentation operators (and samplers if necessary), to provide required information in time to support the design effort.

Project Constraints: FEMP remediation activities are being performed in support of the Accelerated Remediation Plan, and soil remediation activities must be consistent with the SEP. FRL scanning, and if necessary, sampling and analytical testing, must be performed with existing manpower and instrumentation, considering instrument availability, to support the remediation and certification schedule. The results of FRL Phase I will determine Phase II HPGe measurement location and if necessary, will determine physical sample location. Design and execution of potential remediation is dependent on successful completion of this work.

Instrumentation: Real-time monitoring includes mobile sodium iodide (NaI) systems referred to as the Radiation Measurement Systems (RMS). In addition, stationary germanium detectors mounted on a tripod (the HPGe), are also used. These instruments can significantly accelerate the pace of necessary characterization by detecting soil contaminated with gamma resolvable radiological ASCOCs in a rapid and non-intrusive manner.

2.0 Identify the Decision

Decision

Delineate the horizontal extent of above-FRL (hot spot criteria) radiological contamination in the area soil. In addition, determine the need for Phase II real-time measurements to further assist in the above-FRL delineation.

3.0 Identify Inputs That Affect the Decision

Required Informational Input

Real-time FRL measurements will be used to estimate the surface soil contamination and the variation in surface soil contamination in areas scheduled for design, modeling, precertification, or certification activities. In addition, RTIMP data may be used to determine physical sampling collection location and/or a review of existing physical sample data, process knowledge, or visible observation.

Sources of Informational Input

FRL measurements for gamma discernible radiological COCs will involve measurements from mobile and stationary in-situ gamma spectrometry equipment. Physical samples may be collected to verify real-time measurements, or to investigate non-gamma resolvable ASCOCs.

Action Levels

FRLs established in the OU2 and OU5 Records of Decision are specific for radiological COC, and in some cases, vary between remediation areas. The FRLs were developed to account for health risks, cross media impact, background concentrations, and applicable or relevant and appropriate requirements (ARARs) and represent not-to-exceed contaminant-specific average soil concentrations. Real-time HPGe measurements may also be taken to support excavation to ALARA requirements. Physical samples may be used to verify HPGe readings and to precertify for non-gamma resolvable ASCOCs.

The 3x FRL concentrations/activities obtained through two-point averaging of mobile NaI measurements have been developed based on the ability of the instrumentation to resolve these levels. Refer to the Real-Time User's Manual for additional details.

Methods of Data Collection

FRL Phase I measurements will be utilized to obtain as close to complete coverage of the areas of concern. Hot spot confirmation and delineation measurements will be obtained during FRL Phase II by strategically placed stationary HPGe measurements. Analysis and data management for FRL Phase I data will be conducted at ASL A. FRL Phase II data may be conducted at either ASL A or ASL B, at the discretion of the Project. The decision to collect Phase II data at ASL A, or ASL B will depend on the Project's need for validated data. Only ASL B data is subject to validation, at project request. Real-time data collection for Phase II ASL A and ASL B measurements are identical. All measurements will be performed in compliance with operating procedures, the Real-Time User's Manual, the SEP, and the SCQ.

The FRL Phase I data will be utilized to establish general radiological concentration patterns and detect areas of elevated total gamma activity, as well as provide isotopic information for resolvable ASCOCs. The FRL Phase II HPGe gamma detectors will be used to confirm and delineate Phase I potential hot spot measurements, as needed. All real-time Phase I and Phase II measurements will be collected in accordance with the procedures identified in Section 7.0 of this DQO.

Surface physical samples may be collected to verify HPGe measurements for non-gamma resolvable ASCOCs. If physical sampling is needed, it will be identified in PSPs. The data quality of these samples will be consistent with the latest sampling DQO.

4.0 The Boundaries of the Situation

Spatial Boundaries

Domain of the Decision: Boundaries are limited to surface soils of areas planned for certification, and adjacent areas, as defined in the individual work plans.

Population of Soils: The soils affected are surface soils (to a nominal depth of 6 inches), which include recently excavated surfaces and undisturbed soils associated with excavation areas as designated in the individual work plans.

Temporal Boundaries

Time Constraints on Real-Time Measurements: The scheduling of FRL scanning is closely associated with the design process and excavation schedule. FRL real-time scanning must be conducted prior to design, excavation, if any, and before certification activities begin. The scanning data must be returned and processed into useable format in time for the information to be useful within the current remediation schedule.

Practical Considerations: In-situ gamma spectrometry measurements cannot be made during snow coverage or standing water conditions or during precipitation. Field analytical methods should also be limited to unsaturated soils. Most areas undergoing scanning are flat, open terrain, and are readily accessible to the equipment. Some areas may require preparation, such as cutting of grass or removal of undergrowth, fencing and other obstacles. In situ measurements will require coordination with appropriate maintenance personnel for site preparation. Physical and environmental parameters will be recorded and assessed during data collection. Refer to the Real-Time User's Manual for additional details.

