

**COMPREHENSIVE LEGACY MANAGEMENT AND
INSTITUTIONAL CONTROLS PLAN**

VOLUME 2

**FERNALD CLOSURE PROJECT
FERNALD, OHIO**

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LIST OF ACRONYMS

AWWT	Advanced Waste Water Treatment
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CFR	Code of federal regulations
DOE	Department of Energy
DOE-GJO	Department of Energy, Grand Junction Office
EPA	United States Environmental Protection Agency
FCP	Fernald Closure Project
G/LD&LMP	Groundwater/Leak Detection and Leachate Monitoring Plan
GMA	Great Miami Aquifer
GMR	Great Miami River
IC(s)	institutional control(s)
LCS	leachate collection system
LDS	leak detection system
LM	Legacy Management
NARA	National Records Archive
NPDES	National Pollutant Discharge Elimination System
NRRP	Natural Resource Restoration Plan
OSDF	On-Site Disposal Facility
OU	operable unit
PCCIP	Post Closure Care and Inspection Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
ROD	record of decision
WAC	waste acceptance criteria

1.0 INTRODUCTION

The Fernald Closure Project (FCP) is situated on a 1,050-acre tract of land, approximately 18 miles northwest of Cincinnati, Ohio. The FCP site is located near the unincorporated communities of Ross, Fernald, Shandon and New Haven. Land use in the area consists primarily of residential areas, farming, gravel excavation operations, light industry and parks.

The Comprehensive Environmental Response Compensation and Liability Act (CERCLA) is the primary driver for environmental remediation of the FCP. The site was divided into five operable units and a Remedial Investigation and Feasibility Study (RI/FS) was conducted for each unit. Based on the results of the RI/FS, Records of Decision (RODs) were issued outlining the selected remedy for each Operable Unit (OU).

- **Operable Unit 1, Waste Pits Area** - The remedy for OU1 includes removing all material from the waste pits, stabilizing the material by drying, and shipping it off-site for disposal.
- **Operable Unit 2, Other Waste Units** - The remedy for OU2 includes removing material from the various units, disposing of material that meets the on-site waste acceptance criteria (WAC) in the On-site Disposal Facility (OSDF), and shipping all other material off-site for disposal. WAC were developed by DOE and regulators to strictly control the type of waste disposed on site.
- **Operable Unit 3, Production Area** - The OU3 remedy includes decontaminating and decommissioning all contaminated structures and buildings, recycling waste materials if possible, disposing of material that meets the on-site WAC in the OSDF, and shipping all other material off-site for disposal.
- **Operable Unit 4, Silos 1 – 4** - The OU4 remedy includes removal and treatment of all material from the silos and shipping it off-site for disposal.
- **Operable Unit 5, Environmental Media** - OU5 includes all environmental media, including soil, surface water, groundwater and vegetation. The *Sitewide Excavation Plan* (SEP) (DOE 1998) describes the remediation of soils. The OU5 ROD (DOE 1996) describes the approved remediation method of pump-and-treat for groundwater.

Ecological restoration follows remediation and is the final step to completing cleanup of the site. Ecological restoration is being implemented in order to achieve settlement a 1986 State of Ohio Claim against DOE for injuries to natural resources at Fernald under CERCLA. Restoration activities at the site are also being implemented to address wetland mitigation requirements under the Clean Water Act and to stabilize and revegetate areas impacted during remediation. The approach to ecological restoration of the FCP is outlined in the *Natural Resource Restoration Plan* (NRRP) (DOE 2002).

The anticipated closure of the Fernald Closure Project is June 2006. At that time, the OSDF, located on the eastern side of the FCP will be complete. The OSDF will consist of 8 disposal cells and will cover an area of approximately 123 acres, including the surrounding buffer area. Approximately 904 acres of the FCP property will be ecologically restored, having been graded following excavations, amended, and seeded/planted or otherwise enhanced to create ecosystems comparable to native pre-settlement southwestern Ohio. A few facilities may remain on site following remediation. These include the Advanced Wastewater Treatment (AWWT) facility and supporting infrastructure (i.e., Bio-Surge Lagoon, Storm Water Retention Basins, pipelines, etc.), the silos waste treatment facility, a power station and a few office trailers.

