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INTEGRATED ENVIRONMENTAL MONITORING PLAN

FERNALD CLOSURE PROJECT
FERNALD, OHIO

JANUARY 2006

U.S. DEPARTMENT OF ENERGY

2505-WP-0022
REVISION 4B
FINAL

OPENING NOTES: JANUARY 2006 IEMP SUBMITTAL

This transmittal documents the second submittal of the Integrated Environmental Monitoring Plan (IEMP), as part of the Comprehensive Legacy Management and Institutional Controls Plan (LMICP), Volume II, Attachment D. The IEMP, Revision 4, specifically addresses monitoring requirements for calendar years 2005 and 2006. Earlier revisions of the IEMP covered previous calendar year monitoring (i.e., Revision 0: August 1997 through 1998; Revision 1: 1999 through 2000; Revision 2: 2001 through 2002; and Revision 3: 2003 through 2004). The following dates are associated IEMP, Revision 4, submittals, as well as the inclusion in the LMICP:

- **October 29, 2004:** IEMP, Revision 4 (calendar years 2005 and 2006 monitoring/reporting)
- **January 20, 2005:** IEMP, Revision 4, change pages to address comment responses (calendar year 2005 and 2006 monitoring/reporting)
- **September 28, 2005** (first submittal as part of the LMICP): IEMP, Revision 4, annual review (calendar year 2006 monitoring/reporting). Note: The annual review is a requirement of the IEMP and was performed to ensure that environmental monitoring for calendar year 2006 will be in line with site activities and requirements.
- **January 2006** (second submittal as part of the LMICP): IEMP, Revision 4B (calendar year 2006 monitoring/reporting); updated monitoring sections are provided (Sections 3 through 7 and Appendix D).

The IEMP annual review and biennial revisions specified in Section 7.0 of the plan meet DOE Order 5400.1 requirements for review and revision of environmental monitoring plans. This order states that the annual review cycle provides the mechanism for identifying and initiating any program modifications necessary to align the IEMP with near-term remediation activities and that any resulting modifications to the IEMP will be communicated to the U.S. Environmental Protection Agency (EPA) and the Ohio Environmental Protection Agency (OEPA). The October 2004 and September 2005 dates identified above meet the requirements of the biennial revision and annual review, respectively. The January 2006 submittal, as part of the LMICP, includes updated monitoring and reporting sections that incorporate weekly conference call agreements/discussions (e.g., IEMP annual review discussions on December 6, 2005). The next full revision of the IEMP will be Revision 5, which will cover at least calendar years 2007 and 2008 monitoring/reporting; it is anticipated to be submitted in late October 2006.

As indicated in the September 2005 submittal, the transition to post-closure is anticipated to occur during 2006. It is also anticipated that various items referenced in the IEMP, such as procedures and the Sitewide CERCLA Quality Assurance Project Plan (SCQ), may need to be revised to reflect Office of Legacy Management practices. If, during the calendar year, it is necessary to make updates to the procedures referenced in the IEMP or the SCQ, then the approach or updates will be communicated to the EPA and OEPA for approval. Additionally, it is understood that with post-closure efforts beginning in 2006, the Fernald site

organizational structure referenced in Table 2-1 will be updated. Note: The post-closure organizational structure will be defined by the Office of Legacy Management.

During calendar year 2006, as the site progresses from closure through transition into post-closure, it is anticipated that regulatory requirements, and health and safety requirements (including radiological requirements), will continue to be addressed. It is also acknowledged that as the site progresses to post-closure, the emphasis on the role of project-specific monitoring will decrease and be limited to monitoring covered under post-closure plans included in the LMICP (e.g., the on-site disposal facility leak detection monitoring plan).

To facilitate the review process, a summary table of technical changes that have been incorporated into this IEMP submittal is provided (directly after these opening notes). As indicated above, the monitoring and reporting sections have been updated in this IEMP submittal. The sections updated in this submittal include:

Section 3: Groundwater Monitoring Program
Section 4: Surface Water and Treated Effluent Monitoring Program
Section 5: Sediment Monitoring Program
Section 6: Air Monitoring Program
Section 7: Program Summary and Reporting
Appendix D: Natural Resource Monitoring Plan

In addition, an updated Figure 2-1 (Fernald Site Schedule) and Table 2-2 (Fernald Site Remediation Field Activities) are provided in Sub-Attachment A, directly after the summary table of changes. Note: The table of contents and references have also been updated as part of this submittal.

Note: The IEMP, Revision 4B, implementation date is January 1, 2006. This date supports the calendar year monitoring and reporting structure outlined in the IEMP and contract requirements.

GENERAL SUMMARY TABLE OF TECHNICAL CHANGES FOR JANUARY 2006 INTEGRATED ENVIRONMENTAL MONITORING PLAN REVISION 4B SUBMITTAL

Section/Page Number	Description of Modification	Driver/Technical Information
Global (Figure 2-1 and Table 2-2)	Updated Figure 2-1 and Table 2-2 to reflect the site schedule for 2006. Note: Several site activities have been either completed ahead of schedule or are delayed until 2006. (The updated figure and table are provided in Sub-Attachment A following this summary table.)	The change is required based on updated schedule of site activities.
Global (Sections 3 through 6)	Updated text to reflect activities to be performed in calendar year 2006 (i.e., reference to calendar year 2005 has been removed).	Calendar year 2005 activities are complete; therefore, references to 2005 have been removed where appropriate.
Global (Sections 3 through 6)	Updated figures and text to eliminate the ninth contingency cell for the on-site disposal facility. It has been determined that the ninth cell will not be needed.	It has been determined that the ninth cell will not be needed.
Global (Sections 3 through 7)	Updated text to reflect the elimination of mid-year reporting.	EPA and OEPA approval to eliminate mid-year reporting was given on December 6, 2005 conference call. There will be limited environmental impacts with the completion of many primary site remediation activities in late 2005 and early 2006. Therefore, environmental reporting can be addressed annually, as identified in DOE Orders 5400.1 and 450.1.
Section 4	The following monitoring updates have been made: – Eliminated monitoring at SWD-01 during calendar year 2006. Monitoring of this location will be revisited during the preparation of the IEMP, Revision 5. – Eliminated monitoring at STP-4601 (based on NPDES permit updates/requirements) – Eliminated quarterly sampling from IEMP characterization for cadmium, cyanide, mercury, and silver at location PF 4001 (already being addressed at a higher frequency per NPDES requirements) – Added text to identify that isotopic thorium monitoring will stop after soil certification in the waste pit area is completed.	Each update was made for the following reasons: – Based on monitoring data, which show no FRL exceedances for several years and reduced remediation activities around SWD-01 – The sewage treatment plant was removed in May 2005; therefore, there will be no further sampling (identified through NPDES) – Cd, Cn, Hg, and Ag are already sampled more frequently under NPDES – Isotopic thorium monitoring was added with respect to waste pit activities. When certification is completed in the waste pit area, it should no longer be necessary to perform isotopic thorium monitoring.

GENERAL SUMMARY TABLE
(Continued)

Section/Page Number	Description of Modification	Driver/Technical Information
Section 6	Updated section reflects: – The monitors that have been removed or relocated during 2005 (e.g., WP17-A). Note: Removal and relocation of monitors were also addressed through the weekly conference calls. – That project IEMP air monitoring will continue until the Silos Project D&D and the silos area soil certification process has been completed. Then the removal of project air monitors will be discussed through the weekly conference calls and/or correspondence with the EPA and OEPA on a case-by-case basis, as necessary. – That the IEMP site boundary air monitoring program will continue during 2006 until source materials have been removed from the site, D&D activities are complete, on-site disposal facility cells are capped, and the soil certification process has been completed. Then, the removal of air monitors (particulate, radon, and direct radiation) will be discussed through the weekly conference calls and/or correspondence with the EPA and OEPA on a case-by-case basis.	Documentation through weekly conference calls and letters: – Requests from EPA and OEPA on reducing air monitoring: Letter: J. Saric to J. Reising, "Re: IEMP Air Monitor Reductions," dated June 16, 20005. – Letter: T. Schneider to W. Taylor, "Response to OEPA Comments of the Approach for the Phased Reduction of Project Related Air Monitors in the IEMP," dated September 13, 2005. – Letter: T. Schneider to J. Reising, "Re: Approach for the Reduction of Site Boundary IEMP Air Monitors," dated October 21, 2005. – Letter: J. Saric to J. Reising, "Re: IEMP Site Boundary Air Monitor Reductions," dated November 8, 2005.
Section 7	Updated Section 7 to reflect those changes made in other IEMP sections (e.g., number of air monitors updated in revised Section 6).	In order to maintain consistency with proposed changes associated with other sections, as identified in this table.
Appendix D	The Natural Resource Monitoring Plan has been updated to include implementation monitoring requirements for specific restoration projects to be completed in 2006 (e.g., waste pit area).	In order to consolidate Fernald site natural resource monitoring.

Note: Sections 1 and 2, and Appendices A through C have not been revised for this submittal but will be revised in their entirety as part of the IEMP, Revision 5, submittal to occur later in 2006. Updates to Section 1 and 2 would reflect new site organizational structures (post-closure), and Appendices A and B would include data through calendar year 2005 (currently not available). Additionally, the primary change to Appendix A will be the removal of references to five-year monitoring and the removal/addition of monitoring locations based on plugging/abandonment and replacement activities. With respect to Appendix C, the text should:

- Reference the site boundary not the fenceline because the fencing has been removed
- Reflect that waste pit excavations are complete (with the exception of certification)
- Indicate that the K-65 Silos have been removed (material being processed not stored)
- Maintain only first paragraph in Section C.3.2 (Routine Surveillance).

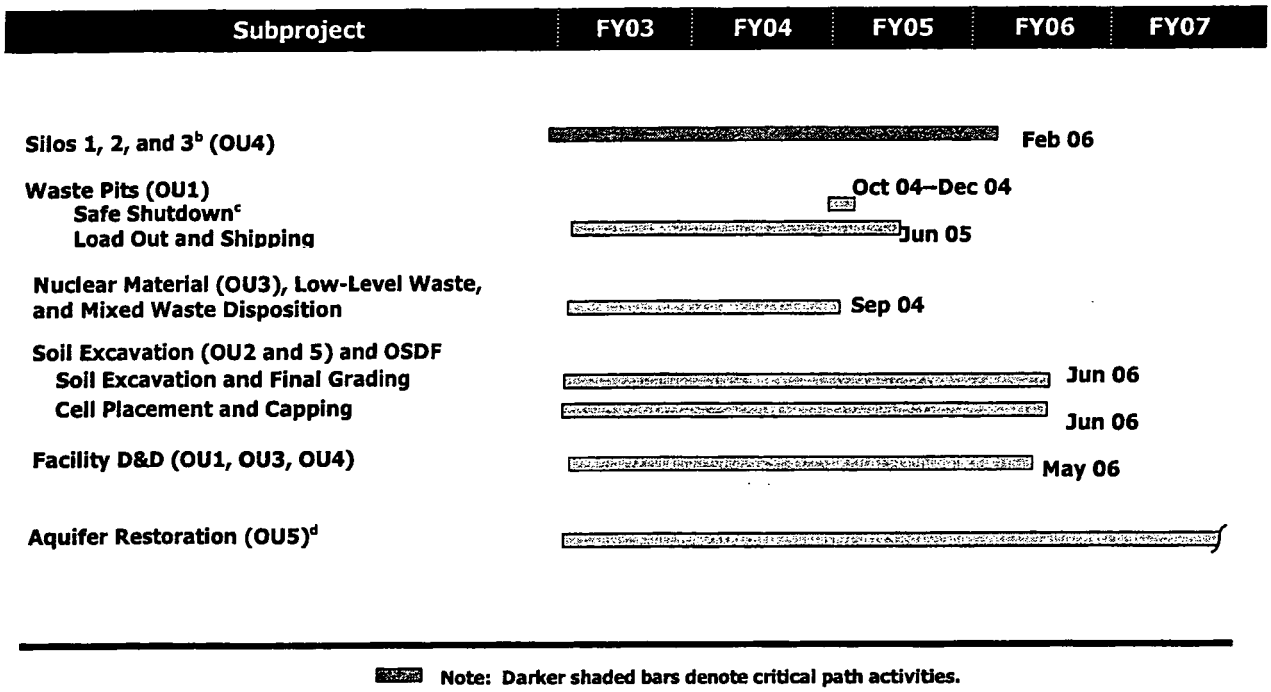
SUB-ATTACHMENT A

FIGURE 2-1, FERNALD SITE SCHEDULE AND

TABLE 2-2, FERNALD SITE REMEDIATION FIELD ACTIVITIES FOR 2005 AND 2006

FIGURE 2-1

FERNALD SITE SCHEDULE[a]



[a]Note that this schedule is based on fiscal year (FY) of October through September, instead of calendar year.
[b]Schedule includes design, construction, startup, operation, waste disposal, and facility shutdown.
[c]Safe Shutdown pertains to Waste Pit Project process facilities.
[d]Groundwater pumping and treatment, and limited activities, will continue during the post-closure phase. Post-closure activities include long-term stewardship and continued operations of groundwater remediation facilities, and will be managed by the DOE Office of Legacy Management.

TABLE 2-2

FERNALD SITE REMEDIATION FIELD ACTIVITIES

Remediation Project	2005	2006
Waste Pits Project	Loading and shipping for off-site disposal by rail (activities will be performed for non-waste pit material).	Loading and shipping of off-site disposal by rail (activities will be performed for non-waste pit material).
Aquifer Restoration/ Wastewater Project	Continue sitewide groundwater monitoring. Complete conversion of AWWT into CAWWT. Begin operating CAWWT. Shut down all other water treatment facilities and prepare them for decontamination and dismantling. Continue operation and maintenance of extraction system wells. Complete installation of waste storage area (Phase II) wells. Continue collection and treatment of storm water and wastewater. Continue on-site disposal facility leak detection and leachate monitoring.	Continue sitewide groundwater monitoring. Continue operation of water treatment facilities. Continue operation and maintenance of extraction system wells. Continue collection and treatment of storm water and wastewater until soil certification is complete and the last cell of the on-site disposal facility is capped. Continue on-site disposal facility leak detection and leachate monitoring.

TABLE 2-2
(Continued)

Remediation Project	2005	2006
Demolition, Soil, and Disposal Project	Complete excavation of clay for contouring layer and vegetative cover from borrow area.	Continue and complete impacted material placement.
	Begin final grading and planting for restoration for borrow area.	Complete stream corridors certification.
	Complete Cell 4 cap construction.	Complete Area 1 certification.
	Continue and complete Cell 5 impacted material placement.	Complete Area 5 certification.
	Continue and complete Cell 6 impacted material placement.	Complete Area 6 certification.
	Continue Cell 7 impacted material placement.	Complete Area 7 certification.
	Continue Cell 8 impacted material placement.	Complete main drainage corridor certification.
	Begin and complete Cell 5 cap construction.	Complete final restoration of borrow area.
	Begin and complete Cell 6 cap construction.	Complete Area 4B final restoration.
	Begin Cell 7 cap construction.	Complete stream corridors restoration.
	Begin main drainage corridor certification.	Complete Area 5 final restoration.
	Complete Area 2 certification.	Complete Area 6 final restoration.
	Complete Area 3A and 3B certification.	Complete Area 7 final restoration.
	Complete Area 4A certification.	Complete Cell 7 cap construction.
	Complete 4B excavation and certification.	Complete Cell 8 cap construction.
	Continue Area 7 excavation and certification.	Complete Area 6 excavation.
	Begin and complete stream corridors excavation.	Complete Area 7 excavation.
		Complete main drainage corridor excavation.

TABLE 2-2
(Continued)

Remediation Project	2005	2006
Demolition, Soil, and Disposal Project (cont.)	Begin stream corridors certification. Complete decontamination and dismantling east warehouse complex. Complete decontamination and dismantling Waste Pit Project facilities. Begin decontamination and dismantling of Silo 3 facilities. Complete Area 2 final restoration. Begin and complete Area 3A final restoration. Begin and complete Area 3B final restoration. Begin and complete Area 4A final restoration. Begin and complete Area 4B final restoration.	Begin and complete decontamination and dismantling of the Silos 1 and 2 remediation facilities. Complete decontamination and dismantling of Silo 3 facilities. Complete decontamination and dismantling of the remaining miscellaneous small structures (including railroad track) and trailers
Silos Projects	Silo 3 startup. Silo 3 operations and shipping/disposal. Radon Control System operation. Silos 1 and 2 Accelerated Waste Retrieval operations (Silos 1 and 2 material retrieval). Silos 1 and 2 remediation facility startup. Silos 1 and 2 treatment, transportation, and off-site storage. Begin safe shutdown of remediation facilities.	Complete Silos 1 and 2 treatment, transportation, and off-site storage. Complete Silo 3 operations and shipping/disposal. Complete safe shutdown of remediation facilities.

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NESHAP	National Emissions Standards Hazardous Air Pollutant
NPDES	National Pollutant Discharge Elimination System
NRMP	National Resource Monitoring Plan
NRRP	Natural Resource Restoration Plan
NRT	Natural Resource Trustee
NTU	nephelometric turbidity units
O&M	operations and maintenance
OAC	Ohio Administrative Code
OEPA	Ohio Environmental Protection Agency
ORC	Ohio Revised Code
OSDF	on-site disposal facility
OU	operable unit
pCi/g	picoCuries per gram
pCi/kg	picoCuries per kilogram
pCi/L	picoCuries per liter
$pCi/m^2/sec$	picoCuries per square meter per second
pCi/m^3	pico-curies per cubic meter
PRG	preliminary remediation goal
PRRS	Paddys Run Road Site
RCRA	Resource Conservation and Recovery Act
SCQ	Sitewide CERCLA Quality Assurance Project Plan
SWIFT	Sandia Waste Isolation Flow and Transport
TLD	thermoluminescent dosimeter
U.S.C.	United States Code
VAM3D	Variability Saturated Analysis Model in 3 Dimensions
WPP	Waste Pits Project

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LIST OF ACRONYMS

ALARA	as low as reasonably achievable
AMS	air monitoring station
ANSI	American National Standards Institute
ARAR	applicable or relevant and appropriate requirement
ASL	analytical support level
AWWT	advanced wastewater treatment facility
BAT	best available technology
BTV	benchmark toxicity value
CAWWT	converted advanced wastewater treatment facility
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
Ci/g	Curies per gram
cm	centimeter
CMT	continuous multi-channel tubing
COC	constituent of concern
COEC	constituent of ecological concern
CWA	Clean Water Act
D&D	decontamination and dismantling
DCF	dose conversion factors
DOE	U.S. Department of Energy
EMP	Fernald Site Environmental Monitoring Plan
EPA	U.S. Environmental Protection Agency
FCP	Fernald Closure Project
FFA	Federal Facility Agreement
FFCA	Federal Facility Compliance Agreement
FRL	final remediation level
FY	fiscal year
GPMPP	Groundwater Protection Management Program Plan
HAMDC	highest allowable minimum detection concentration
IEMP	Integrated Environmental Monitoring Plan
m^3	cubic meters
MCL	maximum contaminant level
MDC	minimum detectable concentration
µg/L	micrograms per liter
mg/L	milligrams per liter
m/min	meters per minute
mrem	millirem
MS/MSD	matrix spike/matrix spike duplicate
NEPA	National Environmental Policy Act

Section 1.0

1.0 INTRODUCTION

1.1 BACKGROUND

The U.S. Department of Energy's (DOE's) Fernald Closure Project (FCP) has completed its remedial investigation/feasibility study obligations, and final records of decision for all five Fernald site operable units are now in place. Since 1997, the project's focus has been on the safe and efficient execution of site remediation, including facility decontamination and dismantling; the design and construction of waste processing and disposal facilities; waste excavation and shipping; and continuation of groundwater remediation. In recognition of this increased focus on remedy implementation, DOE developed an integrated environmental monitoring strategy tailored to the near-term cleanup actions and the post-closure activities planned for the Fernald site. The monitoring strategy was initially documented in the first issue of the Integrated Environmental Monitoring Plan (IEMP) in 1997 followed by updated monitoring programs in subsequent revisions (in 1999, 2001, and 2003) based on the planned two-year revision cycle. The biennial revision cycle continues to be essential to adjust the IEMP monitoring programs as cleanup progresses, particularly under the current 2006 site closure schedule.

As with past IEMP revisions, this IEMP revision directs environmental monitoring program elements toward sitewide remediation activities and incorporates any new regulatory requirements for sitewide monitoring, reporting, and remedy-performance tracking activated by the formal applicable or relevant and appropriate requirements (ARARs) identified in the Fernald site's remedy selection documents. The emphasis of this revision of the IEMP is on tailoring the sitewide monitoring needs to those activities being conducted in 2005 and 2006. The IEMP also serves as the reporting link for selected project-specific emission control monitoring activities that will accompany remediation during Fernald site cleanup.

The basis for the current understanding of environmental conditions at the Fernald site is the extensive site environmental data that have been collected. The data were collected over a 10-year period through the remedial investigation process required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended, combined with seven years of subsequent routine environmental monitoring data collected through the IEMP. Analysis of the remedial investigation data resulted in the selection of a final remedy for the Fernald site's environmental media, with the issuance of the Final Record of Decision for Remedial Actions at Operable Unit 5 (DOE 1996b) in January of 1996. Operable Unit 5 includes all environmental media, contaminant transport pathways, and environmental receptors (soil, groundwater, surface water, sediment, air, and biota) at and around the Fernald site that have been affected by past uranium production operations. The remedy for Operable Unit 5 defines final sitewide cleanup levels and establishes the general areal extent of on- and off-property actions necessary to mitigate environmental impacts caused by site production activities.

The IEMP is a formal remedial design deliverable required to fulfill Task 9 of the Remedial Design Work Plan for Remedial Actions at Operable Unit 5 (DOE 1996c). This revision to the IEMP (Revision 4) provides an update to the original IEMP (approved in August of 1997) as required by the Remedial Design Work Plan and DOE Order 5400.1 (DOE 1990) (Note: In January 2003, DOE Order 450.1 went into effect, superceding DOE Order 5400.1. The intent of the DOE Order 450.1 is met through existing DOE contractual requirements, established FCP programs, and the closure mission of the site. Until such time that the FCP contract is modified, DOE Order 5400.1 will continue to be referenced in the IEMP.)

1.2 PROGRAM OBJECTIVES AND SCOPE

As cleanup actions continue and post-closure activities are initiated/conducted, the need for accurate, accessible, and manageable environmental monitoring information continues to be essential. The IEMP has been formulated to meet this need and will serve several comprehensive functions for the site by:

- Maintaining the commitment to a remediation-focused environmental surveillance monitoring program that is consistent with DOE Orders 5400.1 and 5400.5 (DOE 1993), and continues to address stakeholder concerns. Both orders are listed as "to-be-considered" criteria in all Fernald site records of decision and are, therefore, key drivers for the scope of the monitoring program.

- Fulfilling additional sitewide monitoring and reporting requirements activated by the CERCLA ARARs for each Fernald site record of decision, including determining when environmental restoration activities are complete and cleanup standards have been achieved

- Providing the mechanism for assessing the performance of the Great Miami Aquifer groundwater remedy, including determining when restoration activities are complete

- Providing a reporting mechanism for many environmental regulatory compliance monitoring activities (i.e., on-site disposal facility groundwater monitoring; Federal Facility Compliance Agreement [FFCA] and elements of the National Pollutant Discharge Elimination System [NPDES] discharge reporting; and the air pathway-specific dose estimates required under National Emissions Standards for Hazardous Air Pollutants [NESHAP] Subpart H) with the environmental reporting for DOE Order 5400.1

- Providing a reporting interface for various project-specific, emission-control monitoring activities that, because of ARARs, will be implemented at project locations under approved project-specific remedial design plans.

Under the IEMP, data showing the environmental conditions at the Fernald site are collected, maintained, and evaluated. Contaminant releases attributable to remedial activities at the Fernald site are also evaluated and compared against established thresholds. DOE fulfills its obligation to document most environmental monitoring information under the umbrella of the IEMP reports. The monitoring program is also designed to appraise and report on the effectiveness of the administrative and engineering emission controls.

Several remediation-based environmental activities fall outside the scope of the IEMP. These activities include:

- Some project-specific, emission-control monitoring activities which, because of ARARs, are being implemented under project-specific design plans outside of the IEMP. These projects and accompanying remedial design plans are identified and their reporting interfaces with the IEMP are described in subsequent sections of this document.

- The soil remediation pre-certification and certification sampling program which is being conducted as part of the work scope of the Demolition, Soil, and Disposal Project

- The ambient air sampling and direct radiation measurements conducted for worker health and safety purposes as part of the occupational monitoring program

- The spill and chemical release reporting required under the Superfund Amendment and Reauthorization Act, Title III.

Each of these efforts will continue to be conducted outside the formal scope of the IEMP, although the results of the efforts will be factored, as necessary, into the sitewide interpretations provided in IEMP reports.

In addition to the environmental activities specifically excluded from the scope of the IEMP, boundary conditions throughout the IEMP further define the IEMP scope. These boundary conditions are as follows:

- The administrative boundary lies between remedial actions for groundwater south of the Fernald site and those potential remedial actions associated with the Paddys Run Road Site plume. This boundary is shown in the Feasibility Study Report for Operable Unit 5 (DOE 1995b) and the Proposed Plan for Operable Unit 5 (DOE 1995d).

- The programmatic boundary refers to the differentiation between the scope and responsibility associated with the design, implementation, and documentation of environmental monitoring activities. Monitoring activities are designated as project-specific (associated with emission controls at the project) or IEMP (associated with monitoring the collective impact on a particular environmental medium resulting from all remediation activities). The designation is based on an evaluation of the pertinent regulatory drivers and DOE policies that have monitoring implications.

- The geographic boundary refers to the physical boundary of a project or activity.

Sitewide environmental monitoring, which generally refers to the IEMP monitoring programs, measures the collective environmental impacts resulting from all remediation activities.

1.3 RELATIONSHIP TO PROJECT-SPECIFIC REMEDIAL PROGRAMS

To define the interface between the IEMP and the individual remediation projects, the monitoring-related ARARs in the Fernald site's records of decision were evaluated. During the ARARs analysis, monitoring requirements were evaluated to determine if they had sitewide implications (and therefore, fell under the scope of the IEMP), or pertained to project-specific monitoring as part of the emission controls implemented by individual remediation projects. The results of these evaluations are presented for each environmental medium in Sections 3.0 through 6.0.

The programmatic boundary established through the IEMP designates the monitoring activities that will be the responsibilities of the remediation projects. Establishing this boundary ensures:

- The roles and responsibilities for designing, implementing, and reporting on monitoring activities are explicitly understood by the Fernald site project organizations, their regulatory counterparts, and stakeholders
- That all regulatory obligations for conducting and documenting the results of monitoring activities are identified and met
- That monitoring and reporting activities are integrated in order to promote efficiency of execution and support consistency in technical approach and data interpretations.

To fully delineate this programmatic boundary, it is necessary to clearly define the scope of monitoring activities that will be executed by individual remediation projects and their relationship to the IEMP. Project-specific monitoring activities are divided into compliance monitoring and process control monitoring categories.

Project-specific compliance monitoring will be implemented by remediation projects to meet the requirements of monitoring-related ARARs designated as project-specific through the ARARs analysis presented in each medium-specific section of the IEMP. The results of the ARARs analysis provide the basis for determining when project-specific compliance monitoring programs will be developed. If there is no project-specific responsibility for monitoring identified through the ARARs analysis, then no project-specific compliance-monitoring program will be developed. For those ARARs designated as project-specific, the affected remediation project is responsible for designing, implementing, and documenting the monitoring program in compliance with the requirement and for identifying any programmatic interface with the IEMP. This responsibility includes meeting all reporting obligations for demonstrating compliance with the given requirement.

Project-specific process control monitoring is designed and implemented by the individual remediation project to provide timely feedback on the performance of a remediation treatment process or operation relative to a design specification. This information is used to adjust the process or operation to ensure that conditions remain within specified operating parameters. In general, process control schemes rely on real-time or near real-time measurements, or quick turnaround analytical methods that provide prompt feedback on system performance. Due to the need for a quick response, process control measurements primarily occur within a treatment process or operation. However, under certain circumstances, monitoring environmental media at or near a project boundary may be appropriate within the process control scheme of a specific project operation. The following criteria provide the basis for determining when project-specific process control monitoring within environmental media will be considered by the affected projects.

- Projects processing and/or treating waste materials (such as process residues) that pose a significant risk to human health and/or the environment. These projects are associated with remediation activities for operable units other than Operable Unit 5.

- When, due to the location of the remediation activity on the Fernald site property, it is likely that emissions from the project will not be assessed through the sitewide monitoring programs defined under the IEMP.

While the criteria listed above provide a basis for determining when additional project-specific environmental monitoring (beyond that required to meet ARAR obligations) may be implemented, they are not intended to limit the range or scope of potential monitoring activities that may be implemented to successfully complete site remediation. Additional process control monitoring may be proposed in response to changes in the remedial design or discovery of unanticipated field conditions.

The IEMP provides a reporting link for project-specific compliance and process control results, as necessary, to fulfill the responsibility for providing a comprehensive evaluation of sitewide environmental conditions. Each remediation project will continue to be responsible for the design and execution of its own monitoring activities required to demonstrate compliance with its respective project-specific monitoring ARARs and to obtain the necessary immediate feedback required for effective process control. The information collected through both project-specific and IEMP monitoring programs will be used to support a remedial action decision-making process during active site remediation. The role of each monitoring program and the range of decisions encompassed within this process are discussed in detail in Section 1.5.

1.4 PLAN ORGANIZATION

The IEMP is comprised of seven sections and four appendices. The remaining sections and their contents are as follows:

Section 2.0 Summary of the Fernald Site Remedial Strategy: provides a description of the individual remediation projects for each of the five operable units, a status summary of the project-specific monitoring that is planned for each project, and a two-year (2005 and 2006) forecast of the remediation and post-closure activities planned for each major project

Section 3.0 Groundwater Monitoring Program: provides a description of the monitoring activities necessary to track the progress of the restoration of the Great Miami Aquifer and discusses the groundwater monitoring activities necessary to maintain compliance with Resource Conservation and Recovery Act (RCRA) requirements as specified in the Ohio Environmental Protection Agency (OEPA) Director's Findings and Orders dated September 2000; and a description of the integration with the groundwater monitoring program for the on-site disposal facility

Section 4.0 Surface Water and Treated Effluent Monitoring Program: provides a description of the routine sitewide surface water monitoring to be performed during active remediation and post-closure to maintain compliance with surface water and treated effluent discharge requirements

Section 5.0 Sediment Monitoring Program: provides a description of the sediment monitoring activities to independently verify the overall effectiveness of the sediment controls accompanying the remedial construction and excavation activities

Section 6.0 Air Monitoring Program: provides a description of the sitewide air monitoring to be conducted during active remediation of the Fernald site, and includes a description of the plan for particulate, radon, and direct radiation measurements

Section 7.0 Program Summary and Reporting: summarizes the program design and scope of each media monitoring program, and provides a detailed accounting of the reporting elements included within the IEMP reporting framework

Appendix A The Groundwater Monitoring Approach: provides detailed justification for the groundwater sampling program

Appendix B Surface Water Final Remediation Level (FRL) Exceedances: provides documentation, by constituent, of the particular sample location where FRLs have been exceeded

Appendix C Dose Assessment: summarizes the IEMP's responsibility for preparing the Fernald site's annual radiological dose assessment related to remediation activities to comply with NESHAP Subpart H requirements and the intention of DOE Order 5400.5

Appendix D Natural Resource Monitoring Plan (NRMP): provides the regulatory requirements and strategy for the monitoring of ecological impacts to wetlands, threatened and endangered species, and terrestrial and aquatic habitats. The NRMP also outlines additional provisions for reporting these monitoring results to Fernald site Natural Resource Trustees.

The IEMP is organized according to the principal environmental media and contaminant migration pathways routinely examined under the program. For each of the media comprising the program, evaluations of the regulatory drivers and pertinent DOE policies that govern environmental monitoring were conducted. Findings were made regarding those drivers that have sitewide implications and those that are project-specific in scope (and therefore fall outside the domain of the IEMP). These evaluations were used to define, for each medium, the ARAR-driven administrative boundaries that separate the project-specific emission control monitoring activities from those sitewide environmental monitoring activities that are the responsibility of the IEMP. The results of these evaluations are presented in detail for each respective media in Sections 3.0 through 6.0.

The schedule (as of September 2004) and regulatory drivers were evaluated to define the 2005 and 2006 IEMP scope for each environmental medium, and a medium-specific plan was prepared to define detailed program implementation requirements. The details and results of this evaluation are presented in Sections 3.0 through 6.0.

1.5 ROLE OF THE IEMP IN REMEDIAL ACTION DECISION MAKING

As indicated in Section 1.2, one of the primary responsibilities of the IEMP is to help ensure that the Fernald site's cumulative environmental emissions resulting from the implementation of multiple, concurrent, remedial action projects at the site do not exceed the regulatory-based limits or result in unacceptable off-site conditions. Fundamental to this role is the recognition that each remedial action project at the Fernald site is expected to be implemented and operated in full compliance with its project-specific, emission-control requirements for the respective environmental pathways of concern. It is thus the responsibility of the individual remedial design documents (required by the CERCLA Remedial Design Work Plans for each of the five operable units) to convey the project-specific measures for satisfying worker health and safety, process control, and environmental protection requirements accompanying each remedial action project. Under this fundamental expectation, the IEMP can serve to provide independent oversight assurance that there are no undesirable compounding environmental effects resulting from the concurrent implementation and operation of otherwise fully compliant individual projects.

In light of this oversight responsibility, the data generated through the IEMP support a number of management decisions regarding the progressive implementation strategy, sequence, and overall management control of the individual remedial action projects. This subsection highlights: (1) the key management decisions that will be supported by the IEMP; (2) the organizational responsibilities for making the decisions; (3) the framework and criteria needed to facilitate the decisions; and (4) the communication process for internally conveying the results of the decisions to the respective project organizations and externally to the Fernald site's stakeholders. Each of the environmental media sections of this plan (Sections 3.0 through 6.0) provides detailed discussions of the specific IEMP data use and decision-making criteria that are relevant to that particular medium.

Additionally it is important to note that monitoring will be conducted following the completion of cleanup as required to assess the continued protectiveness of the remedial actions. The IEMP will specify the type and frequency of environmental monitoring activities to be conducted during remedy implementation, and ultimately, following the cessation of remedial operations as appropriate. The IEMP will delineate the Fernald site's responsibilities for sitewide monitoring of surface water and sediment over the life of the remedy, and ensure that FRLs are achieved at project completion. The IEMP will also serve as the primary vehicle for determining to EPA and OEPA's satisfaction that remedial action objectives for the Great Miami Aquifer have been attained. In addition to these FRL attainment responsibilities, the IEMP will also define sitewide remedial monitoring requirements for air.

1.5.1 What are the Management Decisions that the IEMP Will Support?

In its role of compiling the information necessary to assess cumulative sitewide impacts, the IEMP supports the following key management decisions:

- From an environmental media perspective, are environmental restoration activities complete such that cleanup standards are achieved and monitoring can be ceased or reduced?
- From a sitewide perspective, is the Fernald site maintaining compliance with its various regulatory requirements for emission control and environmental monitoring?
- Are there any trends in the sitewide environmental monitoring data that indicate the potential for an unacceptable future condition?
- In the event of a regulatory non-compliance situation or potentially unacceptable cumulative trend, what activities or projects are the principal contributors to the situation?
- What specific response actions must be taken to address the situation, and which projects are affected?
- What communication with regulatory agencies or other concerned stakeholders is necessary as a result of the situation and/or decisions made?

The response action decisions necessary to address potentially undesirable cumulative effects could involve:

- Upgrading project-specific emissions controls (beyond those that are regulatory-based) for one or more projects to further reduce cumulative emissions
- Slowing the pace of activities within one or more remedial projects for a specified period of time
- Altering the number or variety of active projects underway at a particular time
- Continued monitoring of cumulative data trends.

As discussed in the next subsection, Fernald site decision makers will be conducting ongoing evaluations of the data generated by both the projects and the IEMP to ensure satisfactory operating conditions are maintained during remedy implementation and through post-closure.

1.5.2 Who is Responsible for Making the Decisions?

The environmental data are used by Fernald site management personnel to closely monitor the acceptability of the various remedial projects underway at any particular time. Thus, the bulk of the day-to-day planning and routine operating decisions will be internal to the Fernald site, with process adjustments implemented on a situation-specific, as-needed basis.

In the majority of cases, the data evaluation will conclude that all regulatory requirements are being met and that no unacceptable cumulative trends in the monitoring data are present. The evaluation and conclusions will be documented for regulatory agency concurrence through the normal reporting mechanisms described in this plan.

The Fernald site will notify the U.S. Environmental Protection Agency (EPA) and the OEPA immediately (prior to taking an action internally) for three important, albeit unlikely, situations:

- The evaluation indicates that attainment of a regulatory schedule milestone is in jeopardy because of the mitigative actions necessary to address an adverse cumulative situation
- For the air pathway, the data evaluation indicates that an actual current condition has resulted in an exceedance of a NESHAP regulatory compliance limit (as opposed to an undesirable data trend indicating the potential for an unacceptable hypothetical future condition)
- For the air pathway, a projected exceedance of a NESHAP regulatory compliance level is believed to be imminent.

For these three special cases, Fernald site personnel will: (1) identify the root cause of the unacceptable situation; (2) determine the options for addressing the problem; and (3) communicate with EPA and OEPA to arrive at a mutually acceptable decision concerning the follow-up actions to be taken. Immediate notification to the EPA and OEPA will be made via telephone followed by written communication. For all remaining situations (i.e., those involving the Fernald site's responses to undesirable data trends for any of the environmental media), Fernald site personnel will identify and implement appropriate actions internally, and will document the decisions and resultant response actions via telephone, in the IEMP mid-year reports, or in the annual site environmental reports (refer to Section 1.5.4).

Environmental media personnel are responsible for the ongoing review of media–specific monitoring data and the identification of any related environmental compliance issues. Similarly, the remediation projects are responsible for identifying any noncompliant situation within their project-specific monitoring program (e.g., stack emissions). The environmental compliance organization serves to review the compliance-related, project-specific monitoring data and facilitate reporting of these data. If the potential for an unacceptable

future situation is identified, then alternatives for addressing the problem will be identified. The alternatives will be assessed with respect to their implications and communicate the results of the evaluations as necessary to the Fernald site's stakeholders, EPA, and OEPA.

1.5.3 What are the General Criteria for the Decisions?

The IEMP establishes, on a medium-specific basis, the types of data and thresholds or regulatory limits required to support the management decisions described above. Each set of medium-specific criteria is handled uniquely because of the varying medium-specific locations where the regulatory criteria are applied. For example, the Fernald site's most restrictive air monitoring criterion (the 10 millirem NESHAP requirement discussed in Section 6.0) is applied at locations at the site's fenceline, near the location of actual receptors.

The medium-specific sections of this plan review which monitoring requirements are to be met at the project boundaries (and thus fall under the domain of the individual projects), and which requirements fall outside the project boundaries and, because of their cumulative nature, fall under the domain of the IEMP. This distinction in responsibilities is facilitated by an in-depth ARAR review for each environmental medium to identify applicable compliance locations and the resultant responsibilities for meeting them. Additionally, the medium-specific sections define the criteria to be used to identify trends in the data that could indicate an imminent unacceptable situation. Each of the medium-specific sections specifies the frequency of the data evaluations to satisfy the Fernald site's overall remediation planning and decision-making requirements. DOE will evaluate the remediation data accordingly, and will report the results according to the approach summarized below.

1.5.4 How Will IEMP Decisions Be Communicated?

Each medium section of this IEMP (Sections 3.0 through 6.0) present medium-specific reporting components, and Section 7.0 summarizes the overall reporting strategy for the IEMP. The data will be made available to the regulatory agencies on an ongoing basis in the form of electronic data files through the IEMP Data Information Site. Both IEMP mid-year data summaries and annual site environmental reports will be issued as part of the IEMP program. The reports will provide a reporting mechanism for both IEMP data and the project-specific environmental data gathered to meet project-specific regulatory compliance requirements pertinent to sitewide interpretation.

As indicated above, the majority of the management decisions made from IEMP data evaluations will be internally executed by the Fernald site, as part of its internal remediation planning and operations control practices. These internal decisions fall into two categories:

- Routine "process adjustment" decisions, which will be made by the lead project organizations to react and respond to project-specific operating conditions and process-control objectives

- Major "project control" decisions, which may have more impact on the remediation project's continuing operations as discussed in Section 1.5.2, are the responsibility of the environmental compliance organization (in collaboration with the affected project organizations) to respond to a pending adverse cumulative situation that may be developing.

The routine process adjustment decisions will not necessarily be reported as part of the IEMP mid-year or annual reporting cycles. These types of routine decisions will be maintained as part of the project organizations' daily operations logs and are considered to be normal in the course of day-to-day practice in order to achieve project-specific operating objectives. The major project-control decisions will be summarized in IEMP mid-year data summaries and in annual site environmental reports. The decision-reporting format will include: (1) a description of the pending adverse conditions; (2) the actions taken to respond to the situation; and (3) the mitigation results obtained. All such internal decisions will be made consistent with the Fernald site's enforceable work plans and ARAR compliance requirements.

Three special circumstances were identified in Section 1.5.2 that require EPA and OEPA input before response actions are taken by Fernald site management. For these three circumstances, EPA and OEPA concurrence will be sought before the actions are taken. Once a mutually agreeable decision is reached, the actions will be implemented. The decision process, actions taken, and results obtained will be summarized in the next available IEMP mid-year data summary report and/or in the annual site environmental report.

The IEMP mid-year data summaries and annual site environmental reports will be furnished to EPA and OEPA in accordance with the provisions summarized in Section 7.0. The IEMP annual site environmental reports will also be available for review by the Fernald site's stakeholders at the Public Environmental Information Center and to selected stakeholders via mail.

1.6 PROGRAM MODIFICATIONS AND REVISIONS

The IEMP will continue to function as a "living document" revised as necessary to accommodate activities during post-closure and through the completion of site restoration. As part of this living document concept, the IEMP, Revision 4, primarily focuses on the remediation activities forecasted for 2005

and 2006. The IEMP will be reviewed annually for necessary changes and revised every two years. Yearly reviews will focus on the appropriateness of the IEMP scope. The two-year revision cycle will provide the opportunity to update monitoring strategies based on changing site activities and conditions, and to address stakeholder concerns, as necessary. This review/revision cycle will allow for the scale-back of monitoring activities deemed no longer appropriate based on environmental media concentrations. If necessary, immediate specific modifications to the IEMP will be made as data are reviewed. These immediate changes will be communicated to the agencies via telephone and documented in the next annual review update or revision, as appropriate. The two-year revision cycle for the IEMP will also fulfill the formal commitment for revision of the Fernald site's sitewide environmental monitoring program at least every three years as intended by DOE Order 5400.1.

It is important to note that the IEMP, Revision 4, will become an attachment to the Comprehensive Legacy Management and Institutional Control Plan when the plan is revised in 2005. It is expected that future revisions of the IEMP, which will further define post-closure environmental monitoring and reporting activities, will continue to be a part of the Comprehensive Legacy Management and Institutional Control Plan. It should also be noted that these post-closure activities will be managed by the DOE Office of Legacy Management.

Section 2.0

2.0 SUMMARY OF THE FERNALD SITE CLOSURE AND POST-CLOSURE STRATEGY FOR 2005 AND 2006

This section presents the descriptions of the Fernald site's five operable units, the remediation projects, and the associated large-scale remediation activities scheduled in 2005 and 2006 (i.e., closure and post-closure timeframe).

2.1 FERNALD SITE REMEDIATION STRATEGY

The Fernald site's remedial strategy reflects the culmination of all CERCLA activities at the site. This includes extensive site characterization activities to determine the nature and extent of contamination, baseline risk assessments, and detailed evaluation and screening of remedial alternatives leading to a final remedy selection as documented in the record of decision for each operable unit.

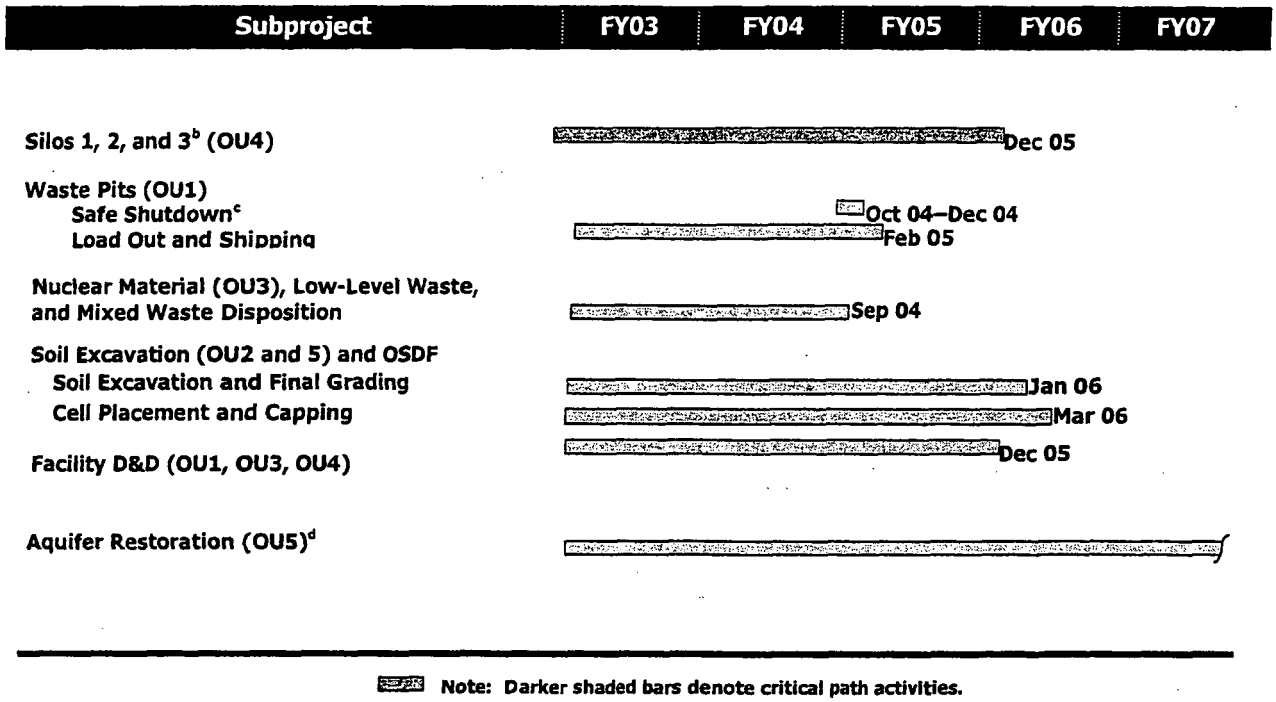
The Fernald site is executing an integrated remediation strategy focusing on accelerated remedial design and action to achieve site closure in 2006. At the heart of this strategy is integrated project planning that consolidates cleanup activities and schedules across the projects. Successful implementation is dependent on the close coordination and sequencing of remediation activities (such as on-site disposal facility preparation, facilities decontamination and dismantlement, and final soil and groundwater remediation) among all project organizations throughout the remedial design/remedial action process. The Fernald schedule is summarized in Figure 2-1. Section 2.2 describes activities that are underway or completed.

The Fernald site began a projectized remedial action approach in 1997 that integrated activities among the operable units to ensure that the final adopted sitewide remedy is well reasoned, cost effective, and ensures long-term protection of human health and the environment. Table 2-1 provides the crosswalk between each operable unit remedy and the projects' responsibilities for implementing each remedy. When a project organization is mentioned in this document, references to the applicable operable unit are generally included, as identified in the Table 2-1 description. Note that in mid-2003 several reorganizations and project name changes occurred. These changes are reflected in Table 2-1 and are comprised of the following:

- The Waste Pits Remedial Action Project became the Waste Pits Project
- The Soil and Disposal Facility Project combined with the Decontamination and Demolition Project to form the Demolition, Soil, and Disposal Project
- The Aquifer Restoration/Wastewater Project was divided: the wellfield and wastewater treatment operations portion went to the Operations and Support Organization, and the Aquifer Restoration/Water Management portion went to the Demolition, Soil, and Disposal Project. (For simplification purposes this report will still refer to Aquifer Restoration/Wastewater Project at times as necessary.)

FIGURE 2-1

FERNALD SITE SCHEDULE[a]



[a]Note that this schedule is based on fiscal year (FY) of October through September, instead of calendar year.
[b]Schedule includes design, construction, startup, operation, waste disposal, and facility shutdown. Note that Silos 1, 2, and 3 schedules are pending disposal agreements; however, operations are anticipated to only require approximately six months for Silos 3 and 12 months for Silos 1 and 2.
[c]Safe Shutdown pertains to Waste Pit Project process facilities.
[d]Groundwater pumping and treatment, and limited activities will continue to be performed during the post-closure phase. Post-closure activities include long-term stewardship and continued operations of groundwater remediation facilities and will be managed by the DOE Office of Legacy Management.

TABLE 2-1

FERNALD SITE OPERABLE UNIT REMEDIES AND ASSOCIATED PROJECT RESPONSIBILITIES

Operable Unit	Description	Remedy Overview	Project/Responsibilities[a]
1	• Waste Pits 1–6 • Clearwell • Burn pit • Berms, liners, caps, and soil within the boundary	Record of Decision Approved: March 1995 Record of Decision Amendment Approved: November 2003 Excavation of materials with constituents of concern (COCs) above FRLs; waste processing and treatment by thermal drying (as necessary); off-site disposal at a permitted facility; and remediation.	Waste Pits Project is responsible for rail upgrades; excavation of Operable Unit 1 waste units; pre-treatment of wastewater as necessary to meet Aquifer Restoration/Wastewater Project wastewater acceptance criteria; waste processing, drying, and loading; rail transport; and off-site disposal of all waste pit waste as well as any contaminated soil and debris that exceed the waste acceptance criteria for the on-site disposal facility. (Note: Some of the activities within this project are being performed by Shaw Environmental.) Demolition, Soil, and Disposal Project is responsible for excavation and certification of contaminated soil beneath the waste pits as well as at- and below-grade remediation facilities and is responsible for decontamination and dismantling of Operable Unit 1 remediation facilities. Aquifer Restoration/Wastewater Project is responsible for final treatment of contaminated runoff, perched water collected during waste pit excavation, and processing wastewater discharges. Each project is responsible for transporting remediation wastewater to the head works of the advanced wastewater treatment facility for treatment.
2	• Solid waste landfill • Inactive flyash pile • Active flyash pile (now inactive) • North and south lime sludge ponds • Other South Field disposal areas • Berms, liners, and soil within the operable unit boundary	Record of Decision Approved: May 1995 Post-Record of Decision Fact Sheet Approved: April 1999 Excavation of all materials with COCs above FRLs; treatment for size reduction and moisture control as required; on-site disposal in the on-site disposal facility; off-site disposal of excavated material that exceeds the waste acceptance criteria for the on-site disposal facility.	Demolition, Soil, and Disposal Project was responsible for excavating and disposing of waste from all Operable Unit 2 subunits and certifying the footprints. This project was also responsible for the ongoing design, construction and maintenance, and closure of the on-site disposal facility that will contain Operable Unit 2 subunit wastes, Operable Unit 5 soil and debris, and Operable Unit 3 debris. Waste Acceptance Organization was responsible for field oversight of soil excavations, for reviewing and signing manifests for impacted material delivered to the on-site disposal facility for placement, and for rejecting any unacceptable shipments. Aquifer Restoration/Wastewater Project was responsible for treating contaminated runoff and perched water collected during excavation of Operable Unit 2 subunit wastes. This project is responsible for leachate and leak detection monitoring at the on-site disposal facility and for treating leachate from the on-site disposal facility. Each project is responsible for transporting remediation wastewater to the head works of the advanced wastewater treatment facility for treatment.