5.0 Develop a Logic Statement

Parameters of Interest

For FRL Phase I, parameters of interest are gross gamma activity and 3-times the FRL values of total uranium, radium-226 and thorium-232, as calculated by a moving two-point average of consecutive readings. For FRL Phase II, parameters of interest are all HPGe-discernable radiological ASCOCs.

FRL Target Levels

For FRL Phase I, target levels are the highest gross gamma activity readings, 3x FRL for total uranium, radium-226 and thorium-232, and WAC trigger levels for total uranium. For FRL Phase II, target levels are the FRLs of all gamma discernable radiological ASCOCs including the WAC trigger level for total uranium.

Decision Rules

Following FRL Phase I, any Phase I NaI scanned areas exhibiting patterns of high gross gamma activity will be measured with the HPGe. Also, any Phase I HPGe measurements greater than 3x FRL will be scanned with the HPGe for hot spot evaluation per section 3.3 of the Real-Time User's Manual.

Following FRL Phase II, if HPGe results indicate an area could fail FRLs, the soil may be evaluated further with additional HPGe measurements or physical samples, or undergo remedial excavations. If remedial excavations are performed, the excavated area will be measured with post-excavation HPGe measurements to ensure removal of the contamination. Once the remediation is complete, FRL attainment is confirmed by the HPGe.

6.0 Establish Constraints on the Uncertainty of the Decision

Range of Parameter Limits

The range of surface soil concentrations anticipated will be from background (natural concentrations) to greater than 3X FRL.

Types of Decision Errors and Consequences

Decision Error 1: This decision error occurs when the decision maker decides an area meets FRLs when the average soil concentration in an area is above the FRL, or the soil contains ASCOC concentrations above the hot spot criteria (3x FRL for hot spots ≤ 10 m^2, or 2x FRL for hot spots > 10 m^2). This decision error would lead to the area failing certification for average radiological COC concentrations above the FRL or for hot spot criteria. If an area fails certification sampling and analytical testing, remobilization and further excavation, precertification, and certification sampling would be necessary.

Decision Error 2: This decision error occurs when the decision maker decides that additional HPGe and/or physical samples are necessary based on FRL Phase II results; or the decision maker directs the excavation (or additional excavation) of soils, when they actually have average radiological COC concentrations below the FRLs and no ASCOC hot spots (3x FRL for hot spots ≤ 10 m^2, or 2x FRL for hot spots > 10 m^2). This would result in added sampling and analytical costs and/or added costs due to the excavation of clean soils and an increased volume in the OSDF. This is not as severe as Decision Error 1. The addition of clean soil to the

OSDF would result in further reduction, although minimally, to human health risk in the remediated areas.

True State of Nature for the Decision Errors

The true state of nature for Decision Error 1 is that the actual concentrations of radiological ASCOCs are greater than their FRLs and/or the hot spot criteria. The true state of nature for Decision Error 2 is that the true concentrations of COCs are below their FRLs and/or hot spot criteria. Decision Error 1 would be the more severe error.

7.0 Optimize a Design for Obtaining Quality Data

As discussed in Section 3.3.3 of the SEP, FRL scanning consists of two separate activities. Refer to Section 1.0 of this DQO for a general overview of FRL Phase I and FRL Phase II activities.

Real-time measurements are generated by two methods: 1) the mobile sodium iodide (NaI) detection systems which provide semi-quantitative radiological data, and 2) the stationary high purity germanium (HPGe) system that provides quantitative measurements of radiological COCs. If necessary, physical samples may also be collected for HPGe data verification, and to precertify for non-gamma resolvable ASCOCs.

Surface moisture readings are obtained in conjunction with Phase I and Phase II the NaI and HPGe system measurements using the Troxler nuclear moisture and density gauge or the Zeltex moisture meter. If conditions do not permit the use of the moisture meters, a soil moisture sample may be collected and submitted to the on-site laboratory for percent moisture analysis, or a default moisture value of 20% may be used. The soil moisture data will be used as is discussed in Sections 3.8, 4.11 and 5.2 of the Real-Time User's Manual. The gamma data will be corrected to a dry weight equivalent.

Background radon monitoring will also occur in conjunction with Phase I and Phase II NaI and HPGe system measurements, as specified in the PSP. Refer to the Section 5.3 of the Real-Time User's Manual for a discussion on radium-226 corrections.