1.1 Purpose and Organization of this Institutional Controls Plan

This *Institutional Controls Plan* (ICP) outlines the institutional controls (ICs) that will be established and enforced during the post-closure or Legacy Management (LM) period at the Fernald Closure Project (FCP). This ICP will document the Department of Energy's approach to maintaining ICs as required by United States Environmental Protection Agency (EPA) guidance. The ICs outlined in this Plan are designed to ensure the continued protection of human health and the environment following closure of the site. This Plan will be updated as the site moves towards Closure and more detail regarding implementation of the ICP is identified.

This ICP is Volume II of a two-volume document, the *Comprehensive Legacy Management and Institutional Controls Plan*. The *Legacy Management Plan* (formerly the *Comprehensive Long-Term Stewardship Plan*) is Volume I of the document. The LM volume describes the policies that pertain to legacy management, and what is required at the FCP for legacy management purposes. The ICP volume of the document serves as the "umbrella" document providing the overview and approach to implementing ICs at the FCP. The detailed, subject specific documents attached to this Plan provide further detail and more subject specific information regarding ICs and other post-closure activities. These documents include the *Post Closure Care and Inspection Plan, On-site Disposal Facility* (PCCIP) (DOE 1997a, Attachment A); *Groundwater/Leak Detection and Leachate Monitoring Plan* (G/LD&LMP) (DOE 1997b, Attachment B); and the *Operations and Maintenance Master Plan for the Aquifer Restoration and Wastewater Project* (OMMP) (DOE 1999, Attachment C).

The ICs outlined in this Plan are organized into the following categories:

Controls on Disturbance and Use of the FCP (Section 2.0) – describes ICs that will apply to both the FCP Site and the on-site disposal facility (OSDF) that are designed to limit access and land use. This category of controls will focus on ensuring the FCP remains in a configuration consistent with the designated land use and that unauthorized uses of the FCP do not occur.

Controls to Prevent Human and Environmental Exposure to Residual Contaminants (Section 3.0) – Describes the controls (i.e., monitoring and sampling) used to ensure continued protection of human health and the environment. This category of controls will focus on maintaining engineered systems and infrastructure that are designed to protect human health and the environment.

Information Management for FCP Institutional Controls (Section 4.0) – Describes management of and access to FCP Site and OSDF inspection records and data. This section will include a discussion on public access to information and requirements for reporting to the agencies.

1.2 What are Institutional Controls?

The EPA, in draft guidance documents, has defined institutional controls as administrative and/or legal controls (i.e., non-engineered) that help to minimize the potential for human exposure to contamination and/or protect the integrity of a remedy. ICs work by limiting land or resource use by providing information to modify or guide human behavior at the site.

The Department of Energy (DOE), also in draft guidance documents, has defined institutional controls as mechanisms designed to appropriately limit access to or uses of land and facilities, to protect cultural and natural resources, to maintain physical security of DOE facilities, and to prevent or limit inadvertent human and environmental exposure to residual contaminants. Institutional controls include methods to preserve knowledge and to inform current and future generations of hazards and risks.

Although the DOE and EPA definitions differ slightly, (DOE includes physical controls, such as fences and gates, as institutional controls) they both focus on the same goal, to protect human health and the environment from residual hazards.

1.3 Why Institutional Controls Are Necessary

Institutional controls are important to help minimize the potential for exposure to and release of residual contaminants, ensuring the protection of human health and the environment. Institutional controls are also important in helping to protect engineered remedies by providing a means to ensure the remedy remains successful, is not showing signs of failure, or is not being vandalized or damaged by outside elements (natural or human) in any way. Institutional controls are a necessary part of the approach to site remediation that rely on both engineered and non-engineered remedies.

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1.4 Agency Requirements for Institutional Controls

The development of the ICP is required by the Operable Unit (OU) 5 Record of Decision (ROD). The intent of the ICP is to describe the physical controls on access as well as the administrative and other ICs that will be implemented at the FCP.