TABLE 2-1
(Continued)

Operable Unit	Description	Remedy Overview	Project/Responsibilities[a]
3	Former production area, associated facilities, and equipment (includes all above- and below-grade improvements) including, but not limited to: • All structures, equipment, utilities, effluent lines, and K-65 transfer line • Wastewater treatment facilities • Fire training facilities • Scrap metals piles • Drums, tanks, solid waste, waste product, feedstocks, and thorium	Record of Decision Approved: September 1996 Adoption of Operable Unit 3 Interim Record of Decision; alternatives to disposal through the unrestricted or restricted release of materials, as economically feasible for recycling, reuse, or disposal; treatment of material for on- or off-site disposal; required off-site disposal for process residues, product materials, process-related metals, acid brick, concrete from specific locations, and any other material exceeding the on-site disposal facility waste acceptance criteria; and on-site disposal for material that meets the on-site disposal facility waste acceptance criteria.	Demolition, Soil, and Disposal Project is responsible for decontamination and dismantling of all above-grade portions of buildings and facilities at the Fernald site. This project is responsible for excavation and certification of soil beneath facilities and for removal of at- and below-grade structures. This project is also responsible for design, construction, and closure of the on-site disposal facility that will contain Operable Unit 2 subunit wastes, Operable Unit 5 soil, and Operable Unit 3 debris. Additionally, this project is responsible for decontamination and dismantling of all Operable Unit 4 remediation facilities and associated above ground pipings. Waste Acceptance Organization is responsible for reviewing facility decontamination and dismantling planning documents. This organization is also responsible for field oversight of debris sizing, segregation of on-site disposal facility material categories, and prohibited items; completing field tracking logs; completing manifests for material bound for the on-site disposal facility; and compiling final records of decontamination and dismantling debris placed in the on-site disposal facility. Aquifer Restoration/Wastewater Project is responsible for treating decontamination and other wastewater during decontamination and dismantling activities, and processing wastewater discharges. Each decontamination and dismantling project is responsible for transporting remediation wastewater to the head works of the advanced wastewater treatment facility for treatment.

TABLE 2-1
(Continued)

Operable Unit	Description	Remedy Overview	Project/Responsibilities[a]
4	• Silos 1 and 2 (containing K-65 residues) • Silo 3 (containing cold metal oxides) • Silo 4 (empty and never used) • Decant tank system • Berms and soil within the operable unit boundary	Record of Decision Approved: December 1994 Explanation of Significant Differences for Silo 3 Approved: March 1998 Record of Decision Amendment for Silos 1 and 2 Approved: July 2000 Record of Decision Amendment for Silo 3 Approved: September 2003 Explanation of significant Differences for Silos 1 and 2 Approved: November 2003 Removal of Silo 3 materials for treatment (to the extent implementable) and off-site disposal. Removal of Silos 1 and 2 residues and decant sump tank sludges with on-site stabilization of materials, residues, and sludges followed by off-site disposal; demolition and decontamination of silos and remediation facilities. Excavation of silos area contaminated soil above the FRLs; disposal for contaminated soils and debris that meet the on-site disposal facility waste acceptance criteria; and site restoration. Concrete from Silos 1 and 2, and contaminated soil and debris that exceed the on-site disposal facility waste acceptance criteria will be disposed of off site.	Silos 1 and 2 Project is responsible for transfer of Silos 1 and 2 residues to temporary transfer tanks, treatment, and transport off site. Waste treatment systems will be completed to support the final remediation of the silos. Silo 3 Project is responsible for Silo 3 content removal and transport off site. Demolition, Soil, and Disposal Project is responsible for certification, excavation, and disposition of contaminated soil beneath the silos and for removal of subsurface structures (i.e., sub-grade silo decant system). The project is responsible for design, construction, and closure of the on-site disposal facility that will contain Operable Unit 2 subunit wastes, Operable Unit 5 soil, and Operable Unit 3 debris. Aquifer Restoration/Wastewater Project is responsible for the ultimate treatment and discharge of wastewater generated from Advanced Waste Retrieval activities and Silos 1, 2, and 3 remediation activities. Once silos projects are complete, this project will provide final treatment of decontamination wastewater from demolition activities. The Silos Project is responsible for pre-treatment of its wastewater as necessary prior to final treatment at the CAWWT. Each project is responsible for capturing and transporting remediation wastewater to the head works of the advanced wastewater treatment facility for treatment.

TABLE 2-1
(Continued)

Operable Unit	Description	Remedy Overview	Project/Responsibilities[a]
5	• Groundwater • Surface water and sediments • Soil not included in the definitions of Operable Units 1–4 • Flora and fauna	Record of Decision Approved: January 1996 An Explanation of Significant Differences document was approved in November 2001, formally adopting EPA's Safe Drinking Water Act Maximum Contaminant Level for uranium of 30 µg/L as both the FRL for groundwater remediation and the monthly average uranium effluent discharge limit to the Great Miami River. Extraction of contaminated groundwater from the Great Miami Aquifer to meet FRLs at all affected areas of the aquifer. Treatment of contaminated groundwater, storm water, and wastewater to attain concentration and mass-based discharge limits and FRLs in the Great Miami River. Excavation of contaminated soil and sediment to meet FRLs. Excavation of contaminated soil containing perched water that presents an unacceptable threat, through contaminant migration, to the underlying aquifer. On-site disposal of contaminated soil and sediment that meet the on-site disposal facility waste acceptance criteria. Soil and sediment that exceed the waste acceptance criteria for the on-site disposal facility will be treated, when possible, to meet the on-site disposal facility waste acceptance criteria or will be disposed of at an off-site facility. Also, site restoration, institutional controls, and post-remediation maintenance.	Aquifer Restoration/Wastewater Project is responsible for designing, installing, and operating the remediation systems for Great Miami Aquifer groundwater restoration. This project is responsible for groundwater monitoring in the Great Miami Aquifer; reporting on the progress of aquifer restoration; designing, constructing, and operating the aquifer restoration well field and final wastewater treatment systems at the Fernald site. This project is also responsible for operation, maintenance, and monitoring of the on-site disposal facility leachate collection system and leak detection system. Additionally, this project is responsible for decontamination, dismantling and disposal of Operable Unit 5 remediation facilities necessary through the post-closure phase of the Fernald site. Demolition, Soil, and Disposal Project is responsible for certification of sitewide soil; excavation, and disposition of contaminated soil, sediment, perched groundwater and at- and below-grade structures; and final site restoration. The project is responsible for design, construction, maintenance, and closure of the on-site disposal facility that will contain Operable Unit 2 subunit wastes, Operable Unit 5 soil, and Operable Unit 3 debris. Waste Acceptance Organization is responsible for reviewing Demolition, Soil, and Disposal Project planning documents. This project is also responsible for oversight of field excavations; segregating on-site disposal facility material categories and segregating prohibited items; completing field tracking logs; completing manifests for material bound for the on-site disposal facility; and compiling final records of soil and at- and below-grade debris placed in the on-site disposal facility.

[a]Aquifer Restoration/Water Management was previously a part of Aquifer Restoration/Wastewater Project, which is referenced in this table. The Aquifer Restoration/Water Management currently is within the Demolition, Soil, and Disposal Project and is referenced in Section 3.

The project organizations with primary responsibilities for CERCLA remediation, their current status (as of July 2004), and their key initiatives under the Fernald 2006 closure plan are summarized as follows:

- Waste Pits Project – This work scope includes the completion of remedial actions for the excavation; drying (as required); loading and rail transport of contents of Waste Pits 1-6, the burn pit, and the clearwell to an off-site disposal facility (Envirocare of Utah); and responsibility for the off-site disposal of contaminated soil and debris that exceed the waste acceptance criteria for the on-site disposal facility.

  Status: This project is 91 percent complete with 786,000 tons of waste pit material shipped via 123 unit trains since pit excavation began in 1999.

  Initiatives: In May 2002, the project adopted a 24-hour-per-day, 7-day-per-week schedule for dryer operation. In addition, through the approval of a Record of Decision Amendment, the on-site disposal facility will be used (instead of an off-site facility) for disposal of selected subsurface and waste pits cover material that is below the waste acceptance criteria.

- Demolition, Soil, and Disposal Project – This project is responsible for the completion of remedial actions to address contaminated soil at the Fernald site and miscellaneous waste units including the South Field, flyash piles, Lime Sludge Ponds, and the solid waste landfill. It is responsible for excavation and removal of building foundations; roadways; underground utilities and piping systems; sitewide restoration activities; and management of perched water encountered during remediation. This project is also responsible for the design, installation, maintenance, and closure of the on-site disposal facility; and the facility shutdown, decontamination, and dismantling of the above-grade portion of the former uranium processing facilities and all treatment facilities used to support remedial actions of other operable units. The scope also includes disposal of all generated debris, either on site or off site, based on associated waste acceptance criteria. (The Waste Acceptance Organizations oversees waste acceptance criteria compliance.)

  Status: This project is 60 percent complete with 1,625,000 cubic yards of soil and debris placed into six cells of the on-site disposal facility. Approximately 1.3 million cubic yards of material remain to be placed in the facility. Sixty-four percent of the Fernald site is certified as clean. Fifty-five percent of the facility decontamination and demolition is complete with 175 of 316 structures removed.

  Initiatives: The intervening layer thickness was approved to be reduced from 4 feet to 2 feet. The construction of Cells 4 through 8 was successfully accelerated. Cell 7 liner system has been completed; Cell 8 liner will be complete by the end of 2004. Cell 3 final cover system will also be completed by the end of 2004. Cell 4 final cover will be approximately 75 percent complete by the end of 2004. The remaining cells are planned to be completely capped by March 2006. The annual on-site disposal facility placement rates and excavation rates have successfully been elevated to meet project goals. Placement and excavation rates will continue to be accelerated. Additionally, the Closure Decontamination and Demolition Subcontract was de-scoped to allow Fluor Fernald to safely self-perform the majority of the remaining decontamination and dismantling in accordance with the site schedule.

- Silos Projects – These projects oversee the design and completion of remedial actions for the contents of Silos 1 through 3, including the retrieval, stabilization as necessary, and transport of the inventoried residues for off-site disposal.

  Status: Silos 1 and 2 – Design and construction of the Silos 1 and 2 remediation facility is complete, and startup testing is in process. Accelerated Waste Retrieval (Silos 1 and 2 waste retrieval and radon control system) operation is in process.

  Silo 3 – Construction and startup testing of the Silo 3 remediation facility is complete and the facility is being maintained in operable condition pending resolution of disposal issues.

  Initiatives: Silos 1 and 2 – Transfer of Silos 1 and 2 material to the Transfer Tank Area for storage, pending operation of the Silos 1 and 2 remediation facility, is expected to be completed by mid-2005. Startup testing of the remediation facility is in process and the facility is expected to be ready for operation in 2005.

  Silo 3 – The Silo 3 remediation facility will be maintained in operational status until disposal issues are resolved.

- Aquifer Restoration/Wastewater Project – This project is responsible for the completion of activities necessary to restore the water quality in the affected portions of the Great Miami Aquifer including pumping, treating, and discharging extracted groundwater. This project is responsible for groundwater modeling, monitoring, and reporting. This project is responsible for the design, construction, maintenance, and operation of all conveyance, treatment, and discharge systems for groundwater, wastewater, and storm water at the Fernald site. The Aquifer Restoration/Wastewater Project is also responsible for the on-site disposal facility leak detection monitoring program and for monitoring leachate (quantity and quality) generated in the on-site disposal facility. Note that wastewater from individual projects may require project-specific pre-treatment and transportation to one of the project's treatment head works. This will be determined with the Aquifer Restoration/Wastewater Project on a project-by-project basis.

  Status: The Aquifer Restoration/Wastewater Project is 49 percent complete (based on actual pounds of uranium removed from the aquifer through July 2004 versus the 2003 estimated total amount to be removed).

  Initiatives: The AWWT water treatment facility is being converted into a smaller water treatment facility (CAWWT) to provide for the site's remaining water treatment needs.

2.2 GENERAL REMEDIATION ACTIVITIES

Several of the remediation projects involve similar large-scale field activities (some of which are underway or completed) that will occur throughout the Fernald cleanup, particularly during the 2005 and 2006 time frame. These activities include site preparation; excavation/retrieval; construction; remediation facility operation; soil treatment; wastewater management and treatment; transportation of waste materials; on-site disposal facility development, waste placement, and capping; decontamination and dismantling, and safe shutdown; soil certification; and site restoration. Each field activity has associated monitoring

implications, primarily resulting from the potential impact of fugitive dust generation and stormwater runoff; they are described as follows:

- Site Preparation: Site preparation activities, such as excavation of stormwater basins, preparations for development of laydown areas and soil stockpile areas, and construction of remedial facilities that will result in the generation of dust to some degree as well as stormwater runoff

- Waste Excavation/Retrieval and Soil Excavation: The excavation and movement of waste and soil will create dust, which must be controlled, throughout the remediation. The following areas remain to be excavated:

  - In Operable Unit 5, all contaminated soil above FRLs (including affected soils beneath demolished structures in Operable Units 3 and 4, beneath the waste pits in Operable Unit 1, and beneath portion of Operable Unit 2, as required) on the Fernald site property

  - The contents of Silos 1, 2, and 3 will be retrieved for storage, treatment (Silos 1 and 2), and shipment, although all processes will be conducted within closed or sealed systems.

- Operation of Remediation Facilities: During the operation of remediation facilities, administrative and engineered controls limit the fugitive point source air emissions and surface water discharges. An extensive amount of environmental control data is being, and will be, generated and reviewed against control limits during the operation of these facilities, including the Waste Pits Project and Silos Projects.

- Soil Treatment: Soil that has already been excavated that does not meet the waste acceptance criteria for the on-site disposal facility for chemical parameters will require treatment prior to disposal. There is no remaining soil that has been identified that requires treatment; however, investigations are continuing to be performed in a portion of the Fernald site.

- Wastewater Management: Wastewater generated during remediation must be collected, monitored, and discharged or, if necessary, transported for treatment at one of the designated wastewater treatment facilities. Wastewater includes pumped groundwater, decontamination water, storm water, and other potentially contaminated water requiring treatment.

- Transportation of Treated and Untreated Waste to On- and Off-Site Disposal Facilities: All materials and soils with constituents of concern (COCs) above FRLs on the Fernald site property will be transported following excavation, treatment, or both, to on- or off-site disposal facilities. This activity will generate dust throughout the life of the remediation even though the best available control technology is employed to limit emissions.

- Decontamination and Dismantling: Along with the facilities in the former production area, all facilities constructed to implement remedies will eventually undergo decontamination and dismantling. Decontamination and dismantling, which is nearly complete within the former production area, will continue throughout the life of the remediation.

- Soil Certification: As the last facilities undergo dismantling and disposal and soil excavation is completed, certification activities will be initiated. This activity involves collecting physical samples across the remediated areas in order to provide the necessary data to prove that remediation efforts have successfully removed the entirety of the contamination to the acceptable final remediation levels.

- Site Restoration: As certification is completed, restoration activities will begin. This activity will involve movement and final grading of soil, planting/seeding native vegetation, and related activities.

Post-closure activities will be comprised of some of the activities listed above (e.g., operation of remediation facilities and wastewater management) in order to complete groundwater restoration. It should be noted that post-closure activities will be managed by the DOE Office of Legacy Management.

2.3 TWO-YEAR PROJECTION OF REMEDIATION FIELD ACTIVITIES

The two-year IEMP revision schedule limits the uncertainties associated with long-range project planning and provides flexibility to customize monitoring programs to align with the current mix of remediation activities and actively incorporate stakeholder input. In addition, the annual IEMP review will enable DOE to update the plan each year if the need arises. Table 2-2 identifies the remediation field activities for this two-year period and Figure 2-2 shows the area for planned excavations during 2005.

This two-year schedule provides the basis to estimate monitoring needs, on both a project-specific and a sitewide basis. The scope of the activities detailed above was a fundamental consideration in developing the IEMP monitoring approach and media-specific sampling programs.

TABLE 2-2

FERNALD SITE REMEDIATION FIELD ACTIVITIES FOR 2005 AND 2006

Remediation Project	2005	2006
Waste Pits Project	Loading and shipping for off-site disposal by rail (activities will be performed for non-waste pit material)	
Aquifer Restoration/ Wastewater Project	Continue sitewide groundwater monitoring. Complete conversion of AWWT into CAWWT. Begin operating CAWWT. Shut down all other water treatment facilities and prepare them for decontamination and dismantling. Continue operation and maintenance of extraction system wells. Complete installation of waste storage area (Phase II) wells and any other needed wells. Continue collection and treatment of storm water and wastewater. Continue on-site disposal facility leak detection and leachate monitoring.	Continue sitewide groundwater monitoring. Continue operation of water treatment facilities. Continue operation and maintenance of extraction system wells. Continue collection and treatment of storm water and wastewater until soil certification is complete and the last cell of the on-site disposal facility is capped. Continue on-site disposal facility leak detection and leachate monitoring.

TABLE 2-2
(Continued)

Remediation Project	2005	2006
Demolition, Soil, and Disposal Project	Complete excavation of clay for contouring layer and vegetative cover from borrow area.	Complete final restoration of borrow area.
	Begin final grading and planting for restoration for borrow area.	Continue and complete Cell 8 cap construction.
	Complete Cell 4 cap construction.	Complete Stream Corridors certification.
	Continue and complete Cell 5 impacted material placement.	Complete Area 7 certification.
	Continue and complete Cell 6 impacted material placement.	
	Continue and complete Cell 7 impacted material placement.	
	Complete Cell 8 impacted material placement.	
	Begin and complete Cell 5 cap construction.	
	Begin and complete Cell 6 cap construction.	
	Begin and complete Cell 7 cap construction	
	Begin Cell 8 cap construction.	
	Complete Area 2 certification.	
	Complete Area 3A and 3B certification.	
	Complete Area 4A certification.	
	Complete 4B excavation and certification.	
	Complete Area 5 excavation and certification.	
	Complete Area 6 excavation and certification.	
	Resume Area 7 excavation and certification.	
	Begin Stream Corridors excavation and certification.	

TABLE 2-2
(Continued)

Remediation Project	2005	2006
Demolition, Soil, and Disposal Project (cont.)	Complete decontamination and dismantling east warehouse complex.	
	Complete decontamination and dismantling Waste Pit Project facilities.	
	Complete decontamination and dismantling Silos facilities.	
Silos Projects	Silo 3 startup.	
	Silo 3 operations and shipping/disposal.	
	Radon Control System operation.	
	Silos 1 and 2 Accelerated Waste Retrieval operations (Silos 1 and 2 material retrieval).	
	Silos 1 and 2 remediation facility startup.	
	Silos 1 and 2 treatment, transportation, and disposal.	
	Begin and complete safe shutdown of remediation facilities.	

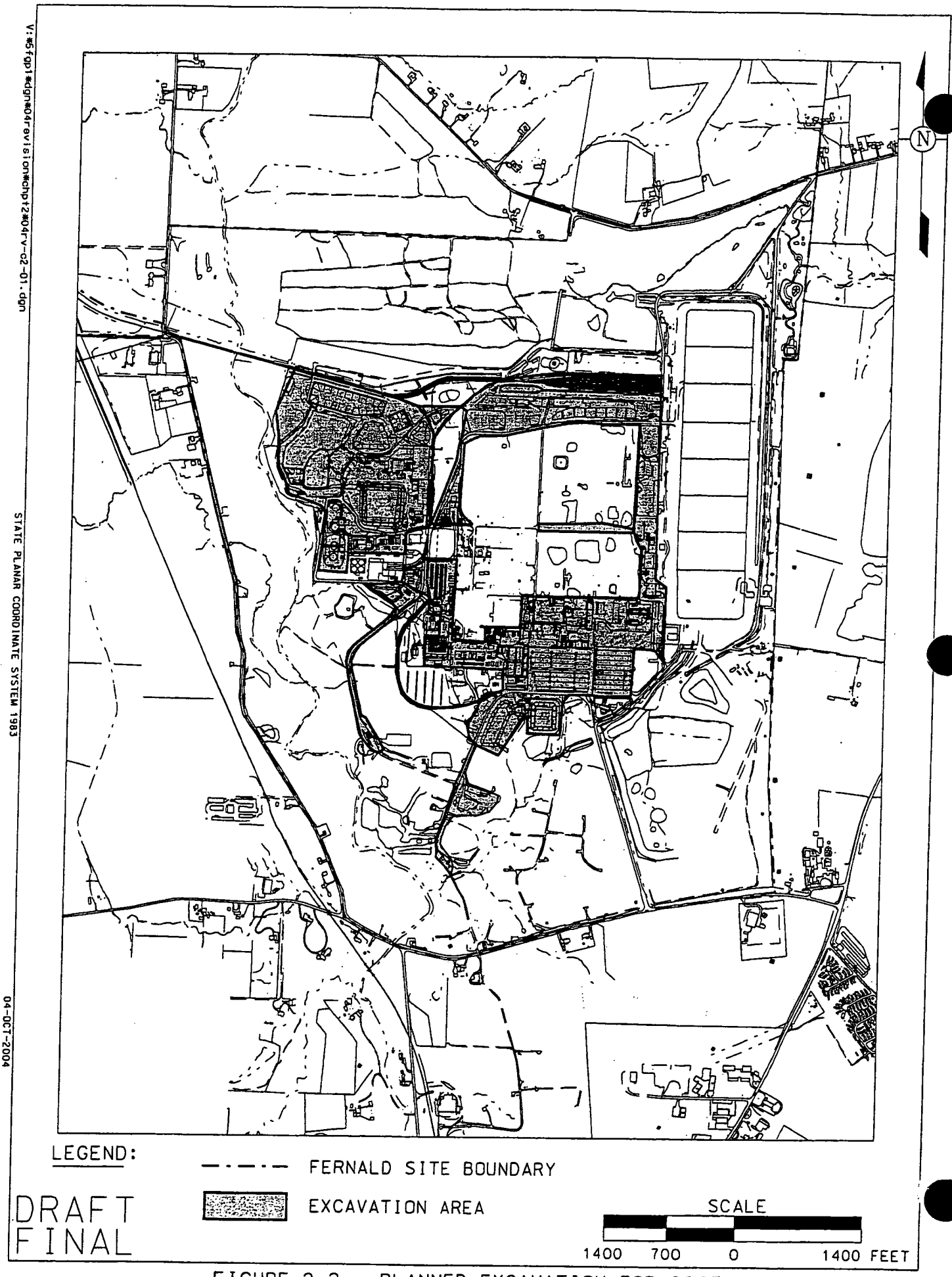


FIGURE 2-2. PLANNED EXCAVATION FOR 2005

Section 3.0

3.0 GROUNDWATER MONITORING PROGRAM

Section 3.0 presents the monitoring strategy for tracking the progress of the restoration of the Great Miami Aquifer and satisfying the site-specific commitments related to groundwater monitoring. A medium-specific plan for conducting all groundwater monitoring activities is provided. Program expectations for 2006 are outlined in Section 3.4, and the program design for 2006 is presented in Section 3.5.

3.1 INTEGRATION OBJECTIVES FOR GROUNDWATER

Remediation of the Great Miami Aquifer is being conducted using pump-and-treat technology, and is progressing toward certification through a staged process. The six stages are:

Stage I: Pump-and-Treat Operations
Stage II: Post Pump-and-Treat Operations/Hydraulic Equilibrium State
Stage III: Certification/Attainment Monitoring
Stage IV: Declaration and Transition Monitoring
Stage V: Demobilization
Stage VI: Long-Term Monitoring

The groundwater sampling specified in the IEMP tracks the performance of the Great Miami Aquifer groundwater restoration remedy being implemented under Operable Unit 5. The IEMP is the controlling document for groundwater remedy performance monitoring, and is currently focused on groundwater monitoring needed to support Stage I, Pump-and-Treat Operations, in 2006. Groundwater monitoring requirements for Stages II through VI of the groundwater certification process will be defined in future revision of the IEMP. The following is a brief description of the stages listed above:

Stage I – Pump-and-Treat Operations

The aquifer remedy is currently in Stage I. The principal contaminate of concern is uranium. Groundwater is being pumped from contaminated portions of the aquifer and treated for uranium.

A phased approach to remediation of the aquifer has been organized around three groundwater restoration modules:

1. The South Plume Module
2. The South Field Module
3. The Waste Storage Area Module

An overview of each aquifer restoration module is provided in Section 3.4, and Figure 3-1 identifies the location of these aquifer restoration modules. As discussed in Section 3.4, the aquifer remedy once included a re-injection module. Operation of the Re-injection Module was discontinued in 2004. Pump-and-treat operations will continue for each groundwater module until FRL concentrations in the aquifer have been achieved or mass removal efficiency of the extraction system has decreased such that it is apparent groundwater FRL concentration limits in the aquifer cannot be achieved. The controlling document for the operation of the pump and treat system is the Operations and Maintenance Master Plan for Aquifer Restoration and Wastewater Treatment (OMMP), Revision 2. Ultimately, the IEMP will be used to document the approach of determining when the various modules complete pump-and-treat operations. A Certification Strategy is currently being prepared that will explain how certification will progress for each active module in the aquifer remediation system. Once the Certification Strategy has been approved, monitoring requirements needed to support the strategy will be incorporated into future revisions of the IEMP as deemed appropriate.

The design of the groundwater monitoring program in 2006 was developed in recognition of:

- Operation of the South Field (Phases I and II) Module
- Operation of the South Plume Module
- Operation of the Waste Storage Area (Phases I and II) Module
- Soil excavation/certification activities in Areas 4B, 5, 6, and 7 including the silos area, and on-property stream corridors
- Continue and complete waste placement, closure, and capping activities at the on-site disposal facility
- Operation activities associated with the Operable Unit 4 Accelerated Waste Retrieval Project and Silo 3 Project treatment facility, and activities associated with the Silos 1 and 2 remediation facility.

Additional information concerning site remediation activities is contained in Section 2.0.

Along with this performance-based responsibility, the IEMP in 2006 serves to integrate several former compliance-based groundwater monitoring or protection programs:

- OEPA Director's Findings and Orders for property boundary groundwater monitoring to satisfy RCRA facility groundwater monitoring requirements
- Private well sampling
- Groundwater Protection Management Program Plan.

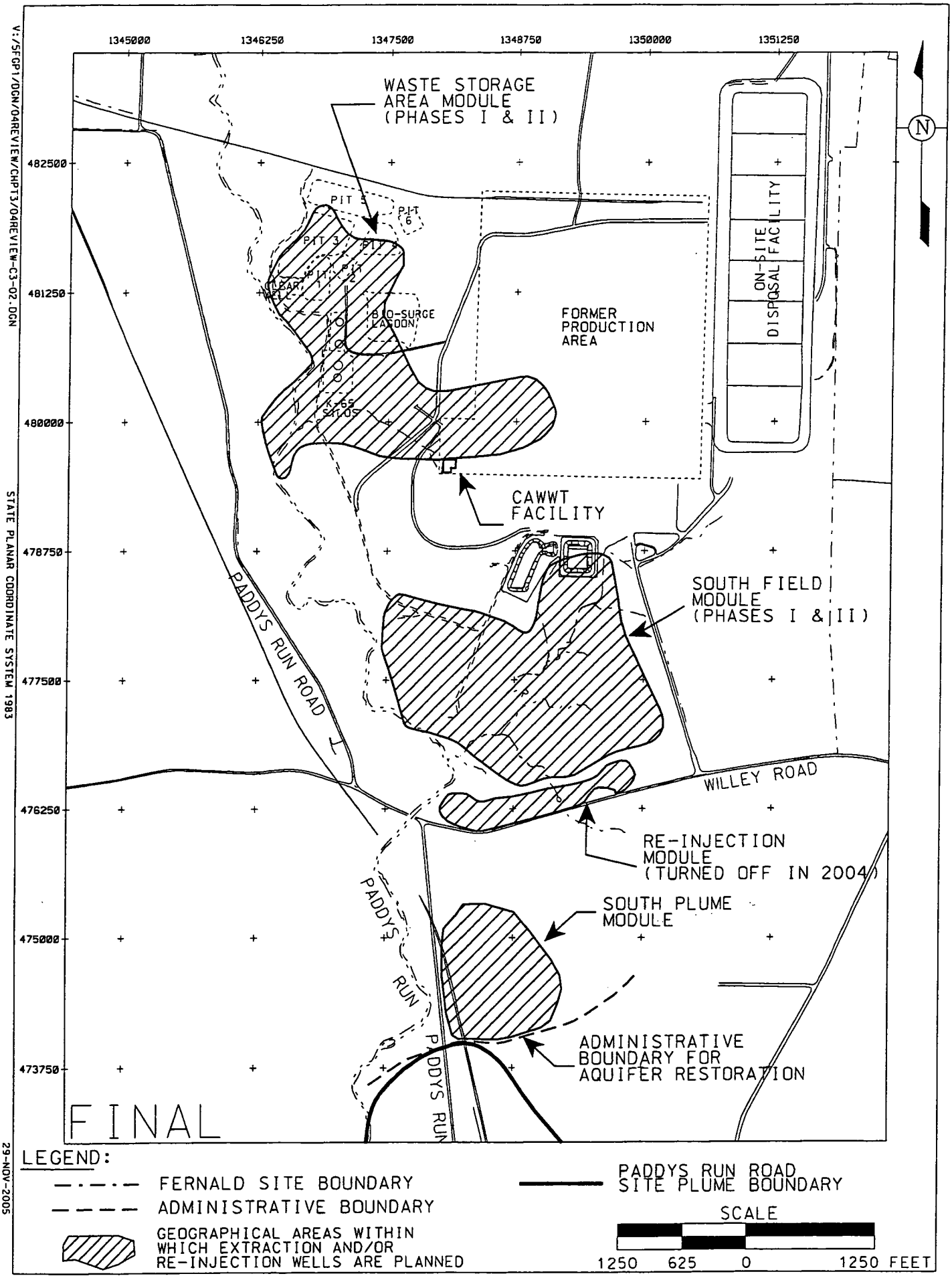


FIGURE 3-1. LOCATION OF AQUIFER RESTORATION MODULES

As discussed in Section 3.7, these activities were brought together under a single reporting structure to facilitate regulatory agency review of the progress of the Operable Unit 5 groundwater remedy.

Stage II – Post Pump-and-Treat Operations/Hydraulic Equilibrium State

Stage II monitoring will begin on a module-specific basis when pump-and-treat operations have stopped. The objective will be to document that the aquifer has re-adjusted to steady state non-pumping conditions prior to proceeding to Stage III, Attainment Monitoring. During Stage II, groundwater levels will be routinely measured to document that steady-state water level conditions have been achieved. Groundwater FRL constituent concentrations will also be routinely measured. If uranium concentrations rebound to levels above the groundwater FRL during the steady-state assessment, then pumping operations would resume. If uranium concentrations remain below the groundwater FRL during the steady-state assessment and do not appear to be trending up toward the groundwater FRL, then the certification process will proceed to Stage III, Certification/Attainment Monitoring. It is anticipated that Stage II monitoring will take approximately three months.

Stage III – Certification/Attainment Monitoring

Certification/attainment monitoring will also be module-specific. Data collected during Stage II will be used to document that remediation goals have been met, and that the goals will continue to be maintained in the future. Statistical tests will be used to predict the long-term ability to maintain below-FRL constituent concentrations.

Stage IV – Declaration and Transition Monitoring

Because certification is being approached on a module-specific basis, efforts need to be taken to ensure that upgradient plumes do not migrate into and re-contaminate downgradient areas where remediation goals have been achieved. A few monitoring wells will be positioned at the upgradient edge of the clean areas and will be monitored to document that the upgradient plume is not impacting the clean area. It is anticipated that Stage IV monitoring could be conducted for as long as 10 years, essentially the time when the groundwater model predicts that cleanup goals will be achieved in the South Plume Module versus the Waste Storage Area Module.

Stage V – Demobilization

Stage V identifies that all structures, trailers, liners, pipes (except the outfall line), and utilities dedicated for aquifer restoration and wastewater treatment will need to be properly decontaminated and dismantled in order to be protective of the environment. With the exception of the water treatment facility, the D&D of infrastructure will not take place until the entire aquifer has been certified clean. This will provide the

means to re-initiate pumping in any area of the aquifer that may require additional pumping prior to achieving final certification.

Stage VI – Long-Term Monitoring

Long-term monitoring will be conducted after the last groundwater module area is certified clean. The monitoring will focus on the elevation of the water table in the area of the on-site disposal facility. If the water table rises to an elevation that exceeds what was previously recorded for the area, then groundwater monitoring beneath former source areas will be initiated to determine if any new sources have dissolved into the groundwater.

3.2 SUMMARY OF REGULATORY DRIVERS, DOE POLICIES, AND OTHER FERNALD SITE-SPECIFIC AGREEMENTS

This section presents a summary evaluation of the regulatory-based requirements and policies governing monitoring of the Great Miami Aquifer. The intent of the section is to identify the pertinent regulatory drivers, including applicable or relevant and appropriate requirements (ARARs) and to-be-considered requirements, for the scope and design of the Great Miami Aquifer groundwater monitoring system. These requirements are used to confirm that the program design satisfies the regulatory obligations for monitoring that have been activated by the Operable Unit 5 Record of Decision, and to achieve the intentions of other pertinent criteria, such as DOE Orders and the Fernald site's existing agreements that have a bearing on the scope of groundwater monitoring.

The results of the analysis are also used to define, as appropriate for these media, the administrative boundaries between the IEMP and the project-specific source control monitoring conducted by other organizations.

3.2.1 Approach

The analysis of the regulatory drivers and policies for groundwater monitoring was conducted by examining the suite of ARARs and to-be-considered requirements in the five approved CERCLA Operable Unit Records of Decision to identify the subset with specific groundwater monitoring requirements. The Fernald site's existing compliance agreements issued outside the CERCLA process (such as the September 10, 1993, OEPA Director's Findings and Orders [OEPA 1993]) were also reviewed.

3.2.2 Results

The following regulatory drivers, compliance agreements, and DOE policies were found to govern the monitoring scope and reporting requirements for remedy performance monitoring and general surveillance of the protectiveness of the Great Miami Aquifer groundwater remedy:

- The CERCLA Record of Decision for Remedial Actions at Operable Unit 5 requires the extraction and treatment of Great Miami Aquifer groundwater above FRLs until the full, beneficial use potential of the aquifer is achieved, including use as a drinking water source. The FRLs are established by considering chemical-specific ARARs, hazard indices, and background and detection limits for each contaminant. Many Great Miami Aquifer FRLs are based on established or proposed Safe Drinking Water Act maximum contaminant levels (MCLs), which are ARARs for groundwater remediation. For Fernald site-related contaminants that do not have an established MCL under the Safe Drinking Water Act, a concentration equivalent to an incremental lifetime cancer risk of 10^{-5} for carcinogens or a hazard quotient of 1 for non-carcinogens was used as the FRL, unless background concentrations or detection limits are such that health-based limits could not be attained. (In these cases the background or detection limit became the FRL.) The FRLs will be tracked throughout all affected areas of the aquifer and will be the basis for determining when the Great Miami Aquifer restoration objectives have been met. By definition, the Operable Unit 5 Record of Decision incorporates the requirements of the Fernald site's existing CERCLA South Plume Removal Action (which was the regulatory driver for the former Design Monitoring and Evaluation Program Plan and the Groundwater Monitoring and Reporting Program).
- Per the CERCLA Remedial Design Work Plan for Remedial Actions at Operable Unit 5, monitoring will be conducted following the completion of cleanup as required to assess the continued protectiveness of the remedial actions. The IEMP will specify the type and frequency of environmental monitoring activities to be conducted during remedy implementation and ultimately, following the cessation of remedial operations as appropriate. The IEMP will delineate the Fernald site's responsibilities for sitewide monitoring over the life of the remedy, and ensure that FRLs are achieved at project completion. The IEMP will also serve as the primary vehicle for determining to EPA and OEPA's satisfaction that remedial action objectives for the Great Miami Aquifer have been attained.
- The September 10, 1993, OEPA Director's Findings and Orders required groundwater monitoring at the Fernald site's property boundary to satisfy RCRA facility groundwater monitoring requirements, and have been superceded by Directors Final Findings and Orders, issued September 7, 2000. The September 7, 2000 Directors Final Findings and Orders specify that the site's groundwater monitoring activities will be implemented in accordance with the IEMP. The revised language allows modification of the groundwater monitoring program as necessary via the IEMP revision process without issuance of a new order.
- DOE Order 5400.1, General Environmental Protection Program establishes the requirement for a Groundwater Protection Management Program Plan (GPMPP) for DOE facilities. The required informational elements of a GPMPP are fulfilled by the Remedial Investigation (DOE 1995e) and Feasibility Study reports for Operable Unit 5. The groundwater monitoring program requirement is being fulfilled by the IEMP. This also satisfies DOE Manual 435.1 (DOE 2001c), which refers to DOE Order 5400.1.

- DOE Order 5400.5, Radiation Protection of the Public and Environment establishes radiological dose limits and guidelines for the protection of the public and environment. Demonstration of compliance with these limits and guidelines for radiological dose is based on calculations that make use of information obtained from the Fernald site's monitoring and surveillance program. This program is based on guidance in the Environmental Regulatory Guide for Radiological Effluent Monitoring and Environmental Surveillance (DOE 1991). The Fernald site's private well sampling program for the Great Miami Aquifer (that was previously in the Fernald Site Environmental Monitoring Plan [DOE 1995c]) is conducted to satisfy the intention of this DOE Order with respect to groundwater. While most private well water users in the affected area are now provided with a public water supply, a limited private well sampling activity will be maintained to supplement the groundwater monitoring network provided by monitoring wells. A dose assessment is no longer required due to the availability of a public water supply.
- The 1986 Federal Facilities Compliance Agreement requires that the Fernald site maintain a sampling program for daily flow and uranium concentration of discharges to the Great Miami River and report the results quarterly to the EPA, OEPA, and Ohio Department of Health. The sampling program conducted to address this requirement has been modified over the years and is currently governed by an agreement reached with EPA and OEPA in early 1996 with modifications documented and approved through biennial IEMP revisions. For groundwater, this agreement is specifically related to the South Plume wellfield to quantify the amount of uranium removed and total volume of groundwater extracted.

The groundwater monitoring plan provided in this IEMP has been developed with full consideration of the regulatory drivers described above. Each of these drivers, and the associated monitoring conducted to comply with these drivers, are listed in Table 3-1. This table also lists each regulatory requirement for the on-site disposal facility groundwater monitoring program and the associated project-specific plan. Sections 3.7 and 7.0 outline the current and long-range plan for complying with the reporting requirements contained in the IEMP drivers.

Project-specific groundwater monitoring is required only for one project—the on-site disposal facility. The IEMP will not be used as the mechanism for conducting on-site disposal facility performance monitoring within the glacial overburden and the Great Miami Aquifer. A leak detection monitoring program plan, which includes both leachate and groundwater monitoring as part of a leak detection program, was submitted separately from the IEMP and approved by EPA and OEPA in 1997. The on-site disposal facility monitoring requirements include the regulatory drivers, the ARARs, and to-be-considered criteria that have a bearing on the design and execution of a groundwater monitoring program for the on-site disposal facility and are as follows:

- Ohio Solid Waste Disposal Facility Groundwater Monitoring Rules, Ohio Administrative Code (OAC) 3745-27-10 specify groundwater monitoring program requirements for sanitary landfills. These regulations describe a three-tiered program for detection, assessment, and corrective measures.

TABLE 3-1

FERNALD SITE GROUNDWATER MONITORING PROGRAM REGULATORY DRIVERS AND RESPONSIBILITIES

	DRIVER	ACTION
IEMP	CERCLA Record of Decision for Operable Unit 5	The IEMP describes routine monitoring to ensure remedy performance and to evaluate impacts of remediation activities to the Great Miami Aquifer. The IEMP will be modified toward completion of the remedial action to include a sampling plan to certify achievement of the FRLs.
	OEPA Director's Final Findings and Orders; RCRA/Hazardous Waste Facility Groundwater Monitoring	The IEMP describes routine monitoring at wells located at the property boundary to ensure remedy performance and to evaluate impacts of remediation activities to the Great Miami Aquifer.
	DOE Order 5400.1, Groundwater Protection Management Plan. Also satisfies DOE M 435.1 which refers to DOE Order 5400.1	The IEMP describes routine monitoring to ensure remedy performance and to evaluate impacts of remediation activities to the Great Miami Aquifer.
	DOE Order 5400.5, Radiation Protection of Public and Environment	No longer required.
	Federal Facilities Compliance Agreement, Radiological Monitoring	The IEMP describes the routine sampling and reporting of the South Plume wellfield in terms of the total volume extracted and the amount of uranium removed.

TABLE 3-1
(Continued)

	DRIVER	ACTION	PROJECT PLAN
PROJECT	OAC 3745-27-10, Ohio Solid Waste Disposal Facility Groundwater Monitoring	A leak detection monitoring program in the glacial overburden and the Great Miami Aquifer is being conducted for the on-site disposal facility.	Groundwater, leak detection, and leachate monitoring plan for the on-site disposal facility
	40 CFR 264.90-.99 (OAC 3745-54-90 through 99); 40 CFR 265.90-.94 (OAC 3745-65-90 through 94), RCRA/Ohio Hazardous Waste Disposal Facility Groundwater Monitoring	A leak detection monitoring program in the glacial overburden and the Great Miami Aquifer is being conducted for the on-site disposal facility.	Groundwater, leak detection, and leachate monitoring plan for the on-site disposal facility
	Uranium Mill Tailings Reclamation and Control Act Regulations Groundwater Monitoring for Disposal Facilities	A leak detection monitoring program in the Great Miami Aquifer is being conducted for the on-site disposal facility.	Groundwater, leak detection, and leachate monitoring plan for the on-site disposal facility
	OAC 3745-27-19(M)(4) and (5), Ohio Solid Waste Disposal Facility Leachate Detection and Collection Systems	Monitoring of on-site disposal facility leachate detection and collection systems is included in the on-site disposal facility leak detection monitoring program.	Groundwater, leak detection, and leachate monitoring plan for the on-site disposal facility

Note: Refer to Appendix A of the On-site Disposal Facility Groundwater/Leak Detection and Leachate Monitoring Plan (DOE 2006) for ARARs and other regulatory requirements.

- RCRA/Ohio Hazardous Waste Groundwater Monitoring Requirements for Regulated Units, 40 Code of Federal Regulations (CFR) 264.90 through .99 (OAC 3745-54-90 through 99) and 40 CFR 265.90 through .94 (OAC 3745-65-90 through 94), which specify groundwater monitoring program requirements for surface impoundments, landfills, and land treatment units that manage hazardous wastes. Because the Ohio regulations are at least as stringent, and in some cases more stringent, they are the controlling regulations.
- Uranium Mill Tailings Reclamation and Control Act Regulations, 40 CFR 192.32(A)(2), which specify standards for uranium byproduct materials in piles or impoundments. These regulations require conformance with the RCRA groundwater monitoring performance standard in 40 CFR 264.92. Compliance with RCRA/Ohio Hazardous Waste rules for groundwater monitoring will fulfill the substantive requirements for groundwater monitoring in the Uranium Mill Tailings Reclamation and Control Act regulations.
- Ohio Solid Waste Disposal Facility Rules, OAC 3745-27-19(M)(4) and (5), which require submittal of an annual operational report, including a summary of the quantity of leachate collected for treatment and disposal, location of leachate treatment, verification that the leachate management system is operating properly, and the results of analytical testing of an annual grab sample of leachate for groundwater monitoring constituents listed in Appendix I of OAC 3745-27-10.

Note: Refer to Appendix A of the On-site Disposal Facility Groundwater/Leak Detection and Leachate Monitoring Plan for ARARs and other regulatory requirements.

3.3 PROGRAMMATIC BOUNDARY FOR THE GROUNDWATER MONITORING PROGRAM

This section identifies the programmatic boundaries that have been established between the IEMP and the project-specific activities to be conducted by others in 2006. The intent behind the boundary definition is to clearly delineate the scope and geographic extent of the IEMP's monitoring responsibility and to establish a recognized interface between the sitewide focus of the IEMP and the predominant emission control focus of project-specific monitoring.

The programmatic boundary for each environmental medium at the Fernald site will be unique, and for certain media, time-dependent. One or more of the following defines the medium-specific boundary:

- Regulatory monitoring requirements for the media
- Physical boundaries (i.e., geologic, hydrogeologic, or surface boundaries imposed by the remediation projects)
- Medium-specific monitoring requirements specifically assigned to the IEMP by administrative decisions.

Because of these unique considerations, the boundary definitions and responsibilities are provided for each medium in order to clearly convey the line of responsibility for that medium under the IEMP. For groundwater, three programmatic boundaries require definition for the IEMP:

- Responsibility for the Great Miami Aquifer and the soil/perched groundwater remediation efforts
- The Administrative Boundary between the Fernald site and the Paddys Run Road Site contaminant plumes (refer to Figure 3-1)
- Responsibility for construction and performance monitoring of the on-site disposal facility.

3.3.1 Responsibility for Great Miami Aquifer and Soil/Perched Groundwater Remediation Efforts

For the Fernald site's Great Miami Aquifer plume, all the geographic areas that are to be restored under the Operable Unit 5 Record of Decision (or routinely monitored beyond the restoration area) reside within the scope of the Aquifer Restoration/Water Management Project. Soil and perched groundwater remediation responsibilities also reside within the Demolition, Soil, and Disposal Project. The pre-certification and certification sampling activities that will accompany the excavation of affected soil and perched groundwater zones (to demonstrate the attainment of cross media-based soil FRLs) will be performed by the Demolition, Soil, and Disposal Project.

3.3.2 Administrative Boundary Between the IEMP and Paddys Run Road Site Contaminant Plumes

As described in the Remedial Investigation Report for Operable Unit 5 (refer to Section 4.8.2), the Paddys Run Road Site consists of two facilities: PCS Purified Phosphates (formerly Albright and Wilson Americas, Inc.) and Ruetgers-Nease Chemical Company, Inc. PCS Purified Phosphates occupies the northern portion of the site and manufactures phosphate compounds. Rutgers-Nease manufactures aromatic sulfonated compounds and occupies the southern portion of the site.

The Paddys Run Road Site Remedial Investigation Report released in September 1992 documented releases to the Great Miami Aquifer of inorganics, volatile organic compounds, and semi-volatile organic compounds. The Proposed Plan for Operable Unit 5 acknowledged that DOE's role and involvement, if any, in OEPA's ongoing assessment and cleanup of the Paddys Run Road Site plume would be separately defined as part of the Paddys Run Road Site response obligations and in accordance with the Paddys Run Road Site project schedule. Groundwater monitoring will continue south of the Administrative Boundary until certification of the off-property South Plume is complete. This monitoring will assess the nature of the 30-µg/L total uranium plume south of the Administrative Boundary and the impact that pumping of the South Plume extraction wells has on the Paddys Run Road Site plume.

3.3.3 Responsibility Boundary for Construction and Performance Monitoring at the On-Site Disposal Facility

The Demolition, Soil, and Disposal Project is responsible for construction, filling, capping, and maintenance of each cell of the on-site disposal facility. The Aquifer Restoration/Wastewater Project is responsible for leak detection monitoring for the on-site disposal facility; and for leachate monitoring, conveyance, and treatment.

On-site disposal facility monitoring results will be reported on the IEMP Data Information Site and in the annual site environmental report. Evaluation of baseline conditions will be provided through technical memoranda.

3.4 PROGRAM EXPECTATIONS AND DESIGN CONSIDERATIONS

3.4.1 Program Expectations

The IEMP groundwater monitoring program is designed to provide a comprehensive monitoring network that will track remedial wellfield operations and assess aquifer conditions. The expectations of the monitoring program in 2006 are to:

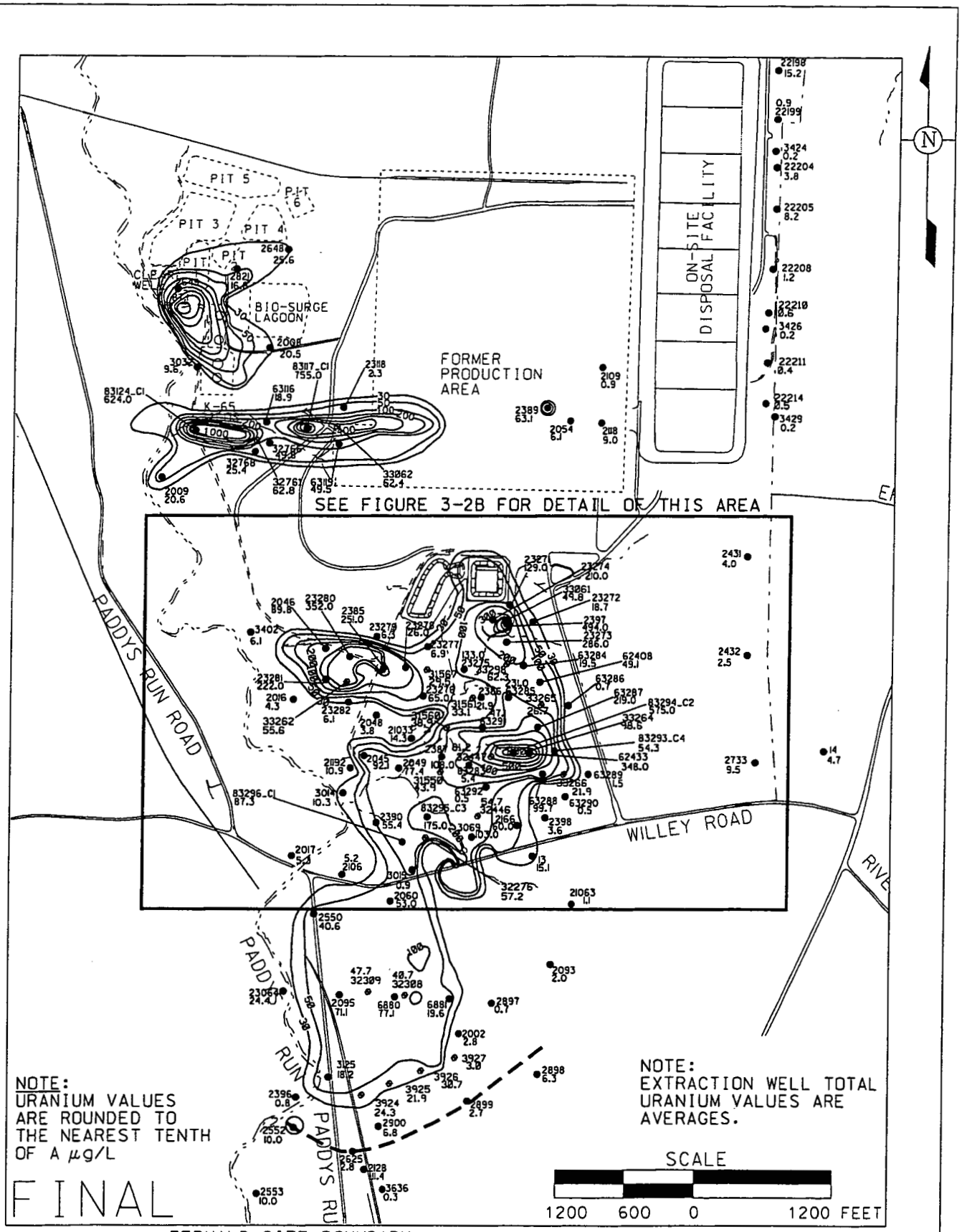
- Provide groundwater data to assess the capture and restoration of the 30-µg/L total uranium plume
- Provide groundwater data to assess the capture and restoration of non-uranium FRL constituents
- Provide groundwater data to assess groundwater quality at the downgradient Fernald site property boundary and off site at the leading edge of the 30-µg/L total uranium plume
- Provide groundwater data that are sufficient to assess how reasonable model predictions are over the long term
- Provide groundwater data to assess the impact that the aquifer restoration is having on the Paddys Run Road Site plume
- Continue to fulfill DOE Order 5400.1 requirements to maintain an environmental monitoring plan for groundwater
- Continue to address concerns of the community regarding the progress of the aquifer restoration.