Sodium Iodide (NaI) System

The mobile NaI detector systems are collectively called the Radiation Measurement Systems (RMS). They are used to achieve as close to complete coverage of the area as possible, taking into consideration the topographic and vegetative constraints which limit access. The NaI systems currently are used to obtain measurements over an area specified in a PSP to detect radiological total activity patterns and elevated radiological activity. The NaI detector systems are used at a 31 cm detector height at 1 mph for a 4 second acquisition with a 0.4 meter overlap, and are consistent with the Real-time User's Manual. If the total uranium FRL is 20 ppm or lower, the NaI systems should not be used for FRL attainment, the HPGe system should be used.

The mobile NaI systems are electronically coupled with a global positioning system (GPS) rover and base unit to record each measurement location. Counting and positioning information is recorded continuously on a field personal computer (PC) and stored on disk or hard drive for future downloading on the site soil database and Graphical Information System (GIS) system, or transferred directly to the Local Area Network (LAN) by Ethernet.

Information from the NaI/GPS system is recorded on the PC and transferred to the Unix system through the local area network on a regular (at least daily) basis. The information is plotted on the FEMP GIS system, or in the field using Surfer software. With the output, patterns of elevated total activity, and locations of elevated concentrations can be identified.

Data reduction is an important aspect of NaI system data use. Individual total uranium, radium-226 and thorium-232 concentrations will undergo two-point averaging. The two-point averaged values will be mapped and evaluated with respect to 3x FRL.

NaI measurements may be used for design, excavation during remediation, and precertification decision making if the measurements clearly indicate below FRL criteria have been met. They may also be used to determine the location and number of FRL Phase II HPGe measurements, if required.

In-Situ HPGe Detectors

The HPGe detector is used during FRL Phase I or FRL Phase II, as follows:

- During FRL Phase I, the HPGe is used in areas where topographic or vegetative constraints prevent mobile NaI detector access or if the NaI systems are out of service. The HPGe is used in a 99.1% coverage grid over the accessible area. Detector height is 1 meter with a count time of 15 minutes.

- During FRL Phase II, the HPGe detector is used at strategic locations established thorough the FRL Phase I screening. These locations are where the highest readings of gross gamma activity were identified and/or where individual ASCOC concentrations were identified as hot spots. The HPGe is used to identify radiological COC levels, which in turn provide information concerning the ability to pass FRLs. The number of Phase II HPGe measurements to delineate the hot spot boundary varies based on the size of extent of contamination. If the area potentially exceeding the 2x FRL or 3x FRL exhibits a visible contamination boundary, the Project may determine that Phase II measurements may not need to be collected.

Physical Soil Sampling

Physical samples may be collected and analyzed for target radiological COCs to verify the HPGe measurements and/or to precertify for non-gamma discernable ASCOCs. If physical samples are required, they will be collected in compliance with the applicable sampling DQO. Criteria for obtaining physical samples, such as sample density, will be specified in the PSP, if necessary. The minimum data quality acceptable for this purpose will be identified in the applicable sampling DQO. Field QC, ASL and Validation requirements will be consistent with the SCQ and SEP requirements.

Data Quality Objectives
Real Time FRL Measurements

1A. Task/Description: FRL real-time measurements.
1B. Project Phase: (Put an X in the appropriate selection.)

RI ☐ FS ☐ RD ☐ RA ☒ R$_v$A ☐ OTHER ☐

1.C. DQO No.: SL-056, Rev. 0 DQO Reference No.: Current Sampling DQO

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2. Media Characterization: (Put an X in the appropriate selection.)

Air ☐ Biological ☐ Groundwater ☐ Sediment ☒ Soil ☒

Waste ☐ Wastewater ☐ Surface water ☐ Other (specify) __________

---

3. Data Use with Analytical Support Level (A-E): (Put an X in the appropriate Analytical Support Level selection(s) beside each applicable Data Use.)

Site Characterization
A ☒ B ☒ C ☐ D ☐ E ☐

Risk Assessment
A ☐ B ☐ C ☐ D ☐ E ☐

Evaluation of Alternatives
A ☐ B ☐ C ☐ D ☐ E ☐

Engineering Design
A ☒ B ☒ C ☐ D ☐ E ☐

Monitoring during remediation activities
A ☒ B ☒ C ☐ D ☐ E ☐

Other: Precertfication
A ☒ B ☒ C ☐ D ☐ E ☐

4.A. Drivers: Applicable or Relevant and Appropriate Requirements (ARARs), Operable Unit 5 Record of Decision (ROD), the Real-Time User's Manual, the Sitewide Excavation Plan and the Project-Specific Plan (PSP).

4.B. Objective: To determine if the area of interest is likely to pass FRLs for all HPGe discernable radiological COCs

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5. Site Information (Description): The OU2 and OU5 RODs have identified areas at the FEMP that require remediation activities. The RODs specify that the soils in these areas will be clean and demonstrated to be below the FRLs.