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infrastructure will have fences constructed around it to prevent unauthorized access. Controls will also include enforcing the land use restrictions, maintaining fences and other infrastructure (as needed), and replacing or updating signs on a regular basis to ensure the security of the site.

2.1.3.3 Routine Inspection of Property

Inspection of site property and infrastructure will be conducted on a quarterly basis. Inspections will include such things as fences, signs/postings, and the condition of perimeter areas, roadways, pathways, and access points.

2.2 OSDF

The primary institutional controls for the disturbance and use of the OSDF include limiting access to the OSDF and preventing unauthorized use of the OSDF and its associated buffer area. Engineered barriers, such as fencing, gates and locks are also key institutional controls. The Institutional Controls are summarized in Table 2-2. Primary and secondary points of contact will be established to ensure authorized and emergency access, and open communication.

2.2.1 Proprietary Controls and Points of Contact

"Proprietary" controls are those controls that originate from the responsibilities associated with the ownership of property. The federal government will maintain property ownership, as stated in the OU2 ROD. Primary and secondary points of contact will be established to ensure authorized and emergency access, and open communication. Points of contact will also be listed and updated in the Legacy Management Plan, Volume I of this document.

2.2.2 Governmental Controls

As stated in the OU2 and OU5 RODs, the federal government will maintain property ownership of the area comprising the OSDF and associated buffer areas. It is expected that DOE will maintain the responsibility to manage and maintain the OSDF. Any subcontract support required to implement specific aspects of maintenance and monitoring will be made aware of all restrictions on use and disturbance of the OSDF.

2.2.3 Engineered Barriers and Informational Devices

Physical barriers to access to the OSDF and its surrounding buffer area will include exclusion fencing, gates and locks, which will be maintained to restrict access to the area. Signs and postings will include information on restrictions, access information, contact information, and emergency information.

TABLE 2-1
 CONTROLS ON DISTURBANCE AND USE OF THE FCP SITE

ACTION	FREQUENCY	SCOPE
Establish point of contact	Initially and when updates are needed	Provide primary and backup points of contact for emergencies. Points of contact will be updated in the Legacy Management Plan as needed.
Ownership	NA	Federal government will maintain ownership of site property.
Deed restrictions	Annual verification	If oversight of portions of the FCP property (outside of the disposal facility area) is transferred at any time, all zoning and deed restrictions will be communicated to the appropriate parties, and proper notifications will be provided as required.
Access controls	Quarterly	In order to maintain the integrity of the site, access may need to be limited or restricted in some areas. Signs indicating restricted access will require monitoring and maintenance to ensure their legibility and integrity.
Routine Site Inspections	Quarterly	Inspections will be conducted to ensure infrastructure, signs/posting, fences/gates, perimeter areas, and access points are in a secure and safe configuration.

TABLE 2-2
 CONTROLS ON DISTURBANCE AND USE OF THE OSDF

ACTION	REFERENCE	REQUIREMENT	FREQUENCY	SCOPE
Establish points of contact	PCCIP p.4-2	OAC 3745-27-11(B)(3) OAC 3745-66-18(c)(3) OAC 3745-68-10 40 CFR Sec. 258.61(c)(2) 40 CFR Sec. 265.118(c)(3) 40 CFR Sec. 264.118(b)(3)	Initially and when updates are needed	Provide primary and backup points of contact to ensure authorized and emergency access. Points of contact are provided in Table 4-2 of the PCCIP. Updates will be provided as needed.
Ownership	PCCIP p.4-1	OU2 ROD OU5 ROD	NA	The federal government will maintain property ownership of the area comprising the OSDF and associated buffer areas.
Deed restrictions	PCCIP p.4-1	OU2 ROD OU5 ROD	NA	Verify on an annual basis deed restrictions are still in place. Restrictions will be provided in the deed, and proper notifications will be provided as required.
Informational devices	PCCIP p.4-3	OU2 ROD	NA	Signs and postings will include information on restrictions, access information, contact information, and emergency information.
Engineered barriers	PCCIP p.4-3	OU2 ROD	NA	Access to the OSDF will be physically restricted by means of fences, gates and locks.