3.4.2 Design Considerations

3.4.2.1 Background

The Great Miami Aquifer is contaminated with uranium and other constituents from the Fernald site. An evaluation of the nature and extent of contamination in the Great Miami Aquifer can be found in the Remedial Investigation Report for Operable Unit 5. Uranium is the principal COC.

Figures 3-2A and 3-2B show the maximum total uranium plume map (30 µg/L uranium or higher) as of the first half of 2005. These maps represent a compilation of several different monitoring depths within the aquifer, and illustrate the maximum lateral extent of the plume at all depths. The majority of the top of the plume is situated at the water table. In some regions of the aquifer, however, the top of the plume is situated below the water table. More detailed presentations of the geometry of the uranium plume can be found in Appendix G of the Baseline Remedial Strategy Report, Remedial Design for Aquifer



LEGEND:
- FERNALD SITE BOUNDARY
- 5.1 TOTAL URANIUM CONCENTRATION MEASURED IN THE FIRST HALF OF 2005
- 30 URANIUM CONTOURS BASED ON 30 µg/L FRL, MAXIMUM, GEOPROBE RESULTS, AND MAXIMUM TOTAL URANIUM DATA THROUGH THE FIRST HALF OF 2005
- ADMINISTRATIVE BOUNDARY FOR AQUIFER RESTORATION
- MONITORING WELL
- EXTRACTION WELL

FIGURE 3-2A. MONITORING WELL DATA AND MAXIMUM TOTAL URANIUM PLUME THROUGH THE FIRST HALF OF 2005

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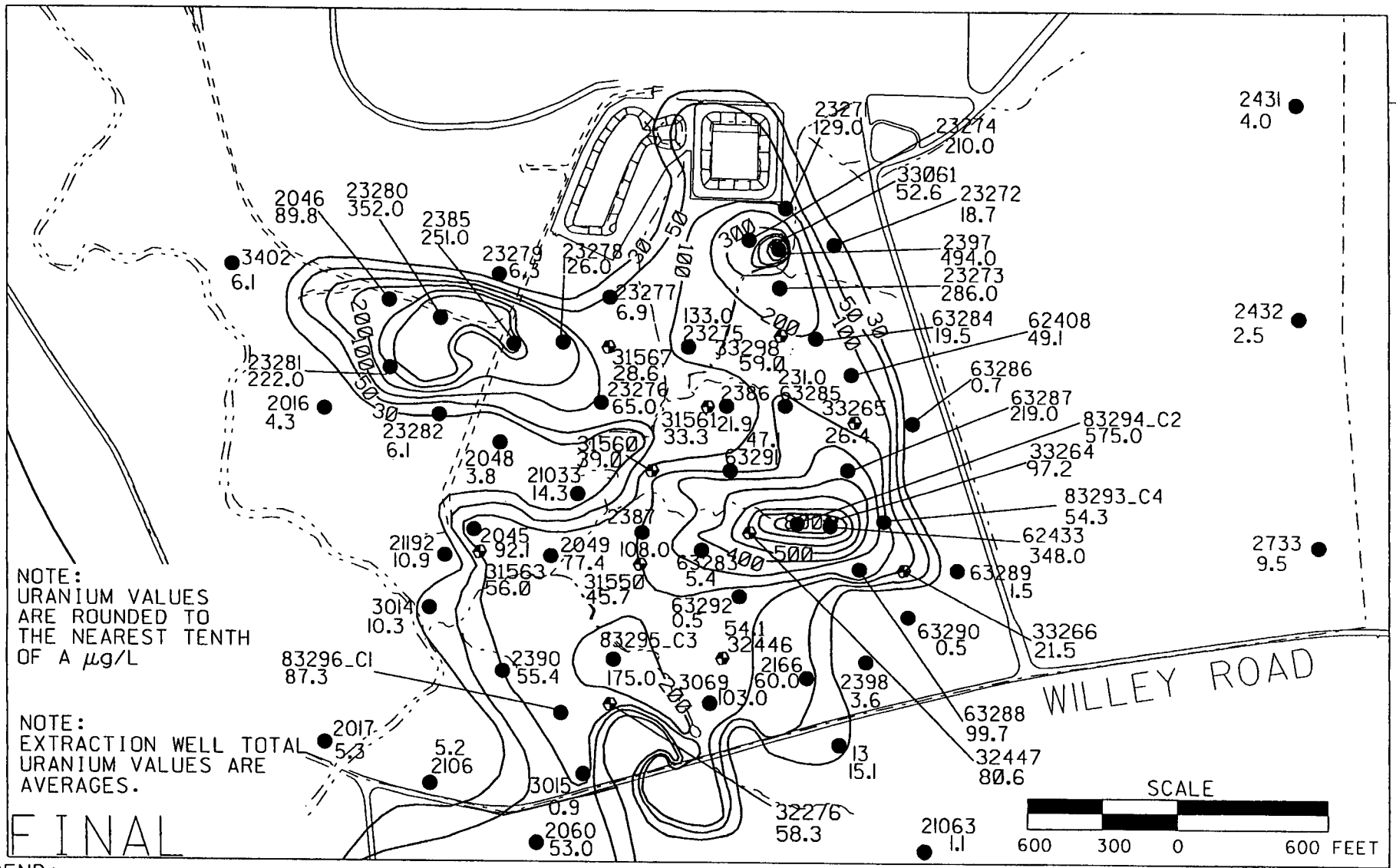


LEGEND:

- FERNALD SITE BOUNDARY
- ● MONITORING WELL
- ⊗ EXTRACTION WELL
- 5.1 TOTAL URANIUM CONCENTRATION MEASURED IN THE FIRST HALF OF 2005
- —30— URANIUM CONTOURS BASED ON 30 µg/L FRL, MAXIMUM GEOPROBE RESULTS, AND MAXIMUM TOTAL URANIUM DATA THROUGH THE FIRST HALF OF 2005

V:/5FGP1/DGN/04REVIEW/CHPT3/05-1HF-PLM-B.DGN
STATE PLANAR COORDINATE SYSTEM 1983

FIGURE 3-2B. MONITORING WELL DATA AND MAXIMUM TOTAL URANIUM PLUME IN SOUTH FIELD THROUGH THE FIRST HALF OF 2005

29-NOV-2005

Restoration (Task 1) (DOE 1997a); the Conceptual Design for Remediation of the Great Miami Aquifer in the Waste Storage and Plant 6 Areas (DOE 2000a); the Design for Remediation of the Great Miami Aquifer South Field (Phase II) Module (DOE 2002b), and the Waste Storage Area (Phase II) Design Report (DOE 2005g).

The primary sources of contamination at the Fernald site that contributed to the present geometry of the uranium plume include: (1) the waste pits in the waste storage area; (2) the inactive flyash pile that was present in the South Field area; (3) former production activities; and (4) the previously uncontrolled surface water runoff from the former production area that had direct access to the aquifer through a former drainage originating near the Plant 1 Pad and flowing west through the waste storage area and the Pilot Plant drainage ditch.

A groundwater remediation strategy that relies on pump-and-treat technology is being used to conduct a concentration-based cleanup of the Great Miami Aquifer. The restoration strategy focuses primarily on the removal of uranium, but has also been designed to limit the further expansion of the plume, achieve removal of all targeted contaminants to concentrations below designated FRLs, and prevent undesirable draw-down impacts beyond the Fernald site.

The "remediation footprint" of the aquifer is a term used to define those areas of the aquifer that will be targeted for the remediation. The OU5 Record of Decision establishes that "areas of the Great Miami Aquifer exceeding FRLs will be restored through extraction methods." Over the course of the aquifer remedy, the areas of the aquifer being targeted for restoration have changed due to:

- The collection of additional characterization data to support modular designs
- Changing the uranium FRL concentration for groundwater from 20 μg/L to 30 μg/L.

Following is a brief discussion of the changes, along with the definition of "remediation footprint."

Continued groundwater monitoring and direct-push sampling conducted to support the design of individual aquifer modules provided data that indicated the area of the aquifer exceeding the groundwater FRL for uranium was larger than the area defined in the Operable Unit 5 Record of Decision.

Changing the FRL concentration for uranium in groundwater from 20 μg/L to 30 μg/L decreased the area of the aquifer that was defined as exceeding the groundwater FRL for uranium in the Operable Unit 5 Record of Decision. In 1996, when the Operable Unit 5 Record of Decision was signed, the (MCL for uranium in drinking water had not been promulgated but was proposed as 20 μg/L. The FRL for uranium

for the groundwater remedy was defined as 20 μg/L to match the proposed MCL. In 2001, EPA finalized the MCL for uranium at 30 μg/L for drinking water. Through a Record of Decision Explanation of Significant Differences (ESD), the MCL became the FRL for total uranium in groundwater at the Fernald site.

To incorporate the changes presented above, the remediation footprint of the aquifer is conservatively defined as the areas contained within a composite of all previous 20-μg/L maximum uranium plume interpretations through 2000, and 30-μg/L maximum uranium plume interpretations subsequent to 2000, located north of the Administrative Boundary for Aquifer Restoration. The remediation footprint of the aquifer (updated through 2004) is shown in Figure 3-3. The interpretation will be updated each year as new data are collected.

Pumping groundwater from the aquifer prior to the start of the actual groundwater remediation began in August 1993 with the startup of five extraction wells in the South Plume. The wells were installed and operated as part of a removal action to prevent the further southern migration of the uranium plume while the Remedial Investigation of the plume was being completed and a remediation system was being designed.

The design of the aquifer remediation system has evolved via the issuance of several different design documents. The first aquifer remediation design was presented in the Operable Unit 5 Feasibility Study. The design consisted of 28 extraction wells pumping for 27 years. It is this design that is contained in the Operable Unit 5 Record of Decision. A commitment was made in the Operable Unit 5 Record of Decision to pursue technological advances that might decrease the remediation time. A technology that was pursued was treated groundwater re-injection. Groundwater modeling was conducted to determine if adding re-injection wells to the remediation would facilitate a quicker cleanup. The groundwater modeling showed that a faster cleanup could be realized by using re-injection if several other actions were also realized. These other actions included:

- Other operable units completing their accelerated cleanup objectives so that surface access is available for aquifer remediation wells
- The accelerated removal of sources to allow extraction wells to be located closer to the center of uranium plumes
- Modeled geochemical and hydraulic parameters being consistent with aquifer conditions.

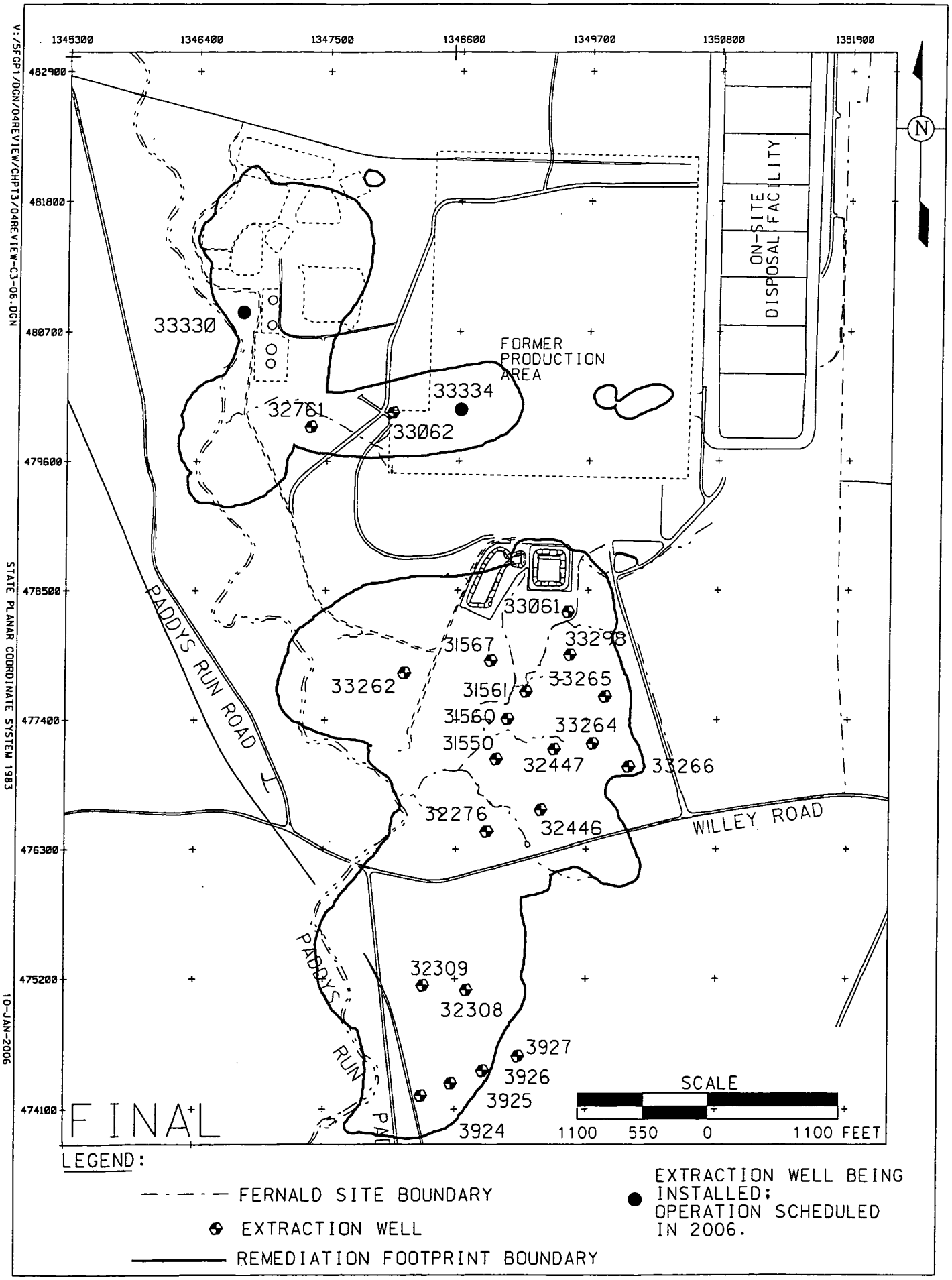


FIGURE 3-3. EXTRACTION WELL LOCATIONS

An aquifer remediation design, which included re-injection, was presented in the Baseline Remedial Strategy Report, Remedial Design for Aquifer Restoration. This design called for 37 pumping wells and 10 re-injection wells. The predicted cleanup time was modeled at 10 years. The pumping and re-injection wells were subdivided into five area specific restoration modules:

- The South Plume Module
- The South Field Module
- The Waste Storage Area Module
- The Plant 6 Module
- The Re-Injection Demonstration Module

Although groundwater modeling showed that re-injection expedited the cleanup, the technology was unproven at the Fernald site. Of concern was the cost of keeping the wells operational (industry experience showed that these wells tend to plug). A demonstration was needed to prove that the re-injection wells could be operated efficiently at the Fernald site. The decision was made to tie the demonstration into the remedy design presented in the Baseline Remedial Strategy Report. If successful, the impact to the remedy would be immediate.

In the summer of 1998, the first wells for the aquifer remediation became operational and marked implementation of the aquifer remedy design presented in the Baseline Remedial Strategy Report. Implementation of the Baseline Remedial Strategy Report design included a groundwater re-injection demonstration that was conducted from September 2, 1998, to September 2, 1999. At the request of the Fernald site, the evaluation of re-injection technology at the Fernald site was sponsored by DOE's Office of Science and Technology Subsurface Contaminants Focus Area. The re-injection demonstration was successful and re-injection was incorporated into the aquifer remedy.

Changes to the aquifer remedy design for the Waste Storage Area and Plant 6 modules were implemented in 2002 based on findings and groundwater modeling results presented in the Conceptual Design for Remediation of the Great Miami Aquifer in the Waste Storage and Plant 6 Areas. Characterization efforts conducted in support of the design showed that the uranium plume in the Plant 6 area had dissipated, eliminating the need for extraction wells in this area. Therefore, an aquifer restoration module is no longer planned for the Plant 6 area; however, groundwater monitoring in the Plant 6 area will continue until the Waste Storage Area Module, which is up gradient of the Plant 6 area, has been certified clean. In 2006, one monitoring well (Monitoring Well 2389) will be routinely monitored in the Plant 6 area.

Characterization efforts conducted in support of the waste storage area design also showed that the uranium plume in the waste storage area was smaller than what was characterized during the Remedial

Investigation/Feasibility Study, and that the waste storage area uranium plume in the vicinity of the confluence of Paddys Run and the Pilot Plant drainage ditch needed to be redefined and extended to the east. In light of these findings, a new restoration module for the waste storage area was modeled and designed. The number of wells needed in the design to remediate the waste storage area went from 10 (Baseline Remedial Strategy Report design) down to five (modified module design). The details concerning this design are presented in the Design for Remediation of the Great Miami Aquifer in the Waste Storage and Plant 6 Areas (DOE 2001a). Three of the extraction wells began pumping in 2002.

Changes to the aquifer remedy design for the South Field module were implemented in 2003 based on findings presented in the Design for Remediation of the Great Miami Aquifer, South Field (Phase II) Module. Characterization efforts conducted to support the design showed that uranium concentrations beneath western portions of the Southern Waste Units were much lower than in previous years. The lower concentrations were attributed to source removal, natural flow of clean groundwater from the west into the area, the continued flushing of clean recharge water through Paddys Run to the underlying aquifer, increased flushing of clean recharge water through deep surface excavations in the inactive flyash pile, and remedial pumping of the extraction wells to the east of this area. The modified design for Phase II of the South Field Module went from nine new extraction wells and five new re-injection wells (Baseline Remedial Strategy Report design) down to four new extraction wells, one new re-injection well, conversion of an existing extraction well into an injection well, and an injection basin (modified module design).

In 2004, aquifer remedy design changes were implemented to address changing water treatment needs resulting from site closure and to stop well-based re-injection. Several water treatment flows were eliminated or reduced (e.g., remediation wastewater, sanitary wastewater, storm water runoff) from the scope of the treatment operation. Elimination or reduction of these flow streams provided an opportunity to reduce the size of the water treatment facility remaining to service the aquifer restoration after site closure. Reducing the size of the treatment facility prior to site closure in 2006 reduced the amount of impacted materials that needed future off-site disposal. In 2004, consensus was reached on a decision to "carve down" the AWWT into a smaller facility—the converted AWWT facility (CAWWT). During and after CAWWT construction, groundwater treatment capacity was limited so that treated groundwater was not available to support well-based re-injection or to continue to meet uranium discharge requirements. Therefore, in September 2004 well-based re-injection was stopped to facilitate construction of the CAWWT.

Groundwater modeling presented in the Comprehensive Groundwater Strategy Report (DOE 2003a) predicted that continued use of large-scale re-injection using existing re-injection wells would shorten the aquifer remedy by three years (comparison of Alternatives 1 and 6). These results indicated limited benefit to maintaining the infrastructure for large-scale, well-based re-injection (when viewed in relation to water treatment facility scale down activities) and supported the decision to stop re-injection. Therefore, the decision was also made in 2004 not to restart well-based re-injection once the CAWWT was operational.

Other operational strategies to enhance the aquifer remedy are being explored, such as inducing recharge to the Great Miami Aquifer through the storm sewer outfall ditch. A phased testing approach is being pursued that involves measuring induced flow rates and seasonal runoff flow into the storm sewer outfall ditch, and possibly conducting site-specific infiltration tests at key locations in the bed of the storm sewer outfall ditch. The phased testing will result in a decision to either incorporate the storm sewer outfall ditch recharge strategy into the site remedy, or to conduct further testing. A baseline flow test began on August 18, 2005 to determine if the storm sewer outfall ditch is capable of delivering an infiltration rate of 500 gallons per minute (gpm) to the aquifer. Clean groundwater is being pumped into the storm sewer outfall ditch from a construction well located on the east side of the Fernald site. This baseline test will be limited to the clean (northeast) branch of the storm sewer outfall ditch. If the baseline test is successful and plans are made to use the storm sewer outfall ditch strategy in the groundwater remedy, a flow rate higher than the 500 gpm will be considered, but logistics involving a source of clean water and meeting established discharge limits at the Parshall Flume will need to be evaluated also. A treatment capacity of 500 gpm is being reserved to treat storm water so it cannot be dedicated to re-injection. Water treatment priorities are defined in Section 5.2 of the draft Operations and Maintenance Master Plan for Aquifer Restoration and Wastewater Treatment (OMMP), Revision 2. At a minimum, additional flow measurements could be made to quantify how much water above the 500-gpm, induced flow the storm sewer outfall ditch will infiltrate into the aquifer from natural seasonal runoff. Site-specific infiltration tests through the bed of the storm sewer outfall ditch may also be conducted. If the baseline 500-gpm flow test is not successful, additional flow testing will be conducted. Additional flow testing in the storm sewer outfall ditch would involve both the northwest and northeast branches of the storm sewer outfall ditch. The flow rate for this additional testing will be a minimum of 500 gpm, but could be higher based on logistics involving an additional source of clean water, meeting established discharge limits at the Parshall Flume, and the ability of the storm sewer outfall ditch to accept the water. If this later flow testing is successful, then the storm sewer outfall ditch recharge strategy will be added to the aquifer remedy.

Changes to the remedy design for the waste storage area were implemented in 2005 based on findings presented in the Waste Storage Area (Phase II) Design. Characterization data collected to support the

Phase II design were used to re-define the footprint of the 30-µg/L uranium plume. The data indicated that uranium concentrations in the aquifer near the former silos area were higher than what was mapped prior to the characterization, but that the footprint of the plume was smaller than previously mapped. Because the uranium plume footprint was smaller only one additional extraction well is needed to remediate it. This new extraction well is scheduled for installation in early 2006, and will be operational in 2006.

3.4.2.2 The Modular Approach to Aquifer Restoration

Restoration of the Great Miami Aquifer is being accomplished by using a series of area-specific groundwater restoration modules and a centralized water treatment facility (refer to Figure 3-1).

In 2006, the South Field Module, South Plume Module, and Waste Storage Area Module will all be operational. Figure 3-3 shows the location of the extraction wells that comprise these modules.

South Plume Module

Six extraction wells (3924, 3925, 3926, 3927, 32308, and 32309) will be operational in the South Plume Module in 2006. Extraction Wells 3924, 3925, 3926, and 3927, which were originally called the South Plume Module, have been in operation since 1993 as part of a removal action. Located at the southern edge of the total uranium plume, the initial South Plume Module, as reported in the Work Plan for the South Contaminated Plume Removal Action (DOE 1992), was installed to create a hydraulic barrier and to prevent further southern migration of the uranium plume. In 1998, two additional extraction wells (32308 and 32309) became operational just north of the four original South Plume Module wells. These two wells were installed under a project known as the South Plume Optimization Module. The term "South Plume Module" is used to refer to both the original extraction wells installed under the South Plume Module and those installed under the South Plume Optimization Module.

South Field Module

Thirteen extraction wells (31550, 31560, 31561, 32276, 32446, 32447, 33061, 33262, 33264, 33265, 33266, 33298, and 33326) will be operational in the South Field Module in 2006. Restoration of the aquifer in the South Field area began in 1998 when 10 extraction wells (31550, 31560, 31561, 31562, 31563, 31564, 31565, 31566, 31567, and 32276) began pumping around the excavation area near the storm sewer outfall ditch (South Field Extraction [Phase I] Module). Six of the original ten extraction wells (31562, 31563, 31564, 31565, 31566, and 31567) are no longer operating:

- Extraction Well 31562 was shut down in 2003 and replaced by a new well (33298)
- Extraction Well 31563 was shut down in 2002 and converted to a re-injection well as part of the South Field (Phase II) project

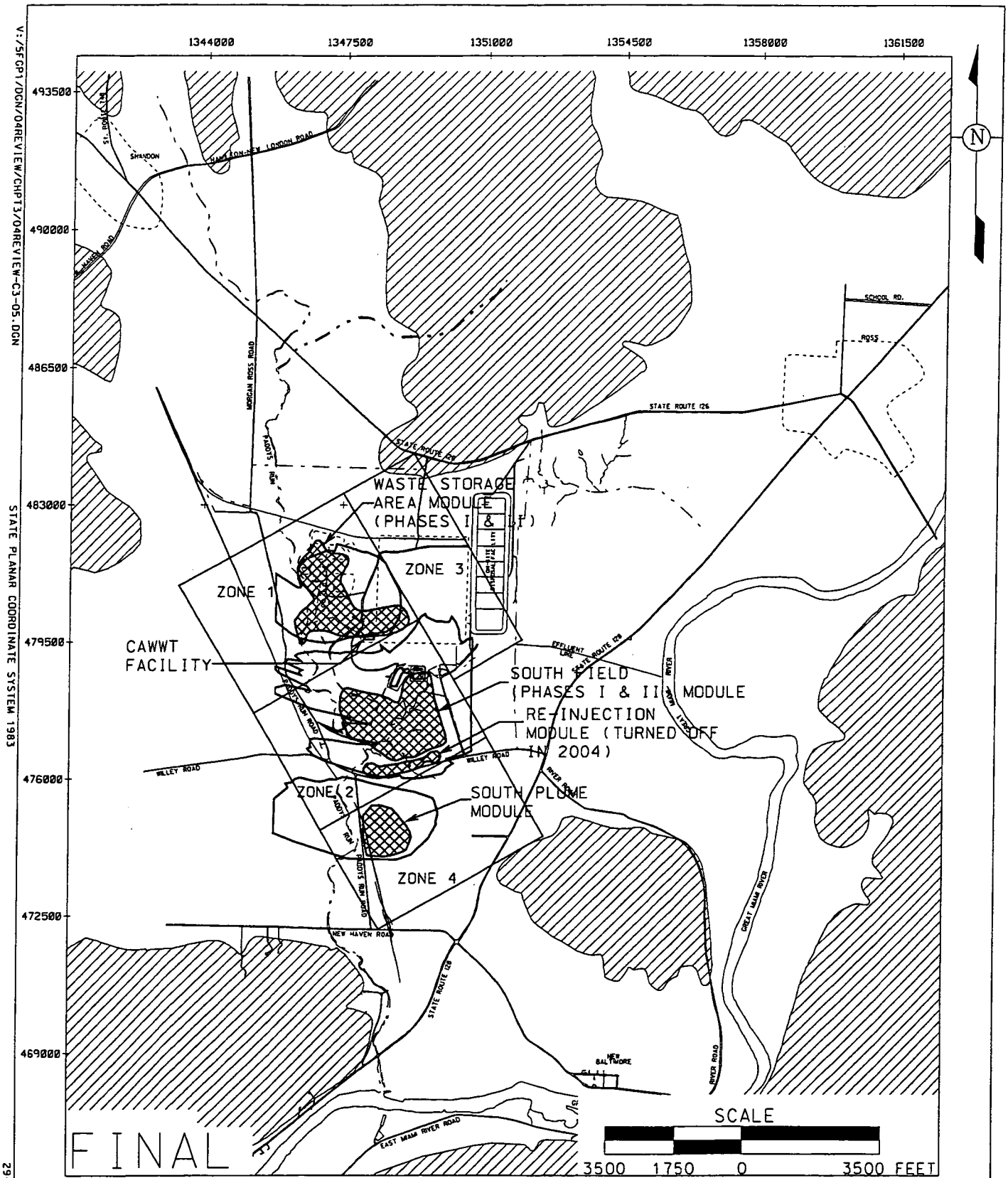
- Extraction Wells 31564 and 31565 were shut down in 2001 so that additional soil remediation could be conducted in the area. The decision was made not to re-start pumping at these wells because they are no longer situated in locations that will provide a pumping benefit to the aquifer remedy.
- Extraction Well 31566 was shut down in 1998 to minimize the potential for pulling contamination into a region of the aquifer with finer grain sediment.
- Extraction Well 31567 was shut down in 2005 due to excessive plugging of the well screen; it was replaced by a new well (33326).

The South Field Module was expanded in 1999 and 2002. In 1999, Extraction Wells 32446 and 32447 were added and began operating in 2000. Extraction Well 33061 was added and became operational in 2002. In 2003, the module was modified again, this time as part of Phase II. Four new extraction wells (33262, 33264, 33265, 33266), one replacement well (33298), two re-injection wells (33263, 31563), and one injection basin became operational. Because of the decision in 2004 to stop well-based re-injection, the two re-injection wells (33263 and 31563) are no longer operating. Also, the injection basin has become a passive feature in that water is not being actively pumped to the basin. Figure 3-3 shows the location of the extraction wells that will be operational in 2006.

Waste Storage Area Module

In 2006, four extraction wells (32761, 33062, 33334, and 33330) will be operating in the Waste Storage Area Module. Two of the extraction wells (32761 and 33062) were installed as part of the Waste Storage Area (Phase I) Module. A third extraction well (well 33063) installed as part of the Waste Storage Area (Phase I) Module was plugged and abandoned in 2004 to facilitate surface excavation activities. A replacement well (Well 33334) will be operational in 2006. Extraction Well 33330 is part of the Waste Storage Area (Phase II) Design. It is scheduled for installation in early 2006, and will be operational in 2006.

The groundwater monitoring program for 2006 is designed to track remedy performance of the modules presented above. For monitoring purposes, the aquifer is divided into five zones referred to as "aquifer zones" (refer to Figure 3-4). These aquifer zones are used to evaluate the predicted performance (both individually and collectively) at the aquifer restoration modules. Aquifer Zones 1, 2, and 4 contain aquifer remediation modules. Aquifer Zone 0 (the fifth zone) is the area outside the other four aquifer zones.



LEGEND:

- FERNALD SITE BOUNDARY
- 10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT
- BEDROCK HIGHS
- GEOGRAPHIC AREAS FOR EACH MODULE

ZONE 0 CONSISTS OF ALL AREAS OUTSIDE ZONES 1, 2, 3, AND 4.

FIGURE 3-4. GROUNDWATER AQUIFER ZONES AND AQUIFER RESTORATION FOOTPRINT

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The locations of the extraction wells comprising the restoration modules are as follows:

- The South Plume Module is located in Aquifer Zone 4
- The South Field Module (Phases I and II) is located in Aquifer Zone 2
- The Waste Storage Area Module (Phases I and II) is located in Aquifer Zone 1.

Groundwater modeling predicts that aquifer remedy pumping will create a hydraulic capture zone that is larger than the actual dimension of the 30-μg/L total uranium plume. In previous plans, the extent of this capture zone was called the 10-year, uranium-based restoration footprint. The 10-year time reference originated from the 1997 modeling done for the Baseline Remedial Strategy Report that predicted a 10-year cleanup time. As discussed earlier, the current design is modified from the Baseline Remedial Strategy Report Design; therefore, the 10-year aquifer restoration footprint originating from the Baseline Remedial Strategy Report is no longer applicable to the remedy. A new 10-year, time-of-travel footprint that does not include well-based re-injection operations was presented in the final Groundwater Remedy Evaluation and Field Verification Plan, Revision 0. Information concerning how this new footprint was constructed is also presented in that report. The new 10-year, time-of-travel remediation footprint is shown in Figure 3-4 in order to show its relationship to the aquifer zones.

3.4.2.3 Well Selection Criteria

Geologic and hydrogeologic properties, predicted and actual groundwater flow, and contaminant distribution within the Great Miami Aquifer (before and during remediation) serve as input to the design and modification of the IEMP groundwater monitoring network. Field measurements and computer simulations were conducted to support initial design efforts.

All available information is reviewed to select appropriate monitoring well locations. The monitoring well locations for the IEMP are selected according to the following criteria:

- Monitor within the projected capture zone of the groundwater restoration operation unless an operational concern (e.g., the close proximity of the South Plume extraction wells to the Paddys Run Road Site plume) requires a monitoring location to be outside of the capture zone. Note: Pumping rates may change to optimize the operation through time; therefore, the capture zone may also change.
- Use existing monitoring wells in the remediation footprint of the aquifer and avoid installing new monitoring wells unless determined necessary based on operational knowledge, which will be used to help select new locations
- Provide adequate areal coverage across each remediation module area
- Include monitoring wells that are needed to meet site-specific monitoring commitments

- Avoid selecting monitoring well locations that would interfere with surface remediation activities such as soil excavations. Note: This criterion is becoming less of a concern because most of the planned monitoring wells are already in place. At issue, however, is the loss of monitoring wells should excavation activities expand into areas that contain existing monitoring wells. If wells are lost due to surface operations, replacement wells will be installed if deemed appropriate at the time.
- Select monitoring well locations that will provide data needed to determine how reasonable model predictions are over the long term
- Select monitoring well locations in consideration of landowner concerns. In the off-property portion of the South Plume, landowner access concerns have, and will continue to have, a bearing on the location and number of monitoring wells in that area. Generally, location of monitoring wells is limited to peripheral areas along the edges of the farm fields. This monitoring well limitation is being addressed through supplemental use of direct push sampling that can be conducted during the times of the year when the fields are not being used for crops.

During 2006, approximately 130 wells at the Fernald site will be sampled as identified in the subsections that follow.

3.4.2.4 Constituent Selection Criteria

The groundwater sampling constituent selection criteria are based on evaluation of the groundwater data that have been collected since the inception of the IEMP. Rationale and information concerning constituent selection is presented in Appendix A. Following is an overview.

Restoration of the aquifer will be verified against FRLs. FRLs for the aquifer have been established in the Operable Unit 5 Record of Decision for 50 COCs. Groundwater monitoring focuses on these 50 FRL constituents to assess the progress of the aquifer remedy.

As presented in Appendix A, a short list of constituents has been established for monitoring purposes and is based on where and whether constituents have had FRL exceedances in the aquifer since inception of the IEMP. Constituents on the short list are monitored semiannually. Monitoring of those constituents not on the short list will be addressed during Stage III, Certification/Attainment Monitoring, as necessary.

Table 3-2 summarizes groundwater sampling results since the inception of IEMP program and contains the following information:

- Column 1 lists the 50 constituents for which FRLs were established in the Operable Unit 5 Record of Decision
- Column 2 lists the respective FRL concentration for each of the constituents

TABLE 3-2

GROUNDWATER FRL EXCEEDANCES BASED ON SAMPLES AND LOCATIONS SINCE IEMP INCEPTION (FROM AUGUST 1997 THROUGH 2004)

(1) Constituent	(2) Groundwater FRL[a]	(3) Basis for FRL[b]	(4) No. of Samples[c]	(5) No. of Samples >FRL[c,d]	(6) Percent of Samples >FRL	(7) Zones with FRL Exceedances (No. of Wells with exceedances in each Aquifer Zone)[c,d,e]	(8) Range above FRL[c,d,e]
Uranium, Total	30 µg/L	A	3778	957	25.33%	1(15) 2(38) 3(3) 4(16)	30.13 J/1160 NV
Zinc	0.021 mg/L	B	1129	78	6.91%	0(10) 1(5) 2(14) 3(5) 4(2)	0.0212 NV/13.6 -
Manganese	0.90 mg/L	B	1316	84	6.38%	0(5) 1(6) 2(10) 3(5) 4(4)	0.916 -/105 J
Nickel	0.10 mg/L	A	1138	20	1.76%	0(1) 1(1) 2(7) 3(1)	0.101 -/1.54 -
Technetium-99	94 pCi/L	R*	1459	28	1.92%	1(3)	101.08 -/1352.266 J
Nitrate[f]	11 mg/L	B	1898	31	1.63%	1(5) 2(1)[g]	11.4 -/331 NV
Lead	0.015 mg/L	A	1138	13	1.14%	0(2) 1(2) 2(4) 3(2)	0.0157 -/0.201 -
Arsenic	0.050 mg/L	A	1356	14	1.03%	0(1) 1(1) 2(1) 4(4)	0.051 -/0.125 -
Molybdenum	0.10 mg/L	A	810	10	1.23%	1(1)	0.207 -/0.69 -
Boron	0.33 mg/L	R	1947	15	0.77%	2(2)	0.331 -/1.16 -
Antimony	0.0060 mg/L	A	1139	8	0.70%	0(4) 1(1) 2(2)4(1)	0.00601 -/0.0196 J
Trichloroethene	0.0050 mg/L	A	1325	10	0.75%	1(2)	0.0207 -/0.120 -
Carbon disulfide	0.0055 mg/L	A	1004	6	0.60%	0(1)[h] 1(3) 2(1)[h]	0.006 -/0.014 -
Fluoride	4 mg/L	A	1359	4	0.29%	0(2) 1(1) 3(1)	5.3 -/12.3 -
Vanadium	0.038 mg/L	R	951	1	0.11%	0(1)	0.0664 J[i]
1,1-Dichloroethane	0.28 mg/L	A	86	0	0%	NA	NA
1,1-Dichloroethene	0.0070 mg/L	A	517	0	0%	NA	NA
1,2-Dichloroethane	0.0050 mg/L	A	704	0	0%	NA	NA
2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.000010 mg/L	D	19	0	0%	NA	NA
4-Methylphenol	0.029 mg/L	R	86	0	0%	NA	NA
4-Nitrophenol	0.32 mg/L	R	86	0	0%	NA	NA
alpha-Chlordane	0.0020 mg/L	A	724	0	0%	NA	NA
Aroclor-1254	0.00020 mg/L	D	86	0	0%	NA	NA
Barium	2.0 mg/L	A	194	0	0%	NA	NA
Benzene	0.0050 mg/L	A	905	0	0%	NA	NA
Beryllium	0.0040 mg/L	A	877	0	0%	NA	NA
bis(2-Chloroisopropyl) ether	0.0050 mg/L	D	411	0	0%	NA	NA
bis(2-Ethylhexyl)phthalate	0.0060 mg/L	A	86	0[j]	0%	NA[j]	NA
Bromodichloromethane	0.10 mg/L	A	723	0	0%	NA	NA
Bromomethane	0.0021 mg/L	R	86	0	0%	NA	NA
Cadmium	0.014 mg/L	B	994	0	0%	NA	NA

TABLE 3-2
(Continued)

(1) Constituents	(2) Groundwater FRL[a]	(3) Basis for FRL[b]	(4) No. of Samples[c]	(5) No. of Samples >FRL[c,d]	(6) Percent of Samples >FRL	(7) Zones with FRL Exceedances (No. of Wells with exceedances in each Aquifer Zone)[c,d,e]	(8) Range above FRL[c,d,e]
Carbazole	0.011 mg/L	R	411	0	0%	NA	NA
Chloroethane	0.0010 mg/L	D	86	0	0%	NA	NA
Chloroform	0.10 mg/L	A	86	0	0%	NA	NA
Chromium VI	0.022 mg/L	R	16	0	0%	NA	NA
Cobalt	0.17 mg/L	R	878	0	0%	NA	NA
Copper	1.3 mg/L	A	86	0	0%	NA	NA
Mercury	0.0020 mg/L	A	2064	0[k]	0%	NA	NA
Methylene chloride	0.0050 mg/L	A	84	0	0%	NA	NA
Neptunium-237	1.0 pCi/L	R*	1606	0	0%	NA	NA
Octachlorodibenzo-p-dioxin	1.0E-7 mg/L	D	19	0	0%	NA	NA
Radium-226	20 pCi/L	A	194	0	0%	NA	NA
Radium-228	20 pCi/L	A	86	0	0%	NA	NA
Selenium	0.050 mg/L	A	991	0	0%	NA	NA
Silver	0.050 mg/L	A	856	0	0%	NA	NA
Strontium-90	8.0 pCi/L	A	1394	0	0%	NA	NA
Thorium-228	4.0 pCi/L	R*	992	0	0%	NA	NA
Thorium-230	15 pCi/L	R*	86	0	0%	NA	NA
Thorium-232	1.2 pCi/L	R*	902	0	0%	NA	NA
Vinyl chloride	0.0020 mg/L	A	723	0	0%	NA	NA

[a]From Operable Unit 5 Record of Decision, Table 9-4.
[b]From Operable Unit 5 Feasibility Study, Table 2-16:
A = ARAR-based
B = Based on 95th percentile background concentrations
D = Based on lowest achievable detection limit
R = Risk-based Preliminary Remediation Goal (PRG)
R* = Risk-based Preliminary Remediation Level includes the radionuclide risk-based PRG plus its 95th percentile background concentration.
[c]Based on filtered and unfiltered samples from the August 1997 through 2004 IEMP groundwater data.
[d]Sample results having a -, J, or NV qualifier were used:
- = result is confident as reported
J = result is quantitatively estimated
NV = result is not validated
[e]NA = not applicable
[f]Nitrate/nitrite results are evaluated with respect to the nitrate FRL.
[g]Since the IEMP inception, there has been only one nitrate/nitrite exceedance at Well 2017 (in 1998) (refer to Figure A-12).
[h]Since the IEMP inception, there has been one isolated exceedance for carbon disulfide at two locations (refer to Figure A-5).
[i]Since the IEMP inception, there has been only one vanadium exceedance at Well 2426 (in 1998) (refer to Figure A-16).
[j]Of the 86 samples analyzed for bis(2-Ethylhexyl)phthalate, a common laboratory containment, five had results above the FRL. The FRL results above are all considered suspect due to laboratory analysis issues, laboratory blank and field blank contamination, or field duplicate results being non-detected. The five exceedances are as follows: 0.014J mg/L, Well 2398 and 0.010J mg/L, Well 3390 in Aquifer Zone 2; 0.016J mg/L, Well 2109 in Aquifer Zone 3; and 0.008J mg/L, Well 2125 and 0.13J mg/L, Well 3095 in Aquifer Zone 4.
[k]The mercury exceedance is suspect, due to negative MS/MSD recoveries. In fact, the MS/MSD (i.e., spiked samples) results were both extremely below the original sample result.

- Column 3 identifies the basis for each FRL constituent (i.e., risk, ARAR, background, or detection limit) as defined in the Operable Unit 5 Feasibility Study Report
- Column 4 documents the number of samples that have been analyzed for each constituent since the start of IEMP sampling
- Column 5 notes the number of samples that have had a concentration greater than the FRL for each constituent
- Column 6 notes the percent of the samples for each constituent that have had a concentration greater than the FRL
- Column 7 identifies the zones where FRL exceedances have been observed and the number of wells in each zone that had exceedances
- Column 8 shows the above FRL concentration range for each constituent that had FRL exceedances.

As shown in Table 3-2, 35 of the 50 groundwater FRL constituents have not had an FRL exceedance. Excluding uranium, the groundwater FRL constituents that did have recorded exceedances were from a limited number of wells. The spatial distribution of these wells indicates that many of the non-uranium FRL exceedances are not associated with a plume.

Groundwater monitoring focuses on the short list of 15 groundwater FRL constituents. The following monitoring will be conducted:

1. Uranium, which is the primary COC and has the greatest number of wells with exceedances, will be monitored semiannually.

2. Constituents that have FRL exceedances in multiple zones (i.e., antimony, arsenic, fluoride, lead, manganese, nickel, and zinc) will be monitored semiannually as follows:

   - At a minimum, all constituents will be monitored at downgradient wells including existing property boundary/on-site disposal facility wells along the eastern perimeter of the site and those wells along the eastern/southern boundary of the South Plume. Area C on Figure A-19 shows the configuration of this monitoring network, which lies in Zones 0, 2, 3, and 4, and for the most part outside of the restoration footprint. Monitoring at these locations will document that above-FRL contaminants are not migrating beyond the expected capture zone.

     Note: Carbon disulfide and nitrate/nitrite are considered to have legitimate exceedances in only one zone (Zone 1) and are discussed below (refer to item #3).

   - In addition to being monitored in Zones 0, 2, 3, and 4, constituents that have exceedances in multiple zones were evaluated with respect to Zone 1 to determine if monitoring is conducted to address consistent/recent exceedances in this area. Monitoring will be addressed in this zone, in addition to the monitoring at the Property/Plume Boundary, to ensure that the constituents exhibiting consistent/recent exceedances are being monitored near potential sources. From review of Table A-2 (in Appendix A), manganese in Zone 1 appears to have consistent/recent exceedances. Therefore, it will be monitored in this zone at wells that have exceedances. In addition to manganese, nickel had an exceedance in 2002. Nickel will also be monitored in Zone 1. Refer to Area A on Figure A-19 for the locations to be monitored in Zone 1.

3. Constituents that have FRL exceedances in only one zone will be monitored semiannually solely in that zone. The monitoring will consist of the following: carbon disulfide, molybdenum, nitrate/nitrite, technetium-99, and trichloroethene in Zone 1 (waste storage area), and boron in Zone 2 (South Field). Specific monitoring locations will be based on the wells that have exceedances.

   Note: Carbon disulfide has exceedances primarily in Zone 1. The two wells that have exceedances outside Zone 1 were Property Boundary Wells 2432 and 3069. These wells were sampled quarterly and exceedances were slightly above the FRL (6 μg/L with respect to the 5.5 μg/L FRL). For Well 2432, there have been no additional exceedances since the occurrence during first quarter 1999. With regard to the one exceedance for Well 3069 that occurred during fourth quarter 2001, a duplicate result during the sampling event was below the FRL (refer to Figure A-5). No additional exceedances for carbon disulfide have occurred at Well 3069 since 2001.

   Nitrate/nitrite has exceedances primarily in Zone 1. One well (2017), which is located in Zone 2, had a one-time exceedance in 1998.

4. Vanadium has a one-time exceedance in 1998 during quarterly sampling at one well (2426). This constituent will be monitored less than semiannually due to the lack of exceedances. Monitoring for this constituent is addressed in Section A.3.2. Vanadium will be addressed during Stage III, Certification/Attainment Monitoring.

Based on the above four criteria, 13 non-uranium groundwater FRL constituents are on the "short list" and are monitored semiannually (refer to Table 3-3).

3.5 DESIGN OF THE IEMP GROUNDWATER MONITORING PROGRAM

The monitoring approach for 2006 focuses on IEMP data and specifically calls for semiannual monitoring of groundwater FRL constituents with exceedances. A list of IEMP groundwater monitoring wells is provided in Table 3-4. Table 3-5 provides a list of the monitoring requirements. Justification for the monitoring approach is provided in Appendix A.

The monitoring strategy and technical approach will be revised as necessary in subsequent revisions to the IEMP to encompass operational changes over the life of the remedy. A start-up monitoring, project-specific plan or variance to an existing plan will be developed to supplement the IEMP each time a new extraction well begins to operate for the first time.

TABLE 3-3
IEMP CONSTITUENTS WITH FRL EXCEEDANCES, LOCATION OF EXCEEDANCES, AND REVISED MONITORING PROGRAM

Parameter	Aquifer Zones with Exceedances	Monitoring Program
Antimony	Multiple Zones	Property/Plume Boundary
Arsenic	Multiple Zones	Property/Plume Boundary
Boron	Aquifer Zone 2 (South Field)	South Field
Carbon Disulfide	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Fluoride	Multiple Zones	Property/Plume Boundary
Lead	Multiple Zones	Property/Plume Boundary
Manganese	Multiple Zones[a]	Property/Plume Boundary, Waste Storage Area
Molybdenum	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Nickel	Multiple Zones	Property/Plume Boundary, Waste Storage Area
Nitrate/Nitrite	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Technetium-99	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Trichloroethene	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Zinc	Multiple Zones	Property/Plume Boundary

[a]There are consistent/recent exceedances of manganese in Zone 1; therefore, this constituent will be monitored in the waste storage area and along the Property/Plume Boundary.