6.A. Data Types with appropriate Analytical Support Level Equipment Selection and SCQ Reference: (Place an "X" to the right of the appropriate box or boxes selecting the type of analysis or analyses required. Then select the type of equipment to perform the analysis if appropriate. Please include a reference to the SCQ Section.)

1.	pH	☐	2.	Uranium	☒*	3. BTX	☐
	Temperature	☐		Full Rad.	☒*	TPH	☐
	Spec.Conductance	☐		Metals	☐	Oil/Grease	☐
	Dissolved Oxygen	☐		Cyanide	☐		
	Technetium-99	☐		Silica	☐		
4.	Cations	☐	5.	VOA	☐	6. Other (specify)	
	Anions	☐		ABN	☐	Percent Moisture	
	TOC	☐		Pesticides	☐		
	TCLP	☐		PCB	☐		
	CEC	☐					
	COD	☐					

* If specified in the PSP for NaI and HPGe detectable rad's.

6.B. Equipment Selection and SCQ Reference:

Equipment Selection	Refer to SCQ Section
ASL A Mobile NaI, HPGe and HPGe*	SCQ Section: Not Applicable
ASL B HPGe*	SCQ Section: App. G , Table 1
ASL C ______	SCQ Section: ______
ASL D ______	SCQ Section: ______
ASL E ______	SCQ Section: ______

* Choosing the ASL level for Phase II FRL HPGe measurements is at the discretion of the project considering the project need for validated data.

7.A. Sampling Methods: (Put an X in the appropriate selection.)

Biased [X] Composite [ ] Environmental [ ] Grab [X] Grid [X]

Intrusive [ ] Non-Intrusive [X] Phased [ ] Source [ ]

7.B. Sample Work Plan Reference: The DQO is being established prior to completion of the Project-Specific Plans.
Background samples: OU5 RI/FS

7.C. Sample Collection Reference:
-EQT-22, *Characterization of Gamma Sensitive Detectors*
-EQT-23, *Operation of High Purity Germanium Detectors*
-EQT-32, *Troxler 3440 Series Surface Moisture Gauge*
-EQT-33, *Real Time Differential Global Positioning System*
-EQT-39, *Zeltex Infrared Moisture Meter*
-EQT-40, *Satloc Real-time Differential Global Positioning System*
-EQT-41, *Radiation Measurement Systems*
-ADM-16, *In-Situ Gamma Spectrometry Quality Control*
-User Guidelines, Measurement Strategies, and Operational Factors for Deployment of In-Situ Gamma Spectrometry at the Fernald Site, 20701-RP-0006

---

8. Quality Control Samples: (Place an "X" in the appropriate selection box.)

8.A. Field Quality Control Samples:

Trip Blanks	[ ]	Container Blanks	[ ]
Field Blanks	[ ]	Duplicate Samples	[X]*
Equipment Rinsate Samples	[ ]	Split Samples	[ ]
Preservative Blanks	[ ]	PE Samples	[ ]

Other (specify) Radon Monitoring, moisture *
* If specified in the PSP.

8.B. Laboratory Quality Control Samples:

Method Blank	[ ]	Matrix Duplicate/Replicate	[ ]
Matrix Spike	[ ]	Surrogate Spikes	[ ]

Other (specify) ____________________

---

9. Other: Please provide any other germane information that may impact the data quality or gathering of this particular objective, task or data use.

APPENDIX B

DOE LETTER DOE-0172-02 AND SUMMARY FOR MONITORING AND SAMPLING REQUIREMENTS FOR INCINERATOR PAD AND MAINTENANCE BUILDING AREA

Department of Energy

Ohio Field Office
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155

DEC 10 2001

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0172-02

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

ORGANICALLY CONTAMINATED SOIL EXCAVATION CONTROL

Reference: Letter, J. Reising to J. Saric and T. Schneider, "Request for Concurrence to Initiate Soil Stockpiles," dated November 21, 2001

This letter is to request your approval for the excavation control and characterization process that will be performed for two special excavations in Area 3A due to organic contaminations, one behind the Maintenance Building (Building 12) and the other at the former Incinerator Pad (10D) as described in the Area 3A/4A Integrated Remedial Design Package. The Project Specific Plan (PSP) for Area 3A/4A Excavation Characterization and Precertification, which covers the entire Area 3A/4A excavation, has not yet been approved by either the United States Environmental Protection Agency (USEPA) or the Ohio Environmental Protection Agency (OEPA). Therefore, this letter directly addresses only these areas that require excavation prior to the Calendar Year (CY) 2002 construction season. The excavation of these two areas must be completed prior to the start of the coming construction season in an effort to prepare the general area for full-scale excavation. Excavation is scheduled to start as soon as your approval of this process is received.