3.0 CONTROLS TO PREVENT HUMAN AND ENVIRONMENTAL EXPOSURE TO RESIDUAL CONTAMINANTS

3.1 FCP Site

Institutional controls will be established for the FCP site to ensure the prevention of human and environmental exposure to residual contaminants. These include monitoring and sampling to ensure continued protection from exposure, and maintaining engineered systems and infrastructure designed to protect human health and the environment. Further details on these controls are discussed below and included in Table 3-1.

3.1.1 FCP Site Inspections

FCP site inspections will be conducted on a quarterly basis to ensure there are no activities being conducted on site that would pose a threat to human health or the environment. Activities such as digging, off-road vehicle travel (e.g., motorcycles, all-terrain vehicles), fishing and hunting, as well as others, will be prohibited on site. A list of prohibited activities will be posted at multiple locations on site. Inspections will also ensure that infrastructure designed and in place for the protection against human exposure to contaminants, such as fences and signs, are in good condition and functioning as intended. More frequent inspections may be required under certain circumstances (a pattern of unauthorized activities or uses). If warranted, more frequent inspections will be carried out to ensure site restrictions are being maintained.

3.1.2 Surface Water Discharge

Until the groundwater remedy is complete, a National Pollutant Discharge Elimination System (NPDES) permit or similar permit mechanism will need to be in place for surface water discharge to the GMR. Monitoring and reporting to maintain compliance with the permit requirements will be part of post-closure responsibilities at the FCP. Completion of the groundwater remedy will include the close out of the permit for surface water discharge.

3.1.3 Groundwater

Aquifer restoration operations and maintenance activities are part of an on-going remedial action governed by the OU5 ROD. The requirements for the operations and maintenance activities are outlined in the OMMP (Attachment C). The OMMP established the design logic and priorities for the major flow and water treatment decisions needed to maintain compliance with the FCP's NPDES permit and ROD based surface water discharge limits. The OMMP is designed to guide and coordinate the extraction, collection, conveyance, treatment and discharge of all groundwater, storm water, sanitary and remediation wastewater generated sitewide through the duration of the cleanup program. The plan also allows

for balanced sitewide water management. Periodic reviews and updates of the OMMP will be conducted to respond to needed changes in program emphasis or the addition of new components, as necessary.

Once the groundwater remedy had been certified as complete, the well field infrastructure will be decommissioned and disposed as necessary. Post-remedy groundwater monitoring requirements (if any) will be defined as part of the groundwater remedy certification, and incorporated into a later version of this Plan. Any additional groundwater monitoring would be carried out along with the other requirements of this Plan and evaluated as part of the CERCLA five-year reviews.

3.2 OSDF

Institutional controls will be established for the OSDF and its buffer area to ensure the prevention of human and environmental exposure to residual contaminants. Further details about these controls are discussed below and are included in Table 3-2. Additional information regarding OSDF inspection and maintenance, leak detection/leachate monitoring and leachate management are included in the PCCIP. The PCCIP addresses the inspection, monitoring and maintenance activities necessary to ensure the continued proper performance of the OSDF. Key concepts addressed include ownership; access controls and restrictions; deed and/or use restrictions; environmental monitoring; leachate management; inspections; custodial maintenance; contingency repair; corrective actions; emergency notifications and reporting; and public involvement. The PCCIP is in the process of being updated and will continue to be updated throughout the closure period as needs and requirements for the care of the OSDF change.

3.2.1 OSDF Inspection and Maintenance

Maintenance and monitoring on the cap and cover system includes semi-annual site inspections, custodial and preventative maintenance, and unscheduled inspections. Table 3-2 of this Plan provides current details on the required monitoring and maintenance.

Routine inspections include monitoring the health of the vegetative cover; the existence of burrowing animals; the extent of surface erosion or cracking; subsidence, if any; extent of any leachate seeps; integrity of run-off controls; and integrity of benchmarks. If determined necessary or appropriate, the frequency of the routine inspections may be revised through the CERCLA 5-year reviews. Routine custodial maintenance includes upkeep of vegetative cover; general mowing; clearing of debris and woody plants, and reseeded.