TABLE 3-4

LIST OF IEMP GROUNDWATER MONITORING WELLS[a]

Number[a]	Total Uranium Monitoring	Property/Plume Boundary Monitoring			Waste Storage Area Monitoring - FRL Exceedances	South Field Monitoring - FRL Exceedances
		Monitor FRL Exceedances	Monitor OSDF Constituents[b]	Monitor PRRS Constituents[c]		
1	13					
2	14					
3	2002					
4	2008					
5	2009					
6	2010				2010	
7	2014					
8	2016					
9	2017					
10	2045					2045
11	2046					
12	2048					
13	2049					2049
14	2060 (12)					
15	2093	2093				
16	2095					
17	2106					
18	2125					
19	2128	2128		2128		
20	2166					
21	2385					
22	2386					
23	2387					
24	2389					
25	2390					
26	2396					
27	2397					
28	2398	2398				
29	2402					
30	2431	2431				
31	2432	2432				
32	2550					
33	2552					
34	2553					
35	2625	2625		2625		
36	2636	2636		2636		
37	2648				2648	

TABLE 3-4
(Continued)

Number[a]	Total Uranium Monitoring	Property/Plume Boundary Monitoring: Monitor FRL Exceedances	Monitor OSDF Constituents[b]	Monitor PRRS Constituents[c]	Waste Storage Area Monitoring - FRL Exceedances	South Field Monitoring - FRL Exceedances
38	2649				2649	
39	2733	2733				
40	2821				2821	
41	2880					
42	2897					
43	2898	2898		2898		
44	2899	2899		2899		
45	2900	2900		2900		
46	3014					
47	3015					
48	3045					
49	3046					
50	3049					
51	3069					
52	3070	3070				
53	3093	3093				
54	3095					
55	3106					
56	3125					
57	3128	3128		3128		
58	3385					
59	3387					
60	3390					
61	3396					
62	3397					
63	3398	3398				
64	3402					
65	3424	3424				
66	3426	3426				
67	3429	3429				
68	3431	3431				
69	3432	3432				
70	3550					
71	3552					
72	3636	3636		3636		
73	3733	3733				
74	3821				3821	
75	3880					
76	3897					
77	3898	3898		3898		
78	3899	3899		3899		
79	3900	3900		3900		
80	4125					
81	4398	4398				

TABLE 3-4
(Continued)

Number[a]	Total Uranium Monitoring	Property/Plume Boundary Monitoring: Monitor FRL Exceedances	Monitor OSDF Constituents[b]	Monitor PRRS Constituents[c]	Waste Storage Area Monitoring - FRL Exceedances	South Field Monitoring - FRL Exceedances
82	6015					
83	6880					
84	6881					
85	21033					
86	21063	21063				
87	21192					
88	22198	22198	22198			
89	22199	22199	22199			
90	22204	22204	22204			
91	22205	22205	22205			
92	22208	22208	22208			
93	22210	22210	22210			
94	22211	22211	22211			
95	22214	22214	22214			
96	23064					
97	23118					
98	23271					
99	23272					
100	23273					
101	23274					
102	23275					
103	23276					
104	23277					
105	23278					
106	23279					
107	23280					
108	23281					
109	23282					
110	31217	31217				
111	32766					
112	32768					
113	62408					
114	62433					
115	63116					
116	63119					
117	63283					
118	63284					
119	63285					
120	63286					
121	63287					
122	63288					
123	63289					
124	63290					
125	63291					

TABLE 3-4
(Continued)

Number[a]	Total Uranium Monitoring	Property/Plume Boundary Monitoring: Monitor FRL Exceedances	Monitor OSDF Constituents[b]	Monitor PRRS Constituents[c]	Waste Storage Area Monitoring - FRL Exceedances	South Field Monitoring - FRL Exceedances
126	63292					
127	82433					
128	83117					
129	83124					
130	83293					
131	83294					
132	83295					
133	83296					
134	83335					
135	83336					

[a]The number in Column 1 is used to identify the number of wells in the program. The individual monitoring well identification numbers are provided in Columns 2-7 as appropriate.
[b]List of total uranium monitoring wells and Property/Plume Boundary monitoring wells that overlap with OSDF monitoring wells.
[c]List of total uranium monitoring wells and Property/Plume Boundary monitoring wells that overlap with Paddys Run Road Site monitoring wells.

TABLE 3-5
MONITORING REQUIREMENTS[a]

1. TOTAL URANIUM

2. WASTE STORAGE AREA

General Chemistry	Inorganic	Radionuclide	Organic
Nitrate/Nitrite	Manganese	Technetium-99	Carbon Disulfide
	Molybdenum	Total Uranium[b]	Trichloroethene
	Nickel		

3. SOUTH FIELD

General Chemistry	Inorganic	Radionuclide	Organic
NA[c]	Boron	Total Uranium[b]	NA[c]

4. PROPERTY/PLUME BOUNDARY FOR FRL EXCEEDANCES

General Chemistry	Inorganic	Radionuclide	Organic
Fluoride	Antimony	Total Uranium[b]	NA[c]
	Arsenic		
	Lead		
	Manganese		
	Nickel		
	Zinc		

5. PROPERTY/PLUME BOUNDARY FOR PRRS

General Chemistry	Inorganic	Radionuclide	Organic
Phosphorous	Arsenic[d]	NA[c]	Benzene
	Potassium		Ethyl benzene
	Sodium		Isopropyl benzene
			Toluene
			Total xylene

[a]Monitoring will be conducted semiannually.
[b]Total uranium is monitored as part of the sitewide uranium monitoring.
[c]NA = not applicable
[d]Arsenic is also monitored with respect to FRL exceedances as part of the Property/Plume Boundary.

3.6 MEDIUM-SPECIFIC PLAN FOR GROUNDWATER MONITORING

This section serves as the medium-specific plan for implementation of the sampling, analysis, and data management activities associated with the sitewide groundwater remedy performance monitoring program. The program expectations and design presented in Section 3.4 were used as the framework for developing the monitoring approach presented in this section. The activities described in this medium-specific plan have been designed to provide groundwater data of sufficient quality to meet the program expectations as defined in Section 3.4.1. All sampling procedures and analytical protocols described or referenced herein are consistent with the requirements of the Sitewide CERCLA Quality Assurance Project Plan (SCQ) (DOE 2003g).

Subsequent sections of this medium-specific plan define the following:

- Project organization and associated responsibilities
- Sampling program
- Change control
- Health and safety
- Data management
- Project quality assurance.

3.6.1 Project Organization

A multi-disciplined project organization has been established to effectively implement and manage the project planning, sample collection and analysis, and data management activities directed in this medium-specific plan. The key positions and associated responsibilities required for successful implementation are as follows:

The project team leader will have full responsibility and authority for the implementation of this medium-specific plan in compliance with all regulatory specifications and sitewide programmatic requirements. Integration and coordination of all medium-specific plan activities defined herein with other project organizations are also key responsibilities. All changes to these activities must be approved by the team leader or designee.

Health and safety are the responsibility of all individuals working on this project scope. Qualified health and safety specialists shall participate on the project team to provide radiation protection and industrial hygiene support, and assist in preparing and obtaining all applicable permits. In addition, safety specialists shall periodically review and update the specific health and safety documents and operating procedures; conduct pertinent safety briefings; and assist in evaluation and resolution of all safety concerns. Quality assurance specialists will participate on the project team, as necessary, to review project

procedures and activities ensuring consistency with the requirements of the SCQ or other referenced standards, and assist in evaluating and resolving all quality related concerns.

3.6.2 Sampling Program

The information derived from the groundwater monitoring program should produce a clear understanding of groundwater quality in the Great Miami Aquifer. The groundwater sampling process will be controlled so that collected samples are representative of groundwater quality. All procedures for monitoring well development, sample collection, and shipment will be performed in accordance with directives established in the SCQ.

3.6.2.1 Total Uranium Monitoring

One hundred thirty-five monitoring wells will be sampled semiannually for total uranium. Forty-three of these wells will be sampled for additional constituents as described in Sections 3.6.2.2 through 3.6.2.4. A list of the wells to be sampled for total uranium only is provided in Table 3-6 and shown in Figure 3-5.

The wells extend across all aquifer zones and provide monitoring coverage in all restoration module areas. Figure 3-5 shows the locations of the monitoring wells.

This semiannual total uranium sampling activity will address the following remediation sampling needs:

- The need to interpret changes to the total uranium plume over time due to remediation activities
- The need to interpret the extent of capture in relation to the total uranium plume
- The need to interpret the effectiveness of the aquifer remedy in maintaining a hydraulic barrier that limits the further southern migration of the total uranium plume and to document the area of uranium contamination (above 30 μg/L) south of the Administrative Boundary
- Continued tracking of uranium concentrations at three off-property private monitoring wells.

Up to 27 locations will also be sampled each year for total uranium using a direct-push sampling tool. Direct-push sampling will provide vertical profile concentration data. The vertical profile data will be used to supplement the fixed monitoring well data in order to produce more robust plume interpretations. Exact locations for the direct-push sampling will be selected each year based on monitoring well data, modeling needs, and data interpretation needs.

TABLE 3-6

LIST OF GROUNDWATER WELLS TO BE SAMPLED FOR TOTAL URANIUM ONLY

13	3046	23278
14	3049	23279
2002	3069	23280
2008	3095	23281
2009	3106	23282
2014	3125	32766
2016	3385	32768
2017	3387	62408
2046	3390	62433
2048	3396	63116
2060 (12)	3397	63119
2095	3402	63283
2106	3550	63284
2125	3552	63285
2166	3880	63286
2385	3897	63287
2386	4125	63288
2387	6880	63289
2389	6015	63290
2390	6881	63291
2396	21033	63292
2397	21192	82433
2402	23064	83117
2550	23118	83124
2552	23271	83293
2553	23272	83294
2880	23273	83295
2897	23274	83296
3014	23275	83335
3015	23276	83336
3045	23277	

Note: Six of the seven available channels in a continuous multi-channel tubing (CMT) well are available for water quality sampling. The seventh channel is used only for water level measurements. The channel completed in the plume interval with the highest measured uranium concentration will be sampled every six months. The other five channels will be sampled once a year to document any changes in the plume concentration profile.

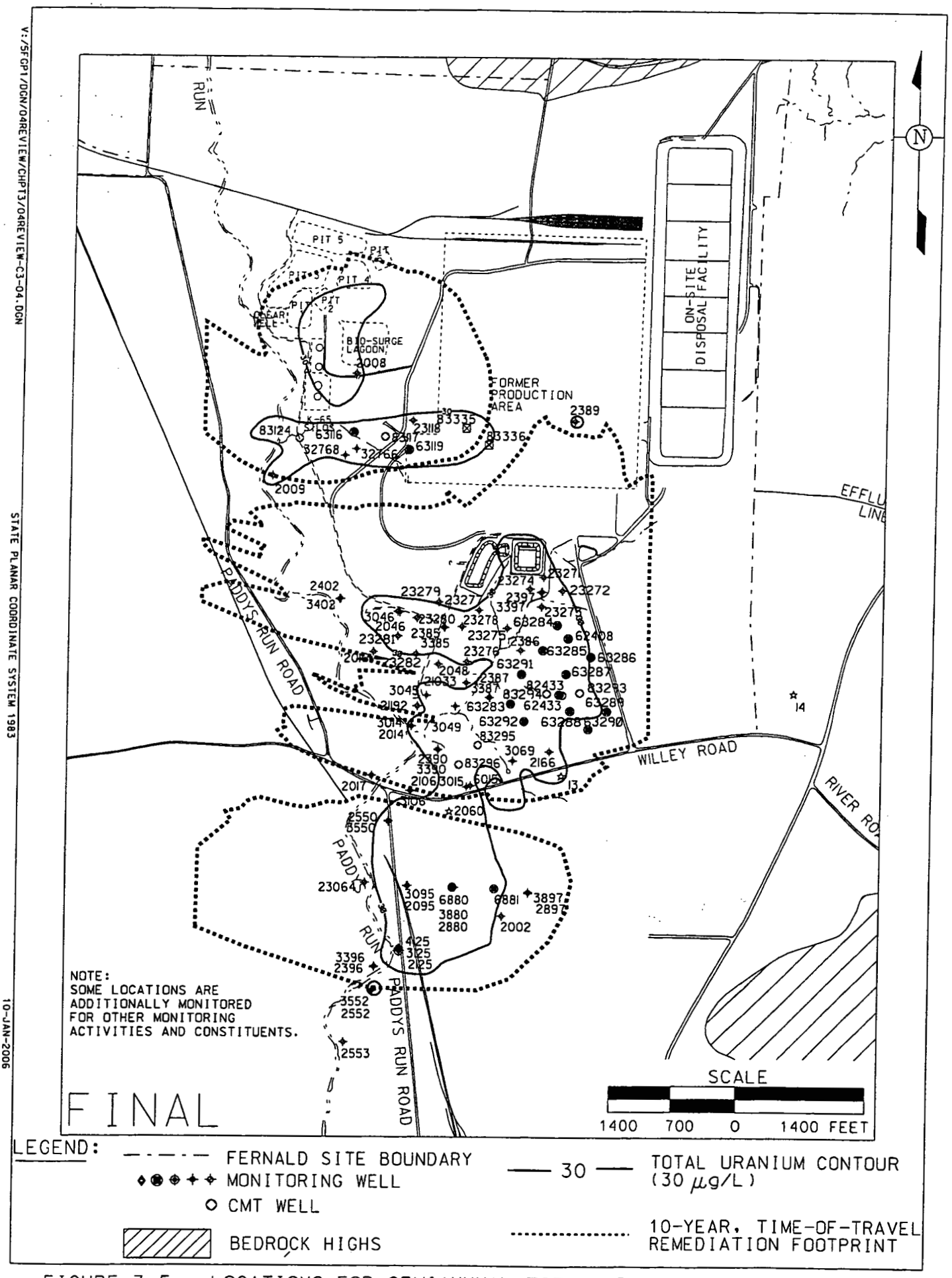

FIGURE 3-5. LOCATIONS FOR SEMIANNUAL TOTAL URANIUM MONITORING ONLY

Three private wells (12, 13, and 14) will also be sampled for total uranium. Figure 3-5 shows the location of these three wells (Private Well 12 is also identified as Monitoring Well 2060). Continuing to add to the historical database at these three private well locations is beneficial for facilitating discussions with area stakeholders on the progress of the aquifer restoration. The three locations are situated immediately downgradient of the Fernald site property boundary.

3.6.2.2 South Field Monitoring

The South Field is located in Aquifer Zone 2 (refer to Figure 3-4). Thirteen extraction wells (South Field [Phases I and II] Module) are scheduled to be operating in the South Field in 2006.

In addition to the monitoring wells being sampled in the South Field for total uranium only (refer to Section 3.6.2.1), two monitoring wells (2045 and 2049) will be sampled semiannually for boron and total uranium. The rationale for the selection of these wells and this constituent is presented in Section 3.4 and Appendix A. Figure 3-6 shows the locations of these two wells. Following is the monitoring table:

SOUTH FIELD MONITORING TABLE
SEMIANNUAL SAMPLING FREQUENCY

General Chemistry	Inorganic	Radionuclide	Organic
NA	Boron	Total Uranium	NA

Direct-push sampling has been conducted annually at seven wells (12367, 12368, 12369, 12370, 12371, 12372, and 12373) along and south of Willey Road since the Re-injection Demonstration. Figure 3-7 shows these locations. This annual direct-push sampling will continue in order to track remediation progress. At each direct-push location, a groundwater sample will be collected at 10-foot intervals beneath the water table, and analyzed for uranium only until it can be verified that the entire thickness of the 30-μg/L total uranium plume has been sampled.

3.6.2.3 Waste Storage Area Monitoring

The waste storage area is located in Aquifer Zone 1 (refer to Figure 3-4). Four extraction wells (32761,33062, 33330, and 33334) will be operating in the waste storage area in 2006. Figure 3-3 shows the locations of these four wells Additional monitoring wells are planned for the waste storage area to supplement the new extraction well that is being installed as part of the Waste Storage Area (Phase II) Design. These new monitoring wells will be added to the list of groundwater wells being monitored in the waste storage area as they become available.

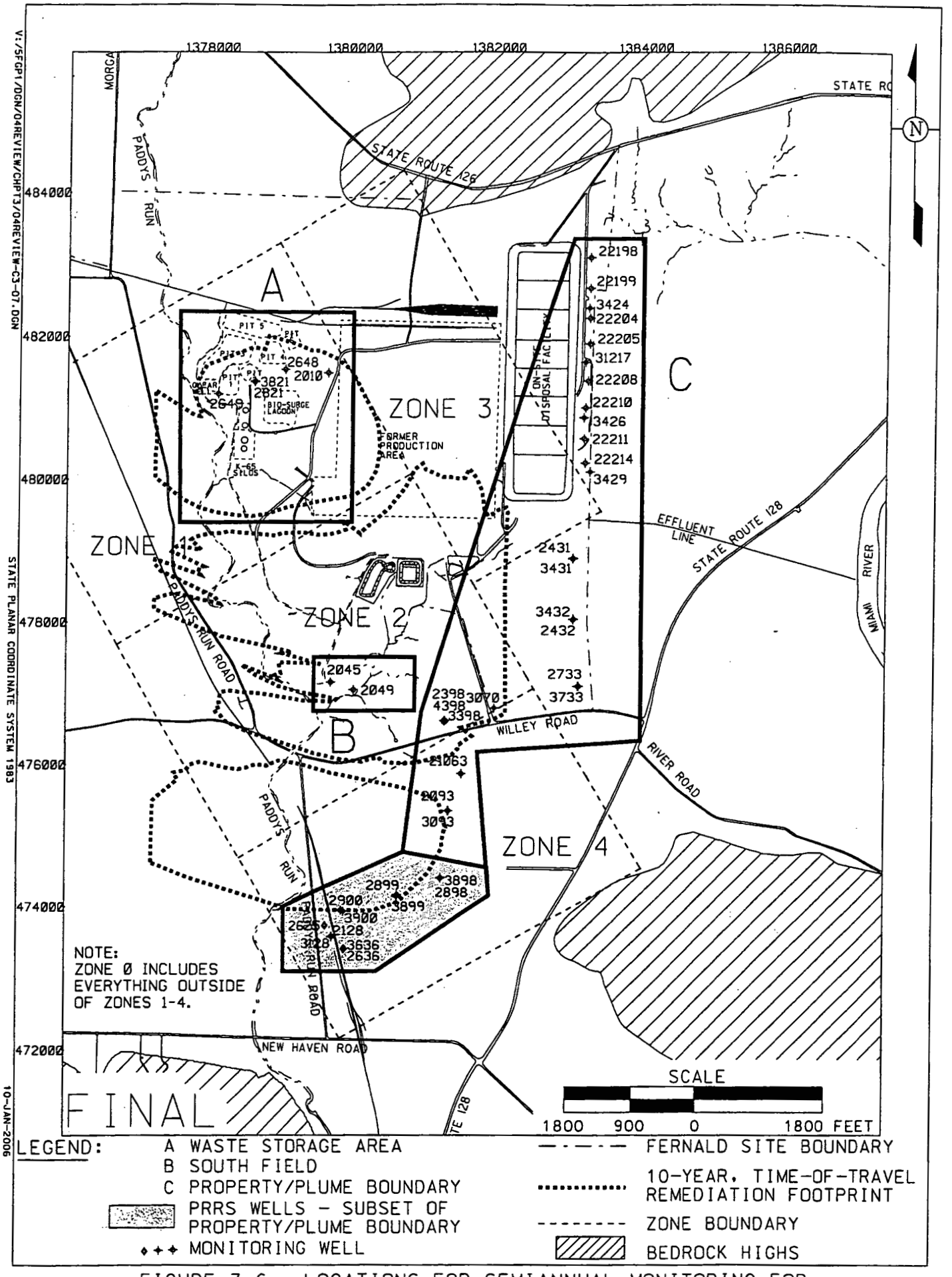

FIGURE 3-6. LOCATIONS FOR SEMIANNUAL MONITORING FOR PROPERTY/PLUME BOUNDARY, SOUTH FIELD, AND WASTE STORAGE AREA

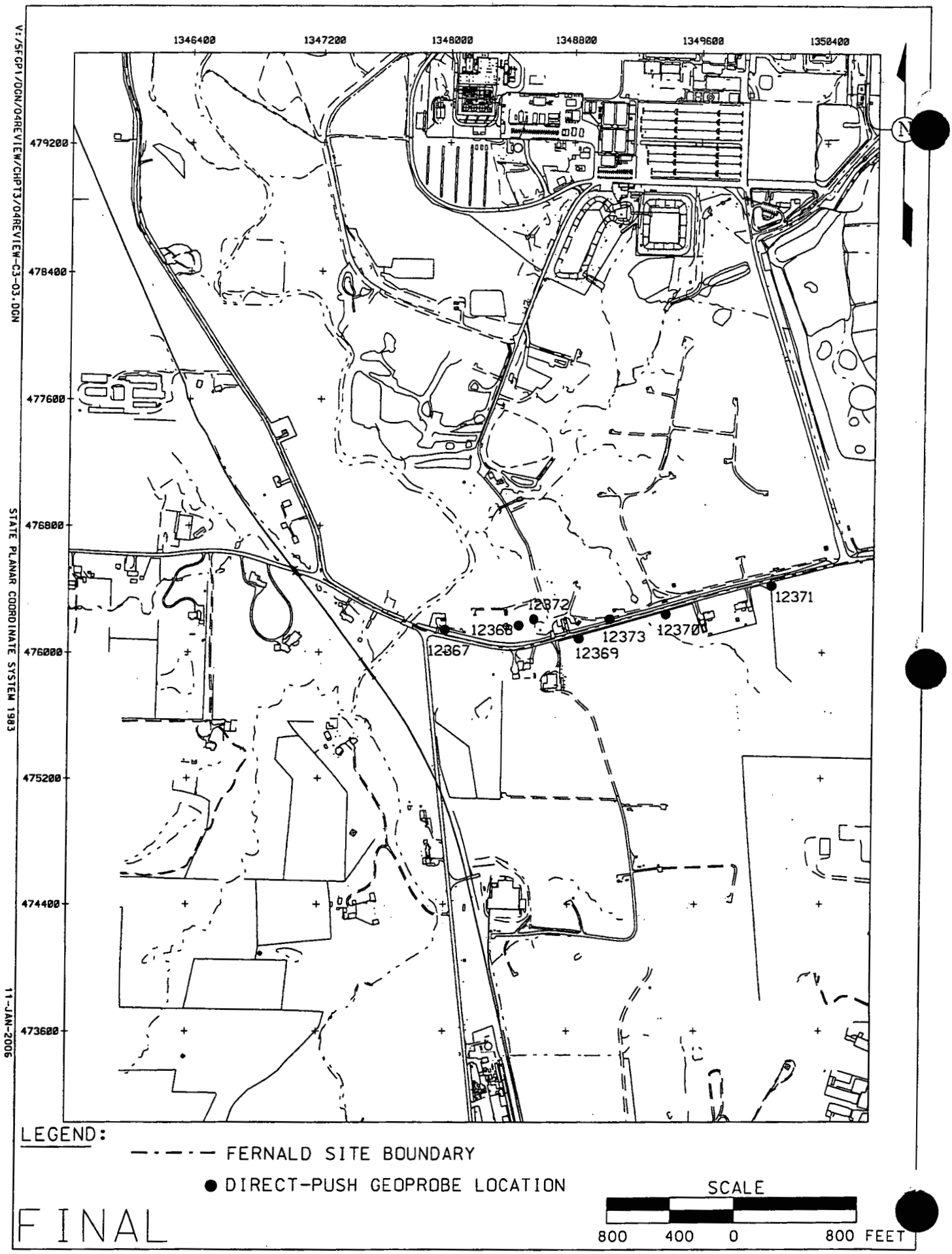

FIGURE 3-7. DIRECT-PUSH SAMPLING LOCATIONS

In addition to the monitoring wells being sampled in the waste storage area for total uranium only (refer to Section 3.6.2.1), the five wells listed below will be sampled semiannually (refer to Figure 3-6 for the locations of these five wells).

FIVE MONITORING WELLS TO BE MONITORED SEMIANNUALLY IN THE WASTE STORAGE AREA

2010	2649	2821	3821	2648

These five wells will be sampled semiannually for the constituents listed in the table below. The rationale for the selection of these wells and these constituents is presented in Section 3.4 and Appendix A.

WASTE STORAGE AREA MONITORING TABLE SEMIANNUAL SAMPLING FREQUENCY

General Chemistry	Inorganic	Radionuclide	Organic
Nitrate/Nitrite	Manganese	Technetium-99	Carbon Disulfide
	Molybdenum	Total Uranium	Trichloroethene
	Nickel		

3.6.2.4 Property/Plume Boundary Monitoring

The focus of the Property/Plume Boundary Groundwater Monitoring activity is to detect and assess potential changes in groundwater conditions along the eastern property boundary and downgradient of the leading edge of the 30-µg/L total uranium plume south of the Fernald site property.

In 2006, monitoring will be conducted along the property boundary and downgradient uranium plume boundary for FRL exceedances; the influence (or lack of influence) that pumping is having on the Paddys Run Road Site Plume will be documented. Monitoring in 2006 will also reduce redundancy with on-site disposal facility monitoring.

Property/Plume Boundary Monitoring for FRL Exceedances

Twenty-five monitoring wells along the eastern property boundary and the leading edge of the off-site total uranium plume will be sampled semiannually (refer to the table that follows). Figure 3-6 is a map showing the locations of the wells.

PROPERTY/PLUME BOUNDARY MONITORING WELLS TO BE MONITORED FOR FRL EXCEEDANCES ONLY

2093	3424	22198
2398	3426	22199
2431	3429	22204
2432	3431	22205
2733	3432	22208
3070	3733	22211
3093	4398	22214
3398	21063	22210
		31217

The 25 monitoring wells will be sampled semiannually for the constituents listed below. All of these constituents have had FRL exceedances. The rationale for the selection of these constituents and the monitoring schedule are presented in Section 3.4 and Appendix A.

PROPERTY PLUME BOUNDARY MONITORING TABLE FOR FRL EXCEEDANCES SEMIANNUAL SAMPLING FREQUENCY

General Chemistry	Inorganic	Radionuclide	Organic
Fluoride	Antimony Arsenic Lead Manganese Nickel Zinc	Total Uranium	NA

Eight of the 25 monitoring wells (22204, 22205, 22208, 22198, 22211, 22214, 22210, and 22199) will be sampled for on-site disposal facility constituents. The data collected will then be used to satisfy both needs. The on-site disposal facility monitoring wells will continue to be sampled quarterly as specified in the On-site Disposal Facility Groundwater/Leak Detection and Leak Monitoring Plan (DOE 2006).

Property/Plume Boundary Monitoring for Paddys Run Road Site Constituents

Groundwater is being pumped from the aquifer immediately north of the Paddys Run Road Site (Extraction Wells 3924, 3925, 3926, and 3927); it remains important to document the influence (of lack of influence) that the pumping has on the Paddys Run Road Site plume. In 2006, groundwater samples will be collected semiannually from 11 monitoring wells (refer to Figure 3-6).

The 11 wells are:

2128	2899	3898
2625	2900	3899
2636	3128	3900
2898	3636	

These 11 wells will be analyzed for Paddys Run Road Site constituents as well as for IEMP FRL exceedance constituents. The Paddys Run Road Site constituent list used in 2005 will be carried over into 2006. The following list shows the constituents to be monitored:

PROPERTY PLUME BOUNDARY MONITORING TABLE FOR FRL EXCEEDANCES AND PADDYS RUN ROAD SITE CONSTITUENTS SEMIANNUAL SAMPLING FREQUENCY

General Chemistry	Inorganic	Radionuclide	Organic
Fluoride	Antimony	Total Uranium	Benzene
Phosphorous	Arsenic		Ethyl benzene
	Lead		Isopropyl benzene
	Manganese		Toluene
	Nickel		Total Xylene
	Potassium		
	Sodium		
	Zinc		

If pumping rates of wells in the South Plume Module are increased above rates established in 1998, then arsenic sampling will be conducted weekly in Monitoring Wells 2128, 2625, 2636, 2900, and in Extraction Wells 3924 and 3925. The arsenic sampling will be used to determine if the increased pumping rates have adversely impacted the Paddys Run Road Site plume. The weekly sampling will be done for a minimum of three weeks after a pumping rate increase; if no changes in arsenic concentration trends are observed, the increased arsenic sampling will be discontinued. Figure 3-6 identifies the locations of these monitoring wells.

3.6.2.5 Monitoring Non-Uranium Groundwater FRL Constituents without IEMP FRL Exceedances

Monitoring for non-uranium groundwater FRL constituents that have not had an FRL exceedance since the inception of the IEMP, will be addressed during Stage III, Certification/Attainment Monitoring, as necessary.

3.6.2.6 Routine Water Level Monitoring

The water table in the Great Miami Aquifer and its response to seasonal fluctuations has been well characterized in the Remedial Investigation Report for Operable Unit 5. Water level data have been routinely collected at the Fernald site since 1988. Water level data are used to evaluate seasonal variations

and interpret groundwater flow directions. This is accomplished by preparing hydrographs and maps of the water table in the Great Miami Aquifer. During the remediation phase of the CERCLA process, water levels will be monitored across the site to assess the effects of extraction operations on the water table and flow conditions within the Great Miami Aquifer.

The Great Miami Aquifer is an unconfined aquifer and responds rapidly to recharge events. Data collected at the Fernald site and reported in the Operable Unit 5 Remedial Investigation Report document that no strong vertical gradients exist in the area of the Fernald site. Water level monitoring will rely mostly on data from Type 2 wells, which will be supplemented as necessary with data from Type 3, Type 6, and Type 8 wells. Type 8 wells will have water level measurements taken in Channels 1 and 6. If Channel 1 is dry, a measurement will be collected from the next deeper channel that is not dry.

Approximately 170 monitoring wells were selected for water level monitoring in 2006; they are shown in Figure 3-8 and listed below. Additional monitoring wells are being planned for the waste storage area to supplement the new extraction well that is being installed as part of the Waste Storage Area (Phase II) Design. These new monitoring wells will be added to the list of groundwater elevation monitoring wells as they become available.

Groundwater elevation monitoring locations were selected to provide areal coverage across all areas of the Fernald site with an increasing density of wells in areas surrounding active aquifer restoration wells. Groundwater elevations will be measured quarterly in these wells to provide data for construction of water table elevation maps. These maps will be used to interpret the location of flow divides, capture zones, and stagnation zones created by the operation of remediation wells. Additional monitoring wells and more frequent measurement intervals may be used near aquifer remediation modules as they become operational and as sensitive capture zones or stagnation zones are identified, or if unpredicted fluctuations in contaminant concentrations are observed.

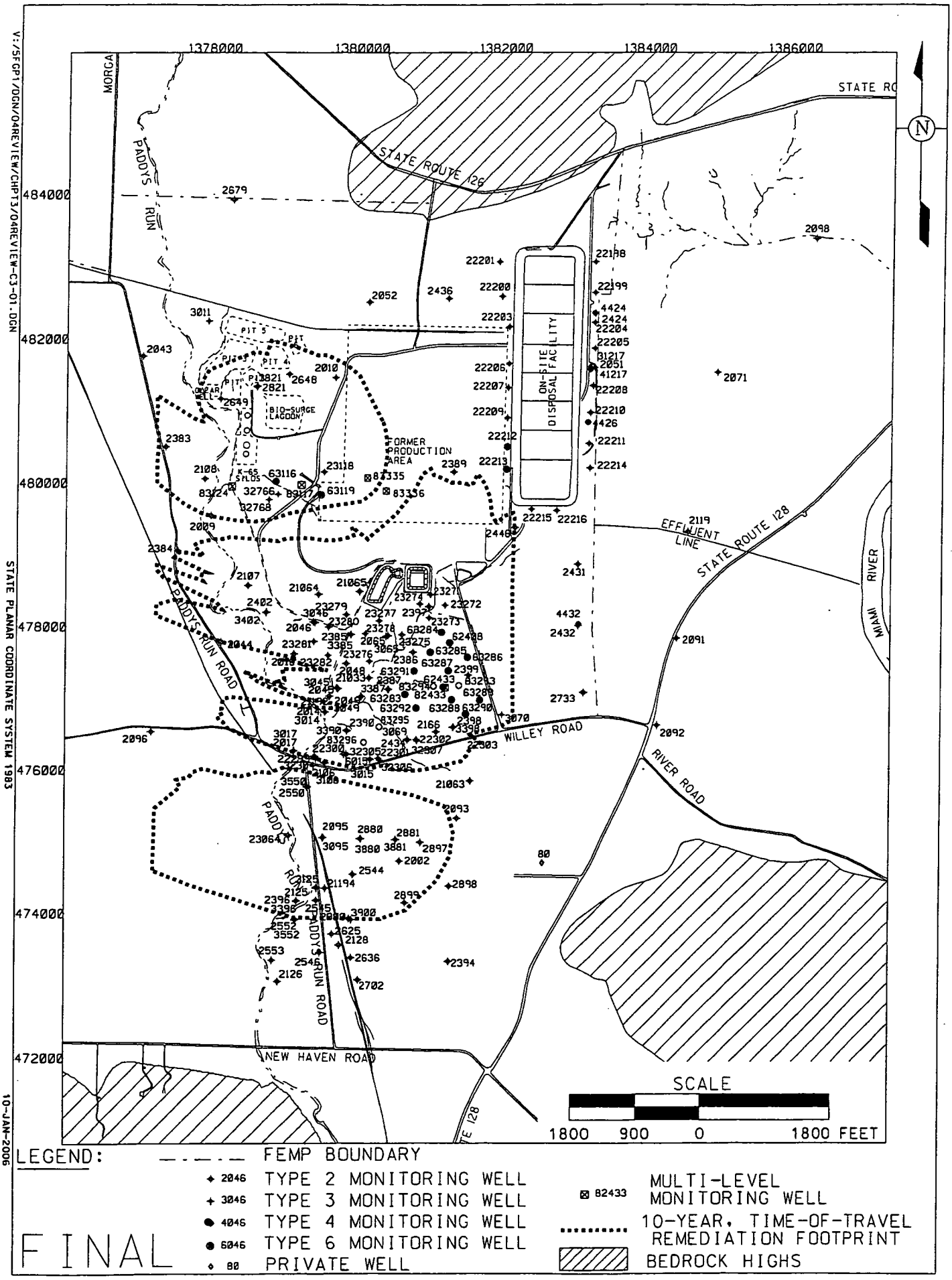

FIGURE 3-8. GROUNDWATER ELEVATION MONITORING WELLS

LIST OF GROUNDWATER ELEVATION MONITORING WELLS

80	2387	3011	22198	23281
2002	2389	3014	22199	23282
2009	2390	3015	22200	31217
2010	2394	3017	22201	32304
2014	2396	3045	22203	32305
2016	2397	3046	22204	32306
2017	2398	3049	22205	32307
2043	2399	3065	22206	32766
2044	2402	3069	22207	32768
2045	2424	3070	22208	41217
2046	2431	3095	22209	62408
2048	2432	3106	22210	62433
2049	2434	3125	22211	63116
2051	2436	3385	22212	63119
2052	2446	3387	22213	63283
2065	2544	3390	22214	63284
2071	2545	3396	22215	63285
2091	2546	3398	22216	63286
2092	2550	3402	22299	63287
2093	2552	3550	22300	63288
2095	2553	3552	22301	63289
2096	2625	3821	22302	63290
2098	2636	3880	22303	63291
2106	2648	3881	23064	63292
2107	2649	3900	23118	82433
2108	2679	4424	23271	83117
2119	2702	4426	23272	83124
2125	2733	4432	23273	83293
2126	2821	6015	23274	83294
2128	2880	21033	23275	83295
2166	2881	21063	23276	83296
2383	2897	21064	23277	83335
2384	2898	21065	23278	83336
2385	2899	21192	23279	
2386	2900	21194	23280	

3.6.2.7 Sampling Procedures

Sample analysis will be performed at the on-site laboratory or a contract laboratory, depending on specific analyses required, laboratory capacity, turnaround time, and performance of the laboratory. The laboratories used for analytical testing must be approved in accordance with the criteria specified in Sections 3.1.5 and 12.4, and Appendix E of the SCQ. These criteria include meeting the requirements for performance evaluation samples, pre-acceptance audits, performance audits, and an internal quality assurance program. A list of approved laboratories and the current status of each is maintained by the Fernald site's Quality Assurance organization.

All monitoring wells will be purged and sampled using the guidelines specified in Sections 6.2 and K.4.2 of the SCQ, which have been incorporated into the standard operating procedures used for conducting groundwater sampling. The applicable SCQ sections and operating procedures pertaining to groundwater sampling are as follows:

Standard Operating Procedures

SMPL-02	Liquid Sampling for Water Monitoring (DOE 2004f)
SMPL-05	Groundwater Level/Total Depth Measurements (DOE 2005c)
SMPL-21	Collection of Field Quality Control Samples (DOE 2002a)
ADM-02	Field Project Prerequisites (DOE 2005b)
ADM-03	Water Sample Shipment (DOE 2004g)
EQT-02	Water Quality Meters (DOE 2005h)
EW-0002	Chain of Custody/Request for Analysis Record for Sample Control (DOE 2004c)

Sitewide CERCLA Quality (SCQ) Assurance Project Plan

Section 4	Quality Assurance Objectives
Section 5	Field Activities
Section 6	Sampling Requirements
Section 7	Sample Custody
Section 8	Calibration Procedures and Frequency
Appendix I	Field Calibration Requirements
Appendix J	Field Activity Methods
Appendix K	Sampling Methods

Table 3-7 summarizes the field sampling information by analytical constituent groups and includes the analytical support level (ASL), holding time, preservative, container requirement, and analytical method. The volume of purge water to be removed from monitoring and extraction wells is specified in Liquid Sampling for Water Monitoring.

TABLE 3-7

ANALYTICAL REQUIREMENTS FOR THE GROUNDWATER MONITORING PROGRAM

Constituent	Method	Sample Type	ASL[a]	Holding Time[b]	Preservative[b]	Container[b,c]
General Chemistry:						
Fluoride	300.0[d], 340.2[d], or 4500C[e]	Grab	B	28 days	None	Plastic
Nitrate/Nitrite	353.1[d], 353.2[d], 4500D[e], or 4500E[e]	Grab	B	28 days	Cool to 4°C, H_2SO_4 to pH <2	Plastic or glass
Phosphorus	365.(all)[d] or 4500E[e]	Grab	B	28 days	Cool to 4°C, H_2SO_4 to pH <2	Plastic or glass
Inorganics:						
Metals	6020[f], 7000A[f], or 6010B[f]	Grab	B	6 months	HNO_3 to pH <2	Plastic or glass
Radionuclides: (All Radiological)	SCQ[g]	Grab	B	Six months or 5x half-life, whichever is less	HNO_3 to pH <2	Plastic or glass
Volatile Organics:	8260B[f]	Grab	B	7 days	Cool to 4°C	Glass vial with Teflon-lined septum cap
		Grab	B	14 days	Cool to 4°C H_2SO_4, HCl, or solid $NaHSO_4$ to pH <2	Glass vial with Teflon-lined septum cap
Field Parameters[h]:	SCQ[i]	Grab	A	NA[j]	NA[j]	NA[j]

[a]The ASL may become more conservative if it is necessary to meet detection limits or data quality objectives.
[b]Appropriate preservative, holding time, and container will be used for the corresponding method.
[c]Container size is left to the discretion of the individual laboratory.
[d]Methods for Chemical Analysis of Water and Wastes (EPA 1983)
[e]Standard Methods for the Examination of Water and Wastewater (APHA 1989)
[f]Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA 1998b)
[g]Radionuclide analyses do not have standard methods; however, the analytical specifications for these constituents are provided in Appendix G of the SCQ.
[h]Field parameters include dissolved oxygen, pH, specific conductance, temperature, and turbidity.
[i]Appendix K of the SCQ provides field analytical methods.
[j]NA = not applicable

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An objective of the IEMP groundwater monitoring program is to collect and analyze representative groundwater samples. The sample analysis for metals and radionuclides should quantify species that are dissolved, occur as mobile precipitates, or are adsorbed onto mobile particles. If immobile particles to which metals are bound are allowed to remain in field-acidified samples, then the laboratory analysis will overstate the true concentration of mobile species present in the sample because acidification dissolves precipitates or causes adsorbed metals to desorb. Turbidity readings and the use of filtration to obtain a representative sample are therefore important field concerns for collection of groundwater samples.

Consistent with OEPA guidelines, 5 nephelometric turbidity units (NTU) will serve as the cut-off for a representative groundwater sample and for determining when filtration of the sample to be analyzed for metals/radionuclides is required. Routine filtration will be avoided at the Fernald site whenever possible. Proper well construction and maintenance will be practiced in order to help keep the turbidity of unfiltered groundwater samples at or below 5 NTU. If, after properly purging a monitoring well, the sample turbidity is greater than 5 NTU, then the sample will be filtered through a 5-micron filter. If the turbidity of the 5-micron filtered sample is still above 5 NTU, then the 5-micron filtered sample will be additionally filtered through a 0.45-micron filter. Both the unfiltered and final filtered uranium sample will be analyzed. The final filtered sample will be analyzed for metals and radionuclides only.

3.6.2.8 Quality Control Sampling Requirements

Field quality control samples will be collected to assess the accuracy and precision of field and laboratory methods as outlined in Section 4.1.1 of the SCQ. These samples will be collected and analyzed in order to evaluate the possibility that some controllable practice, such as decontamination, sampling technique, or analytical method may be responsible for introducing bias in the analytical results. The following types of quality control samples will be collected: sampling equipment rinsates, trip blanks, field blanks, and duplicate samples, as outlined in Section 4 and Appendix A of the SCQ. Each quality control sample is preserved using the same method for groundwater samples. The quality control sample frequencies will be tracked to ensure the proper frequency requirements are met as follows:

- Trip blanks will be prepared for each sampling team on each day of sampling when organic compounds are included in the respective analytical program
- Equipment rinsates will be collected for every 20 groundwater samples that are collected using reusable sampling equipment. If a specific sampling activity consists of less than 20 groundwater samples, then a rinsate sample will still be required. Rinsates are not required when dedicated well equipment or disposable sampling equipment is used.
- Field blanks will be collected for each day of groundwater sampling when organic compounds are included in the respective analytical program
- Field duplicates will be collected for every 20 groundwater samples (or fraction thereof) if the specific sampling program consists of fewer than 20 samples.

The groundwater samples associated with each quality control sample also will be tracked to ensure traceability in the event that contaminants are detected in the quality control samples.

3.6.2.9 Decontamination

In general, decontamination of equipment is minimized due to limited use of reusable equipment during sample collection. However, if decontamination is required, then equipment will be cleaned between sample locations. The decontamination shall be Level II as referenced in Section K.11 of the SCQ. The specific details are outlined in Liquid Sampling for Water Monitoring.

3.6.2.10 Waste Disposition

Wastes that will be generated during sampling activities are purge water and decontamination solutions, and contact wastes. The following subsections provide the proposed disposition methodology for each type of waste generated.

Purge Water and Decontamination Solutions

Groundwater purged from the wells and solutions used to decontaminate sampling equipment will be containerized for proper disposal. For each batch of wastewater, a Wastewater Discharge Request form is submitted to the Fernald site's Compliance organization for direction and approval for disposition. This wastewater is routinely disposed of at the Storm Water Retention Basin or the advanced wastewater treatment plant, depending on the point of origin.

Contact Wastes

Contact wastes, such as personal protective equipment, paper towels, and other solid, investigation-derived wastes, will be placed in plastic bags and placed in dumpsters. Contact wastes generated inside a radiologically controlled or contamination area will be dispositioned to a controlled waste container in the respective area.

3.6.2.11 Monitoring Well Maintenance

During the restoration of the Fernald site, surface cleanup activities will create adverse conditions around several groundwater monitoring wells. Extra effort will be taken on the part of Fernald site personnel to safeguard and inspect groundwater monitoring wells during site restoration. Monitoring well maintenance will center around two questions:

1. Is the monitoring well protective of the subsurface environment in its current condition?
2. Does the monitoring well yield a representative groundwater sample?

Well Maintenance Inspections

Routine inspections of Great Miami Aquifer groundwater monitoring wells will be conducted during sampling or collection of water levels (at a minimum of once a year if the well is not being routinely sampled) to determine if the well is protective of the environment based on the inspection criteria below. Wells may be inspected more frequently if they are located in an area of active surface restoration. All assessment and maintenance activities will be recorded on applicable field data forms. The inspections include, but are not limited to, the following:

- Ensuring that the well identification number is painted or welded on the top of the lid
- Inspecting the ground surrounding the well for depressions and channels that allow surface water to collect and flow toward the wellhead; and for debris and foreign material that could leach contaminants into the subsurface or otherwise interfere with well sampling
- Ensuring visibility and accessibility to the well
- Inspecting locking lids and padlocks to check for rust and ease of operation
- Inspecting the exposed (protective) well casing to ensure that it is free of cracks and signs of corrosion; it is reasonably plumb with the ground surface; it is painted bright orange; the drain hole is clear; it is free of debris; and the well casing has no sharp edges
- Removing and inspecting the well cap to ensure that it is free of debris, fits securely, and the vent hole is clear; and if equipped with a ground-flush cap, ensuring that it is water-tight to prevent surface water from entering the well
- Inspecting concrete surface seals for settling and cracking
- If exterior guards are used to protect the well, then periodically inspecting the guards for visibility and damage and repaint, if necessary.

Well Evaluation

If the turbidity and amount of sediment measured in the well, or the visual inspection indicates a potential problem with the well, then the following work may be performed to evaluate the cause of the sedimentation or other problems:

- Review existing well installation documentation
- Review well history and historical water quality data to identify whether it produces consistently clear or turbid samples
- Review groundwater sampling field records
- Conduct a downhole camera survey to inspect the integrity of the screen and casing.

At least once a year, an assessment will be made of wells that are sampled as to whether or not the well is yielding a representative sample. This assessment includes, but is not limited to, the following:

- Determining how much sediment has entered the well screen and accumulated in the well; and review historical depth records. This will be done by measuring the depths of those wells that do not have dedicated packers.
- Determining if any foreign material is present in the well (e.g., bentonite grout)
- Determining if the groundwater color has changed over time (e.g., due to iron bacteria)
- Evaluating turbidity within the sample.

Well Maintenance Corrective Actions

Corrective actions to address problems identified in the well maintenance inspections will be conducted as soon as feasible. Corrective maintenance to address excessive turbidity will include removal of sediment from the well through redevelopment of the well.

It is possible that minerals can precipitate on well screens. If it is determined that minerals have precipitated in the well or on the well screen, and they are affecting the representativeness of the groundwater sample, then the limited use of chemicals (e.g., chlorine, hydrochloric acid, etc.) to remove the mineral build-up may be considered. It is understood that chemicals have a very limited application in the rehabilitation of monitoring wells because the chemicals can cause changes such that the well will no longer yield a representative sample (EPA 1991). Changes resulting from the use of chemicals could last for a short time or could be permanent. Therefore, if chemical rehabilitation is attempted, it will only be attempted as a last resort. Water quality parameters (such as Eh (redox potential), pH, temperature, and conductivity) will be measured prior to the application of the chemicals and following the use of the chemicals. These measurements will serve as values for comparison of water quality before and after well maintenance.

If a groundwater monitoring well has been damaged in such a way that it is no longer protective of the subsurface environment and it cannot be repaired, then the well will be plugged and abandoned. If it is determined that the well is not yielding a representative groundwater sample and rehabilitation efforts are not effective in correcting the condition, then the well will be considered for plugging and abandonment. If the well is still protective of the subsurface environment, then it might be used for the collection of water level data even though it does not yield representative groundwater samples. Wells designated for plugging and abandonment may be sampled one last time for a subset of water quality parameters listed in Table 3-5.

The exact parameter list selected for the sampling will be based on the location of the well. CMT wells being plugged and abandoned may have each available channel sampled for total uranium (or any groundwater FRL constituent) prior to being plugged and abandoned, as deemed appropriate.

3.6.3 Change Control

Changes to the medium-specific plan will be at the discretion of the project team leader. Prior to implementation of field changes, the project team leader or designee shall be informed of the proposed changes and circumstances substantiating the changes. Any changes to the medium-specific plan must have written approval by the project team leader or designee, Quality Assurance representative, and the field manager prior to implementation. If a Variance/Field Change Notice is required, it will be completed in accordance with Section 15.3 of the SCQ. The Variance/Field Change Notice form shall be issued as controlled distribution to team members and will be included in the field data package to become part of the project record. During biennial revisions to the IEMP, Variance/Field Change Notices will be incorporated to update the medium-specific plan.

3.6.4 Health and Safety Considerations

The Fernald site's Health and Safety organization is responsible for the development and implementation of health and safety requirements for this medium-specific plan. Hazards (such as physical, radiological, chemical, and biological) typically encountered by personnel when performing the specified field work will be addressed during team briefings.

All involved personnel will receive adequate training to the health and safety requirements prior to implementation of the field work required by this medium-specific plan. Safety meetings will be conducted prior to beginning field work to address specific health and safety issues. All Fluor Fernald employees and subcontractor personnel who will be performing field work required by this medium-specific plan are required to have completed applicable training.

For areas that are subject to more restrictive radiological controls where the potential for exposure is greater, radiation work permits are necessary and will be obtained prior to the field work being performed in those areas. A radiological control technician will be assigned to each field crew performing any activities in an area requiring a radiation work permit.

3.6.5 Data Management

Field documentation and analytical results will meet the IEMP data reporting and quality objectives, comply with appropriate sections and appendices of the SCQ, and comply with specific Fernald site procedures such as the Data Validation Procedure (DOE 2003c).

Data documentation and validation requirements for data collected in 2006 for the IEMP fall into two categories depending upon whether the data are field- or laboratory-generated. Field data validation will consist of verifying medium-specific plan compliance and appropriate documentation of field activities. Laboratory data validation will consist of verifying that data generated are in compliance with ASLs specified in the medium-specific plan. Specific requirements for field data documentation and validation, and laboratory data documentation and validation will be in accordance with SCQ and Fernald site procedures.

There are five analytical levels (ASL A through ASL E) defined for the Fernald site in Section 2 of the SCQ. For groundwater in 2006, field data documentation will be at ASL A, and laboratory data documentation, in general, will be at ASL B. A more conservative ASL may be required for laboratory data in order to meet required detection limits or in order to ensure data quality objectives. ASL B is appropriate for laboratory-generated data collected in 2006 because the data are being used for surveillance during site restoration. ASL B provides qualitative, semi-qualitative, and quantitative data with some quality assurance/quality control checks.

At a minimum, 10 percent of the IEMP field and analytical data will undergo validation to ensure that analytical data are in compliance with the ASL method criteria being requested and in order to meet data quality objectives. The percentage of data validated could increase in order to meet data quality objectives.

Data will be entered into a controlled database using a double-key or other verification method to ensure accuracy. The hard copy data will be managed in the project file according to Fernald site record keeping procedures and DOE Orders.

3.6.6 Quality Assurance

Assessments of work processes shall be conducted to verify quality of performance, and may include audits, surveillances, inspections, tests, data verification, field validation, and peer reviews. Assessments shall include performance-based evaluation of compliance to technical and procedural requirements and corrective action effectiveness necessary to prevent defects in data quality. Assessments may be conducted at any point in the life of the project. Assessment documentation shall verify that work was conducted in accordance with IEMP, SCQ, and Quality Assurance Program (DOE 2003f) requirements.

Recommended quarterly quality assurance assessments or surveillances shall be performed on tasks specified in the medium-specific plan. These assessments may be in the form of independent assessments or self-assessments, with at least one independent assessment conducted annually. Independent assessments are the responsibility of designated project Quality Assurance personnel. Self-assessments are performed by project personnel in order to evaluate the overall quality of work performance. The project team leader and the Quality Assurance group will coordinate assessment activities and comply with Section 12 of the SCQ. The project personnel or Quality Assurance representative shall have "stop work" authority if significant adverse effects to quality conditions are identified or work conditions are unsafe.

Only laboratories on the approved laboratory list will be used for sample analyses in accordance with Section 12 and Appendix E of the SCQ.