Area 3A has several zones of organically contaminated soil that are "Above On-Site Disposal Facility (OSDF) Waste Acceptance Criteria (WAC)" or "Toxicity Characteristic Leaching Procedure (TCLP) Characteristic" under Resource Conservation Recovery Act (RCRA). Excavation of these zones and segregation of excavated materials will need to be controlled for both the area-specific organic constituents of concern and for the will be utilized to identify the presence of elevated organic material. For any area exhibiting results greater than this action level, an additional biased sample will be collected for analysis by the portable GC.

As mentioned earlier, at any location within the "Above OSDF WAC" zone where the GC results indicate an "Above OSDF WAC" condition, the excavation will proceed in the direction of the contamination. After excavation, re-sampling will occur at a frequency of one sample every 10 feet with a minimum of two samples taken per sidewall or floor for analysis by GC. The PID measurements will also be taken as indicated above. At any location within the "TCLP Characteristic" zone where GC results indicate levels above twenty (20) times the TCLP limit for the area-specific constituent of concern the excavation will proceed in the direction of the contamination. After excavation, re-sampling will occur at a frequency of one sample every 10 feet with a minimum of two samples taken per sidewall or floor for analysis by GC. PID measurements will also be taken as indicated above.

In the case of the incinerator pad area where there is more than one "Above OSDF WAC" zone in a vertical column, the intervening material between the two zones will also be excavated by lifts and scanned for potential above-WAC conditions (see Figure 2). Characterization will be accomplished by establishing the 20-foot by 20-foot grid system on the floor of each excavation lift and collecting a sample for analysis by the portable GC at the center of each grid block. If there is noticeable discoloration of the soil, the physical sample will be biased to the discolored soil. Again, if any single dimension is less than 40 feet in length, two samples will be collected at representative spacing. This will ensure a minimum of four (4) samples collected on the floor of the excavation lift. The PID measurements will be taken on the floor of the excavation lift as well as the side slopes. These PID measurements will be conducted in the same manner as described above. When analytical results are obtained from the portable GC, they will be evaluated for "Above OSDF WAC" conditions. Any result that is above OSDF WAC will trigger excavation process of remaining soil according to Figure 1.

The VOCs of concern for the two identified organic zones in Area 3A are cis (c) and trans (t) 1,2-Dichloroethene (DCE), Trichloroethene (TCE), and Tetrachloroethene (PCE). Table 1 describes the Method Detection Limit (MDL) for the portable GC and the corresponding OSDF WAC level and 20-time TCLP Limit for each of the organic compounds. TCE is the constituent of concern at the maintenance building area for both OSDF WAC and TCLP. The other three VOCs are constituents of concern at the incineration pad area for OSDF WAC.

DEC 10 2001

Mr. James A. Saric -5- DOE-0172-02
Mr. Tom Schneider

cc w/enclosure:
R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
R. J. Janke, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Hodge, Tetra Tech
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J. Reising, OH/FEMP
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R. Abitz, Fluor Fernald, Inc./MS64
D. Carr, Fluor Fernald, Inc./MSMS2
J. D. Chiou, Fluor Fernald, Inc./MSMS64
T. Hagen, Fluor Fernald, Inc./MS65-2
S. Hinnefeld, Fluor Fernald, Inc./MS52-2
S. Lorenz, Fluor Fernald, Inc./MS52-5
F. Miller, Fluor Fernald, Inc./MS64
C. Neumann, Fluor Fernald, Inc./MS64
T. Walsh, Fluor Fernald, Inc./MS46
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ECDC, Fluor Fernald, Inc./MS52-7