Unscheduled inspections will be conducted as needed if specific circumstances warrant. Examples would include follow-up on the

completion of a maintenance action or cap inspection after an unusually large storm event. Based on the results and determinations made from the inspections, appropriate actions will be taken to address any identified problems.

Maintenance and monitoring of the general support systems for the OSDF will include ensuring physical access controls and restrictions are maintained, routine inspections of the OSDF and surrounding area, routine maintenance activities, and environmental monitoring. Table 3-1 of this Plan provides additional detail on the required monitoring and maintenance.

The federal government will remain the property owner and access to the OSDF and associated buffer area will continue to be restricted in perpetuity by means of fences, gates, locks, and warning signs. Access is anticipated to be limited to personnel conducting inspections, custodial maintenance, and corrective action, and will be authorized by the federal government only.

Routine inspections will include evaluating the condition of physical access controls (fences, gates, locks, and signs); observing adjacent properties for evidence of land use changes; evaluating natural drainage courses in the immediate vicinity; and inspecting the general area for erosion, excess sediment, seepage and signs of human or animal intrusion. If determined necessary or appropriate, the frequency of the routine inspections may be revised through the CERCLA 5-year reviews.

3.2.2 Leak Detection/Leachate Monitoring

Routine OSDF leak detection and leachate monitoring is currently governed by the G/LD&LMP (Attachment B). The G/LD&LMP specifies the frequencies and parameters being monitored in four horizons for each cell of the facility. These horizons are the leachate collection system (LCS), the leak detection system (LDS), perched water in the glacial overburden, and the Great Miami Aquifer (GMA) (both up- and down- gradient of each cell). Cell-specific data from these four horizons are evaluated holistically in order to verify the integrity of the cells. To date the data from this comprehensive leak detection program indicate that the liner systems for the existing cells (Cells 1, 2, and 3) are performing within the specifications established in the OSDF design documentation. The G/LD&LMP is a "living document," that is, it will be modified over time as the OSDF matures and the individual cells are capped. These modifications will be based on the data collected prior to and just after capping. The final version of the G/LD&LMP will govern the post closure leak detection and leachate monitoring program for the OSDF and will be

**TABLE 3-1
 CONTROLS FOR FCP SITE TO PREVENT HUMAN AND ENVIRONMENTAL EXPOSURE TO RESIDUAL CONTAMINANTS**

ACTION	FREQUENCY	SCOPE
Routine FCP site inspection	Quarterly Note that the monitoring frequency may be re-evaluated through the CERCLA five year review process	<ul style="list-style-type: none"> • Inspect infrastructure in place for the protection against human exposure to contaminants, such as fences and postings, to ensure proper condition and function. • Inspect to ensure prohibited activities, such as digging, off-road travel, fishing or hunting, are not taking place on site.
Surface water	Quarterly	<ul style="list-style-type: none"> • Inspect surface water drainages and discharge to ensure water is not being impacted by other means, and that drainages are functioning properly.
Groundwater monitoring	TBD	<ul style="list-style-type: none"> • Monitor groundwater to ensure remedy is functioning properly until remedy certification is complete.

TABLE 3-2
 CONTROLS FOR OSDF TO PREVENT HUMAN AND ENVIRONMENTAL EXPOSURE TO RESIDUAL CONTAMINANTS

ACTION	REFERENCE	REQUIREMENT	FREQUENCY	SCOPE
Routine OSDF cap inspection	PCCIP p.7-1	OAC 3745-66-18(A) & (C) 40 CFR Sec. 264.118(b)(2) 40 CFR Sec. 265.118(c)(2)	Semi-annual Note that the monitoring frequency may be re-evaluated through the CERCLA five year review process	Detect and record any change of the following: <ul style="list-style-type: none"> • General health, density and variety of vegetative cover • Evidence of burrowing animals on the cover • Presence, depth, and extent of erosion or surface cracking, indicating possible cap deterioration • Visibly noticeable subsidence, either locally or over a large area • Presence and extent of visible settlement, including a determination of whether observed settlement is sufficient to pond water • Presence and extent of any leachate seeps • Integrity of run-on and run-off control features • Integrity of benchmarks
Routine inspection of monitoring equipment			Semi-annual	Inspect the automated monitoring and remote sensing equipment to ensure that it is functioning properly and collecting, processing and transmitting data appropriately.
Unscheduled OSDF cap inspection	PCCIP p.8-1		As needed	Unscheduled inspections will be carried out as needed under specific circumstances (e.g., follow-up on maintenance, after significant natural events). Follow-up or contingency inspections will be conducted to investigate and quantify specific problems encountered during a routine scheduled inspection, special study, or other DOE/regulatory agency activity. Follow-up inspections determine whether the cover/cap stability is threatened, and evaluate the need for maintenance/repair/corrective action. Contingency inspections may be situation-unique inspections ordered by DOE or regulatory agencies.