3.7 IEMP GROUNDWATER MONITORING DATA EVALUATION AND REPORTING

This section provides the methods to be used in analyzing the data generated by the IEMP groundwater sampling program in 2006. It summarizes the data evaluation process and actions associated with various monitoring results. The planned reporting structure for IEMP-generated groundwater data, including specific information to be reported in the annual site environmental report, is also provided.

3.7.1 Data Evaluation

Data resulting from the IEMP groundwater program will be evaluated to meet the program expectations identified in Section 3.4.1. Data evaluation will look at both the operational efficiency and the operational effectiveness of the groundwater remediation system (EPA 1992). Operational efficiency refers to implementing the most efficient remedy possible. The objectives are to minimize downtimes, conduct stable operations, meet planned performance goals, and operate a cost-effective system. Operational efficiency will be assessed by tracking the following:

- Pumping rates for individual wells and modules
- Gallons of water pumped
- Extraction well total hours of operation during the year
- The volume of treated water
- Planned versus actual gallons of water pumped.

Operational effectiveness refers to the evaluation of the degree of contamination cleanup achieved. Operational effectiveness will be assessed by tracking the following:

- Planned versus actual pounds of uranium removed from the Great Miami Aquifer
- Pounds of uranium removed per million gallons of water pumped (uranium removal index)
- Running cumulative pounds of uranium removed from the Great Miami Aquifer versus predicted running cumulative pounds of uranium removed from the Great Miami Aquifer
- Total uranium concentration data collected from extraction wells
- Total uranium concentration data collected from monitoring wells
- Water level data collected from monitoring wells
- Interpretations of capture zones
- Regression curves of uranium concentration data at extraction wells
- Regression curves of uranium concentration data at groundwater monitoring wells (starting in 2005 and then every five years). Regression curves of uranium concentration data at groundwater monitoring wells will be prepared every five years because only two data points a year will be added to the database used to generate the curves.

Most of the data will be tabulated, presented in graphs, or presented in maps and evaluated in the following manner:

- Concentration versus time plots for specific constituents
- Tables identifying wells with constituents above FRL concentrations
- Mann-Kendall trend analyses for specific constituents
- Concentration contour maps.

Large quantities of data will be collected and evaluated each year. In order to evaluate the results of the sampling, the data collected for the IEMP will be presented and evaluated using the formats above. The findings of data evaluations will be shared with project personnel. The EPA and OEPA have identified that this is a successful method of evaluating and presenting the data. Groundwater monitoring program data will be evaluated to:

- Assess progress in capturing and restoring the area containing the >30-µg/L total uranium plume
- Assess progress in capturing and restoring the areas affected by non-uranium FRL exceedances
- Assess water quality at the downgradient Fernald site property boundary
- Assess model predictions
- Assess the impact that the aquifer restoration is having on the Paddys Run Road Site plume
- Meet other monitoring commitments
- Address community concerns.

The aquifer restoration system is being designed to reduce the concentration of uranium and non-uranium FRL constituents in the aquifer to concentrations that are at or below their FRL. Because uranium is the principal COC, the aquifer restoration system has been designed to capture the 30-µg/L total uranium plume, with the understanding that the system may need to be modified in the future to capture and remediate non-uranium FRL constituents.

Extraction wells have been positioned within each restoration module to capture the uranium plume. Operational decisions and pumping changes will focus on the capture of the uranium plume in 2006. Operational changes to meet non-uranium FRL concentrations are considered to be a secondary objective. However, evaluation of the need for an operational change to address non-uranium FRL constituents will be ongoing throughout aquifer remediation and is expected to gain in importance as the achievement of the uranium objective approaches.

Following is a discussion of how each of the groundwater program expectations are intended to be met through evaluation of IEMP groundwater data.

Capturing and Restoring the Area Containing the >30-µg/L Total Uranium Plume

Capture and restoration of the area containing the >30-µg/L total uranium plume will be evaluated using groundwater elevation data and the most current maximum total uranium plume interpretation. Groundwater elevation maps with capture zone and flow divide interpretations will be prepared to evaluate the extent of capture.

Remediation of the 30-µg/L total uranium plume will be assessed by monitoring total uranium concentrations over time. The 30-µg/L maximum total uranium plume will be mapped and compared to previous maps to determine how the plume has changed in response to remediation. Direct-push sampling data will be used throughout the remedy to supplement fixed monitoring well location data by providing vertical profile concentration data.

If a new total uranium FRL exceedance is detected in the aquifer, then an attempt will be made to determine the cause of the exceedance. Considerations will include:

- Movement of known total uranium contamination in response to pumping, or natural migration
- New contamination reaching the aquifer as a result of restoration activity
- Previously undetected uranium contamination that has now moved into a monitoring zone as a result of pumping, or natural migration.

When a new extraction well begins operating, water levels will be collected more frequently until conditions have stabilized. Once conditions have stabilized, monitoring will fall back to the regular IEMP monitoring schedule. Individual start-up plans will provide specifics on the frequency of water level and water quality data collection during the start-up time period.

Capturing and Restoring the Areas Affected by Non-uranium FRL Exceedances

The Operable Unit 5 Record of Decision identifies 49 FRL constituents, other than total uranium, that also need to be tracked as part of the aquifer restoration. These 49 constituents are collectively referred to as the non-uranium FRL constituents. During the aquifer restoration, groundwater monitoring will take place for the non-uranium FRL constituents. Constituents that have been detected in the aquifer above their respective FRL will be monitored semiannually.

Non-uranium FRL concentration trends in the Great Miami Aquifer will be assessed through trend analysis when sufficient data have been obtained. The Mann-Kendall statistical test for trend will be used to facilitate the trending interpretation. Concentrations versus time plots may be used to illustrate how the concentrations are trending.

If a new non-uranium FRL exceedance is detected in the aquifer, then an attempt will be made to determine the cause of the exceedance. Considerations will include:

- Movement of known contamination in response to pumping or natural migration
- New contamination reaching the aquifer as a result of restoration activity
- Previously undetected contamination that has now moved into a monitoring zone as a result of pumping or natural migration.

Any FRL exceedance detected at a property boundary/plume boundary well location will be evaluated using the same data evaluation protocol that was approved for the Restoration Area Verification Sampling Program, Project-Specific Plan (DOE 1997d) in order to determine if additional action is required. The constituent concentration data over time will be graphed. If two or more sampling events following an FRL exceedance indicate that the concentrations are below the FRL, then the location will not be considered for remediation or further monitoring above and beyond what is already prescribed by the IEMP. If sampling following the initial FRL exceedance indicates that the exceedance was not just a one-time occurrence, and the exceedance is judged to be the result of Fernald site activities (either historical or current), then action will be taken to address the exceedance.

Meeting Other Monitoring Commitments

Other groundwater monitoring commitments that need to be addressed are private well sampling; property boundary monitoring; and fulfillment of DOE Order 5400.1 requirements to maintain an environmental monitoring program for groundwater.

Total uranium data collected at private wells will be graphed to illustrate changes and will be used in the preparation of total uranium contour maps. Data collected from the Fernald site property/plume boundary monitoring system will be compared to FRLs. This will facilitate the detection and monitoring of FRL exceedances and will determine if interim actions are warranted, in addition to implementing the sitewide aquifer restoration. Lastly, this groundwater monitoring program presented in the IEMP, along with the groundwater data reporting in IEMP annual integrated site environmental reports, fulfills DOE Order 5400.1 requirements.

Groundwater Modeling

Groundwater uranium concentration data and water level data obtained through the life of the remedy will be compared against model-predicted concentrations and water levels to evaluate how reasonable the predictions are over the long term. Individual well residuals (model-predicted concentration versus actual measured concentrations) will be determined without running the model. A mean residual calculation for each monitoring event will also be determined. Determination of a residual will be model layer-specific. The model layer that contains the highest uranium concentration will be used. Monitoring wells in the remediation footprint of the aquifer with well screens installed at the same elevation as the selected model layer, will be included in the residual exercise. Results of the first assessment will be provided in the 2005 Site Environmental Report. The assessment may be continued every five years if it is determined to be beneficial. A brief summary of background information on the groundwater model follows.

Since modeling was conducted for the Remedial Investigation/Feasibility Study and Baseline Remedial Strategy reports, the model has undergone several changes in order to improve its capability for making water level and uranium concentration predictions. DOE has changed from the Sandia Waste Isolation Flow and Transport (SWIFT) groundwater modeling code to the Variably Saturated Analysis Model in 3 Dimensions (VAM3D) modeling code for all site groundwater modeling operations. This transition has been documented in detail in Development and Verification of VAM3DF, a Numerical Flow and Transport Modeling Code (HydroGeologic 1998).

The groundwater modeling grid used in the SWIFT model was retained for the VAM3D model. However, vertical discretization of the model was increased in the VAM3D model to 12 vertical layers instead of the six layers used in the SWIFT model.

The groundwater model was recalibrated for flow to address observed changes in water level conditions and to address seasonal changes in water levels prior to it being used to support the design of the Waste Storage Area Module in 2001, the South Field (Phase II) Module in 2002, and the Waste Storage Area (Phase II) Module in 2005. The 12-layer VAM3D model was recalibrated to current groundwater elevations in May 2000 with calibration activities detailed in the Great Miami Aquifer VAM3D Flow Model Recalibration Report (DOE 2000b). With increased vertical resolution in the VAM3D ZOOM model (14 layers compared to 12 layers in the original VAM3D model), predicted wellhead concentrations for total uranium more closely match observed wellhead concentrations. Wellhead concentration decline curves were published in the 2004 Site Environmental Report (DOE 2005e) comparing modeled versus observed wellhead concentrations for total uranium. These comparisons will continue and will be published in future site environmental reports.

In the past, initial conditions in the fate and transport portion of the groundwater model have been routinely updated. Until recently, the update of initial conditions was considered necessary to incorporate additional characterization data collected during the design of the planned groundwater restoration modules (South Plume Module, South Field [Phases I and II] Module, and Waste Storage Area [Phases I and II] Module). Without the update of initial conditions, the module designs would not have reflected the most up-to-date plume conditions. Because the last planned aquifer restoration module design was recently completed (Waste Storage Area [Phase II] Design), the process of routinely updating initial conditions in the fate and transport portion of the groundwater model can be stopped.

Because of significant seasonal changes in Great Miami Aquifer groundwater elevations, three sets of steady-state flow model boundary conditions were developed for the VAM3D model as a result of the recalibration effort. These three steady-state flow model boundary conditions correspond to nominal groundwater elevations, and minimum and maximum groundwater elevations observed during the wet and dry seasons of the year, respectively. The wet and dry boundary condition data sets will be used in future groundwater modeling activities to predict aquifer remedy performance under those conditions.
To facilitate computational efficiency, a local VAM3D ZOOM model was designed covering a smaller area than the 12-layer VAM3D model. The VAM3D ZOOM model contains 14 layers and covers an area just large enough to encompass the total uranium plume and the extraction wells in the aquifer remedy. The VAM3D ZOOM model design is documented in Integration of Data Fusion Modeling (DFM) with VAM3DF Contaminant Transport Code (HydroGeologic 2000).

Because the ZOOM model boundaries are near some of the aquifer remedy extraction wells, ZOOM model steady-state flow boundaries must be derived from the larger 12-layer VAM3D model to avoid model boundary effects impacting flow model predictions of remedy performance. For all current and future operational flow modeling activities, aquifer remedy pumping scenarios are first run to steady state in the large 12-layer VAM3D model then ZOOM model boundary values are derived from the output of the 12-layer flow model run. This technique is described in more detail in Design for Remediation of the Great Miami Aquifer, South Field (Phase II) Module.

It is understood that the groundwater model may need to be recalibrated for flow if measured water levels and model predictions are not adequate for managing the remedy. If future flow model calibration efforts are performed, the large 12-layer VAM3D model will be recalibrated to observed groundwater elevation data; then VAM3D ZOOM model boundary conditions will be derived from the large 12-layer VAM3D model. Calibration standards will be the same as those used to calibrate the SWIFT model.

The basic strategy for assessing flow predictions will be as follows:

- Model-predicted water level values will be compared to actual field measured values. The decision to recalibrate the groundwater model will be based on how close the model predictions are to field measured values.
- The difference between the maximum and minimum measured groundwater elevation over time will be used to define a water level elevation range for a particular well. The water level range is the result of seasonal variations and long-term water level trends within the aquifer. A range of water levels over time has been established for each water level monitoring well identified in the IEMP.
- If the difference between measured elevations and modeled predictions is greater than 5 feet for more than one-third of the monitoring wells within the capture zone of the extraction system, or for a significant local area of the model domain, then the need to implement model recalibration for the affected area of the model will be evaluated. All relevant groundwater data acquired since the previous flow model calibration will be considered in future flow model calibrations. Comparisons will recognize that modeled predictions represent average conditions within a model block and monitoring wells are not usually located at the center of a model block. One solution might be to compare the surrounding eight model blocks to the actual measured elevation.

<u>Assess the Impact that the Aquifer Restoration Has on the Paddys Run Road Site Plume</u>

As was done from 1997 to 2005, concentration data collected in 2006 for key Paddys Run Road Site constituents will be evaluated using trend analysis. Water level maps will be produced to determine where capture is occurring due to pumping in the South Plume Module.

Adequately Address Community Concerns

The IEMP fulfills the informational needs of the Fernald community by preparing groundwater environmental results in the annual site environmental report. DOE makes these reports available to the public at the Public Environmental Information Center. Comments received over the life of the IEMP program regarding the IEMP groundwater program will be considered for future revisions to the IEMP.

Groundwater Certification Process and Stages

Efforts are underway to develop a Groundwater Certification Plan for the Groundwater Remedy. The objective of the Certification Plan is to document the process that will be followed to certify the aquifer remedy objectives have been met. As explained below, pump-and-treat operations are currently in progress at the Fernald site. The IEMP is the controlling document for remedy performance monitoring during the pump-and-treat operational period. The IEMP will continue to be the controlling document for all groundwater monitoring needed to support the certification process following completion of pump-and-treat operations.

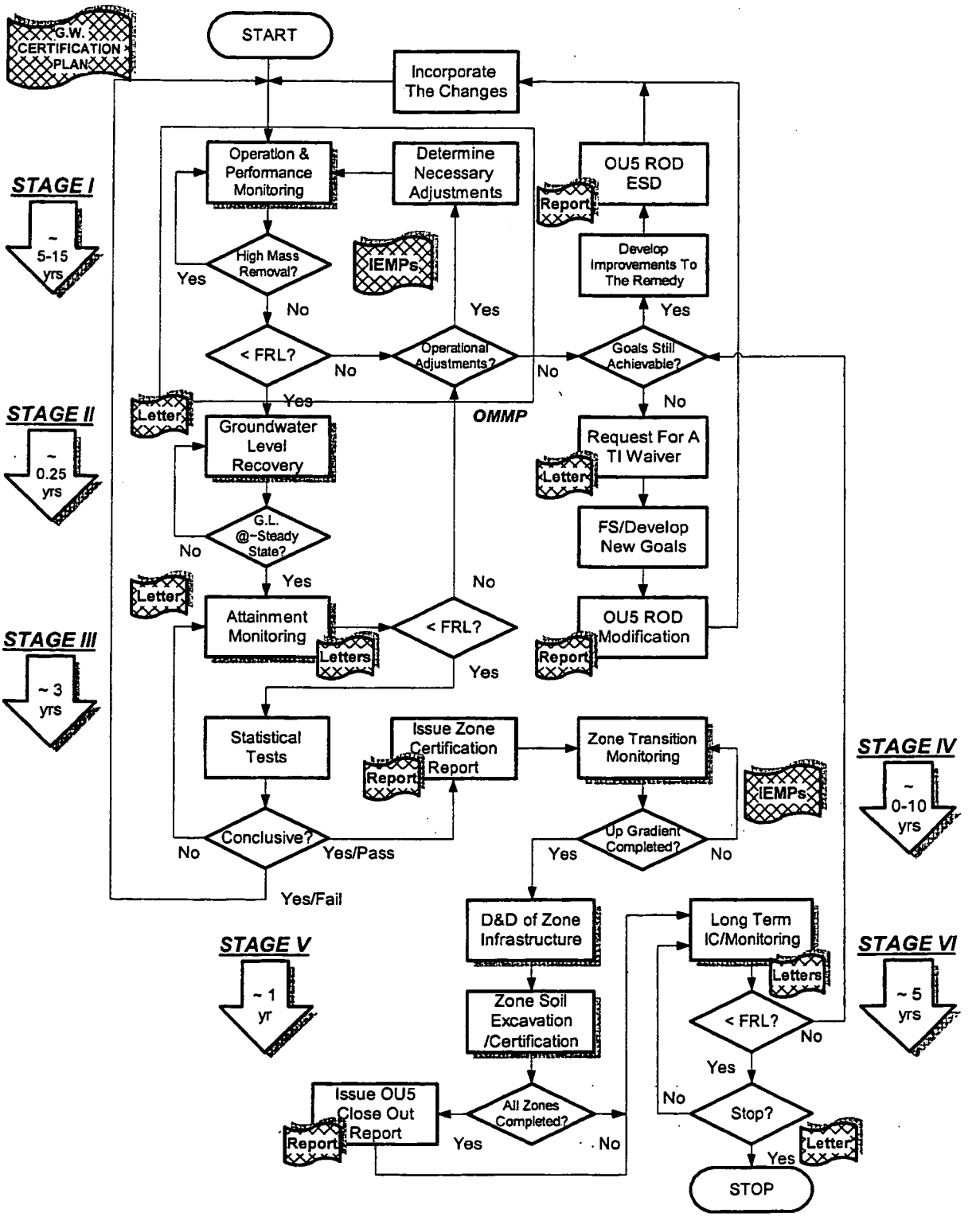
Figure 3-9 illustrates the groundwater certification process. Six stages have been identified for the certification process:

- Stage I: Pump-and-Treat Operations
- Stage II: Post Pump-and-Treat Operations/Hydraulic Equilibrium State
- Stage III: Certification/Attainment Monitoring
- Stage IV: Declaration and Transition Monitoring
- Stage V: Demobilization
- Stage VI: Long-Term Monitoring

In 2006, remedy performance monitoring will continue to support pump-and-treat operations. As illustrated in Figure 3-9, remedy performance monitoring is conducted to assess the efficiency of mass removal and to gauge performance in meeting FRL objectives. If it is determined that high mass removal is not being maintained, or FRL goals are not being achieved, then the need for operational adjustment will be evaluated and implemented if deemed appropriate. A change to the operation of the aquifer restoration system would be implemented through the Operations and Maintenance Master Plan for the Aquifer Restoration and Wastewater Treatment Project (DOE 1997c). A groundwater monitoring change, if found to be necessary, would be implemented through the IEMP. If additional characterization data are needed beyond the current scope of the IEMP then a separate sampling plan will be prepared. Additional sampling activities may use other sampling techniques, such as a direct-push sampling tool, which has been successfully used at the Fernald site to obtain groundwater samples without the use of a permanent monitoring well.

FIGURE 3-9

GROUNDWATER CERTIFICATION PROCESS AND STAGES



The IEMP will be used to document the approach for determining when various modules can be removed from service and groundwater monitoring can focus on subsequent stages of the groundwater certification process.

3.7.2 Reporting

The IEMP groundwater program data in 2006 will be reported on the IEMP Data Information Site, and in the annual site environmental report. Groundwater data that support the On-site Disposal Facility Groundwater/Leak Detection and Leachate Monitoring Plan will be provided in the same manner. Additional information on IEMP data reporting is provided in Section 7.3.3.

Data pertaining to the groundwater program will be provided on the IEMP Data Information Site. The data will be in the format of searchable data sets and/or downloadable data files. This site will be updated every 2 to 4 weeks, as data become available.

The annual site environmental report will be issued each June for the previous calendar year. This comprehensive report discusses a year of IEMP data previously reported on the IEMP Data Information Site. The report includes the following:

Operational Assessment

- The set point pumping rates for each extraction well during the year
- The uranium removal rate of individual wells
- Extraction well total hours of operation during the year
- The volume of treated groundwater
- Extraction well operating time expressed as a percentage of total available operating time
- The volume of water pumped from each extraction well during the year
- Planned versus actual gallons of water pumped
- The net water balance
- Total pounds of uranium removed during the year
- Total pounds of uranium removed from the aquifer since the start of remediation
- Planned versus actual pounds of uranium removed from the Great Miami Aquifer
- Running cumulative pounds of uranium removed from the Great Miami aquifer versus predicted running cumulative pounds of uranium removed from the Great Miami Aquifer
- Total uranium concentration data collected from extraction wells

- Total uranium concentration data collected from monitoring wells
- Water level data collected from monitoring wells
- The maximum, minimum, and average uranium concentration sent to treatment during the last year
- The monthly average uranium concentration in water discharged to the Great Miami River during the year
- Pumping rate figures for each extraction well
- Regression curves of uranium concentration data at extraction wells
- Regression curves of uranium concentration data at groundwater monitoring wells (every 5 years).

Aquifer Conditions

- The area of capture during the year
- A description of the geometry of the total uranium plume during the year
- The effect that restoration had (i.e., pumping) on the Paddys Run Road Site plume during the year
- The status of non-uranium FRL exceedances, including any newly detected FRL exceedances
- Identification of any new areas of FRL exceedances
- A comparison of groundwater restoration performance with respect to model predictions established in the Baseline Remedial Strategy Report
- Any changes that may have been made to the operation or design.

Data that Support the On-site Disposal Facility Groundwater/Leak Detection and Leachate Monitoring Plan

- Status information pertaining to the on-site disposal facility wells along with baseline data summaries
- Leachate volumes and concentrations from the leachate collection system and from the leak detection system for the on-site disposal facility
- Results of quarterly groundwater sampling initiated after waste is placed in a cell of the on-site disposal facility.

In addition, the annual site environmental report will include trend analysis of the data collected from the on-site disposal facility.

Because the IEMP is a living document, annual reviews and two-year revisions have been instituted. The annual review cycle provides the mechanism for identifying and initiating any groundwater program modifications (e.g., changes in constituents, locations, or frequencies) that are necessary to align the IEMP with the current mix of near-term remediation activities. Any program modifications that may be warranted prior to the annual review would be communicated to EPA and OEPA.

Section 4.0

4.0 SURFACE WATER AND TREATED EFFLUENT MONITORING PROGRAM

Section 4.0 provides a description of the routine sitewide surface water and treated effluent monitoring to be performed during active remediation of the Fernald site. This includes many compliance-based monitoring and reporting obligations for surface water and treated effluent, and a medium-specific plan for conducting all surface water and treated effluent monitoring activities.

4.1 INTEGRATION OBJECTIVES FOR SURFACE WATER AND TREATED EFFLUENT

Unlike groundwater and sediment, no direct restoration of the Fernald site's surface water resources (i.e., Paddys Run and the Great Miami River) is required to achieve the surface water FRLs specified in the Record of Decision for Remedial Actions at Operable Unit 5. However, because surface water represents both a contaminant transport pathway and a route of exposure for human and ecological receptors, routine monitoring of surface water is necessary to confirm that the Fernald site's point and non-point discharges from other remedial operations to receiving waters fall within established thresholds. The monitoring activities for surface water will thus function as both a surveillance and a compliance tool over the life of remediation at the Fernald site. These measures will help document that the remedial operations are protective of both groundwater (via the surface water cross-medium pathway) and intended surface water uses in the vicinity of the Fernald site.

The IEMP is the designated mechanism for conducting the sitewide surface water surveillance and compliance monitoring downstream from project-specific controls. The IEMP's focus is to accommodate remedial construction and operation activities taking place in 2006. Ultimately, the IEMP will be used to verify and document that the conclusion of the sitewide remedial actions result in a condition that no longer poses any long-term threat to human health and/or the environment through the surface water pathway. In this comprehensive role, the IEMP serves to integrate several compliance-based monitoring and reporting programs currently in existence for the Fernald site:

- The discharge monitoring and reporting program related to the site's NPDES Permit
- The radiological monitoring of and reporting for the treated effluent mandated by the FFCA and Operable Unit 5 Record of Decision
- The IEMP Characterization Program which combines portions of the former Environmental Monitoring Program (EMP) that has been ongoing at the Fernald site since the 1950s and was updated in the IEMP, Revision 0 (DOE 1997b), to accommodate surface water monitoring needs during remediation.

As discussed in Section 4.6, these programs have been brought together under a single reporting structure to facilitate review of the performance of the Fernald site's surface water protection actions and measures.

4.2 ANALYSIS OF REGULATORY DRIVERS, DOE POLICIES, AND OTHER FERNALD SITE-SPECIFIC AGREEMENTS

This section presents a summary evaluation of the regulatory drivers governing the monitoring of the Fernald site's point and non-point discharges to Paddys Run and the Great Miami River. The intent of this section is to identify the pertinent regulatory requirements, including ARARs and to-be-considered requirements, for the scope and design of the surface water monitoring program. These requirements will be used to confirm that the program satisfies the regulatory obligations for monitoring that have been activated by the records of decision and will achieve the intentions of other pertinent criteria, such as DOE Orders and the Fernald site's existing agreements and permits, as appropriate, that have a bearing on the scope of surface water and treated effluent monitoring.

The results of the analysis will also be used to define, as appropriate for this medium, the administrative boundaries between the IEMP and the project-specific emission control and uncontrolled runoff monitoring conducted by other organizations.

4.2.1 Approach

The analysis of the regulatory drivers and policies for surface water and treated effluent was conducted by examining the suite of ARARs and to-be-considered requirements in the Operable Unit 5 Record of Decision to identify the subset with specific environmental monitoring requirements. The Fernald site's existing compliance agreements issued outside the CERCLA process (such as the NPDES Permit requirements and the FFCA) were also reviewed.

4.2.2 Results

The following summary of regulatory drivers, compliance agreements, and DOE Orders were found to govern the monitoring scope and reporting requirements for surface water and treated effluent:

- CERCLA Record of Decision for Remedial Actions at Operable Unit 5, which requires remediation of the site such that the surface water pathway is protective of the underlying Great Miami Aquifer and various surface water environmental receptors. The surface water FRLs provided in the Operable Unit 5 Record of Decision considered and incorporated all chemical-specific ARARs and to-be-considered requirements for the protection of human health via the surface water pathway. In addition, treatment performance based limits were established restricting total uranium mass discharged to the Great Miami River to 600 lbs/year and a uranium concentration limit of 30 μg/L as a monthly average. (The concentration limit of 30 μg/L established in the Operable Unit 5 Explanation of Significant Differences Document.)

- Per the CERCLA Remedial Design Work Plan for Remedial Actions at Operable Unit 5, monitoring will be conducted following the completion of cleanup as required to assess the continued protectiveness of the remedial actions. The IEMP will specify the type and frequency of environmental monitoring activities to be conducted during remedy implementation, and ultimately, following the cessation of remedial operations as appropriate. The IEMP will delineate the Fernald site's responsibilities for sitewide monitoring of surface water and sediment over the life of the remedy, and ensure that FRLs are achieved at project completion.
- The current NPDES Permit for the Fernald site, which triggers a variety of site-specific surface water and treated effluent sampling, analysis, and reporting requirements (as specified in OAC 3745-33) for non-radiological discharges.
- The 1986 FFCA, which requires that the Fernald site maintain a continuous sample collection program for radiological constituents at the Fernald site's treated effluent discharge points and report the results quarterly to the EPA, OEPA, and the Ohio Department of Health. The sampling program to address this requirement has been modified over the years and is currently governed by an agreement reached with EPA and OEPA in early 1996 as described in the letter "Phase VII Removal Actions and Reporting Requirements Under the Fernald Environmental Management Project Legal Agreements" from DOE to EPA (DOE 1996a). This agreement became effective May 1, 1996 and has since been modified, documented and approved through biennial revisions of the IEMP. This agreement requires sampling at the Parshall Flume (PF 4001), the Storm Water Retention Basin spillway (SWRB 4002O), and the Storm Water Retention Basin bypasses (SWRB 4002B) for radiological constituents. With approval of the IEMP, Revision 0, in 1997, the sampling program was modified to better assess the impact of the site on the surface water pathway. These details are provided in Section 4.4.2.7.
- DOE Order 5400.1, General Environmental Protection Program Requirements, which requires DOE facilities that use, generate, release, or manage significant pollutants or hazardous materials to develop and implement an environmental monitoring plan. Each DOE site's environmental monitoring plan must contain the design criteria and rationale for the routine treated effluent monitoring and environmental surveillance activities of the facility. The IEMP strategy is responsive to the changing site mission and associated remedial needs and complies with DOE Orders.
- DOE Order 5400.5, Radiation Protection of the Public and the Environment, which obligates the Fernald site to perform surveillance monitoring of surface water to ensure that radiological dose limits to the public in the DOE Order are not exceeded. Under these requirements, the exposure to members of the public associated with activities at DOE facilities from all pathways must not exceed, in one year, an effective dose equivalent greater than 100 millirem (mrem). Studies in support of the Operable Unit 5 Feasibility Study demonstrated for all media that combined exposure to radiological COCs at their respective FRLs fall well below the DOE dose requirement. Therefore, monitoring designed to track and document the CERCLA FRL-based remediation of the site meets the intent of DOE Order 5400.5.

The surface water and treated effluent monitoring program described in this IEMP has been developed with full consideration of these regulatory drivers. Any necessary project-specific monitoring is determined during preparation and review of the individual remedial design packages. Table 4-1 lists each of these IEMP and project-specific drivers and the associated monitoring conducted to comply with them. Sections 4.6 and 8.0 provide the Fernald site's current and long-range plan for complying with the reporting requirements invoked by these drivers.

TABLE 4-1

FERNALD SITE SURFACE WATER AND TREATED EFFLUENT MONITORING PROGRAM REGULATORY DRIVERS AND RESPONSIBILITIES

	DRIVER	ACTION
IEMP	DOE Order 5400.1, Environmental Monitoring Plan for all media	The IEMP describes treated effluent and surveillance monitoring as required by DOE Order 5400.1.
	DOE Order 5400.5, Radiation Protection of Public and Environment	The IEMP includes a description for routine sampling of Paddys Run and on-site drainage ditches for radionuclides.
	Operable Unit 5 Record of Decision	The IEMP will be modified toward completion of the remedial action to include sampling to certify FRL achievement. IEMP includes monitoring for performance based uranium discharge limits.
	NPDES Permit	The IEMP describes routine sampling of permit-designated effluent discharges and storm water drainage points for NPDES Permit constituents.
	Federal Facilities Compliance Agreement Radiological Monitoring	The IEMP describes the routine sampling at the Parshall Flume (PF 4001), Storm Water Retention Basin spillway (SWRB 4002O), and Storm Water Retention Basin bypass (SWRB 4002B) for radiological constituents.
	DOE Order 5400.1, Environmental Monitoring Plan for all media	The IEMP describes treated effluent and surveillance monitoring as required by DOE Order 5400.1.

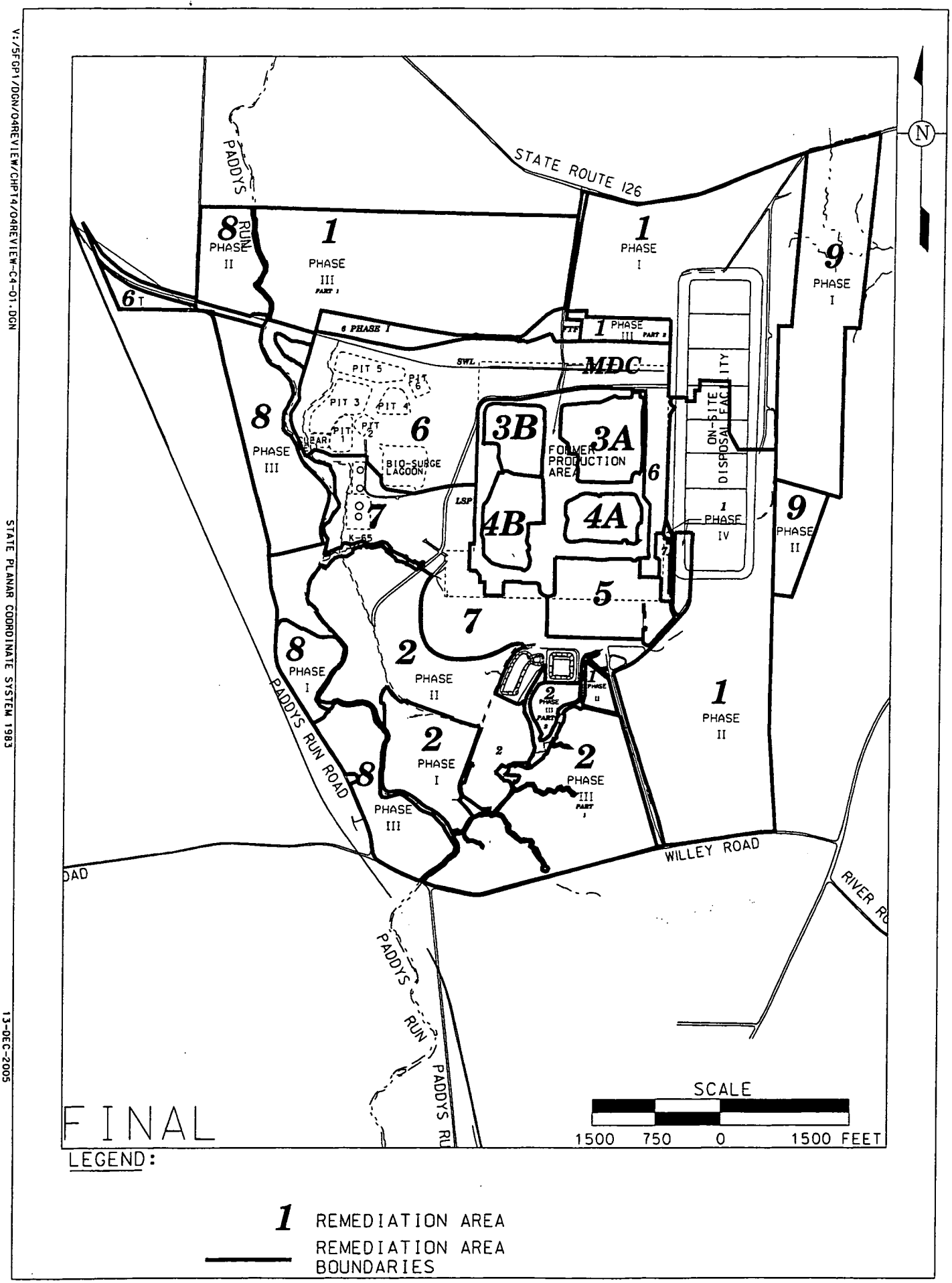
4.3 PROGRAMMATIC BOUNDARY FOR THE SURFACE WATER AND TREATED EFFLUENT MONITORING PROGRAM

This section identifies the programmatic boundaries established between the IEMP and the project-specific activities to be conducted by others. The intent behind the boundary definition is to: (1) clearly delineate the scope and geographic extent of the IEMP's monitoring responsibility; and (2) establish a recognized interface between the sitewide focus of the IEMP and the predominant emission control focus of project-specific monitoring.

It is important to emphasize that the IEMP program boundary for each of the Fernald site's environmental media is unique and, for portions of the surface water and treated effluent program, time-dependent. The boundary is the combined result of:

Regulatory monitoring requirements

- The physical configuration of the site, planned remediation areas (which will change over time) for soil excavation and certification occurring in various areas of the site shown in Figure 4-1, and the associated project-specific controls/monitoring of uncontrolled runoff
- The treated effluent monitoring responsibilities assigned to the IEMP.



LEGEND:

1 REMEDIATION AREA

REMEDIATION AREA BOUNDARIES

FIGURE 4-1. SITEWIDE REMEDIATION AREAS

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For surface water, the programmatic boundary requiring definition for purposes of the IEMP is the line of demarcation between the areas where surface water remains uncontrolled and where surface water is currently controlled (i.e., the former production area, waste storage areas, on-site disposal facility cells in which active waste placement is occurring). As noted above, these boundaries will be transient during remediation as the soil remediation progresses across the site and as additional cells of the on-site disposal facility are developed. In essence, the IEMP will provide surveillance monitoring downstream from the areas where project-specific controls are in place. IEMP surface water and treated effluent monitoring also includes all FFCA and NPDES surface water and treated effluent sampling requirements.

To assist in interpretation of IEMP surface water and treated effluent data collected downstream from the project-specific controls, the IEMP reports will: (1) present contaminant releases attributable to remediation; (2) state whether such releases remain within the established limits; and (3) notify the associated project personnel that such releases have occurred. Section 4.6 discusses this further.

4.4 PROGRAM EXPECTATIONS AND DESIGN CONSIDERATIONS

4.4.1 Program Expectations

The IEMP surface water and treated effluent monitoring program is being designed to collect data sufficient to meet the following expectations for 2006:

- Provide an ongoing assessment of the potential for cross-medium impacts from surface water to the underlying Great Miami Aquifer at locations near the point where the protective glacial overburden has been breached by site drainages
- Document whether the sporadic exceedances of FRLs in various site drainages (noted in IEMP reports) continue to occur at key on-property locations, at the property boundary on Paddys Run, and in the Great Miami River outside the mixing zone, and determine if monitoring can be reduced based on surface water data results and the completion of site soil certification.
- Provide an assessment of impacts to surface water due to uncontrolled runoff and implementation of remediation activities
- Provide additional data at background locations on Paddys Run and the Great Miami River to refine the ability to distinguish site impacts from background as remediation progresses
- Continue to fulfill monitoring and reporting requirements associated with the site NPDES Permit
- Continue to fulfill monitoring and reporting requirements associated with the FFCA and Operable Unit 5 Record of Decision
- Continue to fulfill DOE Order 5400.1 requirements to maintain an environmental monitoring plan for surface water
- Continue to address the concerns of the community regarding the magnitude of the Fernald site's discharges to surface water (i.e., to Paddys Run and the Great Miami River).

The following section provides the design considerations required to fulfill each of these expectations.

4.4.2 Design Considerations

4.4.2.1 Constituents of Concern

A comprehensive listing of COCs has been developed and provides the suite of parameters that have been evaluated for monitoring. Table 4-2 presents this information. The following is a description of each of the columns in Table 4-2.

- Column 1, Constituent: This column represents the suite of constituents considered for monitoring in the surface water pathway as a result of the remedial investigation/feasibility study process at the Fernald site. It represents the constituents for which a FRL was established in the Operable Unit 5 Record of Decision.
- Column 2, Final Remediation Levels: This column represents the human/health protective remediation levels for surface water that were established in the Operable Unit 5 Record of Decision.
- Column 3, FRL Basis: This column is the basis for establishment of the FRL as defined in the Operable Unit 5 Feasibility Study.
- Column 4, Background Values in Surface Water: This column represents updated background values for Paddys Run and the Great Miami River based on data collected for the IEMP through 2003. The IEMP provides this information for purposes of comparison.

4.4.2.2 Surface Water Cross-Medium Impact

To assess the cross-medium impact that contaminated surface water has on the underlying Great Miami Aquifer, the following design considerations are necessary:

- Samples should be collected at those points near where the glacial overburden has been breached by site drainages. As described in the Operable Unit 5 Remedial Investigation, the majority of the Fernald site is underlain by clay-rich glacial overburden. Where present, this glacial overburden provides a measure of protection to the underlying sand-and-gravel aquifer. However, the glacial overburden has been eroded by site drainages primarily in the lower reaches of Paddys Run and in the Storm Sewer Outfall Ditch (refer to Figure 4-2). Additionally, pre-design groundwater characterization activities in the waste storage and Plant 6 areas confirmed that an area in the Pilot Plant drainage ditch adjacent to Paddys Run should be considered as a primary source of infiltration. At these locations, a direct pathway exists for surface water and associated contaminants to reach the underlying sand-and-gravel Great Miami Aquifer.
- Constituents analyzed should represent those area-specific COCs identified in the Operable Unit 5 Feasibility Study and subsequent fate-and-transport modeling as having the potential for cross-medium impact to groundwater via the surface water pathway.
- Sampling frequency should be such that seasonal fluctuations in contaminant concentrations (as well as fluctuations due to varying flow conditions) can be assessed.

TABLE 4-2
SURFACE WATER SELECTION CRITERIA SUMMARY

Constituent[a]	FRL[b]	FRL Basis[b]	95th Percentile Background Level in Surface Water[c,d]			
			Paddys Run		Great Miami River	
			Original	Revised	Original	Revised
General Chemistry (mg/L)						
Fluoride	2.0	A	0.22	0.272	0.9	0.503
Nitrate/Nitrite	2400	R	1.7	4.47	6.6	8.28
Inorganics (mg/L)						
Antimony	0.19	A	ND	0.0012	ND	0.00175
Arsenic	0.049	R	ND	0.00651	0.0036	0.00826
Barium	100	R	0.053	0.0546	0.1	0.101
Beryllium	0.0012	A	ND	0.0003	ND	0.0009
Cadmium	0.0098	B	ND	0.00087	0.01	0.00375
Chromium (VI)[e]	0.010	D	ND	0.00744	ND	0.010401
Copper	0.012	A	ND	0.00841	0.012	0.0147
Cyanide	0.012	A	ND	0.003	0.005	0.00412
Lead	0.010	B	ND	0.00623	0.010	0.01
Manganese	1.5	R	0.035	0.195	0.08	0.115
Mercury	0.00020	D	ND	0.000186	ND	0.000175
Molybdenum	1.5	R	ND	0.00356	0.02	0.00942
Nickel	0.17	A	ND	0.00844	0.023	0.0131
Selenium	0.0050	A	ND	0.0026	ND	0.00293
Silver	0.0050	D	ND	0.000664	ND	0.000348
Vanadium	3.1	R	ND	0.0204	ND	0.00886
Zinc	0.11	A	ND	0.0447	0.045	0.0486

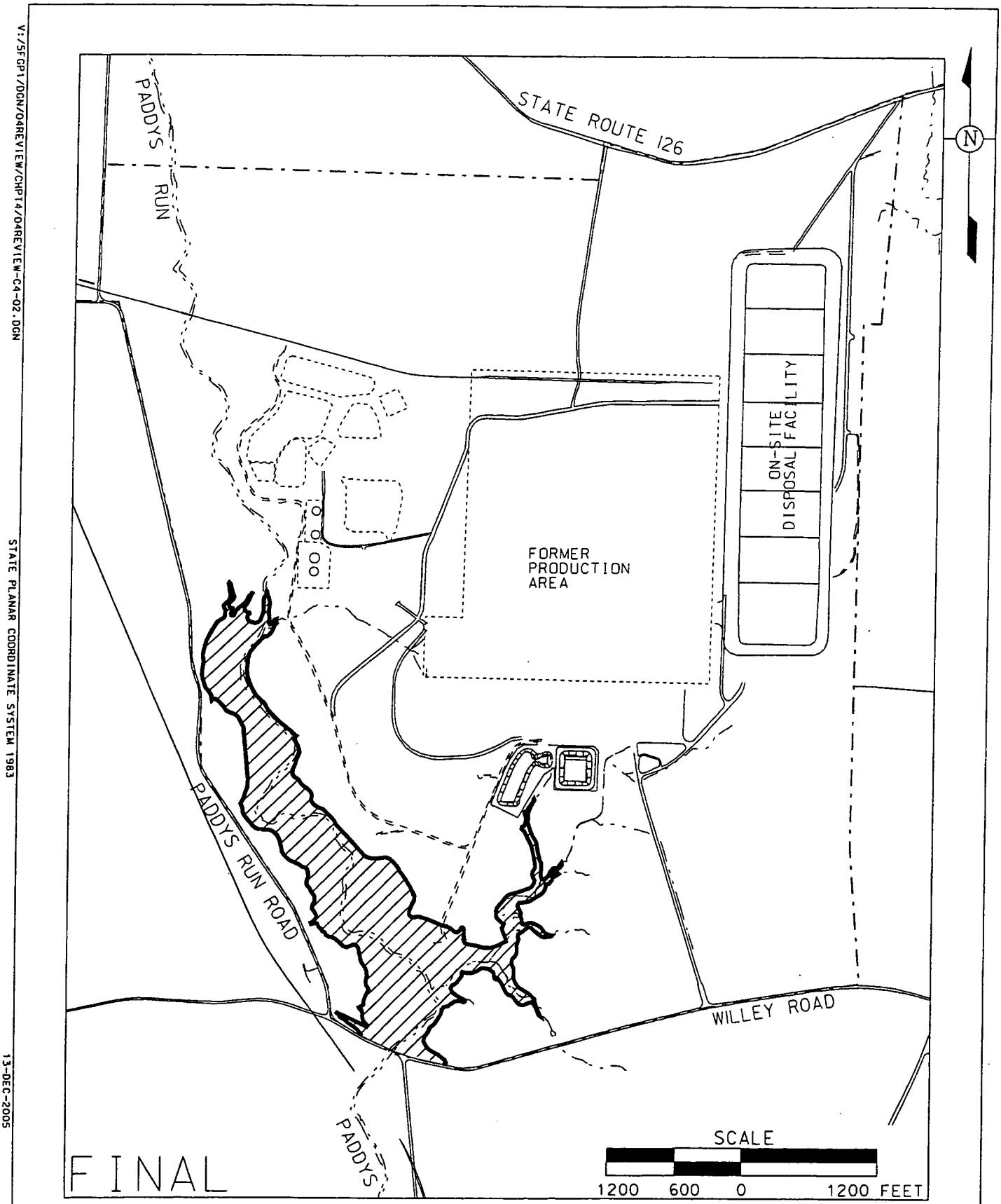
TABLE 4-2
(Continued)

Constituent[a]	FRL[b]	FRL Basis[b]	95th Percentile Background Level in Surface Water[c,d]			
			Paddys Run		Great Miami River	
			Original	Revised	Original	Revised
Radionuclides (pCi/L)						
Cesium-137	10	R	3.1	4.74	ND	3.88
Neptunium-237	210	R	-	0.054	ND	0.0858
Lead-210	11	R	-	2.97	-	2.01
Plutonium-238	210	R	ND	ND	ND	0.038
Plutonium-239/240	200	R	0.09	0.093	ND	0.01
Radium-226	38	R	0.35	0.954	0.41	0.976
Radium-228	47	R	2.1	3.49	2.2	4.17
Strontium-90	41	R	0.96	3.34	ND	1.14
Technetium-99	150	R	ND	4.65	ND	11.3
Thorium-228	830	R	ND	0.238	0.62	0.180
Thorium-230	3500	R	ND	0.483	0.36	0.638
Thorium-232	270	R	ND	0.133	ND	0.178
Uranium, Total (µg/L)	530	R	0.001	1.52	0.001	2.13
Pesticide/PCBs (µg/L)						
Alpha-Chlordane	0.31	R	-	ND	-	ND
Aroclor-1254	0.20	D	-	ND	-	ND
Aroclor-1260	0.20	D	-	ND	-	ND
Dieldrin	0.020	D	-	ND	-	0.0095
Semi-Volatiles (µg/L)						
Benzo(a)anthracene	1.0	D	-	ND	-	ND
Benzo(a)pyrene	1.0	D	-	ND	-	ND
bis(2-Chloroisopropyl)ether	280	R	-	ND	-	ND
bis(2-Ethylhexyl)phthalate	8.4	A	-	2	-	2.5
Dibenzo(a,h)anthracene	1.0	D	-	ND	-	ND

TABLE 4-2
(Continued)

Constituent[a]	FRL[b]	FRL Basis[b]	95th Percentile Background Level in Surface Water[c,d]			
			Paddys Run		Great Miami River	
			Original	Revised	Original	Revised
Semi-Volatiles (µg/L) (Cont.)						
3,3'-Dichlorobenzidine	7.7	R	-	ND	-	ND
Di-n-butylphthalate	6000	R	-	5.09	-	5.5
Di-n-octylphthalate	5.0	D	-	1.75	-	ND
p-Methylphenol	2200	R	-	ND	-	ND
4-Nitrophenol	7,400,000	R	-	ND	-	ND
Volatiles (µg/L)	280	R				
Benzene	280	R	-	ND	-	0.35
Bromodichloromethane	240	R	-	ND	-	ND
Bromomethane	1300	R	-	ND	-	ND
Chloroform	79	A	-	0.782	-	0.3
1,1-Dichloroethene	15	R	-	ND	-	ND
Methylene chloride	430	A	-	1	-	ND
Tetrachloroethene	45	R	-	0.367	-	ND
1,1,1-Tricholoroethane	1.0	D	-	ND	-	ND
1,1,2-Tricholoroethane	230	R	-	ND	-	ND
Other Constituents						
Ammonia			-	0.14	-	0.178
Carbon disulfide			-	ND	-	0.35
Cobalt			-	-	-	0.0123
Trichloroethene			-	0.2	-	ND

[a]Shaded text indicates constituents selected for IEMP surface water analysis at locations other than background and NPDES Permit sample locations.
[b]Derived from Operable Unit 5 Record of Decision, Table 9-5.
A = ARAR values
B = background concentrations
D = analytical detection limit
R = human health risk
[c]ND = non-detected result
- = not applicable/not available
[d]For small data sets (less than or equal to seven samples), the maximum detected concentration is used as the 95th percentile.
[e]FRL based on chromium (VI); however, the analytical results are for total chromium.



LEGEND:

FERNALD SITE BOUNDARY

APPROXIMATE EXTENT OF FERNALD SITE PROPERTY WHERE GLACIAL OVERBURDEN HAS BEEN REMOVED BY EROSION

FIGURE 4-2. AREA WHERE GLACIAL OVERBURDEN HAS BEEN REMOVED BY EROSION

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4.4.2.3 Sporadic Exceedances of FRLs

To comply with the requirements of the Operable Unit 5 Record of Decision, all surface water FRLs must be achieved and maintained at the completion of the remedial actions. During remediation, constituents that have occasionally exceeded FRLs should be monitored to document whether the exceedances continue to occur or, as expected, dissipate as remediation progresses. Because active remediation will be occurring in and near on-property drainages, it is appropriate to monitor for exceedances of the FRLs downstream from the remediation areas and upstream from the off-property receptors. Therefore, sample locations should be located at: (1) on-property locations downstream of historical FRL exceedances; (2) the point where Paddys Run flows off the Fernald site property; and (3) the Parshall Flume (PF 4001), where treated effluent is discharged from the Fernald site to the Great Miami River. (Refer to Figure 4-3 for IEMP surface water and treated effluent sample locations.) To determine the concentration of the treated effluent constituents outside the mixing zone in the Great Miami River, a conservative calculation using the 10-year, low-flow conditions is necessary requiring that flow conditions at the Hamilton Dam gauge be periodically reviewed.

To assist in the development of the scope and focus of the IEMP surface water and treated effluent program, a review of the IEMP surface water data is conducted periodically. The last such review was based on data collected under the IEMP program from August 1997 through December 2001. This evaluation was presented and approved by the agencies as a part of the first quarter 2002 IEMP report, and is summarized in Revision 3 of the IEMP. This evaluation identified a number of parameters sampled since 1997 that had not exceeded their respective FRL (or, if an exceedance occurred, an exceedance had not recurred since the fourth quarter of 1998) and, therefore, were eliminated from the IEMP surface water monitoring program. The parameters that continue to experience sporadic exceedances of their respective FRL will be monitored as indicated in Table 4-3. Note that the monitoring for isotopic thorium, which was added to assess the impact of waste pit excavation activities will be discontinued when soil certification in the waste pit area is complete.