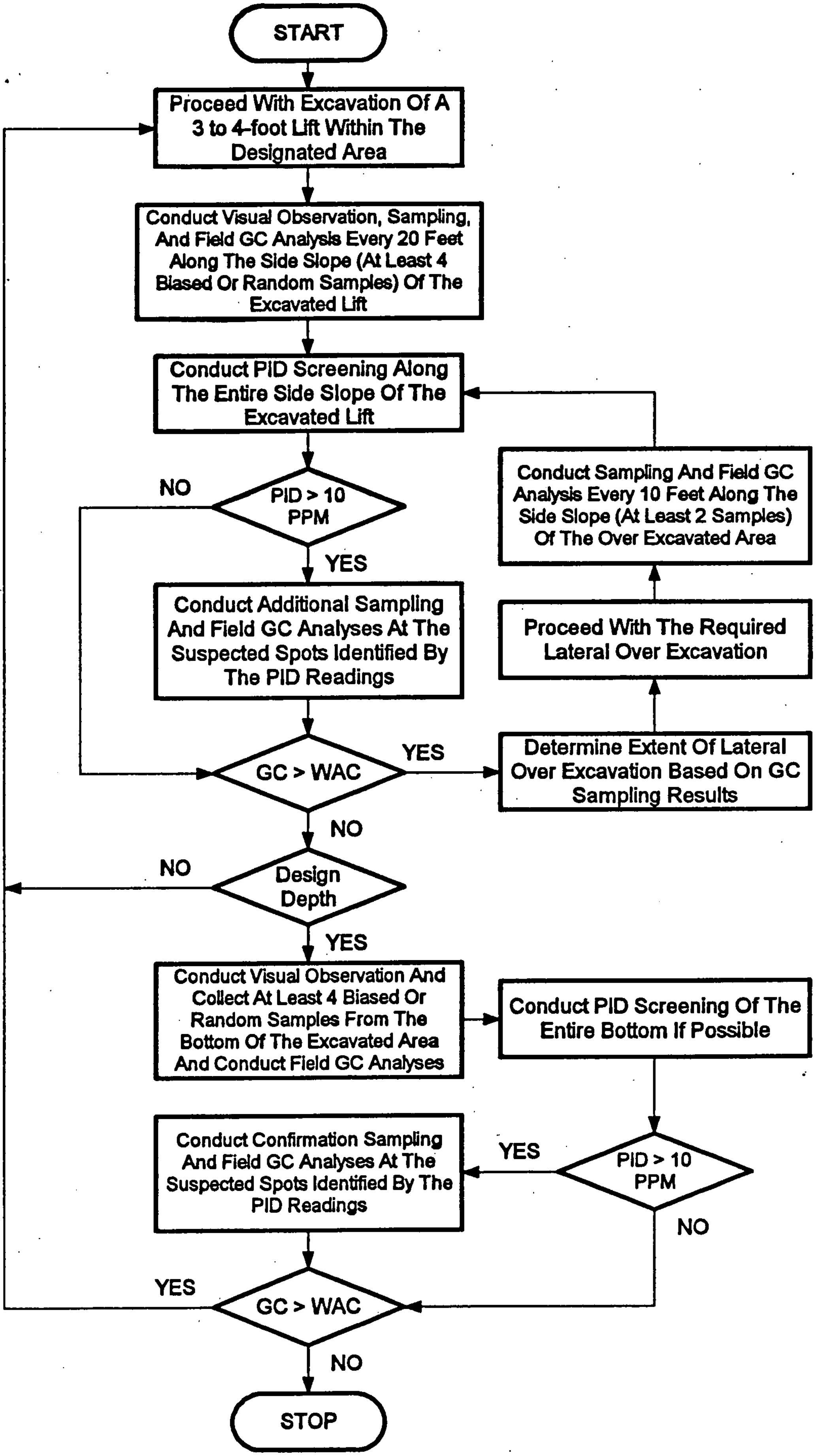

FIGURE 1 - ORGANIC ABOVE WAC SOIL EXCAVATION CONTROL PROCESS

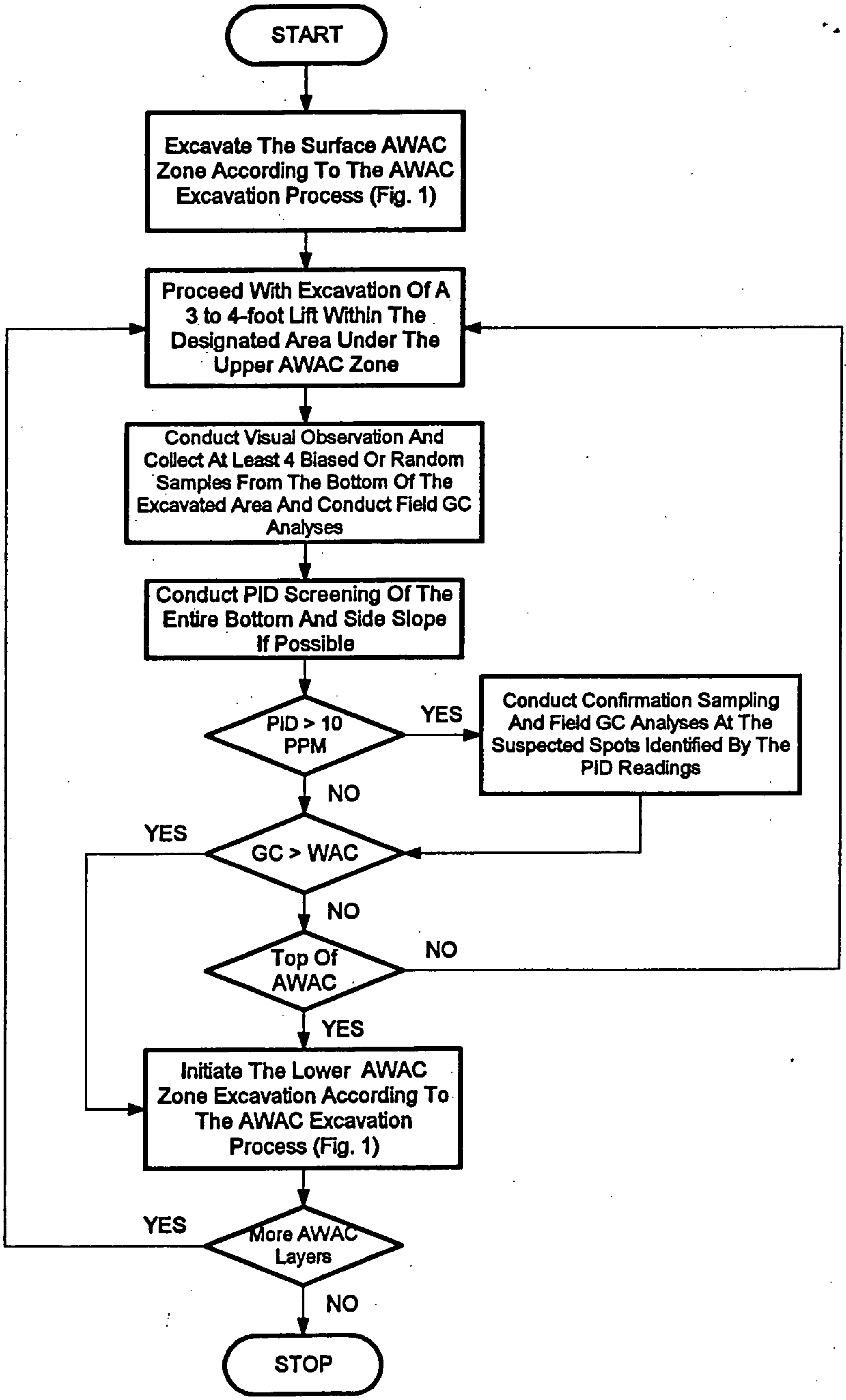

FIGURE 2 - MULTIPLE-LAYER ORGANIC ABOVE WAC SOIL EXCAVATION CONTROL PROCESS

Incinerator Pad and Maintenance Building Area

A. Organic constituents – Above OSDF WAC and TCLP Characteristic zones:

1. After each 3 foot excavation lift:

   a. perform a walkover survey of the side slope using the PID

      - as best as achievable, the entire surface will be scanned
      - scan with PID at a height of 3 inches or less above the surface of soil
      - action level of 10 ppm above background
      - if above this action level, collect a sample from the area for portable GC analysis

   b. collect a sample for portable GC analysis at frequency of one sample every 20 linear feet along perimeter of excavation lift (minimum of one sample per sideslope (at least 4 samples per lift)

      - prior to collecting sample, take PID measurement at location where physical sample will be collected, record this reading (measurement may be used in the future for data comparison purposes)
      - visually inspect the side slopes for discoloration and, if noted, collect sample from the discolored area

   c. in above OSDF WAC areas, if Above OSDF WAC conditions are identified by the portable GC:

      - expand excavation laterally in the direction of the contamination
      - re-sample at frequency of 1 sample every 10 feet (minimum of 2 samples per side slope for analysis with portable GC
      - PID measurements for excavated area are required as described above
      - excavation of lift is complete when all Above OSDF WAC materials have been removed