TABLE 3-2
CONTROLS FOR OSDF TO PREVENT HUMAN AND ENVIRONMENTAL EXPOSURE TO RESIDUAL CONTAMINANTS

ACTION	REFERENCE	REQUIREMENT	FREQUENCY	SCOPE
Routine OSDF cap custodial and preventative maintenance	PCCIP p.9-2	OAC 3745-66-18(A) & (C) 40 CFR Sec. 264.118(b)(2) 40 CFR Sec. 265.118(c)(2)	As needed (mowing of entire OSDF will occur at least once annually in late fall)	Routine custodial and preventative maintenance consists of the following: upkeep of the vegetative cover, general mowing, clearing of debris, removal of woody weeds and seedlings, reseeding
Routine OSDF site area inspection	PCCIP p.7-3	OAC 3745-66-18(A) & (C) 40 CFR Sec. 264.118(b)(2) 40 CFR Sec. 265.118(c)(2)	Semi-annual Note that the monitoring schedule may be revised through the CERCLA five year review process	<ul style="list-style-type: none"> • Inspect and record the security of fences, gates, and locks, as well as the condition of applicable warning signs. • Inspect the adjacent area within approximately 0.25 miles of the OSDF buffer area. Describe evidence of land use changes. • Evaluate natural drainage courses in the immediate vicinity of the OSDF to determine whether there is a threat to the OSDF integrity. Walk approximately 1,000 feet of adjacent natural drainage courses and note unusual or changed sediment deposits, large debris accumulations, man-made or natural constrictions, and recent or potential channel changes. • Evaluate and record the development of gullies. • Evaluate growth of vegetation in channels. • Determine the condition and required maintenance of on-property roads. • Inspect and record the area adjacent to the OSDF for erosion channels, accumulations of sediment, evidence of seepage, and signs of animal or human intrusion.

TABLE 3-2
 CONTROLS FOR OSDF TO PREVENT HUMAN AND ENVIRONMENTAL EXPOSURE TO RESIDUAL CONTAMINANTS

ACTION	REFERENCE	REQUIREMENT	FREQUENCY	SCOPE
Unscheduled OSDF site area inspection	PCCIP p.8-1		As needed	Investigate reports that site integrity may be compromised. Follow-up or contingency inspections will be conducted to investigate and quantify specific problems encountered during a routine scheduled inspection, special study, or other DOE/regulatory agency activity. Determine whether the support systems are threatened, and evaluate the need for maintenance/repair/corrective action. Contingency inspections are situation-unique inspections ordered by DOE when it receives information indicating that site integrity has been or may be threatened.
Routine OSDF site area custodial and preventative maintenance	PCCIP p.9-2	OAC 3745-66-18(A) & (C) 40 CFR Sec. 264.118(b)(2) 40 CFR Sec. 265.118(c)(2)	As needed (mowing will occur at least once annually in late fall)	<ul style="list-style-type: none"> Repair/replace fencing, gates, locks, and signs due to normal wear, severe weather conditions, or vandalism. Mow/clear undesired woody vegetation, reshape, reseed, repair banks, unplug culverts, and clean out channels of run-on/run-off diversion channels.
OSDF Groundwater/leachate monitoring	PCCIP p.5-1 OSDF Groundwater/Leak Detection and Leachate Monitoring Plan (G/LD&LMP)	OAC 3745-27-10 OAC 3745-54-90 through 99	To be evaluated following closure of the facility and included in a revision to the OSDF G/LD&LMP.	A routine monitoring program will be maintained for four zones within and beneath the OSDF. These zones include the LCS, the LDS, perched water within the glacial overburden, and the Great Miami Aquifer (OSDF G/LD&LMP Section 3.2.1). Samples from the four zones will be collected and analyzed pursuant to requirements set forth in a future revision to the OSDF G/LD&LMP.
Other OSDF environmental monitoring	PCCIP p.2-9 PCCIP p.5-1,2	DOE 5820.2A, Chapter III(3)(k)	To be evaluated following closure of the facility and included in a revision to this Plan.	A site wide monitoring program may be required for at least a portion of the initial (30-year) post closure period. The specific parameters and frequencies will be presented in a future version of this Plan.