Additionally, beryllium, cadmium, manganese, and radium-228 have been added to monitoring in 2006 at SWP-03. These four constituents are monitored when the Storm Water Retention Basin overflows because they have been identified as possibly having sporadic exceedances. However, based on actual data collected since 1996, no FRL exceedances for these parameters have occurred at the overflow. These constituents are being added to SWP-03 because it is the last location that surface water is monitored on Paddys Run prior to leaving the site and all area-specific constituents are monitored at this location in order to be conservative. Appendix B provides maps detailing surface water locations with FRL exceedances including historical exceedances and those exceedances at background locations.

To provide surveillance monitoring for FRL exceedances, samples will be collected quarterly and analyzed for those constituents identified in Table 4-3.

TABLE 4-3
SUMMARY OF SURFACE WATER AND TREATED EFFLUENT SAMPLING REQUIREMENTS BY LOCATION

Location	Constituent[a]	IEMP Characterization Requirements (reason for selection)[b,c]	NPDES Requirements[c]	OU5 ROD/FFCA[e] Requirements
SWP-01 and SWR-01 (SWR-4801) (Paddys Run and Great Miami River Background)	**General Chemistry:**			
	Ammonia	-	Quarterly[d]	-
	Total hardness	-	Quarterly[d]	-
	Inorganics:			
	Beryllium	Quarterly (B)	-	-
	Cadmium	Quarterly (B)	Quarterly[d]	-
	Chromium, Total	Quarterly (B)	Quarterly[d]	-
	Cobalt	-	Quarterly[d]	-
	Copper	Quarterly (B)	Quarterly[d]	-
	Cyanide	Quarterly (B)	-	-
	Lead		Quarterly[d]	-
	Manganese	Quarterly (B)	Quarterly[d]	-
	Mercury	Quarterly (B)	Quarterly[d]	-
	Nickel		Quarterly[d]	-
	Silver	Quarterly (B)	Quarterly[d]	-
	Zinc	Quarterly (B)	Quarterly[d]	-
	Radionuclides:			
	Radium-226	Quarterly (B)	-	-
	Radium-228	Quarterly (B)	-	-
	Strontium-90	Quarterly (B)	-	-
	Technetium-99	Quarterly (B)	-	-
	Thorium-228	Quarterly (B)	-	-
	Thorium-230	Quarterly (B)	-	-
	Thorium-232	Quarterly (B)	-	-
	Uranium, Total	Quarterly (B)	-	-
SWP-02 (Paddys Run)	**Radionuclides:**			
	Technetium-99	Quarterly (M)	-	-
	Thorium-228[e]	Quarterly (WP)	-	-
	Thorium-230[e]	Quarterly (WP)	-	-
	Thorium-232[e]	Quarterly (WP)	-	-
	Uranium, Total	Quarterly (PC)	-	-
SWP-03 (Paddys Run at Downstream Property Boundary)	**Inorganics:**			
	Beryllium	Quarterly (S)	-	-
	Cadmium	Quarterly (S)	-	-
	Chromium, Total	Quarterly (S)	-	-
	Copper	Quarterly (S)	-	-
	Cyanide	Quarterly (M)	-	-
	Manganese	Quarterly (S)	-	-
	Mercury	Quarterly (M)	-	-
	Silver	Quarterly (M)	-	-
	Zinc	Quarterly (M)	-	-
	Radionuclides:			
	Radium-226	Quarterly (M)	-	-
	Radium-228	Quarterly (S)	-	-
	Strontium-90	Quarterly (M)	-	-
	Technetium-99	Quarterly (M)[f]	-	-
	Thorium-228[e]	Quarterly (WP)	-	-
	Thorium-230[e]	Quarterly (WP)	-	-
	Thorium-232[e]	Quarterly (WP)	-	-
	Uranium, Total	Quarterly (PC)	-	-

TABLE 4-3
(Continued)

Location	Constituent[a]	IEMP Characterization Requirements (reason for selection)[b,c]	NPDES Requirements[c]	OU5 ROD/FFCA[c] Requirements
SWD-02 (Storm Sewer Outfall Ditch)	**Radionuclides:**			
	Strontium-90	Quarterly (M)	-	-
	Technetium-99	Quarterly (M)	-	-
	Uranium, Total	Quarterly (PC)	-	-
SWD-03 (Waste Storage Area)	**Inorganics:**			
	Copper	Quarterly (S)	-	-
	Cyanide	Quarterly (M)	-	-
	Mercury	Quarterly (M)	-	-
	Silver	Quarterly (M)	-	-
	Zinc	Quarterly (M)	-	-
	Radionuclides:			
	Technetium-99	Quarterly (M)	-	-
	Throium-228[e]	Quarterly (WP)	-	-
	Thorium-230[e]	Quarterly (WP)	-	-
	Thorium-232[e]	Quarterly (WP)	-	-
	Uranium, Total	Quarterly (PC)	-	-
PF 4001 (Parshall Flume - Treated Effluent)	**General Chemistry:**			
	Ammonia	-	3/Week[g]	-
	Carbonaceous biochemical oxygen demand	-	2/Week	-
	Fluoride	-	Monthly	-
	Nitrate/Nitrite	-	Monthly	-
	Oil and grease	-	2/Week	-
	Total dissolved solids	-	Monthly	-
	Total residual chlorine	-	2/Week[h]	-
	Total suspended solids	-	Daily	-
	Inorganics:			
	Antimony	-	Monthly	-
	Arsenic	-	Monthly	-
	Barium	-	3/Week	-
	Beryllium	-	Monthly	-
	Boron	-	Monthly	-
	Cadmium	-	3/Week	-
	Chromium, Total	-	3/Week	-
	Cobalt	-	2/Week	-
	Copper	-	3/Week	-
	Cyanide	-	Monthly	-
	Lead	-	3/Week	-
	Manganese	-	2/Week	-
	Mercury	-	Monthly	-
	Molybdenum	-	3/Week	-
	Nickel	-	3/Week	-
	Selenium	-	3/Week	-
	Silver	-	3/Week	-
	Zinc	-	3/Week	-

TABLE 4-3
(Continued)

Location	Constituent[a]	IEMP Characterization Requirements (reason for selection)[b,c]	NPDES Requirements[c]	OU5 ROD/FFCA[c] Requirements
PF 4001 (Parshall Flume - Treated Effluent) (Cont.)	**Radionuclides:**			
	Radium-226	Quarterly (M)	-	-
	Radium-228	-	-	Monthly
	Strontium-90	Quarterly (M)	-	-
	Technetium-99	Quarterly (M)	-	Monthly
	Uranium, Total	Quarterly (PC)	-	Daily
	Semi-Volatiles:			
	Bis (2-ethylhexyl) phthalate	-	Quarterly	-
	Volatiles:			
	Chloroform	-	Quarterly	-
	1,1-Dichloroethane	-	Quarterly	-
	Trichloroethene	-	Quarterly	-
	Other:			
	Flow Rate	-	Daily	-
SWRB 4002O[1] (Storm Water Retention Basin)	**General Chemistry:**			
	Total residual chlorine	-	Daily	-
	Total suspended solids	-	Daily	-
	Inorganics:			
	Beryllium	Quarterly (S)	-	-
	Cadmium	Quarterly (S)	-	-
	Copper	-	Monthly	-
	Cyanide	Quarterly (M, S)	-	-
	Manganese	Quarterly (S)	-	-
	Mercury	Quarterly (M, S)	Monthly	-
	Radionuclides:			
	Radium-226	Quarterly (M)	-	-
	Radium-228	Quarterly (S)	-	-
	Strontium-90	Quarterly (M)	-	-
	Technetium-99	Quarterly (M, S)	-	-
	Uranium, Total	Quarterly (PC)	-	Daily
	Other:			
	Flow rate	-	Daily	-
SWRB 4002B (Treatment Bypass)	**Radionuclide:**			
	Uranium, Total	-	-	Daily during bypass

TABLE 4-3
(Continued)

Location	Constituent[a]	IEMP Characterization Requirements (reason for selection)[b,c]	NPDES Requirements[c]	OU5 ROD/FFCA[c] Requirements
STRM 4003, STRM 4004[j] STRM 4005, STRM 4006 (Drainages to Paddys Run)	**General Chemistry:**			
	Total suspended solids	-	Semiannually	-
	Inorganics:			
	Copper (4003, 4004, 4006)	-	Semiannually	-
	Lead (4004, 4005, 4006)	-	Semiannually	-
	Mercury	-	Semiannually	-
	Silver (4004, 4006)	-	Semiannually	-
	Radionuclides:			
	Uranium, Total	Quarterly (PC)	-	-
	Other:			
	Fecal coliform	-	Semiannually	-
	Flow Rate	-	Semiannually	-
SWR-4902 (Downstream of Fernald site Effluent)	**General Chemistry:**			
	Ammonia	-	Quarterly	-
	Total Hardness	-	Quarterly	-
	Inorganics			
	Cadmium	-	Quarterly	-
	Chromium	-	Quarterly	-
	Cobalt	-	Quarterly	-
	Copper	-	Quarterly	-
	Lead	-	Quarterly	-
	Manganese	-	Quarterly	-
	Mercury	-	Quarterly	-
	Nickel	-	Quarterly	-
	Silver	-	Quarterly	-
	Zinc	-	Quarterly	-

[a]Field parameter readings, taken at each location, include temperature, specific conductance, pH, and dissolved oxygen.
[b]B = background evaluation; M = based on modeling; PC = primary COC; S = sporadic exceedances of FRLs; WP = Waste Pits Excavation Monitoring
[c]"-"indicates the constituent is not included in the sample program.
[d]Refers only to location SWR-01 (NPDES location SWR-4801); constituents sampled quarterly.
[e]Constituent being monitored after excavation of the waste pits to assess thorium releases as a whole.
[f]The basis for the "M" designation is the contribution from an upgradient location (i.e., SWP-02).
[g]Sampled twice a week in winter (November 1 through April 30) and three times a week in summer (May 1 through October 31).
[h]Constituent not sampled from November through April.
[i]Analyze constituent at frequency indicated, during the overflow event.
[j]New location STRM 4004A has been identified as an alternative sample location for STRM 4004. STRM 4004A will be sampled for the constituents if no flow is observed at STRM 4004 or is otherwise not accessible.

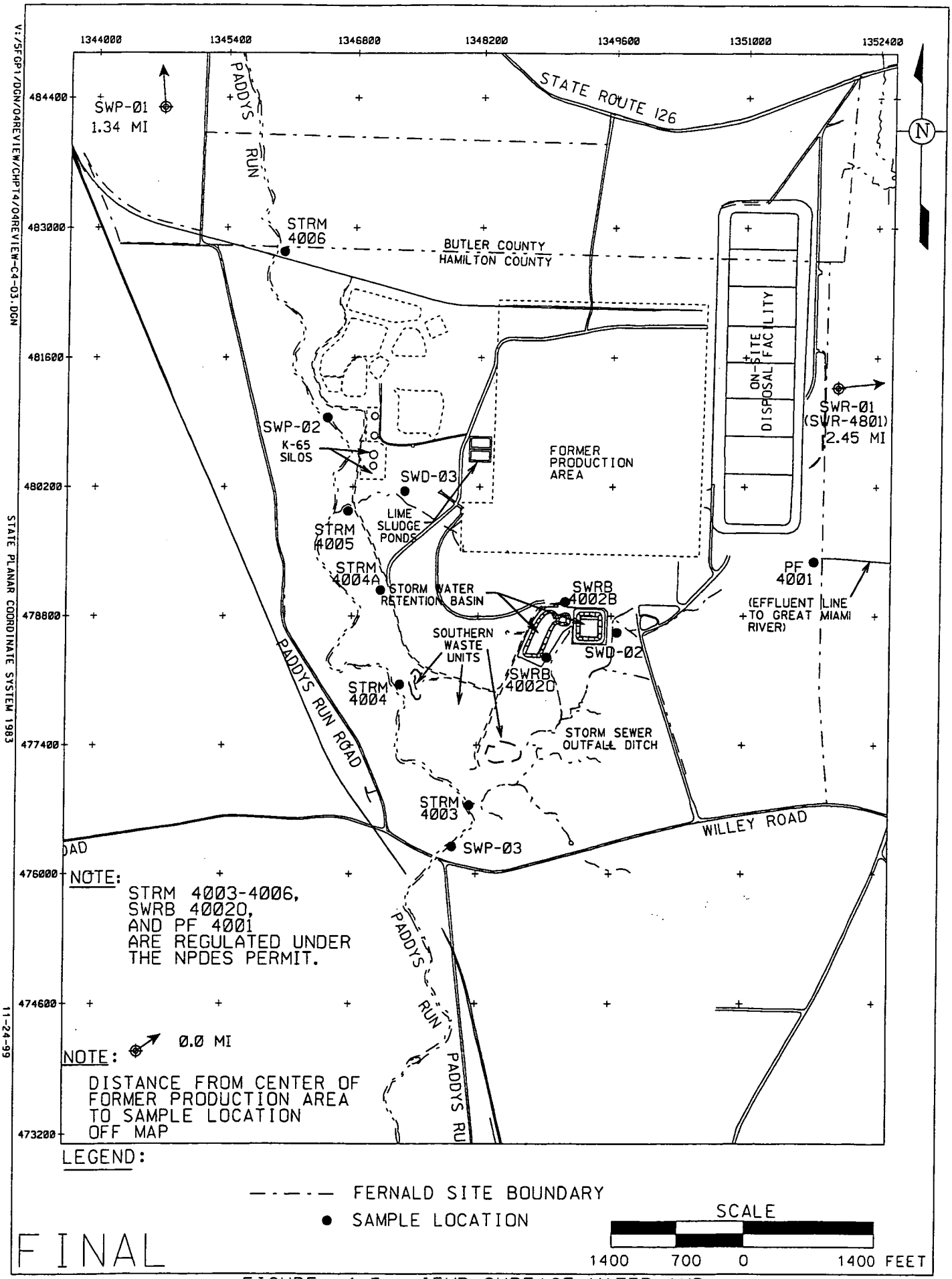


FIGURE 4-3. IEMP SURFACE WATER AND TREATED EFFLUENT SAMPLE LOCATIONS

4.4.2.4 Impacts to Surface Water Due to Uncontrolled Storm Water Runoff and Remediation Activities

As stated in Section 4.3, IEMP surface water monitoring will occur outside of and downstream from areas where storm water is controlled; at points of entry into receiving waters or within main site drainage ditches (in addition to ambient monitoring for background quantification purposes). Contaminated storm water drainage from the site (i.e., from the former production area [Operable Unit 3], the waste storage area [Operable Units 1 and 4], and active cells at the on-site disposal facility) has been identified and controlled through contaminant abatement, formal removal actions, and remediation activities. Engineered controls have been in place throughout remediation activities to ensure contaminated runoff has been appropriately captured and treated.

As remediation has progressed, necessary changes to this engineered infrastructure has occurred and will continue to occur. The control of contaminated runoff will continue to occur, but will shift more towards administrative controls as infrastructure is eliminated and discrete remediation objectives are completed. For instance, as storm sewers are removed due to excavation activities in the former production, runoff that previously flowed by gravity to the Storm Water Retention Basin for treatment at AWWT is now captured in excavations whereby decisions on its disposition will be made based on the status of the soil certification in the area and the relative contamination of the storm water within an excavation. Changes will be necessary to the engineered infrastructure as operations at CAWWT have begun and headworks facilities (Storm Water Retention Basin and Biosurge Lagoon) are removed from service and excavated.

Numerous engineered controls in the form of erosion and sediment controls have been installed to protect surface water drainages downgradient of remediation activities involving construction or excavation. Several basins were installed at various locations around the Fernald site including the northeastern portion of the site, southeast of the silos, east of the waste storage area, west of the new north railyard, and in the on-site disposal facility borrow area.

Several large-scale field activities planned for 2006 that could potentially affect the surface water pathway include:

- Soil excavation/certification activities in Areas 4B, 5, 6 and 7 including the silos area and on-property stream corridors (refer to Figure 4-1)
- Continue and complete waste placement, closure, and capping activities at the on-site disposal facility
- Operation activities associated with the Operable Unit 4 Accelerated Waste Retrieval project and Silo 3 Project treatment facility, and activities associated with the Silos 1 and 2 remediation facility.

Additional information concerning site remedial activities is contained in Section 2.0.

Because total uranium is the primary COC at the Fernald site, total uranium will be monitored quarterly at a minimum at each of the IEMP sample locations to assist in determining the site's impact on the surface water pathway.

Figure 4-4 shows the dramatic effect storm water runoff controls have had in lowering the concentrations of uranium, the principal site contaminant, in surface water leaving the site via Paddys Run. Other important distinctions regarding uranium in uncontrolled runoff from the site to Paddys Run, based on the data in Figure 4-4, include:

- Average concentrations have been far below the human/health protective surface water FRL concentration of 530 µg/L in each year since 1981. (This includes nine years while the site was in production.)
- Annual average concentrations have been consistently below the human/health protective groundwater FRL of 30 µg/L since the Storm Water Retention Basin began collecting contaminated runoff in 1986.

Additional controls for storm water runoff may be required per the Storm Water Pollution Prevention Plan for construction activities. As Section 4.3 notes, responsibility for construction and maintenance of storm water runoff controls and monitoring the effectiveness of such controls is the responsibility of each individual project. The specifications of these storm water runoff controls and associated performance monitoring of the storm water runoff controls will be detailed in Operable Unit 5 soil remediation remedial action work plans and other project-specific remedial action documentation, as warranted.

Effective sampling points for this surveillance monitoring need to be:

- At points downstream of the storm water runoff controls and construction/remediation activities
- At the Fernald site boundary in Paddys Run
- In the treated effluent routed to the Great Miami River as it leaves the facility
- At the Storm Water Retention Basin spillway, during overflow conditions.

Parameters for this surveillance monitoring need to be the constituents that:

- Exceed surface water FRLs upstream from the sample locations
- Are present in sufficient concentration upstream of the sample locations and are mobile to the degree that they have the potential to: (1) cause cross-medium impacts to groundwater; and (2) affect surface water if human/health protective FRLs are exceeded.

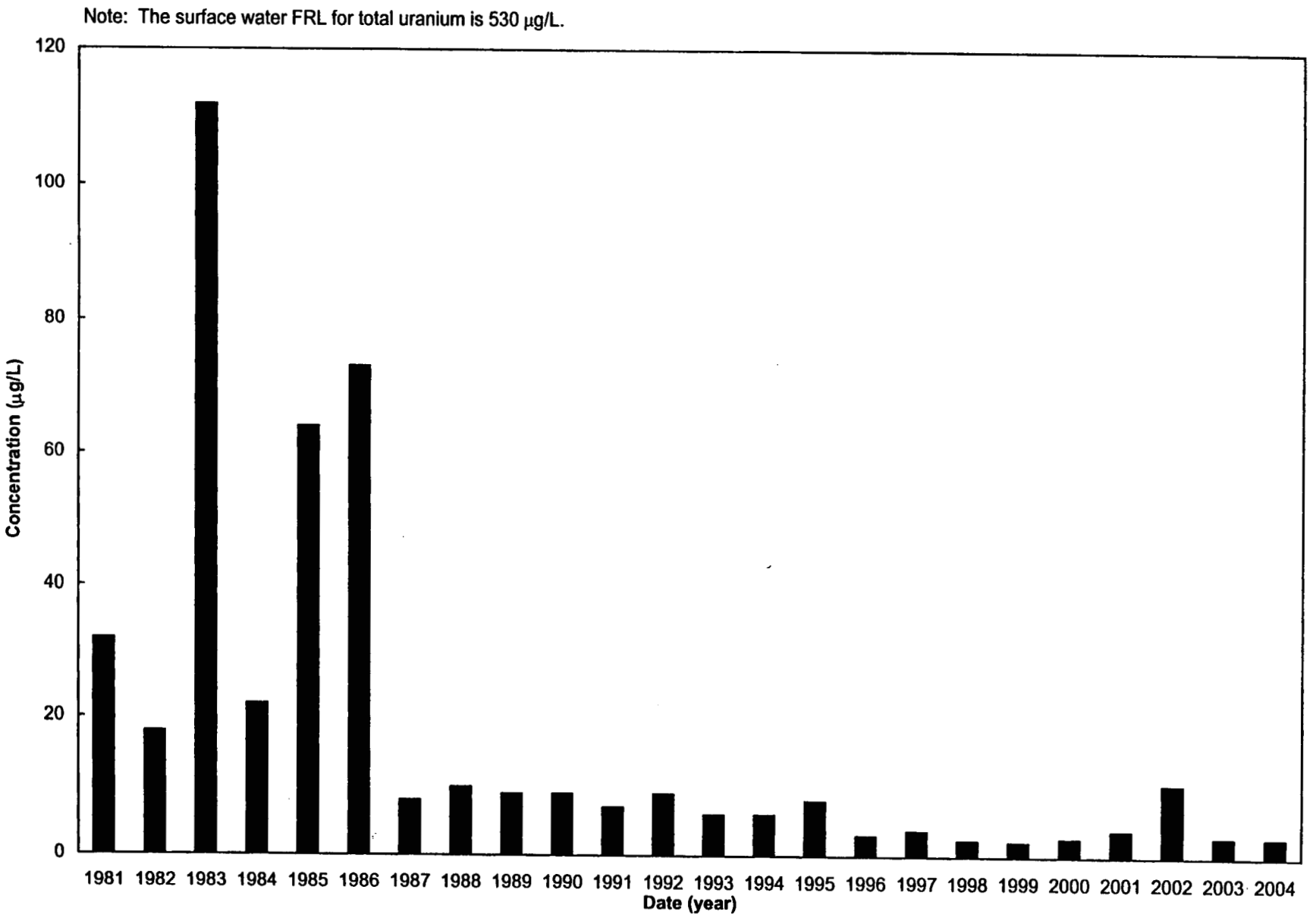


FIGURE 4-4. COMPARISON OF AVERAGE TOTAL URANIUM CONCENTRATIONS IN PADDYS RUN AT WILLEY ROAD SAMPLE LOCATION SWP-03

FINAL

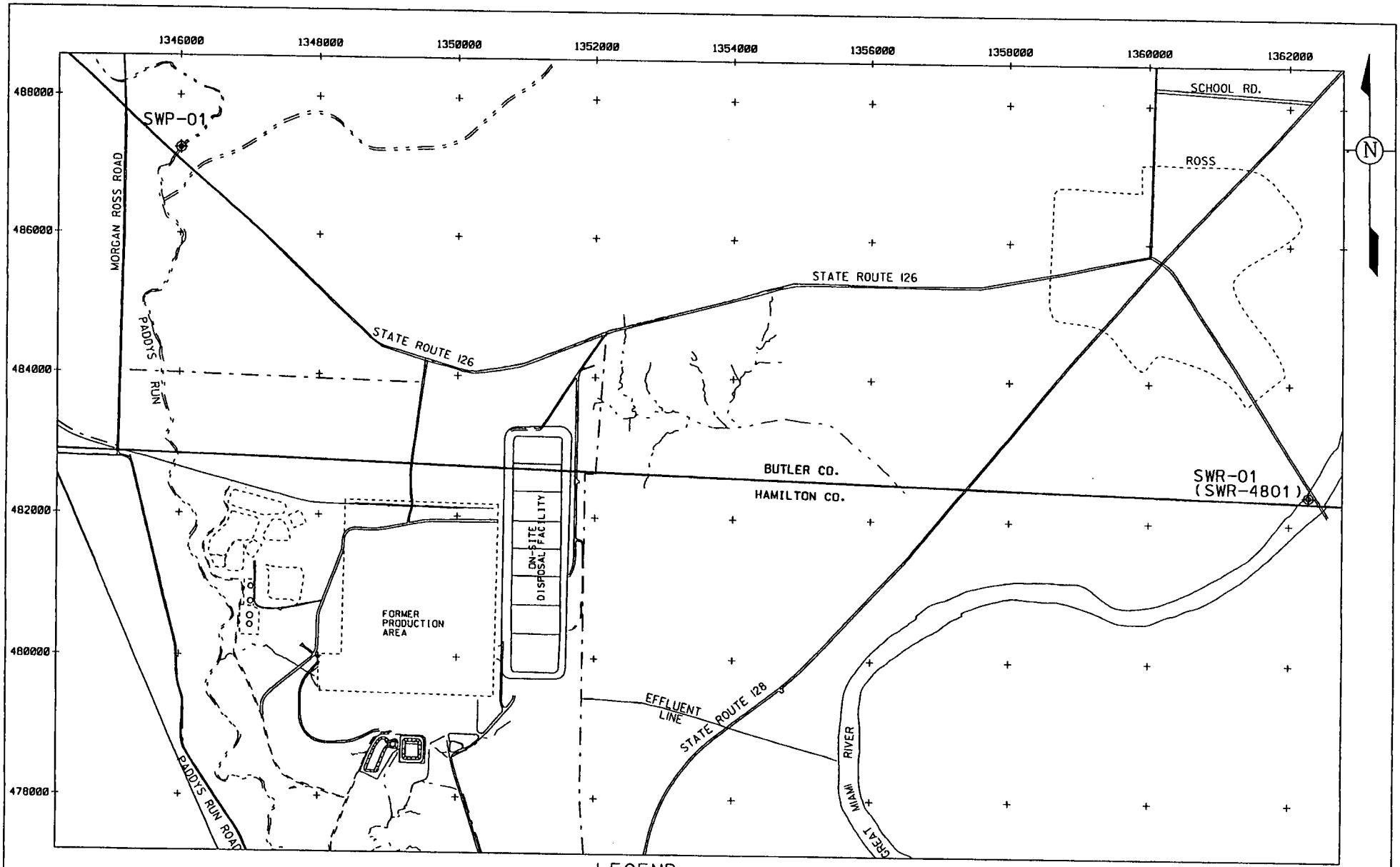
To fulfill this expectation, the frequency of sampling should be such that seasonal variations in contaminant concentrations (as well as fluctuations due to varying flow conditions) can be assessed quarterly. To adequately assess the impact of storm water overflows from areas where storm water is controlled, the frequency of sampling at the Storm Water Retention Basin shall be such that each overflow is characterized.

4.4.2.5 Ongoing Background Evaluation

Because the remedial investigation/feasibility study background data set for Paddys Run and the Great Miami River surface water was limited by the number of samples and temporal variability represented by the samples, monitoring for surface water background has been performed from the initiation of the IEMP through 2004 for all 55 surface water FRL constituents. Although there are only 17 area-specific surface water constituents (i.e., constituents identified as being FRL concerns and monitored under the IEMP characterization program), the extensive list of 55 constituents was monitored at background in order to establish a robust data set. The more extensive list was monitored at background so that if soil sampling indicated the need to expand the list of 17 area-specific surface water constituents, there would be corresponding background data.

Since soil sampling has not indicated a need to add constituents to the list of 17 area-specific surface water constituents, and due to the abundance of background data, and the near completion of many remediation activities, it is recommended that the list of surface water constituents monitored at the background locations be reduced to coincide with the 17 area-specific constituents monitored for surface water FRLs. Refer to Table 4-3 for background monitoring requirements; refer to Figure 4-5 for background surface water sample locations.

Additionally, it is anticipated that as part of surface water certification, background values along with FRL values will be compared to the concentrations at locations monitored for area-specific constituents. The recalculated background values based on IEMP data collected from August 1997 through 2003 is provided as an attachment to the IEMP Revision summary table of changes for informational purposes and a summary of the background values from IEMP data is provided in Table 4-2.



LEGEND:

FERNALD SITE BOUNDARY

SWR-01 SAMPLE LOCATION

SCALE

2000 1000 0 2000 FEET

FINAL

V:/5FGP1/DGN/04REVIEW/
CHPT4/04REVIEW-C4-04.DGN
STATE PLANAR COORDINATE SYSTEM 1983

FIGURE 4-5. IEMP BACKGROUND SURFACE WATER SAMPLE LOCATIONS

13-DEC-2005

4.4.2.6 Continue to Fulfill National Pollutant Discharge Elimination System Requirements

As noted in Section 4.2, wastewater and storm water discharges from the Fernald site are regulated under the state-administered NPDES program. The current permit (OEPA Permit 1IO00004*GD) was issued on June 1, 2003, became effective on July 1, 2003, and expires on June 30, 2008. A recent evaluation was completed in June 2004 whereby changes related to the CAWWT and silos remediation facilities were evaluated by Fluor Fernald for potential impacts on the NPDES Permit (Fluor Fernald, Inc. 2004). It was determined that no modification to the permit was required to incorporate these changes. OEPA concurred with Fluor Fernald's position. A future modification in advance of permit renewal may be initiated to reflect operating conditions at the Fernald site upon entering the legacy management phase of operations. Figure 4-6 identifies the current NPDES Permit sample locations.

4.4.2.7 Continue to Fulfill Federal Facilities Compliance Agreement and Operable Unit 5 Record of Decision Requirements

As noted in Section 4.2.2, the current FFCA sampling and reporting requirements became effective on May 1, 1996. These requirements specify sampling at the Parshall Flume (PF 4001), the Storm Water Retention Basin spillway (SWRB 4002O), the Storm Water Retention Basin bypass (SWRB 4002B), and the South Plume extraction wells (the Storm Water Retention Basin is scheduled to be removed from service in 2006). In addition to these sampling requirements, an estimate of the amount of uranium reaching Paddys Run via uncontrolled storm water runoff is calculated. The IEMP will incorporate sampling of the first three locations described above and will include a total uranium calculation for uncontrolled storm water runoff, the Parshall Flume, and the Storm Water Retention Basin spillway. Section 3.0 discusses sampling of the South Plume extraction wells. As discussed in Section 7.0, monitoring data required by the FFCA have been incorporated into the comprehensive IEMP reporting structure.

The sampling agreement implemented on May 1, 1996 noted that, pending further evaluation, several radiological constituents might be deleted from the FFCA sampling of treated effluent. Further evaluation was performed in the comprehensive point-by-point constituent selection evaluation completed in support of this IEMP surface water and treated effluent sampling program; therefore, the radiological constituents selected for the treated effluent sampling point at the Parshall Flume are composed of those radiological COCs that were found to be both present in those areas where surface water is controlled and ultimately routed to the Storm Water Retention Basin and/or Parshall Flume, and mobile to a degree such that surface water may be impacted above FRLs during remediation as indicated by fate-and-transport modeling.

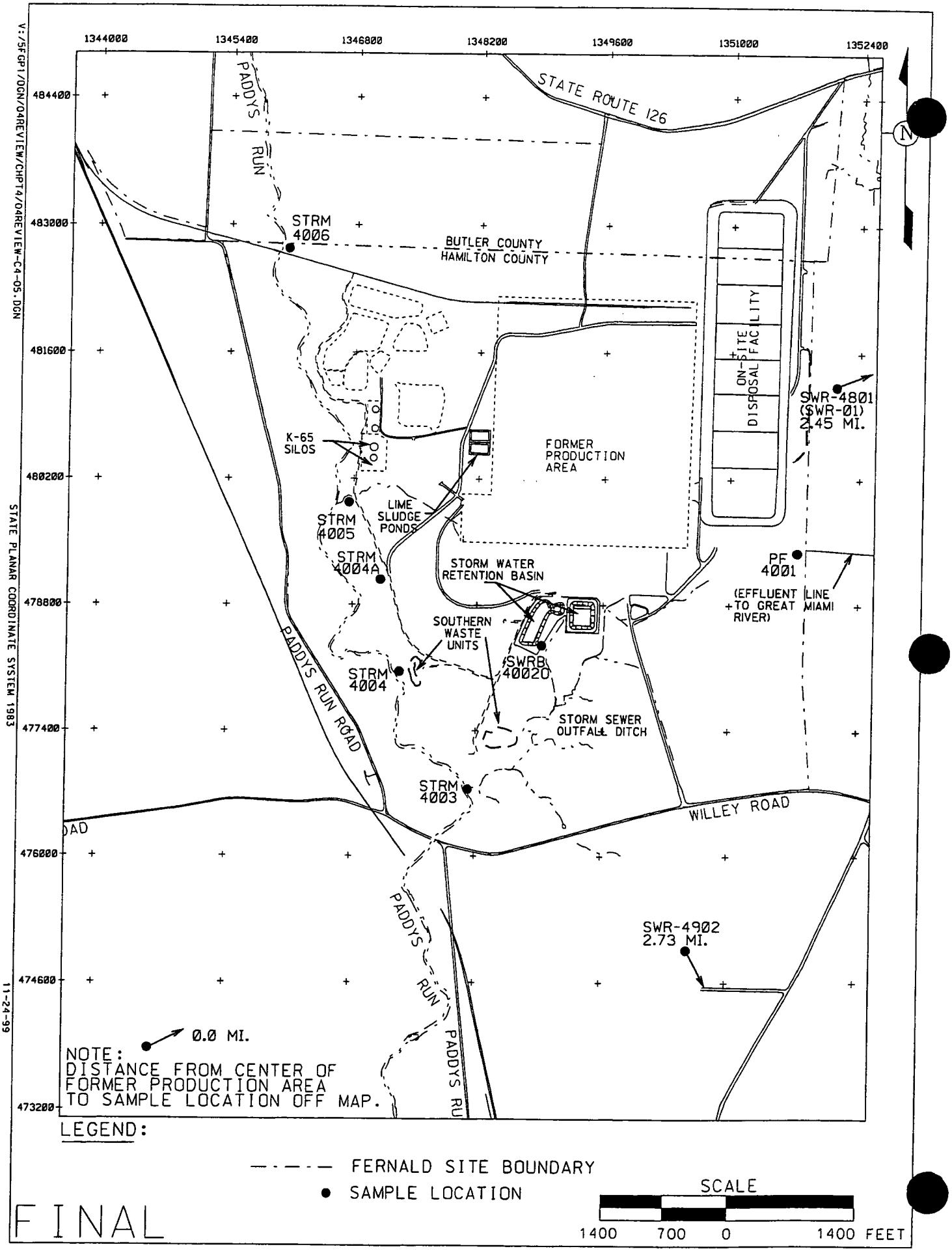


FIGURE 4-6. NPDES PERMIT SAMPLE LOCATIONS

Section 4.4.3 lists these radiological constituents; also listed are all other constituents deemed necessary to fulfill the program expectations outlined in Section 4.4.1 for the Parshall Flume treated effluent sample location as a result of the IEMP constituent selection process.

4.4.2.8 Continue to Fulfill DOE Order 5400.1 Requirements

The design considerations provided above, which were based on information and conclusions derived from the existing DOE-compliant environmental monitoring program as well as the comprehensive findings of the remedial investigation/feasibility study process, are sufficient to meet or exceed the requirements of DOE Order 5400.1 as summarized in Section 4.2.2.

4.4.2.9 Continue to Address Concerns of the Community

The monitoring derived from Section 4.4.2.4 will be sufficient to address the concerns of the community. These concerns focus on limiting the amount of Fernald site-related contamination entering Paddys Run and the Great Miami River. This monitoring will provide a comprehensive monitoring program on Paddys Run at the facility boundary and in the treated effluent destined for the Great Miami River. Monitoring will also document the reduction in Fernald site-related contamination entering these streams that is anticipated to occur as remediation progresses.

4.4.3 Program Design

This section provides the IEMP surface water and treated effluent sampling program for 2006 developed from the design considerations provided in Section 4.4.2. Table 4-3 summarizes the program design by providing the sample locations, the frequency, and the constituents to be sampled for at each location. This table also provides the basis for the locations and constituents with respect to program expectations identified in Section 4.4.1. To simplify the presentation of the surface water and treated effluent program, IEMP characterization consists of the first four "Basis for Selection of Constituent" columns of Table 4-3. This terminology is consistent with the approach used for reporting through the IEMP.
The non-radiological discharge monitoring and reporting related to the NPDES Permit has been incorporated into the IEMP. The radiological discharge monitoring related to the FFCA and Operable Unit 5 Record of Decision has been incorporated into the IEMP.

Near the completion of site remediation, sampling will occur to certify that the surface water pathway at the Fernald site is meeting the obligations set forth in the Operable Unit 5 Record of Decision.

4.5 MEDIUM-SPECIFIC PLAN FOR SURFACE WATER AND TREATED EFFLUENT SAMPLING

This section serves as the medium-specific plan for implementation of the sampling, analytical, and data management activities associated with the IEMP surface water and treated effluent sampling program. The activities described in this medium-specific plan were designed to provide surface water and treated effluent data of sufficient quality to meet the program expectations as stated in Section 4.4.1. The program expectations, along with the design considerations presented in Section 4.4.2, were used as the framework for developing the monitoring approach presented in this plan. All sampling procedures and analytical protocols described or referenced herein are consistent with the requirements of the SCQ.

Subsequent sections of this medium-specific plan define the following:

- Project organization and associated responsibilities
- Sampling program
- Change control
- Health and safety
- Data management
- Project quality assurance.

4.5.1 Project Organization

A multi-discipline project organization has been established and assigned responsibility to effectively implement and manage the project planning, sample collection and analysis, and data management activities directed in this medium-specific plan. Following are the key positions and associated responsibilities required for successful implementation.

The project team leader will have full responsibility and authority for the implementation of this medium-specific plan in compliance with all regulatory specifications and sitewide programmatic requirements. Integration and coordination of all medium-specific plan activities defined herein with other project organizations is also a key responsibility. All changes to project activities must be approved by the project team leader or designee.

Health and safety are the responsibility of all individuals working on this project scope. Qualified Health and Safety specialists shall participate on the project team to provide radiation protection and industrial hygiene support and assist in preparing and obtaining all applicable permits. In addition, safety specialists shall periodically review and update the project-specific health and safety documents and operating procedures, conduct pertinent safety briefings, and assist in evaluation and resolution of all safety concerns.

Quality Assurance specialists will participate on the project team, as necessary, to review project procedures and activities ensuring consistency with the requirements of the SCQ or other referenced standard and assist in evaluating and resolving all quality related concerns.

4.5.2 Sampling Program

To fulfill the requirements of the integrated surface water and treated effluent program, surface water and treated effluent samples shall be collected from locations shown in Figures 4-3, 4-5, and 4-6. Table 4-3 summarizes the surface water and treated effluent sampling frequency and location-specific analytical suites. Tables 4-4 and 4-5 provide the sample collection and analytical method information for these locations and constituents.

Sample analysis will be performed at the on-site laboratory or a contract laboratory dependent on specific analyses required, laboratory capacity, turnaround time, and performance of the laboratory. The laboratories used for analytical testing must be in accordance with the criteria specified in Sections 3.1.5 and 12.4, and Appendix E of the SCQ. These criteria include meeting the requirements for performance evaluation samples, pre-acceptance audits, performance audits, and an internal quality assurance program. A list of approved laboratories and current status of each is maintained by the FCP Quality Assurance organization.

4.5.2.1 Sampling Procedures

Specific sampling procedures associated with surface water and treated effluent are separately discussed in this section. The procedures provide sampling instructions, which meet the applicable requirements, and are outlined in the SCQ as follows:

Sitewide CERCLA Quality (SCQ) Assurance Project Plan

Section 4	Quality Assurance Objectives
Section 5	Field Activities
Section 6	Sampling Requirements
Section 7	Sample Custody
Section 8	Calibration Procedures and Frequency
Appendix I	Field Calibration Requirements
Appendix J	Field Activity Methods
Appendix K	Sampling Methods

TABLE 4-4

SURFACE WATER ANALYTICAL REQUIREMENTS FOR CONSTITUENTS AT SAMPLE LOCATIONS SWD-02, SWD-03, SWP-01[a], SWP-02, SWP-03, AND SWR-01[a]

Constituent	Analytical Method	ASL[b]	Holding Time	Preservative	Container
Inorganics:					
Beryllium Cadmium Chromium, Total Copper Manganese Silver Zinc	7000A[c], 3500[d], 6020[c], or 6010B[c]	B	6 months	HNO_3 to pH <2	Plastic or glass
Mercury	7470A[c]	B	28 days	HNO_3 to pH <2	Plastic or glass
Cyanide, Total	9010B[c], 9012[c], 335.2[e], or 335.3[e]	B	14 days	Cool 4°C, NaOH to pH >12	Plastic or glass
Radionuclides:					
Radium-226 Radium-228 Strontium-90 Technetium-99 Thorium-228 Thorium-230 Thorium-232 Uranium, Total	SCQ[f]	B	6 months	HNO_3 to pH <2	Plastic or glass
Field Parameters[g]:	SCQ[h]	A	NA[i]	NA[i]	NA[i]

[a]Only sample locations SWP-01 and SWR-01 are analyzed for all constituents listed in this table. The remaining sample locations are analyzed for a subset of these constituents (summarized in Table 4-3).
[b]The ASL may become more conservative if it is necessary to meet detection limits or data quality objectives.
[c]Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA 1998b)
[d]Standard Methods for the Examination of Water and Wastewater (APHA 1989)
[e]Methods for Chemical Analysis of Water and Wastes (EPA 1983)
[f]Radionuclide analyses do not have standard methods; Appendix G of the SCQ provides performance specifications.
[g]Field parameters include temperature, specific conductance, pH, and dissolved oxygen.
[h]Appendix K of the SCQ provides field methods.
[i]NA = not applicable

TABLE 4-5

SURFACE WATER AND EFFLUENT ANALYTICAL REQUIREMENTS FOR CONSTITUENTS AT SAMPLE LOCATIONS PF 4001, STRM 4003, STRM 4004, STRM 4005, STRM 4006, SWRB 4002O, SWRB 4002B, SWR-4801, AND SWR-4902

Constituent[a]	Analytical Method[b]	Sample Type[c]	ASL[b,d]	Holding Time[b]	Preservative[b]	Container[b]
General Chemistry:						
Ammonia	350.1[e], 350.3[e], 4500C[f], or 4500F[f]	Composite or Grab[g]	B	28 days	Cool 4°C, H_2SO_4 to pH <2	Plastic or glass
Carbonaceous biochemical oxygen demand	5210B[f]	Composite	B	48 hours	Cool 4°C	Plastic or glass
Chlorine, residual	4500[f]	Grab	B	Analyze immediately	None	Plastic or glass
Fluoride	300.0[e], 340.2[e], 4500C[f]	Composite	B	28 days	None	Plastic or glass
Nitrate/Nitrite	353.1[e], 353.2[e], 353.3[e], 4500D[f], or 4500E[f]	Composite	B	28 days	Cool 4°C, H_2SO_4 to pH <2	Plastic or glass
Oil and grease	9070[h], 1664A[i] 5520B[f], or 413.1[e]	Grab	B	28 days	Cool 4°C, H_2SO_4 to pH <2	Glass
Total dissolved solids	160.1[e] or 2540C[f]	Grab	B	7 days	Cool 4°C	Plastic or glass
Total hardness	2340C[f]	Grab	B	28 days	Cool 4°C, H_2SO_4 to pH <2	Plastic
Total suspended solids	160.2[e] or 2540D[f]	Composite	B	7 days	Cool 4°C	Plastic or glass
Inorganics:						
Antimony Arsenic Barium Beryllium Boron Cadmium Chromium, Total Cobalt Copper Lead Manganese Molybdenum Nickel Selenium Silver Zinc	6020[h], 7000A[h], 3500[f], 6010B[h], 200.8[j], 220.2[e], or 272.2[e]	Composite or Grab[g]	B	6 months	HNO_3 to pH <2	Plastic or glass
Mercury	7470A[h] or 1631[e,k]	Grab	B	28 days	HNO_3 to pH <2	Plastic or glass
Cyanide, Free	9010B[h], 9012[h], 335.1[e], or 4500-CNG[f]	Grab	B	14 days	Cool 4°C, NaOH to pH >12	Plastic or glass

TABLE 4-5
(Continued)

Constituent[a]	Analytical Method[b]	Sample Type[c]	ASL[b,d]	Holding Time[b]	Preservative[b]	Container[b]
Radionuclides:						
Radium-226	SCQ[l]	Grab	B	6 months	HNO_3 to pH <2	Plastic or glass
Radium-228						
Technetium-99						
Strontium-90						
Uranium, Total	SCQ[l]	Grab/Composite[m]	B	6 months	HNO_3 to pH <2	Plastic or glass
Semi-Volatiles:						
Bis(2-ethylexyl)phthalate	8270C[h]	Grab	B	7 days to extraction 40 days from extraction to analysis	Cool 4°C	Glass (amber with Teflon-lined cap)
Volatiles:						
Trichloroethene	8260B[h]	Grab	B	14 days	H_2SO_4 pH <2 Cool 4°C	Glass (with Teflon-lined septum cap)
Chloroform						
1,1-Dichloroethane						
Other:						
Fecal coliform	9222D[f]	Grab	B	6 hours	Cool 4°C	Plastic or glass (sterile)
Flow rate	NA	24 hour total	NA	NA	NA	NA
Field Parameters[n]	SCQ[o]	Grab	A	NA	NA	NA

[a]This represents a comprehensive list of constituents taken from the indicated list of surface water and treated effluent monitoring locations. Each location will be analyzed for a subset of these constituents (summarized in Table 4-3).
[b]NA = not applicable
[c]For composite samples at PF 4001, a flow-weighted composite sample collected over a 24-hour period; for SWRB 4002O, SWRB 4002B, STRM 4003, STRM 4004, STRM 4005, and STRM 4006, composite samples shall be comprised of four samples collected at intervals of at least 30 minutes but not more than two hours.
[d]The ASL may become more conservative if necessary to meet detection limits or data quality objectives.
[e]Methods for Chemical Analysis of Water and Wastes (EPA 1983)
[f]Standard Methods for the Examination of Water and Wastewater (APHA 1989)
[g]Grab samples are collected at locations SWR-4801 and SWR-4902 for this constituent.
[h]Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA 1998b)
[i]Method 1664, Revision A: N-Hexane Extractable Material (HEM; Oil and Grease) and Silica Gel Treated N-Hexane Extractable Material (SGT-HEM; Non-Polar material) by Extraction and Gravimetry (EPA 1998a).
[j]Methods for the Determination of Metals in Environmental Samples (EPA 1994)
[k]Method 1631 for mercury analysis will only be used at NPDES Permit locations where mercury sampling is required.
[l]Radionuclide analyses do not have standard methods; performance specifications are provided in Appendix G of the SCQ.
[m]Total uranium is a grab sample at STRM 4003, STRM 4004, STRM 4005, and STRM 4006 and a composite sample at all other locations.
[n]Field parameters include dissolved oxygen, pH, specific conductance, and temperature.
[o]Appendix K of the SCQ provides field analytical method

Surface Water Sampling

Surface water samples will be collected from locations in Paddys Run, drainage ditches to Paddys Run, the northeast drainage, the spillway of the Storm Water Retention Basin and the Great Miami River. A qualitative assessment of flow conditions (i.e., base flow, storm flow, or between storm and base flow) will be documented at the time of sample collection at each of these locations. Sampling personnel will ensure that access to the sample locations will not result in the inadvertent introduction of foreign materials into the water sample. Additional precautions will be taken to avoid the introduction of floating organic material such as leaves or twigs during sample collection. Samples will be collected without disturbing bottom sediment. Sample technicians shall approach sample locations from downstream of the location; if sample locations are accessed by way of a bridge, samples shall be collected on the upstream side of the bridge. Associated surface water sampling procedures are:

Standard Operating Procedures

43-C-113	NPDES Sampling (DOE 2003e)
43-C-108	IEMP Surface Water Sampling (DOE 2001b)
43-C-104	Horiba Water Quality Meter Calibration, Operation, and Maintenance (DOE 2004e)
EW-0002	Chain of Custody/Request for Analysis Record for Sample Control (DOE 2004c)

Samples will be collected using the methods outlined in these procedures including the collection method, container, preservative, and documentation. Tables 4-4 and 4-5 identify the sample preservative, volume, and container requirements for each constituent.

Treated Effluent Sampling

Treated effluent will be collected by means of flow-proportional samplers at the Parshall Flume. Storm water is also sampled from a bypass pipeline when storm water collected in the Storm Water Retention Basin is diverted from treatment during periods of heavy rainfall. Sampling will be conducted according to the following procedures:

Standard Operating Procedures

EW-0002	Chain of Custody/Request for Analysis Record for Sample Control (DOE 2004c)
43-C-108	IEMP Surface Water Sampling (DOE 2001b)
43-C-113	NPDES Sampling (DOE 2003e)

After every 24 hours of operation, the collected liquid is removed from the automatic sampler to provide a daily flow-weighted sample of the treated effluent. A portion of each daily sample is analyzed to determine the estimate of total uranium discharged to the Great Miami River for the day. The Parshall Flume and Storm Water Retention Basin bypass samples will be analyzed for the constituents listed in

Table 4-3 for the respective locations. Table 4-5 lists the sample preservative, volumes, container requirements, and analytical methods for each constituent.

4.5.2.2 Quality Control Sampling Requirements

Quality control samples will be taken according to the frequency recommended in the SCQ. These samples will be collected and analyzed in order to evaluate the possibility that some controllable practice, such as sampling technique, may be responsible for introducing bias in the project's analytical results. Quality control samples will be collected as outlined in Section 4.1.1 and Appendix A, Table 2-3 of the SCQ as follows:

- A duplicate sample shall be collected each quarter at a randomly selected sample location
- Trip blanks will be prepared and placed in coolers containing samples for volatile organic compound analysis and shall accompany the samples from collection to receipt at the laboratory.

4.5.2.3 Decontamination

In general, decontamination of equipment is minimized because reusable equipment is not used during sample collection. However, if decontamination is required, then equipment will be cleaned between sample locations. The decontamination shall be Level II as referenced in Section K.11 of the SCQ. Sampling bailers used in sampling for mercury at NPDES Permit locations will be decontaminated at a contract laboratory.

4.5.2.4 Waste Dispositioning

Contact waste that is generated by the field technicians during field sampling activities are collected, maintained, and dispositioned, as necessary, depending on the location of waste generation. Contact waste generated outside of radiological control areas will be placed in a clean trash dumpster. Contact waste generated within radiological control areas will be disposed of in a designated radiological contact waste container.

4.5.3 Change Control

Changes to the medium-specific plan will be at the discretion of the project team leader. Prior to implementation of field changes, the project team leader or designee shall be informed of the proposed changes and circumstances substantiating the changes. Any changes to the medium-specific plan must have written approval by the project team leader or designee, Quality Assurance representative, and the Field Manager prior to implementation. If a Variance/Field Change Notice is required, it will be completed in accordance with Section 15.3 of the SCQ. The Variance/Field Change Notice form shall be issued as controlled distribution to team members and will be included in the field data package to become

part of the project record. During biennial revisions to the IEMP, Variance/Field Change Notices will be incorporated to update the medium-specific plan.