   d. in TCLP Characteristic areas, if 20 times the TCLP limit for the ASCOC is identified by the portable GC:

      - expand excavation laterally in the direction of the contamination
      - re-sample at frequency of 1 sample every 10 feet (minimum of 2 samples per side slope for analysis with portable GC
      - PID measurements for excavated area are required as described above
      - excavation of lift = complete when all TCLP Characteristic materials above 20 times the TCLP limit for the ASCOC have been removed

2. At design depth:

   a. perform a walkover survey of the newly exposed side slopes and floor using the PID

      - as best as achievable, the entire surface will be scanned
      - scan with PID at a height of 3 inches or less above the surface of soil

- action level of 10 ppm above background
- if above this action level, collect a sample from the area for portable GC analysis

b. characterize the excavation floor and newly exposed side slopes with portable GC

- lay out a systematic grid (20 feet by 20 feet blocks) over the floor
    - land survey methods or manual field measurement methods
    - mark intersection points of each block
    - collect sample from center of grid block unless discoloration is seen
    - if discoloration is seen, collect sample for grid block from the discolored area
    - prior to collecting sample, take PID measurement at location where physical sample will be collected, record this reading (measurement may be used in the future for data comparison purposes)
    - if floor is less than 40 feet in any direction, collect 2 samples at representative spacing (minimum of 4 samples will be collected from the floor)