4.0 INFORMATION MANAGEMENT FOR FCP INSTITUTIONAL CONTROLS

Records that are needed for IC purposes will be managed by DOE-GJO as the steward of the FCP. DOE-GJO will report to the Office of Legacy Management regarding information and records management at the FCP. Any centralized system to provide stakeholders with access to records or copies of records will also be managed by DOE-GJO. Copies of selected records documenting past remedial activities (e.g., soil certification) and the design and contents of the OSDF will be retained and managed by DOE-GJO for IC purposes. In addition, newly acquired records related to remedy performance must be readily available to stakeholders.

4.1 FCP Site

4.1.1 Inspection Records

Inspection records will include such information as inspections of the general site area, perimeter, access points, infrastructure, and signs and postings.

4.1.2 Public Access to Information

Documents pertaining to FCP site inspections will be made available to the public. These will include inspection records, maintenance records and reports from non-routine inspections. These documents will be available on or near the FCP site. Additional information on records management and public access is presented in Volume 1 of this Comprehensive Legacy Management and Institutional Controls Plan. It is also expected that information related to LM will be available through DOE-GJO. All other site records will go through the required disposition process and will be available through National Records Archive (NARA).

4.2 OSDF

4.2.1 Inspection Records

Inspection records will include such information as inspections of the OSDF cap, infrastructure (e.g., LCS/LDS pipe networks), perimeter fencing, buffer area, and signs and postings.

4.2.2 Monitoring Data

Monitoring data will include monitoring of the leachate collection system, groundwater monitoring and any other environmental monitoring data that is required.

4.2.3 Public Access to Information

Records pertaining to inspection and monitoring of the OSDF will be made available to the public. These will include routine inspection records, monitoring data, and maintenance reports. These documents will be available on or near the FCP site. Additional information on records management and public access is presented in

Volume 1 of the *Comprehensive Legacy Management and Institutional Controls Plan*.

4.3 Reporting

Under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), a review of the remedy at the FCP is required every five years. The CERCLA five-year reviews will focus on the protectiveness of the remedies associated with each of the five OUs. To facilitate the review, a report addressing the ongoing protectiveness of the remedy will be prepared and will be submitted to the EPA. The IC portion of the report will include the data collected from monitoring and sampling, summaries of the inspections conducted of the FCP site and OSDF site and cap during the five-year period, and a discussion on the success of the ICs. If it is determined that a particular control is not working, then required corrective actions will be included.

It is also expected that some form of annual reporting will be required, although details have not been worked out with EPA. Discussions will take place as part of the review of this IC Plan regarding how stakeholders and Regulators would like to be informed of monitoring information and data on an annual basis. More details on annual reporting requirements will be included in later versions of this Plan.

REFERENCES

U.S. Department of Energy, 1995, "Record of Decision for Remedial Actions at Operable Unit 2", Final, Fernald Environmental Management Project, DOE, Fernald Area Office, Cincinnati, Ohio.

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ATTACHMENT A
POST CLOSURE CARE AND INSPECTION PLAN

ATTACHMENT B
GROUNDWATER/LEAK DETECTION AND LEACHATE MONITORING PLAN

ATTACHMENT C
**OPERATIONS AND MAINTENANCE MASTER PLAN FOR THE AQUIFER RESTORATION
AND WASTEWATER PROJECT**