4.5.4 Health and Safety Considerations

The FCP Health and Safety organization is responsible for the development and implementation of health and safety requirements for this medium-specific plan. Hazards (physical, radiological, chemical, and biological) typically encountered by personnel when performing the specified fieldwork will be addressed during team briefings.

All involved personnel will receive adequate training to the health and safety requirements prior to implementation of the fieldwork required by this medium-specific plan. Safety meetings will be conducted prior to beginning fieldwork to address specific health and safety issues. All Fluor Fernald employees and subcontractor personnel who will be performing field work required by this medium-specific plan are required to have completed applicable training.

For areas that are subject to more restrictive radiological controls where the potential for exposure is greater, radiation work permits are necessary and will be obtained prior to the fieldwork being performed in those areas. A radiological control technician will be assigned to each field crew performing any activities in an area requiring a radiation work permit.

4.5.5 Data Management

Field documentation and analytical results will meet the IEMP data reporting and quality objectives, conform to appropriate sections and appendices of the SCQ, and comply with specific site procedures, such as the Data Validation procedure.

Data documentation and validation requirements for data collected in 2006 for the IEMP fall into two categories depending upon whether the data are field- or laboratory-generated. Field data validation will consist of verifying medium-specific plan compliance and appropriate documentation of field activities. Laboratory data validation will consist of verifying that data generated are in compliance with medium-specific, plan-specified ASLs. Specific requirements for field data documentation and validation and laboratory data documentation and validation are in accordance with SCQ and site procedures.

There are five analytical levels (ASL A through ASL E) defined for the in Section 2 of the SCQ. For surface water in 2006, field data documentation will be at ASL A and laboratory data documentation will be at ASL B. A more conservative ASL may be required for laboratory data in order to meet required

detection limits or in order to ensure data quality objectives. ASL B is appropriate for laboratory-generated data collected in 2006 because the data are being used for surveillance during site restoration. ASL B provides qualitative, semi-qualitative, and quantitative data with some quality assurance/quality control checks.

At a minimum, 10 percent of the IEMP data will undergo validation to ensure that analytical data are in compliance with the ASL method criteria being requested and in order to meet data quality objectives. The percentage of data validated could increase in order to meet data quality objectives.

Data will be entered into a controlled database using a double key or verification method to ensure accuracy. The hard copy data will be managed in the project file in accordance with FCP record keeping procedures and DOE Orders.

4.5.6 Quality Assurance

Assessments of work processes shall be conducted to verify quality of performance, and may include audits, surveillances, inspections, tests, data verification, field validation, and peer reviews. Assessments shall include performance-based evaluation of compliance to technical and procedural requirements and corrective action effectiveness necessary to prevent defects in data quality. Assessments may be conducted at any point in the life of the project. Assessment documentation shall verify that work was conducted in accordance with IEMP, SCQ, and FCP Quality Assurance Program requirements.

Recommended quarterly quality assurance assessments or surveillances shall be performed on tasks specified in the medium-specific plan. These assessments may be in the form of independent assessments or self-assessments, with at least one independent assessment conducted annually. Independent assessments are the responsibility of designated project Quality Assurance personnel. Self-assessments are performed by project personnel to evaluate the overall quality of work performance. The project team leader and Quality Assurance personnel will coordinate assessment activities and comply with Section 12 of the SCQ. The project personnel or Quality Assurance representative shall have "stop work" authority if significant adverse effects to quality conditions are identified or work conditions are unsafe.

Only laboratories on the approved laboratory list will be used for sample analyses in accordance with Section 12 and Appendix E of the SCQ.

4.6 IEMP SURFACE WATER AND TREATED EFFLUENT MONITORING DATA EVALUATION AND REPORTING

This section provides the methods for analyzing the data generated by the IEMP surface water and treated effluent sampling program in 2006. This section summarizes the data evaluation process and actions associated with various monitoring results. The planned reporting structure for IEMP-generated surface water and treated effluent data, including specific information to be reported in the annual site environmental report.

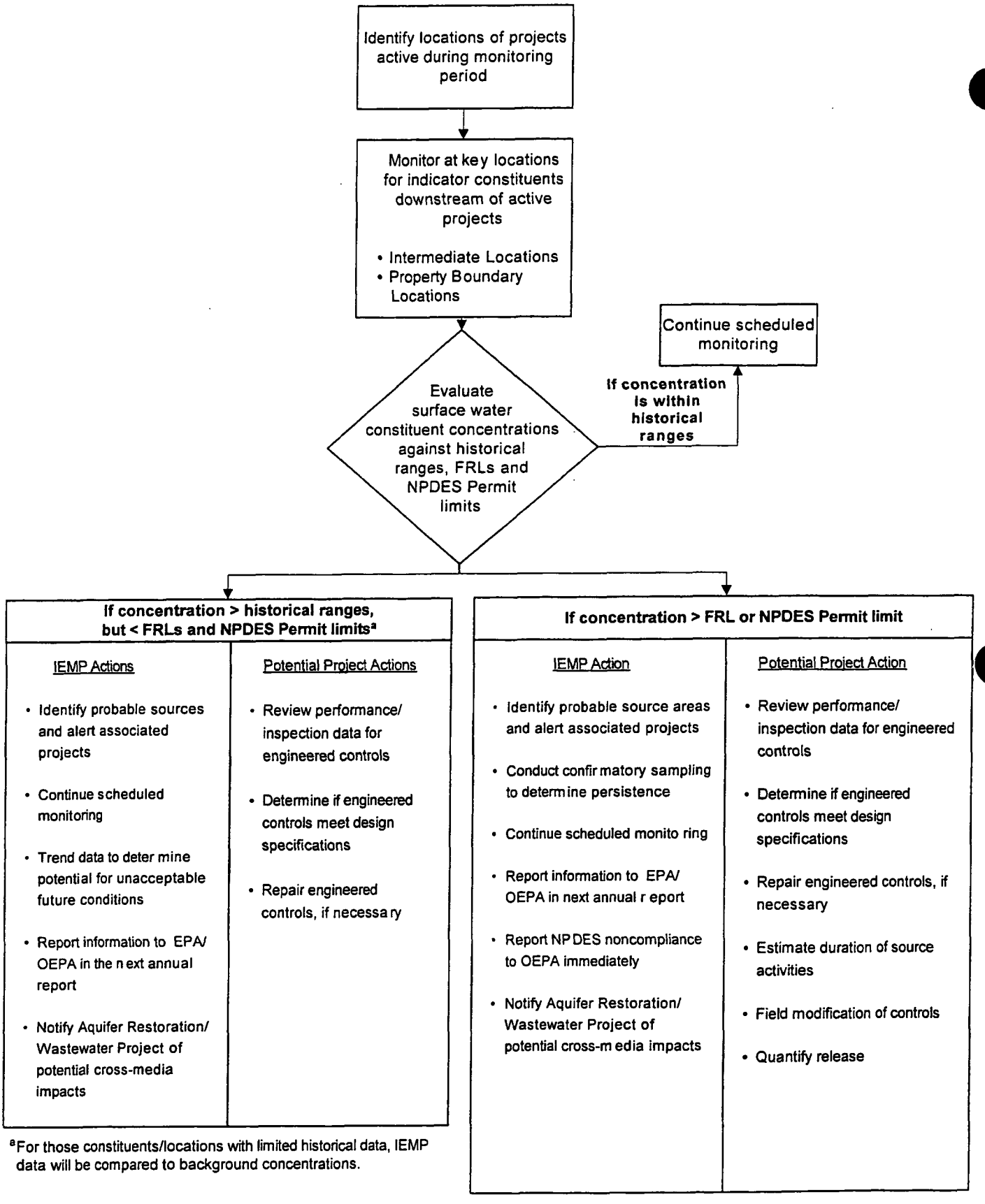
4.6.1 Data Evaluation

Data resulting from the IEMP surface water and treated effluent program will be evaluated to meet the program expectations identified in Section 4.4.1. Based on these expectations, the following questions will be answered through the surface water and treated effluent data evaluation process, as indicated:

- Are surface water contaminant concentrations such that cross-medium impacts to the underlying aquifer could be expected?

Data from sample locations near areas where the glacial overburden is breached by site drainages will be compared to surface water and groundwater FRLs to assess potential impacts to the Great Miami Aquifer. Basic statistics, such as the minimum, maximum, and mean, will be generated yearly. The data generated from individual sampling events will be trended by sample location over time via graphical and, if necessary, statistical methods when sufficient data become available. Should trends above the historical ranges or above FRLs be observed, actions shown in Figure 4-7 will be implemented. Integration of surface water information generated by project-specific monitoring will occur as necessary to determine which projects may have caused the observed trend. The findings of data evaluations will be shared with project personnel.

The personnel responsible for the restoration of the Great Miami Aquifer will be informed so that any potential adverse cross-medium impacts can be factored into the site groundwater remedy. The Demolition, Soil, and Disposal Project and other source projects will be informed of the findings such that the actions indicated in the decision-making process described in Figure 4-7 can be implemented.



[a]For those constituents/locations with limited historical data, IEMP data will be compared to background concentrations.

FIGURE 4-7. IEMP SURFACE WATER DATA EVALUATION AND ASSOCIATED ACTIONS

- Do the sporadic exceedances of FRLs continue to occur, decrease, or increase?

Data evaluation will consist of direct comparison of data to FRLs. It is anticipated that during 2006 with site soil certification being complete, it will be possible to reduce the list of constituents monitored with respect to FRLs (i.e., IEMP Characterization Monitoring).

- Have uncontrolled runoff and implementation of remediation activities caused an undue adverse impact to the surface water or treated effluent?

Data evaluation to determine the impact of remediation activities on surface water or treated effluent will consist of direct comparison of data to surface water FRLs. This assessment will not include data collected from internal monitoring locations within the treated effluent systems (i.e., SWRB 4002B). To provide a better understanding of the uncontrolled runoff flow patterns as remediation activities are occurring, updates of the uncontrolled runoff flow directions will also be reported. Additionally, trend analyses of data will be used to identify trends that may require implementation of additional surface water controls to avoid exceedance of FRLs.

If increasing trends are observed, then project-specific data will be evaluated to determine which projects are adversely affecting surface water or treated effluent quality. Data evaluation findings will be communicated to source project personnel, as appropriate.

- How will site impacts and background concentrations be distinguished as remediation activities are completed?

Background values for surface water in Paddys Run and the Great Miami River were originally established under the Characterization of Background Water Quality for Streams and Ground Water Report (DOE 1995a). This report calculated the 95th percentile statistic for various constituents. Additional data have been collected under the IEMP; therefore, background values have been recalculated and are presented in Table 4-2. It is anticipated that background for the 17 area-specific constituents will be recalculated when soil certification reaches completion as site activities become limited.

- Are the requirements of the NPDES Permit being fulfilled?

Data collected to fulfill the site NPDES Permit requirements will be evaluated for compliance with the NPDES Permit provisions. This evaluation will serve to identify if immediate reporting of noncompliances to OEPA is necessary, and to determine the appropriate corrective action to address the noncompliance.

- Are the FFCA and Operable Unit 5 Record of Decision reporting requirements being fulfilled?

Radiological discharges to the Great Miami River and Paddys Run are regulated by the FFCA and Operable Unit 5 Record of Decision. Reporting for these requirements have been incorporated into the IEMP reporting structure and include a cumulative summary of pounds of total uranium discharged, the number of treatment bypass days per reporting period, and the monthly average total uranium concentration discharged to the Great Miami River.

- Are the program and reporting requirements of DOE Order 5400.1 being met?

DOE Order 5400.1 requires that DOE implement and report on an environmental protection program for the Fernald site. The surface water and treated effluent monitoring program is one component of the sitewide IEMP monitoring program. This IEMP and the annual site environmental report fulfill the requirements of this DOE Order.

- Are community concerns being met through the surface water and treated effluent IEMP program?

The IEMP fulfills the needs of the Fernald community by preparing surface water and treated effluent environmental results in the annual site environmental report. DOE makes these reports available to the public at the Public Environmental Information Center. The specific community concern of the magnitude of Fernald site discharges to Paddys Run and the Great Miami River is addressed in the annual site environmental report in the surface water and treated effluent section.

4.6.2 Reporting

The IEMP surface water and treated effluent program meets the reporting requirements for the NPDES Permit and the FFCA and Operable Unit 5 Record of Decision. The IEMP surface water and treated effluent data will be reported on the IEMP Data Information Site and in the annual site environmental report. The quarterly FFCA reporting requirement is met through the IEMP Data Information Site where the pertinent FFCA-required data are posted as they become available. Additional information on IEMP data reporting is provided in Section 7.3.3.

Data pertaining to the surface water and treated effluent program will be provided on the IEMP Data Information Site. The data will be in the format of searchable data sets and/or downloadable data files. This site will be updated as data become available.

The annual site environmental report will be issued each June. This comprehensive report will discuss a year of IEMP data previously reported on the IEMP Data Information Site. The annual site environmental report will include the following:

- An annual summary of data from the IEMP surface water and treated effluent monitoring program
- Constituent concentrations for each sample location
- Statistical analysis summary for constituents, as warranted by data evaluation
- Status of FFCA and Operable Unit 5 Record of Decision Great Miami River effluent limits, to be presented graphically showing status of compliance with the 30-µg/L and 600-pound total uranium limits as well as indicating the allowable storm water and maintenance related bypass days
- Status of regulatory compliance of the NPDES Permit
- Summary-level information on the effectiveness of the project-specific sediment control structures, if necessary for interpretation of IEMP results
- Actions taken to mitigate unacceptable surface water conditions revealed by the IEMP surface water sampling program
- Observed trends and results of the data comparison to FRLs.

Because the IEMP is a living document, a structured schedule of annual reviews and two-year revisions has been instituted. The annual review cycle provides the mechanism for identifying and initiating any surface water and treated effluent program modifications (i.e., changes in constituents, locations, or frequencies) that are necessary to align the IEMP with the current mix of near-term remediation activities. Any program modifications that may be warranted prior to the annual review would be communicated to EPA and OEPA.

Section 5.0

5.0 SEDIMENT MONITORING PROGRAM

Section 5.0 discusses the monitoring strategy for assessing the impact of remediation activities at the Fernald site on sediments deposited along area surface water drainages. The focus of this program is on sediment outside the areas where surface water and/or sediment controls are in place as a result of the active remediation efforts. This plan discusses the IEMP sampling design and integration with project-specific excavation and sampling activities being conducted in 2006 as part of the Stream Corridors Project to certify sediment in on-property drainages meet FRLs. A medium-specific plan for sediment monitoring activities, a discussion of sediment data evaluation, and the reporting structure are also provided.

5.1 INTEGRATION OBJECTIVES FOR THE SEDIMENT MONITORING PROGRAM

The design considerations for the IEMP sediment monitoring program (discussed in Section 5.4), especially the location of sample points, incorporate information from previous site sediment programs including the IEMP data and information regarding site surface water and sediment controls in place and/or planned during remediation.

Historically, the sitewide sediment pathway has been evaluated under the site's initial environmental monitoring program that began in 1974, and the remedial investigation/feasibility study characterization of sediment that focused on a broader range of constituents (both radiological and non-radiological) in site drainages. The information produced by these programs through 1993 was reported and evaluated in the Remedial Investigation Report for Operable Unit 5 and carried forward into the Feasibility Study Report for Operable Unit 5 for the development of sediment clean up levels. The Record of Decision for Remedial Actions at Operable Unit 5 established health-protective FRLs for sediment. Off-property sediment from the Great Miami River will continue to be collected as part of the IEMP. However, it is anticipated that achievement of on-property sediment FRLs will be accomplished as part of the Stream Corridors Project in 2006 as site soil and sediment are remediated and contaminated source materials are removed.

In order to better define remediation needs in the on-property drainages (storm sewer outfall ditch, Pilot Plant drainage ditch, and Paddys Run), sediment sampling was conducted in 2004 as part of the Stream Corridors Project to confirm the extent of sediment to be excavated, along with any adjacent contaminated soil in a specific area. The Demolition, Soil, and Disposal Project plans to excavate above-FRL sediment and soil in 2005 following the completion of excavation of contaminated soils within each drainage's watershed. The project will conduct excavation control and/or pre-certification sampling during or following excavation in these drainage ways, where necessitated by the pre-design sampling data.

Certification sampling of the on-property stream corridors (Paddys Run, storm sewer outfall ditch, and Pilot Plant drainage ditch) will subsequently take place in 2005/2006.

The sediment monitoring program will continue to provide Fernald site stakeholders with comprehensive sediment data to verify the effectiveness of the Fernald site's sediment controls during ongoing remediation activities in 2006.

5.2 ANALYSIS OF REGULATORY DRIVERS, DOE POLICIES, AND OTHER FERNALD SITE-SPECIFIC AGREEMENTS

This section presents an evaluation of the regulatory drivers governing sediment monitoring during site remediation. The intent of this section is to identify any pertinent regulatory requirements, including ARARs and to-be-considered requirements, for the sediment monitoring program. These requirements will be used to confirm that the design specifications satisfy the regulatory obligations stated below and will achieve the intentions of other pertinent criteria, such as DOE Orders and the Fernald site's existing agreements. The results of the evaluation also are used to define, as appropriate for these media, the programmatic boundaries between the IEMP and project-specific emissions control monitoring conducted by individual project organizations.

5.2.1 Approach

The analysis of the regulatory drivers and policies was conducted by examining the approved CERCLA records of decision to identify any sediment-specific monitoring requirements.

5.2.2 Results

The evaluation of regulatory drivers for sediment monitoring resulted in two regulatory requirements governing the technical scope and reporting for the IEMP sediment monitoring program as well as project-specific monitoring of sediment:

- The CERCLA Record of Decision for Remedial Actions at Operable Unit 5 requires remediation of the site such that the sediment pathway is protective of the underlying Great Miami Aquifer and environmental receptors. The FRLs for sediment are specified in the Operable Unit 5 Record of Decision; however, a specified volume or area of sediment to be remediated was not identified due to the sporadic and isolated detections of contaminants above sediment FRLs. Attainment of sediment FRLs for on-property sediments will be conducted as part of the Stream Corridors Project and attainment sediment FRLs for the Great Miami River sediments will be determined by monitoring at the end of remediation activities, as committed to in the Feasibility Study Report for Operable Unit 5.

- Per the CERCLA Remedial Design Work Plan for Remedial Actions at Operable Unit 5, monitoring will be conducted following the completion of cleanup as required to assess the continued protectiveness of the remedial actions. The IEMP will specify the type and frequency of environmental monitoring activities to be conducted during remedy implementation, and ultimately, following the cessation of remedial operations as appropriate. The IEMP will delineate the Fernald site's responsibilities for sitewide monitoring of surface water and sediment over the life of the remedy, and ensure that FRLs are achieved at project completion.
- The CERCLA Feasibility Study Report for Operable Unit 5 stated that if the concentrations of constituents remain above sediment BTVs after completion of the remedial action, then further investigation and remediation might be warranted. The sediment BTVs listed in the Feasibility Study Report for Operable Unit 5 were identified as contaminant concentrations that are protective of ecological receptors.

DOE Order 5400.1, General Environmental Protection Program, and DOE Order 5400.5, Radiation Protection of the Public, were also evaluated for any to-be-considered criteria that may drive environmental monitoring of sediment. This evaluation concluded that, although sediment sampling has been conducted under previous sampling based on DOE Orders, continued sediment monitoring is not mandated by DOE Orders in light of the current site conditions, planned actions regarding IEMP surface water sampling, and the planned sediment verification sampling both on and off property.

The sediment sampling scope will be continued in 2006 through the use of an on-property, project-specific sampling program (i.e., Stream Corridors Project) and sediment sampling as specified in the IEMP along the Great Miami River as in recent years. Sampling conducted to verify on-property FRL attainment will occur under certification design planning conducted by the Demolition, Soil, and Disposal Project following remediation of areas within each of the on-site drainage's watershed. In particular, some excavation under the Stream Corridors Project (Paddys Run, the Pilot Plant drainage ditch, and the storm sewer outfall ditch), following sampling and design work, is planned during 2006. In early 2006, certification of the on-property drainage is planned to be complete; therefore, no further on-property sediment monitoring is planned.

Table 5-1 lists the regulatory drivers for sediment monitoring. Sections 5.6 and 8.0 provide the plan for the evaluation and reporting of sediment monitoring data.

5.3 PROGRAMMATIC BOUNDARY FOR THE SEDIMENT MONITORING PROGRAM

The programmatic boundary between the IEMP and project-specific activities has been defined in detail in previous versions of the IEMP. With the conclusion of most soil and sediment remediation planned by the end of 2005, the programmatic boundary is less significant than previous years. The intent behind the boundary definition is to: (1) clearly delineate the scope and geographic extent of the IEMP monitoring responsibility; and (2) establish a recognized interface between the downstream surveillance focus of the

IEMP and the predominant emission control and verification (in on-property drainages as part of soil remediation) focus of project-specific monitoring.

TABLE 5-1
FERNALD SITE SEDIMENT MONITORING PROGRAM
REGULATORY DRIVERS AND RESPONSIBILITIES

	DRIVER	ACTION
IEMP	Operable Unit 5 Feasibility Study/Operable Unit 5 Record of Decision	The IEMP will be modified toward completion of the remedial action to include sampling to verify FRL achievement.

	DRIVER	ACTION	PROJECT PLAN
PROJECT	Operable Unit 5 Record of Decision Operable Unit 5 Feasibility Study	Sampling of on-site drainages and streams, as necessary, to determine excavation depth, if any, and certify clean for FRLs and BTVs	Sitewide Excavation Plan; Integrated Remedial Design Package

The IEMP sediment sampling program has been confined to the storm sewer outfall ditch, Paddys Run, and the Great Miami River in past years. For 2006, the IEMP sediment sampling objectives will be largely fulfilled by the project-specific Stream Corridors Project, which will define on-property sampling for stream corridor excavation control and/or certification sampling. The annual sampling of two sediment samples from the Great Miami River will also continue in 2006 as described in the IEMP.

Project-specific sediment sampling in 2006 will be detailed in excavation control, pre-certification and/or certification sampling plans as part of the Streams Corridor Project and will incorporate the requirements of the Sitewide Excavation Plan (DOE 1998).

5.4 PROGRAM EXPECTATIONS AND DESIGN CONSIDERATIONS

5.4.1 Program Expectations

The expectations for the sediment sampling program during 2006 are to:

- Use project-specific sampling plans (e.g., Streams Corridors Project) that will be implemented for excavation control, pre-certification and certification to meet the IEMP monitoring needs to the extent possible, namely that of reporting summary sediment data to stakeholders via the annual environmental report
- Continue monitoring two sample locations in the Great Miami River to confirm that the river is not being impacted by Fernald site remedial actions, including treated discharges from the outfall line.

In 2006, the IEMP sediment program will be limited to the Great Miami River sample locations since the remedial actions and certification of the on-property stream corridors sediments will be complete by early 2006. Continued compliance with the Fernald site's NPDES discharge limits precludes any discharge or accumulation of contaminated sediment in the river. It is anticipated that both the verification sampling and historical information from the Great Miami River will confirm that remediation of sediment in the Great Miami River is unnecessary along with fulfilling the Operable Unit 5 Feasibility Study conclusion/recommendation.

5.4.2 Design Considerations

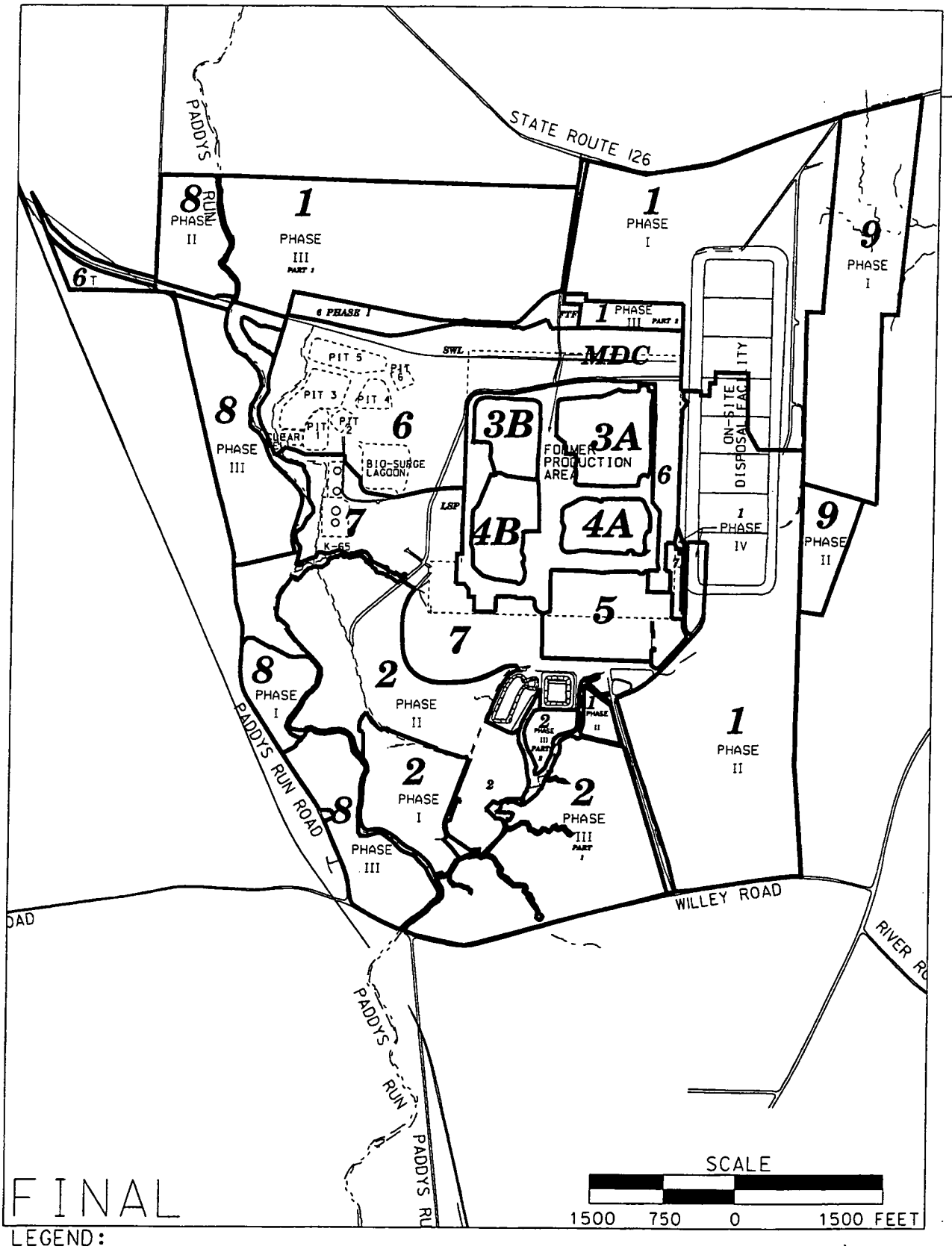
As described in the program expectations above, the program design will primarily rely on project-specific monitoring since these plans will include essentially the same sampling frequency, analytical constituents, sample locations, and ASL as past IEMP sampling programs. The design of the sediment program including project-specific plans will be developed in recognition of the remedial activities planned during 2006. These remedial activities include:

- Soil excavation/certification activities in Areas 4B, 5, 6, and 7 including the silos area and on-property stream corridors (refer to Figure 5-1)
- Continue and complete waste placement, closure, and capping activities at the on-site disposal facility
- Operation activities associated with the Operable Unit 4 Accelerated Waste Retrieval Project and Silo 3 Project treatment facility, and activities associated with the Silos 1 and 2 remediation facility.

Additional information concerning site remedial activities is in Section 2.0.

In the past, the IEMP analytical constituents have included total uranium, radium-226, radium-228, thorium-228, thorium-230 and thorium-232. The project-specific sediment sampling and analysis programs for 2005 and 2006 will include the primary and secondary COCs, including most if not all of the radionuclides sampled under the IEMP in the past. The primary radiological COCs include total uranium, radium-226, radium-228, thorium-228, and thorium-232 while the secondary chemical COCs will likely include selected inorganic and organic chemicals, dependent on the final evaluation of pre-design data collected throughout 2004. Additionally, barium, cadmium, iron, lead, and zinc were identified as constituents of ecological concern (COEC) in the Sitewide Excavation Plan, Appendix C. These sediment COECs will be evaluated during the development of the certification design in 2005 to determine if there is a need for sampling and further evaluation.

With regard to the Stream Corridors, excavation was completed for Paddys Run and the Pilot Plant drainage ditch in December 2005, with certification samples scheduled to be collected January/February 2006. The storm sewer outfall ditch area was certified clean in 2005.



LEGEND:

1 REMEDIATION AREA

REMEDIATION AREA BOUNDARIES

FIGURE 5-1. SITEWIDE REMEDIATION AREAS

V:/5FGPT/DGN/04REVISION/CHPT5/04RV-C5-02.DGN

STATE PLANAR COORDINATE SYSTEM 1983

15-DEC-2005

Regarding public concerns of contaminated sediment mobilization, it should be noted that controls currently in place (and planned future controls during soil and sediment excavation) for site surface water and sediment runoff from the more highly contaminated areas reduce the contamination leaving the site. This is explained in detail for surface water in Section 4.0.

Based on the sediment data over the past 12 years, sediments from the Fernald site do not currently pose a risk to the public. Since 1991, the only sediment FRL exceedance occurred in a 1996 sediment sample from the storm sewer outfall ditch for thorium-232 (sample result of 1.8 picoCuries per gram [pCi/g] versus the FRL of 1.6 pCi/g).

It is anticipated that sediment samples will not be collected in 2006 from the on-property stream corridors as certification is planned to be complete early 2006. Consistent with recent years, samples will be collected annually in 2006 from the two locations on the Great Miami River: one downstream from the outfall line and one background location (refer to Figure 5-2).

5.5 MEDIUM-SPECIFIC PLAN FOR SEDIMENT MONITORING

This section serves as the medium-specific plan for implementation of the sampling, analytical, and data management activities associated with the limited IEMP sediment monitoring program for 2006. This plan pertains to those samples to be collected from the Great Miami River.

The activities described in this medium-specific plan were designed to provide sediment data of sufficient quality to meet the program expectations and design as stated in Sections 5.4.1 and 5.4.2. All sampling procedures and analytical protocols described or referenced herein are consistent with the requirements of the SCQ.

Subsequent sections of this medium-specific plan define the following:

- Project organization and associated responsibilities
- Sampling program
- Change control
- Health and safety
- Data management
- Project quality assurance.

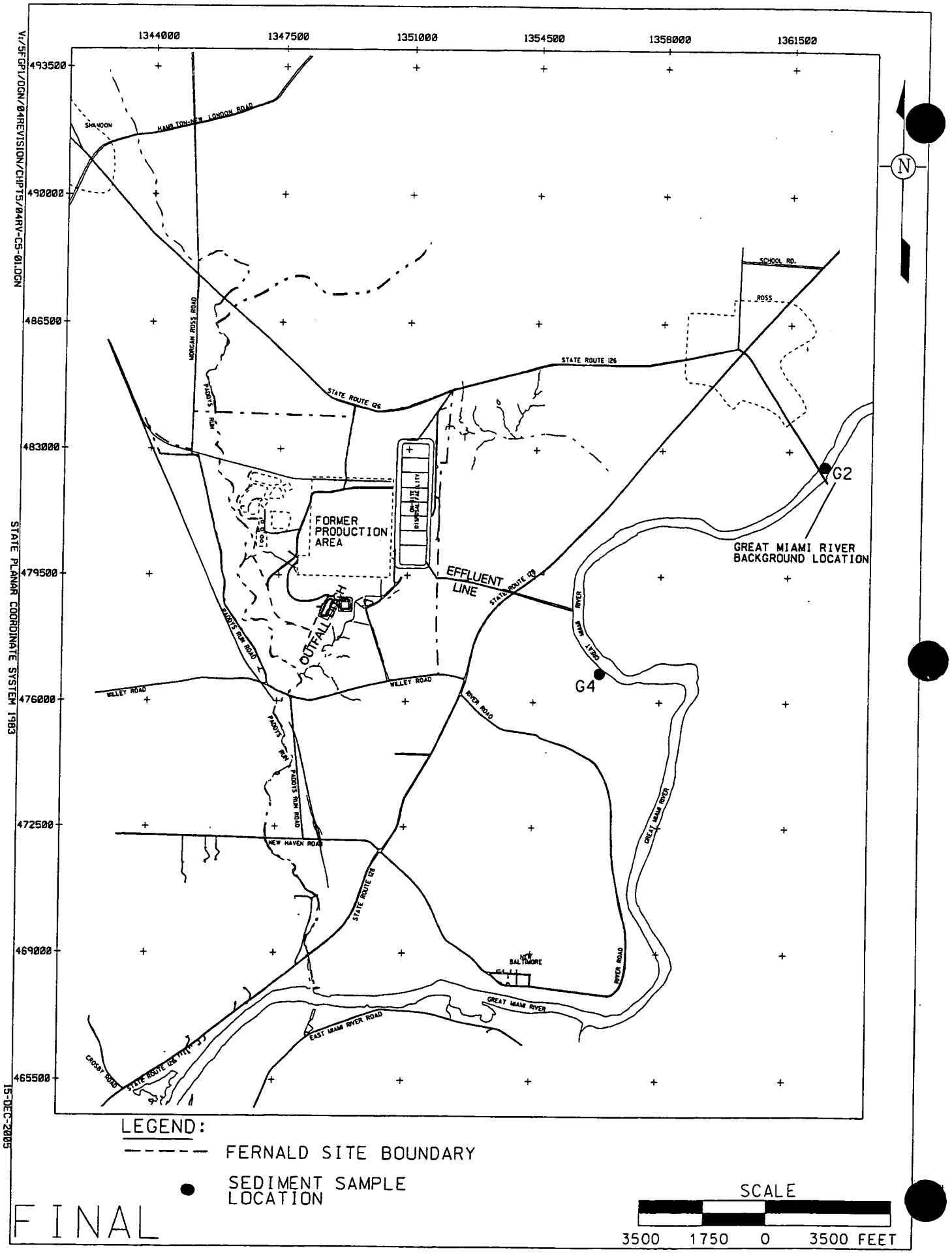


FIGURE 5-2. SEDIMENT SAMPLE LOCATIONS

5.5.1 Project Organization

The project team leader will have full responsibility and authority for the implementation of this medium-specific plan, in compliance with all regulatory specifications and sitewide programmatic requirements. All changes to project activities must be approved by the project team leader or designee.

Health and safety are the responsibility of all individuals working on this project scope. Sampling personnel working on this sampling activity will be qualified in performing the applicable sampling procedures or under the direction of a qualified person.

Quality Assurance specialists will participate on the project team, as necessary, to review project procedures and activities ensuring consistency with the requirements of the SCQ or other referenced standards, and to assist in evaluating and resolving all quality related concerns.

5.5.2 Sampling Program

In 2006, sediment samples will be collected from two locations on the Great Miami River, typically in the summer or fall. Sampling is usually performed in this time period in order to take advantage of the abundance of fresh sediment deposited during flood conditions that commonly occur after the winter and spring seasons, and to enable sampling during low-flow or dry conditions. Sampling at other times of the year is also acceptable although sample collection may be more difficult due to water flow.

Figure 5-2 depicts the two IEMP sediment sample locations. Table 5-2 summarizes the field sample collection information for each of the locations. Sample analysis will be performed at the on-site laboratory or a contract laboratory dependent on specific analyses required, laboratory capacity, turnaround time, and performance of the laboratory. The laboratories used for analytical testing must be approved in accordance with the criteria specified in Sections 3.1.5, 12.4, and Appendix E of the SCQ. These criteria include meeting the requirements for performance evaluation samples, pre-acceptance audits, performance audits, and an internal quality assurance program. A list of approved laboratories and current status of each is maintained by the FCP Quality Assurance organization.

Additionally, it should be noted that samples have been collected in the Great Miami River sediment after the removal of a contaminated section of the abandoned outfall line. The collection of these samples and the data that were obtained are described in the Certification Design Letter for Area 9 (Phase III) Abandoned Outfall Line – Part Two, and the follow-up Certification Report for Area 9 (Phase III) Abandoned Outfall Line – Part Two.

TABLE 5-2

SEDIMENT SAMPLING PROGRAM DESIGN AND ANALYTICAL REQUIREMENTS

Location *Expectation*	Number of Locations	Sample Frequency	Constituent[a]	ASL[b]	Container	Holding Time	Preservative
Great Miami River (G4) *Measure the impact of site effluent*	1	Annually	Uranium, Total	B	500 mL glass or plastic jar	6 months	None
Great Miami River background (G2) *Establish range of background concentration in Great Miami River*	1	Annually	Uranium, Total	B	500 mL glass or plastic jar	6 months	None

[a]Radionuclide analyses do not have standard methods; Appendix G of the SCQ provides performance specifications.
[b]A more conservative ASL may be required for laboratory data in order to meet required detection limits or in order to ensure data quality objectives.

5.5.2.1 Sampling Procedures

Sediment sampling is conducted in accordance with standard operating procedures referenced below. The procedures provide sampling instructions that incorporate the requirements outlined in the SCQ as follows:

Standard Operating Procedures

ADM-02	Field Project Prerequisites (DOE 2005b)
SMPL-01	Solids Sampling (DOE 2005f)
SMPL-21	Collection of Field Quality Control Samples (DOE 2002a)
EW-0002	Chain of Custody/Request for Analysis Record for Sample Control (DOE 2004c)

Sitewide CERCLA Quality (SCQ) Assurance Project Plan

Section 4	Quality Assurance Objectives
Section 5	Field Activities
Section 6	Sampling Requirements
Section 7	Sample Custody
Appendix J	Field Activity Methods
Appendix K	Sampling Methods

Following are project-specific sampling considerations:

- Only recently deposited surface sediment shall be collected, typically from deposition locations such as areas with a slow flow rate (e.g., obstructions in the stream bed that allow sediment to be deposited).
- Samples shall be collected from the top two inches and consist of fine-grained material.
- Any non-sediment materials shall be discarded from the sample, any free water drained from the non-sediment material, and the non-sediment material placed in the sample container.

The exact locations of the sediment sample points are approximate and may change based on where stream flow has deposited sufficient material for sampling. Sediment samples are collected and analyzed according to Table 5-2.

5.5.2.2 Quality Control Sampling Requirements

Quality control samples will be taken according to the frequency recommended in Appendix A, Table 2-3 of the SCQ and are detailed below. These samples will be collected and analyzed to evaluate the possibility that some controllable practice, such as decontamination, sampling, or analytical technique, may be responsible for introducing bias in the analytical results. One field duplicate will be collected from the G4 location in the Great Miami River.

Through its Agreement in Principle with DOE, the State of Ohio empowers the OEPA to take samples that are independent of the split sampling program. In addition, sediment samples may be split annually.

These samples supplement the quality assurance program by providing a means to evaluate comparability between laboratories. Samples collected with OEPA are analyzed for the same constituents as those established in Table 5-2 for the location being sampled.

5.5.2.3 Decontamination

Decontamination of sampling equipment will be performed between sample locations to prevent the introduction of contaminants or cross contamination into the sampling process. The decontamination shall be Level II as referenced in Section K.11 of the SCQ.

5.5.2.4 Waste Dispositioning

Contact wastes that are generated by the field technicians during field sampling activities are collected and placed in a clean trash receptacle.

5.5.3 Change Control

Changes to the medium-specific plan will be at the discretion of the project team leader. Prior to implementation of field changes, the project team leader or designee shall be informed of the proposed changes and circumstances substantiating the changes. Any changes to the medium-specific plan must have written approval by the project team leader or designee, Quality Assurance representative, and the Field Manager prior to implementation. If a Variance/Field Change Notice is required, it will be completed in accordance with Section 15.3 of the SCQ. The Variance/Field Change Notice form shall be issued as controlled distribution to team members and will be included in the field data package to become part of the project record. During biennial revisions to the IEMP, Variance/Field Change Notices will be incorporated to update the medium-specific plan.

5.5.4 Health and Safety Considerations

All involved personnel will receive adequate training to the health and safety requirements prior to implementation of the field work required by this medium-specific plan. Safety meetings will be conducted prior to beginning field work to address specific health and safety issues. All Fluor Fernald employees and subcontractor personnel who will be performing field work required by this medium-specific plan are required to have completed applicable training.

5.5.5 Data Management

Field documentation and analytical results will meet the IEMP data reporting and quality objectives, conform to appropriate sections and appendices of the SCQ, and comply with specific site procedures, such as the Data Validation procedure.

Data documentation and validation requirements for data collected in 2006 for the IEMP fall into two categories depending upon whether the data are field- or laboratory-generated. Field data validation will consist of verifying compliance and appropriate documentation of field activities. Laboratory data validation will consist of verifying that data generated are in compliance with specified ASL B. Specific requirements for field data documentation and validation and laboratory data documentation and validation are in accordance with SCQ and site procedures. ASL B provides qualitative, semi-qualitative, and quantitative data with some quality assurance/quality control checks. The IEMP sediment data will undergo validation to ensure that analytical data are in compliance with the ASL B method criteria being requested and in order to meet data quality objectives.

Data will be entered into a controlled database using a double key or other verification method to ensure accuracy. The hard copy data will be managed in the project file in accordance with FCP record keeping procedures and DOE Orders.

5.5.6 Quality Assurance

Assessments of work processes may be conducted to verify quality of performance, and may include audits, surveillances, inspections, tests, data verification, field validation, and peer reviews. Assessments shall include performance-based evaluation of compliance-to-technical and procedural requirements, and corrective action effectiveness necessary to prevent defects in data quality. Assessment documentation shall verify that work was conducted in accordance with IEMP, SCQ, and FCP Quality Assurance Program requirements.

5.6 IEMP SEDIMENT MONITORING DATA EVALUATION AND REPORTING

This section provides the methods to be used in analyzing the data generated by the IEMP sediment sampling program and project-specific sampling. It summarizes the data evaluation process and actions associated with various monitoring results. The planned reporting structure for IEMP-generated sediment data as well as project-specific data to be reported in the annual site environmental reports is provided.

5.6.1 Data Evaluation

Data resulting from the IEMP sediment program will be evaluated to meet the program expectations identified in Section 5.4.1. Based on these expectations, the following questions will be answered through the sediment data evaluation process, as indicated:

- Have changes in the residual contaminant concentrations occurred in sediments found in the Great Miami River as a result of runoff and treated effluent from the site?

Data evaluation will consist of comparison to historical data, background levels, and FRLs. This evaluation will identify long-term trends of targeted radiological constituents in sediment to determine if the potential exists for an FRL exceedance in the future due to Fernald site remediation activities. As indicated in Figure 5-3, results of the data interpretation will be communicated to project personnel to implement appropriate actions, as necessary. As previously discussed, the future excavation and certification plans will also be factored into this evaluation of data results.

- Should the sediment program be refined in scope as remediation is completed?

Data evaluation to determine if the IEMP sediment program should be revised will be based on the comparison to historic ranges and the sediment FRLs. Data evaluation to address any remaining expectations identified in Section 5.4.1 is encompassed in the data evaluation techniques described above.

- Are community concerns being met through the IEMP sediment program?

The IEMP fulfills the need of the Fernald community by preparing sediment environmental results in annual site environmental reports. DOE makes these reports available to the public at the Public Environmental Information Center.

- Are the program and reporting requirements of DOE Order 5400.1 being met?

DOE Order 5400.1 requires that DOE implement and report results from the environmental protection program for the Fernald site. The sediment monitoring program is one component of the sitewide IEMP monitoring program. This IEMP and annual site environmental reports fulfill the requirements of this DOE Order.

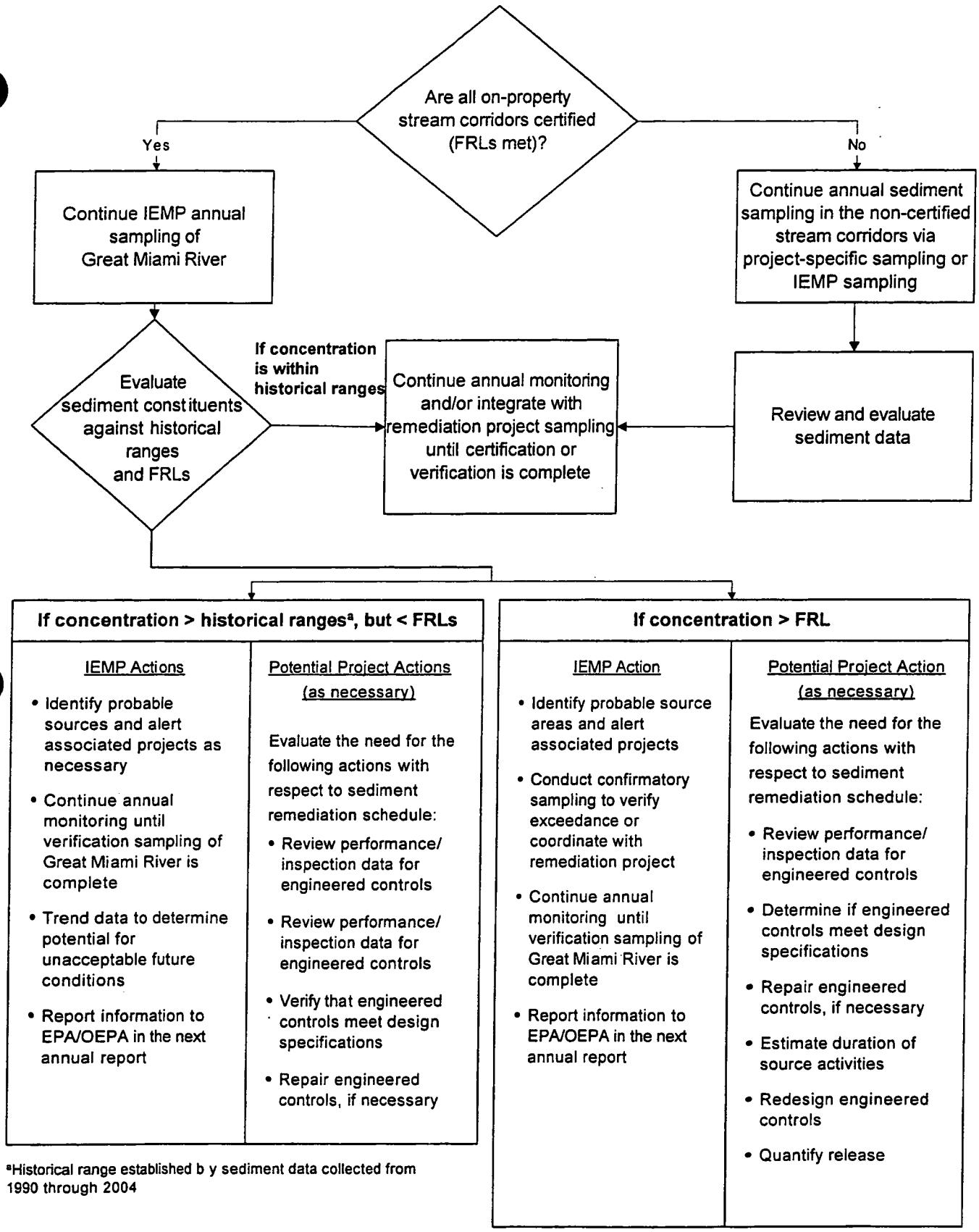


FIGURE 5-3. IEMP SEDIMENT DATA EVALUATION AND ASSOCIATED ACTIONS

5.6.2 Reporting

The IEMP sediment program data will be reported on the IEMP Data Information Site and in the annual site environmental report. Data on the IEMP Data Information Site will be in the format of searchable data sets and/or downloadable data files. The IEMP Data Information Site will be updated when sediment data become available. Due to the volume of data to be generated during certification sampling of the on-property stream corridors, this data set will be presented in summary level form. Additional information on IEMP data reporting is provided in Section 7.3.3.

The annual site environmental report will supplement the IEMP Data Information Site by providing a summary and assessment of the data results, and identifying notable results and/or events related to those data.

The IEMP annual site environmental report will be issued each June and will include the following:

- An annual summary of data from the IEMP sediment monitoring program (Great Miami River sample locations) or equivalent data from the project-specific sampling programs (i.e., Stream Corridors Project); graphical presentation of data trends over time for the Great Miami River locations
- Statistical summary (i.e., minimum, maximum, and mean) by constituent for Great Miami River locations
- Summary-level information on the effectiveness of the project-specific sediment control structures (to include sediment control efficiency data, if necessary for interpretation of sitewide impacts).

If necessary, sediment results will be presented prior to the submittal of annual site environmental report to the EPA and OEPA if significant changes in sediment contaminant concentrations are evident.

Because the IEMP is a living document, a schedule of annual reviews and two-year revisions has been instituted. The annual review cycle provides the mechanism for identifying and initiating any sediment program modifications (i.e., changes in constituents, locations, or frequencies) that are necessary to align the IEMP with the current mix of near-term remediation activities. Any program modifications that may be warranted prior to the annual review will be communicated to EPA and OEPA.

Section 6.0

6.0 AIR MONITORING PROGRAM

Section 6.0 discusses the monitoring strategy for assessing the sitewide impact of the remediation activities on the air pathway. The strategy identifies the activities conducted to satisfy requirements for particulate, radon, and direct radiation monitoring. A medium-specific plan for conducting sitewide and off-property air monitoring activities is provided, along with a plan for reporting air-related activities.

6.1 INTEGRATION OBJECTIVES FOR THE AIR MONITORING PROGRAM

The IEMP air monitoring program objectives for 2006 are consistent with program objectives in previous IEMP revisions. The objectives involve physically monitoring the air pathway to demonstrate compliance with 40 CFR 61 Subpart H, and the requirements of DOE Orders for 2006. These assessments will be integrated with the assessments of the other media sampled under the IEMP and provided to regulatory agencies in reports according to the reporting schedule established in Section 6.6 and summarized for all media in Section 7.0.

The IEMP site boundary air monitoring program will continue through the year until all the source materials have been removed from the site, D&D activities are complete, on-site disposal facility cells are capped, and the soil certification process has been completed. Then the removal of air monitors (particulate, radon, and direct radiation) will be discussed through the weekly conference calls and/or correspondence with the EPA and OEPA on a case-by-case basis. Project IEMP air monitoring will continue until the Silos Project D&D and the silos area soil certification process has been completed. Then the removal of project air monitors will be discussed through the weekly conference calls and/or correspondence with the EPA and OEPA on a case-by-case basis, as necessary.

The design of the air assessment program for 2006 was developed in recognition of the potential major sources of emissions and accelerated clean-up schedule initiatives expected to be active during this time period. The major sources and initiatives include:

- Soil excavation/certification activities in Areas 4B, 5, 6, and 7 including the silos area and on-property stream corridors
- Continue and complete waste placement, closure, and capping activities at the on-site disposal facility
- Continued dismantlement and demolition of on-site structures
- Operation activities associated with the Operable Unit 4 Accelerated Waste Retrieval Project and Silo 3 Project treatment facility, and activities associated with the Silos 1 and 2 remediation facility.