- newly exposed side slopes will be sampled every 20 linear feet (minimum of 1 sample per side slope, 4 samples minimum)
    - if discoloration is seen, collect sample from the discolored area
    - prior to collecting sample, take PID measurement at location where physical sample will be collected, record this reading (measurement may be used in the future for data comparison purposes)

- analyze sample with portable GC for the area-specific VOC of concern

- if above OSDF WAC conditions are identified by the portable GC:
    - expand excavation in the direction of the contamination
    - re-sample at frequency of 1 sample every 10 feet (minimum of 2 samples per side slope or floor for analysis with portable GC
    - PID measurements for excavated area are required as described above
    - excavation of lift is complete when all Above OSDF WAC materials have been removed

- in TCLP Characteristic areas, if 20 times the TCLP limit for the ASCOC is identified by the portable GC:
    - expand excavation laterally in the direction of the contamination
    - re-sample at frequency of 1 sample every 10 feet (minimum of 2 samples per side slope or floor for analysis with portable GC
    - PID measurements for excavated area are required as described above
    - excavation of lift = complete when all TCLP Characteristic materials above 20 times the TCLP limit for the ASCOC have been removed

3. For intervening material between 2 above OSDF WAC zones in a vertical column (Incinerator Pad):

   a. excavate by lift

   b. perform a walkover survey of the side slopes and floor using the PID

      - as best as achievable, the entire surface of the lift will be scanned
      - scan with PID at a height of 3 inches or less above the surface of soil
      - action level of 10 ppm above background
      - if above this action level, collect a sample from the area for portable GC analysis

   c. characterize the excavation floor and newly exposed side slopes with portable GC

      - lay out a systematic grid (20 feet by 20 feet blocks) over the floor
         - land survey methods or manual field measurement methods
         - mark intersection points of each block
         - collect sample from center of grid block unless discoloration is seen
         - if discoloration is seen, collect sample for grid block from the discolored area
         - prior to collecting sample, take PID measurement at location where physical sample will be collected, record this reading (measurement may be used in the future for data comparison purposes)
         - if floor is less than 40 feet in any direction, collect 2 samples at representative spacing (minimum of 4 samples will be collected from the floor)

      - newly exposed side slopes will be sampled every 20 linear feet (minimum of 1 sample per side slope, 4 samples minimum)
         - if discoloration is seen, collect sample from the discolored area
         - prior to collecting sample, take PID measurement at location where physical sample will be collected, record this reading (measurement may be used in the future for data comparison purposes)

   c. analyze sample with portable GC for the area-specific VOC of concern

   d. if above OSDF WAC conditions are identified by the portable GC:

      - expand excavation in the direction of the contamination
      - re-sample at frequency of 1 sample every 10 feet (minimum of 2 samples for analysis with portable GC
      - PID measurements for excavated area are required as described above
      - excavation of lift = complete when all Above OSDF WAC materials have been removed

VOCs of Concern

COC	TCE	PCE	1,1-DCE	t-1,2-DCE	c-1,2-DCE
MDL (mg/kg)	0.09	0.09	0.13	0.17	0.10
OSDF WAC (mg/kg)	128*	128**	11.4 (*Total*)**		
20 x TCLP Limit (mg/kg)	10*	NA	NA		

* applicable to the Maintenance Building
** applicable to the Incinerator Pad

B. For Tc-99 contamination areas Above OSDF WAC (Incinerator Pad):

1. excavate by lift

2. scan for above-WAC Tc-99 conditions:

    - lay out a systematic grid (20 feet by 20 feet blocks) over the floor
        - land survey methods or manual field measurement methods
        - mark intersection points of each block

3. collect samples from floor and sideslopes:

    - from center of grid block on floor
    - if floor is less than 40 feet in any direction, collect 2 samples at representative spacing (minimum of 4 samples will be collected from the floor)
    - side slopes will be sampled every 20 linear feet (minimum of 1 sample per side slope)
    - minimum of 8 physical samples

4. send samples to on-site laboratory for analysis

5. if above OSDF WAC conditions are identified by the on-site lab analysis:

    - expand excavation in the direction of the contamination
    - re-sample at frequency of 1 sample every 10 feet (minimum of 2 samples)
    - excavation of lift = complete when all Above OSDF WAC materials have been removed

C. Radiological scanning for OSDF WAC attainment purposes in organically contaminated areas (Incinerator Pad and Maintenance Building) prior to EPA and OEPA approval of EMS for field applications:

- use the NaI systems (RSS and GATOR) and/or the HPGe tripod systems in accordance with the standard radiological scanning procedures whereby ensuring that the geometry and configuration of the scanned area are acceptable for the specific instruments