Additional information concerning site remedial activities is contained in Section 2.0.

The focus of the program will be to assess the collective sitewide effects of remediation activities occurring in 2006. The results will be evaluated as frequently as possible to provide necessary feedback to the projects to ensure that cumulative sitewide impacts remain below established thresholds. Ultimately, this information will assist in tracking trends during remediation to help identify changes needed in the air assessment program emphasis and/or design. A reporting plan is provided in Section 6.6 to combine the results of the air assessment program and the NESHAP dose assessments into a single reporting mechanism to facilitate regulatory agency review of the sitewide remediation activities and associated emission controls. Appendix C outlines the Fernald site's plan for demonstrating NESHAP Subpart H compliance and producing required dose assessments during remediation.

6.2 ANALYSIS OF REGULATORY DRIVERS, DOE POLICIES, AND OTHER FERNALD SITE-SPECIFIC AGREEMENTS

This section identifies the pertinent regulatory requirements, including ARARs and to-be-considered requirements, for the scope and design of the air monitoring program. These requirements will be used to confirm that the program satisfies the regulatory obligations for monitoring that have been activated by the records of decision and will achieve the intentions of other pertinent criteria (such as DOE Orders and the Fernald site existing agreements) that have a bearing on the scope of air monitoring. The results of the evaluation are also used to define the programmatic boundaries between the sitewide IEMP responsibilities and the project-specific emissions control monitoring conducted by the individual projects.

6.2.1 Approach

The analysis of the additional regulatory drivers and policies for air assessments was conducted by identifying the suite of ARARs and to-be-considered requirements in the approved CERCLA records of decision and legal agreements that contain specific air monitoring requirements. This subset was further divided to identify those monitoring requirements with sitewide implications (and, therefore, fall under the scope of the IEMP) and those that pertain to emission control monitoring that would be the responsibility of the individual remediation projects.

6.2.2 Results

The following regulatory drivers govern the technical scope and reporting requirements for the IEMP's sitewide air monitoring program:

- DOE Order 5400.1, General Environmental Protection Program, which requires DOE facilities that use, generate, release, or manage significant pollutants or hazardous materials to develop and implement an environmental monitoring plan. Each DOE site's environmental monitoring plan must contain the design criteria and rationale for the routine effluent monitoring and environmental surveillance activities of the facility. The IEMP strategy is responsive to the changing site mission and associated remediation needs, and complies with DOE Orders.

- DOE Order 5400.5, Radiation Protection of the Public and Environment, which establishes radiological dose limits and guidelines for the protection of the public and environment. Under this requirement, the exposure to members of the public associated with activities from DOE facilities from all pathways must not exceed, in one year, an effective dose equivalent of 100 mrem. For radiological dose due to airborne emissions only, the DOE Order requires compliance with the 40 CFR 61 Subpart H limit of an effective dose equivalent of 10 mrem/year to a member of the public. Demonstration of compliance with this standard is to be based on an air monitoring approach. The DOE Order also provides guidelines for radionuclide concentrations in air (known as Derived Concentration Guides) and radon concentration limits for interim storage of sources during remediation. These radon limits are 100 picoCuries per liter (pCi/L) at any given point, 30 pCi/L annual average sitewide, 3 pCi/L annual average above background at the Fernald site boundary, and 20 picoCuries per square meter per second (pCi/m^2/sec) flux rate for storage of radon generating wastes (per 40 CFR 61 Subpart Q). The guidance document associated with this DOE Order recommends confirmatory air monitoring surveillance, which is incorporated into the IEMP.
- Proposed 10 CFR 834, DOE Facilities Radiation Protection of the Public and Environment, which is similar in intent to DOE Order 5400.5. However, differences include the deletion of the 100-pCi/L limit and 30-pCi/L annual limit; lowering the fenceline limit to 0.5 pCi/L above background; changes to facility and facility boundary definitions; and clarifications to the definition of point of compliance. Because this rule is adopted into the remediation documents for the Silos and Waste Pits Projects as standards that must be met, the 0.5 pCi/L above background requirement has been incorporated into this plan. If the rule is promulgated, a comprehensive compliance strategy will be developed to accommodate the site-specific circumstances relative to meeting the new standards.
- NESHAP 40 CFR 61 Subpart H, which provides national emissions standards for radionuclides other than radon. Per this requirement, emissions of radionuclides (excluding radon) to the ambient air from DOE facilities shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent in excess of 10 mrem/year. Demonstration of compliance with this standard is to be based on an air monitoring approach.
- Federal Facility Agreement (FFA), Control and Abatement of Radon-222 Emissions, signed November 19, 1991, which ensures that DOE takes all necessary actions to control and abate radon-222 emissions at the Fernald site. This agreement acknowledges that the K-65 Silos (Operable Unit 4) exceed the radon emission of 20 pCi/m^2/sec, but allows the Fernald site to address this exceedance by implementing a removal action to bring radon emissions from the silos to a level as low as reasonably achievable (ALARA), and to attain the NESHAP Subpart Q standard upon completion of final remediation. The removal action work plan included a radon monitoring system, which was previously monitored under the predecessor Environmental Monitoring Plan, and is now incorporated into the IEMP. The FFA also requires demonstration of compliance with the Subpart Q standard (upon completion of remedial actions) for the waste pits, Clearwell, and any other sources found to emit radon in excess of 20 pCi/m^2/sec.
- DOE Order 435.1, Environmental Monitoring, which requires low-level radioactive waste disposal facilities to perform environmental monitoring that meets requirements in DOE Order 5400.1 for all media, including the air pathway. This requirement applies to the on-site disposal facility because it is the only disposal facility at the Fernald site. Instead of a separate monitoring plan for the on-site disposal facility, the air monitoring program for the on-site disposal facility will be integrated and incorporated into the IEMP's air monitoring program.

- Per the CERCLA Remedial Design Work Plan for Remedial Actions at Operable Unit 5, monitoring will be conducted as required following the completion of cleanup to assess the continued protectiveness of the remedial actions. The IEMP will specify the type and frequency of environmental monitoring activities to be conducted during remedy implementation and, ultimately, following the cessation of remedial operations as appropriate. The IEMP will delineate the Fernald site's responsibilities for sitewide monitoring over the life of the remedy, and ensure that FRLs are achieved at project completion. In addition to these FRL attainment responsibilities, the IEMP will also define sitewide remedial monitoring requirements for air.

Upon evaluating the IEMP ARARs in consideration of protection of human health and/or the environment, the 10-mrem/year dose limit was determined to be the most stringent emission limit. Therefore, the 10-mrem/year NESHAP standard provides a reasonable benchmark for ensuring compliance with all other air standards (excluding radon) and ensuring an adequate level of protectiveness.

Twelve other regulatory drivers have air monitoring implications of a project-specific emissions control nature that fall outside the scope of the IEMP. These requirements pertain to the monitoring of fugitive area emission controls and the monitoring of point source emissions. The project-specific air monitoring drivers for fugitive dust include:

- Permit to Install New Sources, Criteria for Decision by Director, OAC 3745-31-05(A)(3), which requires the use of best available technology (BAT) when installing, modifying, and operating an air contaminant source. The BAT Determination for Remedial Construction Activities at the Fernald site provides a method for using BAT as it applies to fugitive dust sources. During 1997, DOE and OEPA negotiated a BAT determination that established control measures, emission standards, and record keeping requirements for the control of fugitive dust from roads (paved and unpaved), material storage piles, parking areas, and construction areas. This BAT determination has been approved by OEPA and is contained in Fugitive Dust Control Requirements (DOE 2002c).
- Ohio General Provisions on Air Pollution Control, Air Pollution Nuisances Prohibited, OAC 3745-15-07 and Ohio Revised Code (ORC) 3704.01-.05, which prohibits the emission or escape into the open air of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, and odors in such amounts that may cause a public nuisance. Control of such emissions is the responsibility of the projects through source control, as described in the BAT Determination for Remedial Construction Activities at the Fernald site.
- Ohio Emissions of Particulate Matter, Restriction of Emission of Fugitive Dust, OAC 3745-17-08, which provides for the restriction of emission of fugitive dust by the use of control measures. Such control measures include, for example, water or dust suppression chemicals for control of fugitive dust from demolition of buildings or on dirt or gravel roads, the use of hoods or fans to enclose and control fugitive dust, and the use of canvas or other coverings for stockpiles.

The project-specific regulatory drivers for point and other sources include:

- NESHAP 40 CFR 61 Subpart Q, which provides national emissions standards for radon. The standard for this regulation is that no source at a DOE facility shall emit more than 20 pCi/m^2/sec of radon-222, as an average for the entire source, into the air. A source is defined in the regulation as any building structure, pile, impoundment, or area used for storage or disposal that contains sufficient quantities of radium so as to exceed the standard. Staging of material, such as the silo residues, during the implementation of remedial actions does not constitute interim storage under NESHAP Subpart Q. To demonstrate compliance with the standard, radon monitoring is conducted at the source. Such source monitoring, with the exclusion of that conducted at the K-65 Silos, will be addressed within project remedial design and remedial action documents.
- NESHAP 40 CFR 61 Subpart H, which provides national emissions standards for radionuclides other than radon. This regulation also requires emission measurements at point sources with a potential to discharge radionuclides into the air in quantities that could cause an effective dose equivalent in excess of 1 percent of the standard (10 mrem/year).
- Ohio Particulate Matter Standards, Restrictions on Particulate Emissions from Industrial Processes, OAC 3745-17-11, which describes emission restrictions for particulates from industrial processes. These restrictions apply to operations, processes, or activity other than those subject to fugitive dust regulations in OAC 3745-17-08 (discussed above) and are, therefore, applicable to process units.
- Particulate Matter Standards, Control of Visible Emissions from Stationary Sources, OAC 3745-17-07(A), which sets visible particulate emission limitations for stacks. Visible particulate emissions from any stack cannot exceed 20 percent opacity, as a 6-minute average.
- Air Quality Standards, Control of Emissions of Organic Materials from Stationary Sources, OAC 3745-21-07(G)(2), which sets a discharge limit of 40 pounds of organic material per day, and no more than 8 pounds per hour, for any article; machine; equipment; or other contrivance used for applying, evaporating, or drying; and photochemically reactive material unless the discharge has been reduced by at least 85 percent.
- Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, Miscellaneous Units, 40 CFR 264.601 through .603, and OAC 3745-57-91 through 93, which requires that miscellaneous units be designed, operated, and maintained to prevent releases to the air pathway. Monitoring may be necessary to evaluate the effectiveness of air emission controls. Operable Unit 1 remedial actions may require the use of miscellaneous units for the management or treatment of RCRA-regulated hazardous waste.
- Permit to Install New Sources, Criteria for Decision by Director, OAC 3745-31-05(A)(3), which requires the use of BAT when installing, modifying, and operating an air contaminant source. Any treatment units for remediation activities will be designed to include BAT.
- General Provisions on Air Pollution Control, Malfunction of Equipment, Scheduled Maintenance, Reporting, OAC 3745-15-06(A)(1) and (2), which require scheduled maintenance of air pollution control equipment in order to prevent a malfunction. Shutdown of the operating unit, if required to conduct the maintenance, must be accompanied by the shutdown of the associated air pollution sources. Project-specific remedial design and remedial action work plans will include a maintenance program to address this requirement.
- Ohio Standards for Active and Inactive Asbestos Disposal Sites, OAC 3745-20-06 and OAC 3745-20-07(A) and (C), which prohibit visible emissions of asbestos during and after placement. Asbestos management is primarily limited to asbestos removal conducted prior to building demolition and disposal either off-site or in the on-site disposal facility. The visible emission standard for asbestos is closely tied to asbestos management, and is not within the scope of the IEMP.

Table 6-1 lists all of the requirements above and includes each of the air assessment regulatory requirements to be conducted under the IEMP and the associated assessment designed to comply with each requirement. Table 6-1 also lists each regulatory driver for project-specific air monitoring, the monitoring conducted to meet the requirement, and the project-specific plan that will describe the monitoring program. Sections 6.6 and 8.0 outline the current and long-range plan for complying with the reporting requirements invoked by the IEMP regulatory drivers.

6.3 BOUNDARY DEFINITION

This section identifies the programmatic boundaries established between the IEMP and the project-specific activities. The intent behind the boundary definition is to clearly delineate the scope of the IEMP's monitoring responsibility and establish a recognized interface between the sitewide focus of the IEMP and the fugitive and point source emission control focus of the project-specific monitoring.

The program boundaries for air monitoring are defined in the following two fundamental areas:

Fugitive Emissions Monitoring

As stated, the air assessment program for 2006 will consist of air monitoring as the vehicle for demonstrating compliance with the NESHAP Subpart H limit, ensuring that no member of the public receives an effective dose equivalent in excess of 10 mrem/year from radionuclide emissions (excluding radon) as a result of Fernald site operations. As such, the air monitoring approach presented in this plan will provide a continual assessment of the collective effectiveness of fugitive and point source emissions from the site relative to this health protective standard. Each project is responsible for controlling fugitive dust to comply with the BAT determination for the Fernald site. The standards and control techniques are provided in Fugitive Dust Control Requirements, which has been approved by OEPA. This procedure outlines the administrative and engineered controls for mitigating fugitive dust. Additional air monitoring at the project level to determine the effectiveness of specific administrative and engineered controls for fugitive dust abatement (above those required under the BAT determination) are not necessary to ensure protection of the public or support compliance with NESHAP Subpart H. However, the air monitoring information maintained by the projects will be used as necessary to support the data interpretations conducted through the IEMP. Likewise, the air monitoring data collected through the IEMP will be used to provide continual feedback to the remediation projects on the effectiveness of emission controls.

TABLE 6-1
FERNALD SITE AIR MONITORING PROGRAM
REGULATORY DRIVERS AND RESPONSIBILITIES

	DRIVER	ACTION
IEMP	DOE Order 5400.1, General Environmental Protection Program Environmental Monitoring Plan for all media	The IEMP describes effluent and surveillance monitoring as required by DOE Order 5400.1.
	DOE Order 5400.5, Proposed 10 CFR 834 Radiation Protection of the Public and Environment	The IEMP describes on-site and off-site monitoring for radon and other radionuclides, and monitoring to determine annual dose from the air pathway.
	NESHAP 40 CFR 61, H Emission Standards for Radionuclides (excluding radon)	The IEMP includes an assessment of the annual dose to the public from the air pathway.
	Federal Facility Agreement Control and Abatement of Radon-222 Emissions	The IEMP includes radon monitoring at the Operable Unit 4 Silos and the Operable Unit 1 waste pits through project completion of the remedial action.
	DOE Order 435.1, Radioactive Waste Management	The IEMP fenceline air monitoring includes air monitoring at locations adjacent to the on-site disposal facility.

TABLE 6-1
(Continued)

	DRIVER	ACTION	PROJECT PLAN
PROJECT	NESHAP 40 CFR 61, Q, Emission Standards for Radon for Storage and Disposal Units or Areas	Radon monitoring at Operable Units 1 and 4 storage and disposal units through project completion of remedial action.	Operable Unit 1 Remedial Design/Remedial Action Documents Package; Operable Unit 4 Remedial Design Packages
	OAC 3745-17-11, Ohio Particulate Matter Standards Industrial Processes	Visible emission monitoring for Operable Unit 1 waste pit treatment unit stacks/vents and Operable Unit 4 treatment units, as determined necessary to ensure compliance with the standard.	Operable Unit 1 Remedial Design/Remedial Action Documents Package; Operable Unit 4 Remedial Design Packages
	40 CFR 264.601-.603; OAC 3745-57-91 through 93, Miscellaneous Hazardous Waste Management Units	Monitoring at vents/stacks at Operable Unit 1 hazardous waste treatment of storage units, as determined necessary by modeling.	Operable Unit 1 Remedial Design/Remedial Action Documents Package
	OAC 3745-31-05(A)(3), BAT for New Air Sources	Air monitoring at stacks/vents for Operable Units 1 and 4 treatment units, as determined necessary to ensure compliance with the standard.	Operable Unit 1 Remedial Design/Remedial Action Documents Package; Operable Unit 4 Remedial Design Packages

TABLE 6-1
(Continued)

	DRIVER	ACTION	PROJECT PLAN
PROJECT - FUGITIVE DUST CONTROL	OAC 3745-17-07(a), Ohio Particulate Matter Standards Visible Particulate Emissions for Stacks	Visible emission monitoring for Operable Unit 1 waste pit treatment unit stacks/vents and Operable Unit 4 treatment units, as determined necessary to ensure compliance with the standard.	Operable Unit 1 Remedial Design/Remedial Action Documents Package; Operable Unit 4 Remedial Design Packages
	OAC 3745-21-07(G)(2), Ohio Air Quality Standards for Organics	Air monitoring at stacks/vents for Operable Unit 1 treatment units, as determined necessary by modeling.	Operable Unit 1 Remedial Design/Remedial Action Documents Package
	OAC 3745-31-05(A)(3), BAT for New Air Sources	Visible emission monitoring for roadways and parking areas, and storage piles associated with the Operable Unit 1 waste pits, soil excavation, and on-site disposal facility projects, and other construction activities as determined necessary to ensure compliance with the standard.	BAT Determination for Remedial Construction Activities at the Fernald Site
	OAC 3745-15-07; ORC 3704.01-.05, Ohio General Provisions on Air Pollution Control, Prohibition of Public Nuisance	Visible fugitive emission monitoring for waste pit excavation, soil excavation areas, and on-site disposal facility construction and waste placement as determined necessary to ensure compliance with the standard.	BAT Determination; Sitewide Excavation Plan
	OAC 3745-17-08, Ohio Emissions of Particulate Matter Control of Emissions of Fugitive Dust	Visible fugitive emission monitoring for waste pit excavation, soil excavation areas, and on-site disposal facility construction and waste placement as determined necessary to ensure compliance with the standard.	BAT Determination; Sitewide Excavation Plan; On-site Disposal Facility Impacted Materials Placement Plan; and Borrow Area Management and Restoration Plan
	OAC 3745-17-07(B)(4) through (6), Ohio Emissions of Particulate Matter Roadways, Parking Areas, and Storage Piles	Visible emission monitoring for roadways, parking areas, and storage piles associated with the Operable Unit 1 waste pits, soil excavation, and on-site disposal facility.	BAT Determination; Operable Unit 1 Remedial Action Documents Package; Sitewide Excavation Plan

Point Source Monitoring

Point source monitoring (i.e., monitoring stacks and vents) is designated as a remediation project responsibility due to the direct emission and process control nature of this monitoring activity. The technical approach and design of stack monitoring systems will be an integral part of the process control scheme and overall system design for existing and future remediation treatment units (e.g., the Silos Projects). The data collected from stack monitoring systems, including radon and particulate data, will provide critical information that will serve as process control feedback on unit operations. As such, the individual remediation project responsible for the process must maintain responsibility for the monitoring system design and operation. However, as discussed in Section 1.0, the data collected from point source emissions will be integrated into the IEMP reporting framework as necessary to support sitewide data interpretations.

6.4 PROGRAM EXPECTATIONS AND DESIGN CONSIDERATIONS

6.4.1 Program Expectations

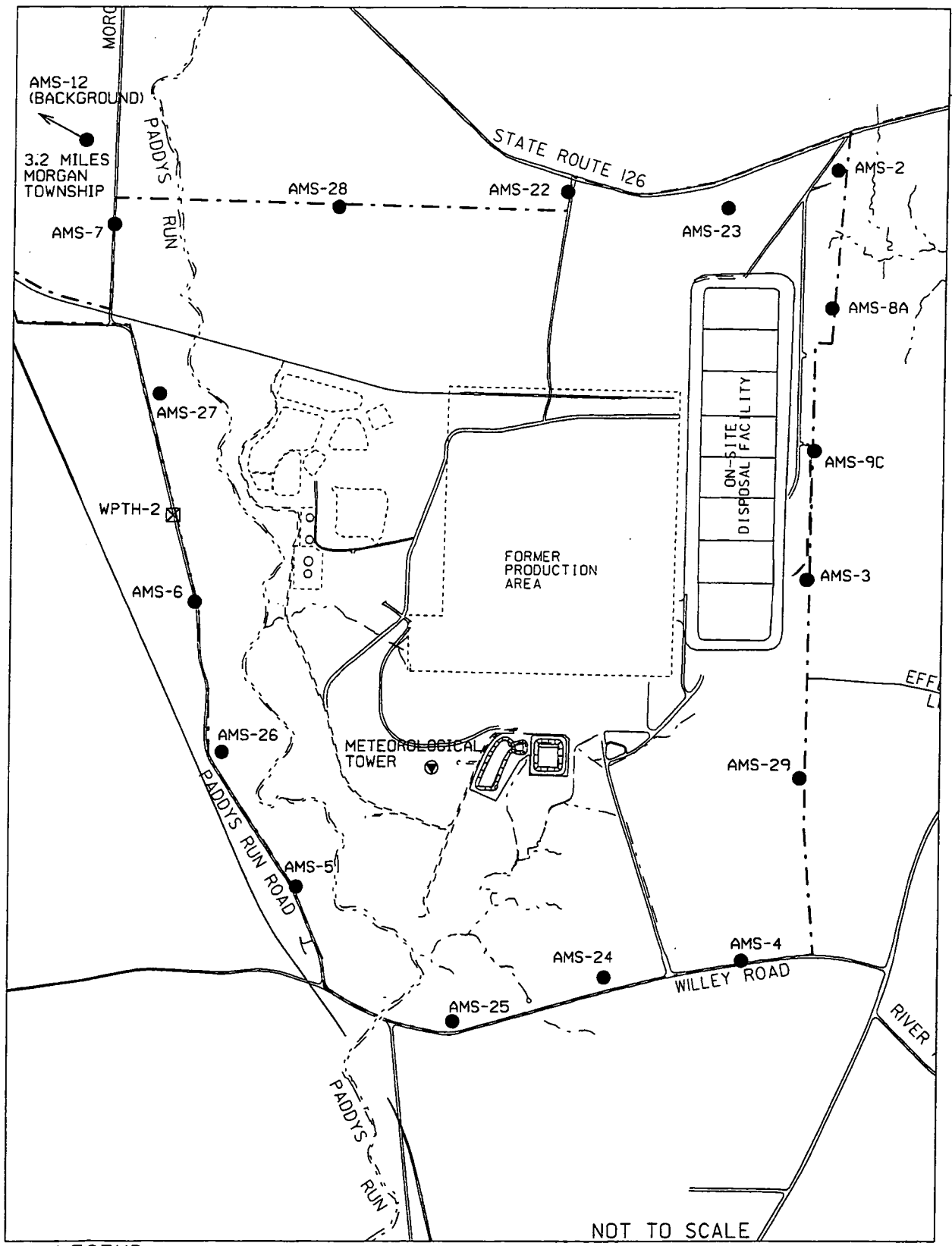
The IEMP air assessment program has been designed to collect data sufficient to meet the following expectations for 2006:

- Provide a program that will provide a continual assessment of the collective emissions accompanying multiple concurrent remediation projects to determine if the emissions are ALARA, and provide necessary early-warning feedback regarding the cumulative sitewide effectiveness of project-specific emission controls relative to applicable protective health standards
- Provide assessment data sufficient to demonstrate compliance with 40 CFR 61 Subpart H requirements ensuring that no member of the public receives an annual effective dose equivalent in excess of 10 mrem
- Provide data sufficient to determine compliance with the radon concentration limits of DOE Order 5400.5 and 10 CFR 834
- Provide measurements of direct radiation sufficient to support the annual dose assessment calculations required by DOE Order 5400.5 accounting for all significant exposure pathways
- Provide a program that promotes the continued confidence of the public and is responsive to concerns raised by stakeholders regarding forthcoming remediation activities

6.4.2 Design Considerations

The air assessment program is comprised of three distinct components:

- Radiological air particulate monitoring
- Air dispersion modeling
- Direct radiation monitoring.



LEGEND:

- FERNALD SITE BOUNDARY
- AMS LOCATION
- DISTANCE FROM CENTER OF FORMER PRODUCTION AREA TO AMS LOCATION OFF MAP
- THORIUM MONITOR LOCATION

FINAL

FIGURE 6-1. IEMP AIR MONITORING LOCATIONS

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Each component of the sitewide air assessment program is designed to address a unique aspect of air pathway monitoring, and as such, reflects distinct sampling methodologies and analytical procedures. The following sections and Appendix C provide a detailed discussion on the design of the IEMP air assessment program.

6.4.2.1 Radiological Air Particulate Monitoring Design Summary

The radiological air particulate monitoring program for 2006 is designed to fulfill the following primary program expectations:

- Provide a continual assessment of the collective emissions accompanying multiple concurrent remediation projects to determine if the emissions are ALARA, and provide necessary early-warning feedback regarding the cumulative sitewide effectiveness of project-specific emission controls relative to the health protective NESHAP standard of 10 mrem
- Provide sufficient monitoring data to demonstrate compliance with 40 CFR 61 Subpart H requirements ensuring that no member of the public receives an annual effective dose equivalent greater than 10 mrem.

To meet these expectations during 2006, the program design is based on taking direct measurements of radionuclide concentrations in the environment at the site boundary and a background location (refer to Figure 6-1). A network of high-volume air monitoring stations has been established, based on the location of the potential off-site receptors and in consideration of the 16 primary wind rose sectors (refer to Figure 6-2). In addition, there is one background monitor and one project monitor included in this total. The Environmental Regulatory Guide for Radiological Effluent Monitoring and EPA siting criteria (40 CFR 58, Appendix E) were considered when selecting these locations.

The sampling and analysis plan for air particulate monitoring program is designed to meet the following two fundamental criteria:

- Provide routine analysis that supports a timely evaluation of the effectiveness of sitewide emission controls
- Account for the major contributors to dose as defined in 40 CFR 61.93(b)(5)(ii).

Based on these criteria, the sampling and analysis frequency for the radiological air particulate monitoring program for 2006 consists of the following:

- Biweekly Uranium and Total Particulate Samples

  Filters will be exchanged biweekly at all air monitoring stations and will be analyzed for total uranium and total particulate. The data will provide the basis for conducting an ongoing assessment of the effectiveness of sitewide emission controls. The results of this assessment will be routinely provided as feedback to the remediation projects in order to support timely project decision making as necessary. Section 6.6 presents the data evaluation process.

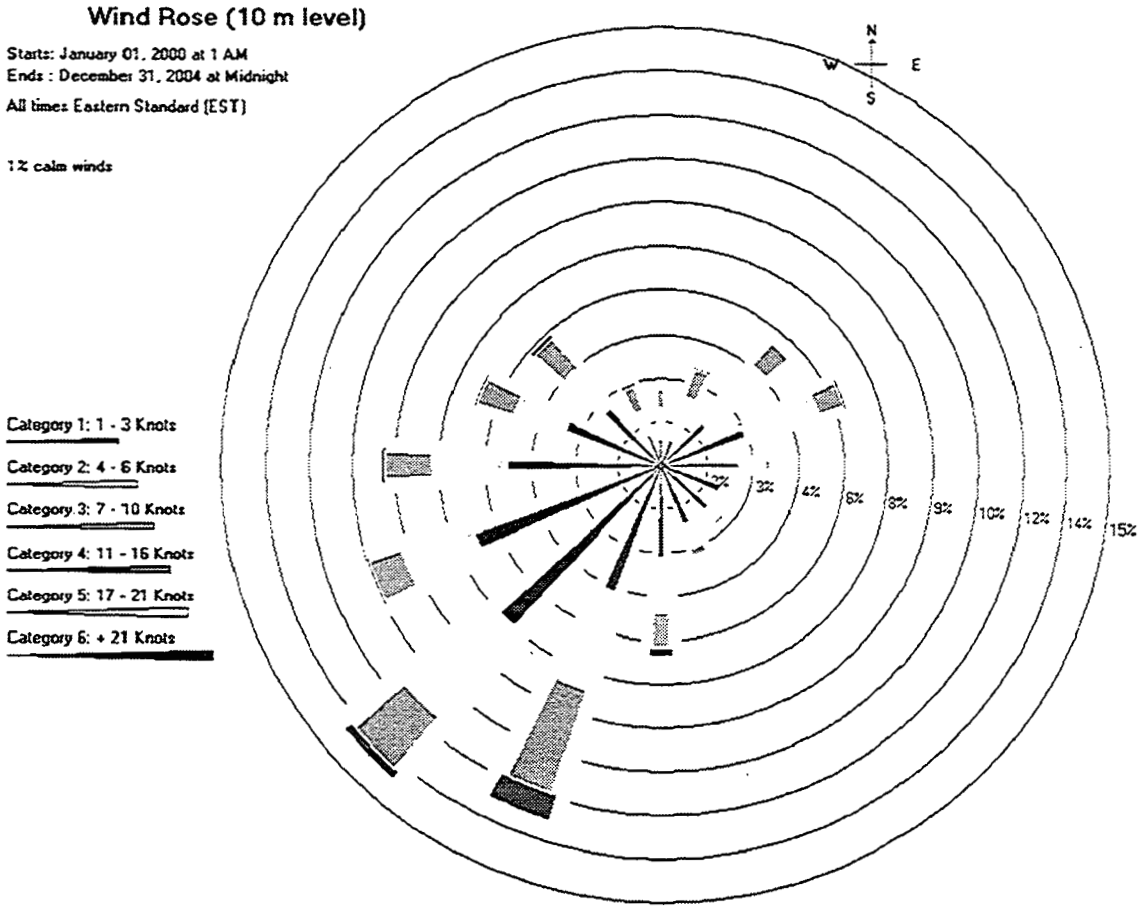


FIGURE 6-2. AVERAGE FERNALD SITE WIND ROSE DATA, 2000-2004

Uranium represents the most pervasive contaminant at the site; it can be analyzed quickly, reliably, and inexpensively, and is expected to be one of the major contributors to dose (in addition to radium-226) based on the remediation activities scheduled over the next year.

The total particulate data will be used to evaluate particulate loading on the filters. The particulate loading will be monitored to ensure that acceptable flow rates are maintained through the filter. If loading becomes excessive due to increased activity at the site and in the surrounding community, then adjustments will be made to the sampling frequency.

- Monthly Thorium Sampling

  During certain remediation projects, thorium may surpass uranium or radium as the major contributor dose. Although thorium isotopes are analyzed quarterly at AMS-2 through AMS-29, continued analysis at the monthly frequency was judged necessary in order to confirm thorium levels at the site boundary remain at low levels for the duration of the Silo 3 remediation project. Therefore, a portion of the biweekly filters from AMS-2 through AMS-29 will be used to form a monthly composite sample (except for the last month of the calendar quarter when quarterly composites are formed) that will be analyzed for isotopic thorium, isotopic uranium, and radium-226.

- Quarterly Composite Sampling

  A portion of each biweekly sample will be used to form a quarterly composite sample for each air monitoring station. The quarterly composite samples will be analyzed at an off-site laboratory for the expected major contributors to dose, including uranium-238, uranium-235/236, uranium-234, thorium-232, thorium-230, thorium-228, and radium-226. The results of the quarterly composite data will be used to track compliance against the NESHAP Subpart H standard. The data will also be incorporated into the ongoing evaluation of emission controls.

The key isotopes selected for quarterly analysis represent the major contributors to dose based on the following considerations:

- Radionuclides which are stored in large quantities at the Fernald site and which will be handled or processed during the remediation effort (uranium, thorium-230, thorium-232, and radium-226)
- Radionuclides which have been the major contributors to dose based on environmental and stack filter measurements (uranium and thorium-230)
- Radionuclides which, due to their concentration in waste and contaminated soil, will be the major contributors to dose if the waste or soil is released in the form of fugitive dust (uranium, thorium-228, and thorium-230).

Additional technical information supporting the sampling and analysis plan presented here is provided in Appendix C. Table 6-2 presents a summary of the analytical and sampling information provided above.

TABLE 6-2

SAMPLING AND ANALYTICAL SUMMARY FOR RADIOLOGICAL AIR PARTICULATE SAMPLES

Locations	Constituent	Sample Matrix	Sample Frequency	AS[a]	Detection Level	Container
AMS-2 through AMS-29	Total Uranium	Air	Biweekly	B	2 µg/filter	20 cm x 25 cm polypropylene 0.3 µm filter
AMS-2 through AMS-29, and WPTH-2	Total Particulate	Air	Biweekly	A	NA[b]	20 cm x 25 cm polypropylene 0.3 µm filter
AMS-2 through AMS-29, and WPTH-2	Thorium-228 Thorium-230 Thorium-232	Air	Monthly (2 months per quarter)	E	0.4 pCi/filter	NA[b]
AMS-2 through AMS-29	Uranium-234 Uranium-235/236 Uranium-238 Thorium-228 Thorium-230 Thorium-232 Radium-226	Air	Quarterly composite	E	$9x10^{-5}$ pCi/m3 $9x10^{-5}$ pCi/m3 $9x10^{-5}$ pCi/m3 $7x10^{-6}$ pCi/m3 $7x10^{-6}$ pCi/m3 $7x10^{-6}$ pCi/m3 $2x10^{-4}$ pCi/m3	NA[b]

[a]The ASL may become more conservative if it is necessary to meet detection limits or data quality objectives.
[b]NA = not applicable

6.4.2.2 Radon Monitoring Design Summary

The radon monitoring component of the IEMP program is designed to collect environmental radon measurements in order to gauge emissions from radon-generating materials contained or processed on site. The monitoring design is influenced by the radon concentration limits established in DOE Order 5400.5 and Proposed 10 CFR 835, and satisfies FFA-mandated monitoring requirements. Continuous environmental radon monitors collect data representing the short-term fluctuations in radon concentrations. These monitors are placed at various locations on site, at the Fernald site boundary, and at an off-site background location. The monitoring locations reflect DOE guidance for siting environmental samplers. Figure 6-3 depicts the locations of continuous alpha scintillation monitors.

Data from the monitors are used to assess compliance with the following limits outlined in DOE Order 5400.5 and Proposed 10 CFR 834:

- 100 pCi/L at any given location and any given time
- Annual average concentration of 30 pCi/L (above background) over the facility
- Annual average concentration of 0.5 pCi/L (above background) at and beyond the Fernald site boundary (Proposed 10 CFR 834).

The radon monitoring program uses a network of continuous environmental radon monitors: 16 collocated with the air particulate monitors at the site boundary, one collocated at the background location, and nine located on site to measure ambient radon concentrations.

Table 6-3 summarizes the sampling and analysis plan for the radon monitoring program.

TABLE 6-3
SAMPLING ANALYTICAL SUMMARY FOR CONTINUOUS RADON DETECTORS

Constituent	Sample Matrix	Sample Frequency	ASL	Holding Time	Preservative	Detection Level	Detection Method
Radon-222	Air	Continuous/24 hours	A	NA[a]	NA[a]	0.05 to 0.15 pCi/L	Alpha Scintillation

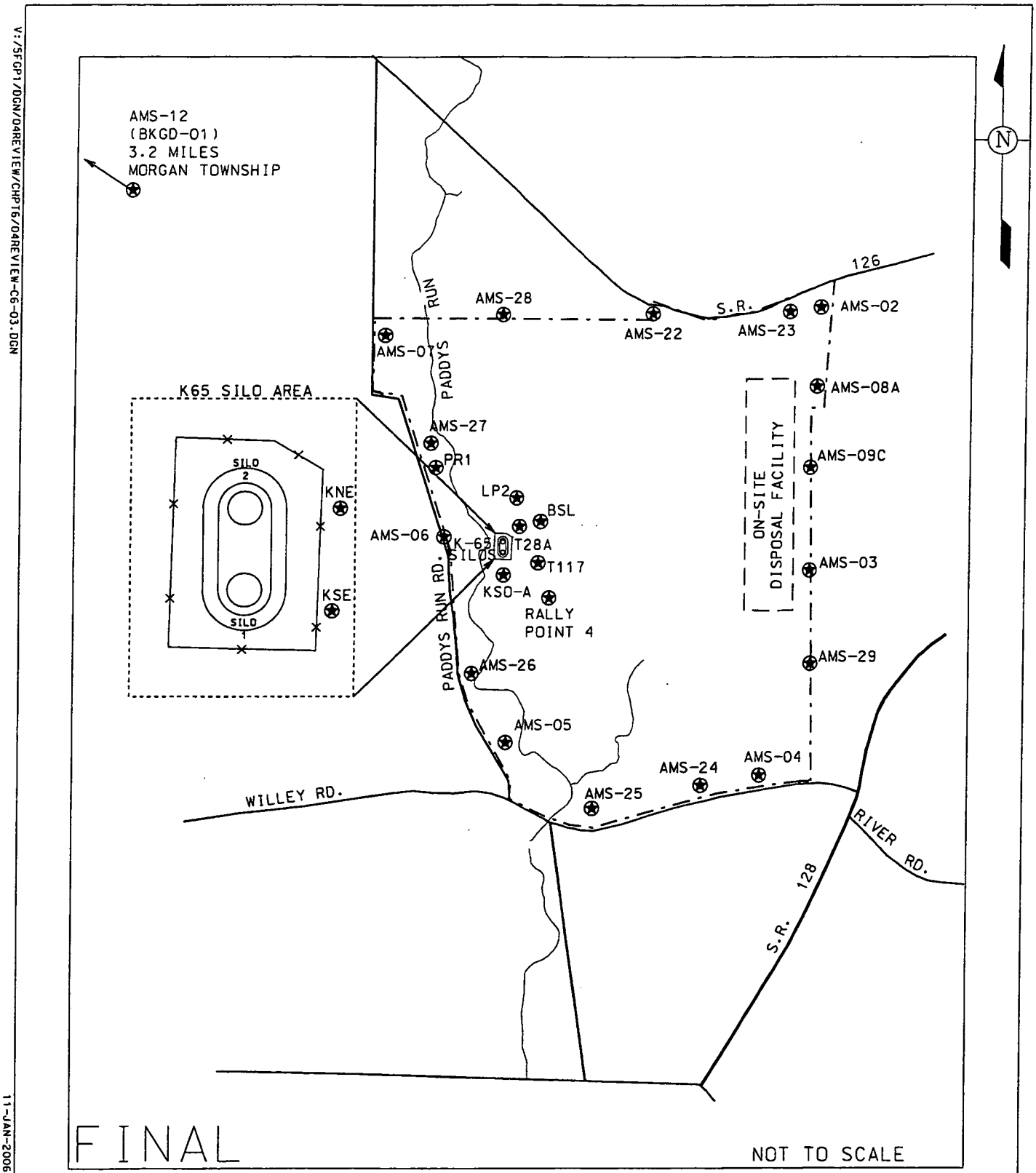
[a]NA = not applicable

Locations near the Silos Project fulfill the need to monitor both the instantaneous ambient 100-pCi/L radon limit as well as the 30-pCi/L annual limit for facilities. Site boundary monitors are collocated with the high-volume air particulate samplers and fulfill the Proposed 10 CFR 834 monitoring and reporting requirements.

The instrument background is the combination of the laboratory-determined count rate for a specific electronic instrument (also known as electronic noise), and any counts from trace radioactive decay products and impurities found in the scintillation material of the continuous radon monitor as measured in a radon-free environment. Instrument background is subtracted from the measurement data prior to comparing data from site boundary and on-site monitors to data from the background monitor. Instrument background corrected data will be presented in IEMP summary reports.

6.4.2.3 Direct Radiation Monitoring Design Summary

The direct radiation monitoring component of the IEMP program is designed to collect measurements of environmental radiation levels resulting from radioactive materials on site. This is accomplished using a network of environmental thermoluminescent dosimeters (TLDs): 16 collocated with the air particulate monitors at the site boundary, five additional locations on Paddys Run Road, five background locations, and two located on site to measure ambient radiation levels. Figure 6-4 identifies the TLD monitoring locations.



LEGEND:

— · — · — FERNALD SITE BOUNDARY

⊛ ENVIRONMENTAL RADON MONITORING - CONTINUOUS ALPHA SCINTILLATION LOCATION

⊛ DISTANCE FROM CENTER OF FORMER PRODUCTION AREA TO LOCATION OFF MAP

FIGURE 6-3. RADON MONITORING - CONTINUOUS ALPHA SCINTILLATION LOCATIONS

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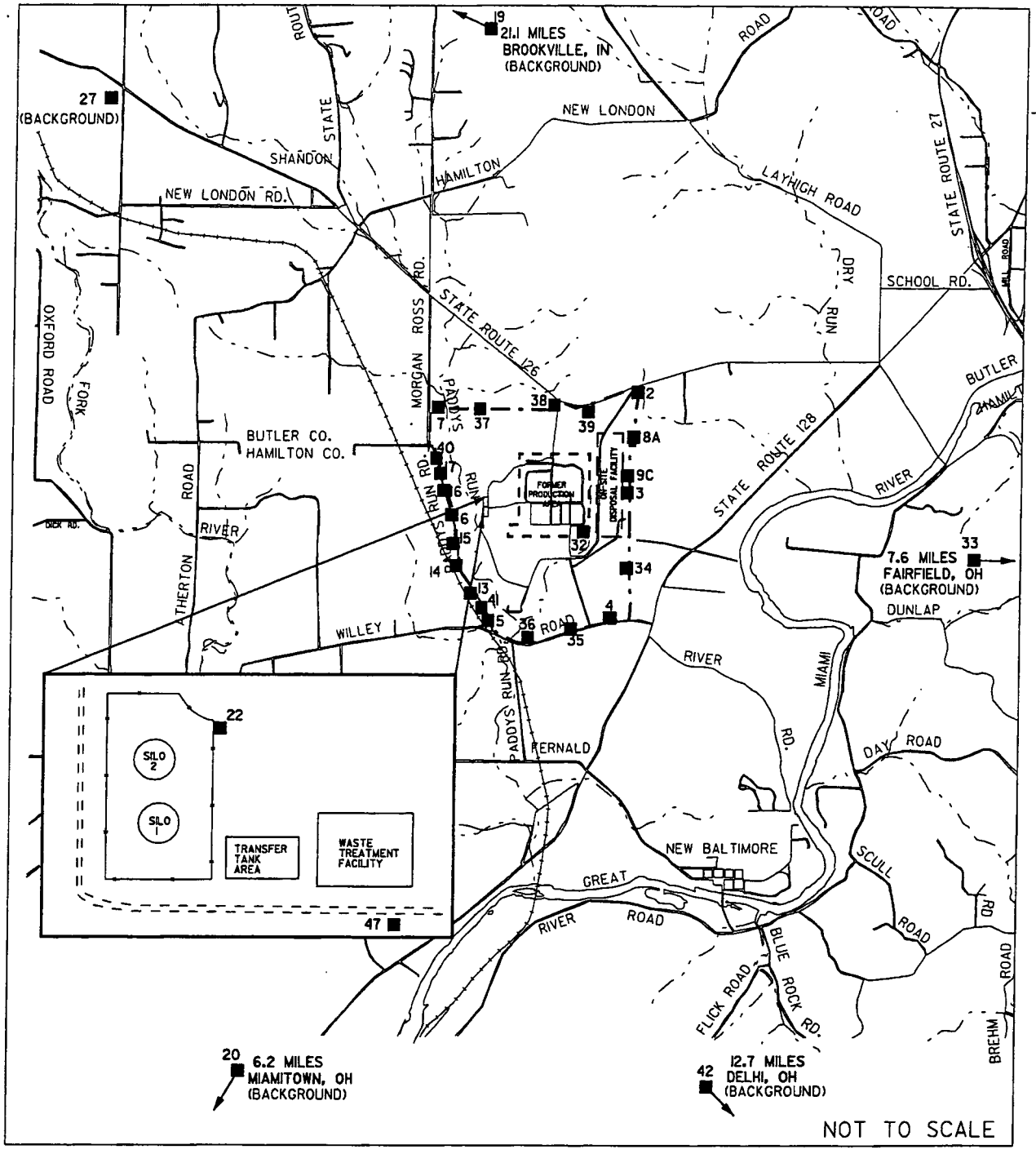

LEGEND:

DISTANCE FROM CENTER OF FORMER PRODUCTION AREA TO SAMPLE LOCATIONS OFF MAP

FERNALD SITE BOUNDARY

DIRECT RADIATION (TLD) MONITORING LOCATION

FINAL

FIGURE 6-4. DIRECT RADIATION (THERMOLUMINESCENT DOSIMETER) MONITORING LOCATIONS

V:/SFGPI/DGN/04REVIEW/04REVIEW-C6-01.DGN.DGN
11-24-99

The network of TLDs provides a mechanism to measure and track ambient radiation levels at the Fernald site boundary from gamma-emitting radioactive materials (primarily radium-226, thorium-232, and their decay products) that are handled and processed during remediation.

Three individual TLDs are placed at each location in order to assess the precision of the data. The TLDs are placed 1 meter above the ground and exchanged quarterly in accordance with industry standards and DOE guidance. The TLDs are processed at the DOE Laboratory Accreditation Program-approved laboratory.

Data from the TLDs are used to assess the direct radiation component of the air pathway dose calculation (refer to Appendix C). Table 6-4 summarizes the sampling and analysis plan for the direct radiation monitoring program.

TABLE 6-4
ANALYTICAL SUMMARY FOR DIRECT RADIATION (TLD)

Analyte	Sample Matrix	Sample Frequency	ASL[a]	Holding Time	Preservative	Detection Level	Container
Gamma Radiation (TLD)	TLD	Quarterly	B	NA[b]	NA[b]	5 mrem	NA[b]

[a]The ASL may become more conservative if it is necessary to meet detection limits or data quality objectives.
[b]NA = not applicable

6.4.2.4 Meteorological Monitoring Program Design Summary

Although not a distinct component of the existing sitewide air monitoring program, the meteorological monitoring program is designed to provide data on the atmospheric conditions that influence the dispersion and transport of contaminants in the air pathway. This program provides critical information for the evaluation and interpretation of air monitoring data. The meteorological monitoring program also supports the design and operation of the IEMP air monitoring program and, as such, is included in this section.

The meteorological monitoring system consists of a single 60-meter meteorological tower located west of the Storm Water Retention Basin (refer to Figure 6-1). Monitoring instruments record wind speed, wind direction, temperature, barometric pressure, precipitation, and store 1-minute and 15-minute average data on the meteorological database. The system has been developed based on the requirements of DOE Order 5400.5 and DOE guidance, and complies with industry standards for calibration and data recovery.

Meteorological data are used in the evaluation and interpretation of environmental data collected from air, radon, and project-specific monitoring. Short-term meteorological data will be used to relate air monitoring results to specific projects, when necessary. For example, if the results from a specific monitor are higher than expected, then the monitoring result would be evaluated using the wind rose developed from meteorological measurements collected during the monitoring period. A remediation project upwind of the monitor during the monitoring period would then be considered a possible source of the higher-than-expected results.

With the anticipated completion of all major remediation projects in 2006, the meteorological monitoring system is scheduled for removal from service. After the system is removed from service, appropriate meteorological data will be obtained from local weather stations through the National Weather Service or the Greater Cincinnati Mesonet (automated local meteorological data), as necessary. Additionally, DOE will notify EPA and OEPA for approval prior to removal of the site meteorological tower.

6.5 MEDIUM-SPECIFIC PLAN FOR SITEWIDE ENVIRONMENTAL AIR MONITORING

This section serves as the medium-specific plan for implementation of the sampling, analytical, and data management activities associated with the sitewide environmental air monitoring program. The program expectations and design presented in Section 6.4 were used as the framework for developing the monitoring approach presented in this section. The activities described herein were designed to provide environmental data of sufficient quality to meet the intended data use as described in the program design in Section 6.4.2. All sampling procedures and analytical protocols described or referenced in this medium-specific plan are consistent with the requirements of the SCQ.

The sitewide environmental air assessment program is comprised of the following three distinct components:

- Radiological air particulate monitoring
- Radon monitoring
- Direct radiation monitoring.

The sampling and analytical aspects of each component are unique; therefore, this medium-specific plan is organized to present a separate discussion of the sampling program for each component. The subsections of this medium-specific plan define the following:

- Program organization and associated responsibilities
- Sampling programs (radiological air particulate, radon, and direct radiation)
- Change control
- Health and safety
- Data management
- Project quality assurance.

6.5.1 Project Organization

A multi-disciplined project organization has been established and assigned responsibility to effectively implement and manage the project planning, sample collection and analysis, and data management activities directed in this medium-specific plan. The key positions and associated responsibilities required for successful implementation are described as follows.

The project team leader will have full responsibility and authority for the implementation of this medium-specific plan in compliance with all regulatory specifications and sitewide programmatic requirements. Integration and coordination of all medium-specific plan activities defined herein with other project organizations are also key responsibilities. All changes to project activities must be approved by the project team leader or designee.

Health and safety are the responsibility of all individuals working on this project scope. Qualified Health and Safety specialists shall participate on the project team to provide radiation protection and industrial hygiene support, and assist in preparing and obtaining all applicable permits. In addition, safety specialists shall periodically review and update the project-specific health and safety documents and operating procedures; conduct pertinent safety briefings; and assist in evaluation and resolution of all safety concerns.

Quality Assurance specialists will participate on the project team as necessary to review project procedures and activities ensuring consistency with the requirements of the SCQ or other referenced standards and assist in evaluating and resolving all quality related concerns.

6.5.2 Sampling Program – Radiological Air Particulates

This sampling program is designed to collect radiological air particulate data that are representative of ambient air conditions at the Fernald site boundary (refer to Figure 6-1). The data collected under this program will be used to assess the collective effect of concurrent remediation activities on the air pathway; provide continual feedback to the remediation projects on the effectiveness of emission controls; and provide a monitoring basis to support the implementation and track the effectiveness of corrective actions, as necessary. As such, field procedures and analytical methods are designed to support the necessary level of data quality.

The monitoring design incorporates a network of 18 high-volume continuous air monitoring stations. Filter media collected biweekly for AMS-2 through AMS-29 will be analyzed for total uranium and total

particulate at ASL B; the project monitor WPTH-2 will be analyzed for total particulates. ASL B provides qualitative, semi-qualitative, and quantitative data with some quality assurance/quality control checks. A portion of each filter is retained for a monthly composite sample, which is analyzed at ASL E at an off-site laboratory. The remainder of the filter sample is retained for a quarterly composite sample, which is analyzed at ASL E, also by an off-site laboratory, for those radionuclides expected to be the major contributors to dose. For the monthly and quarterly composites, ASL E provides quantitative data with fully defined quality assurance/quality control and complete data packages, including raw data, and requires lower detection levels than ASL B. Section 6.4.2.1 and Appendix C provide greater detail on the sampling design.

Sample analysis will be performed at a contract laboratory. The laboratories used for analytical testing must be approved in accordance with the criteria specified in Sections 3.1.5 and 12.4, and Appendix E of the SCQ. These criteria include meeting the requirements for performance evaluation samples, pre-acceptance audits, performance audits, and an internal quality assurance program. A list of approved laboratories and the current status of each is maintained by the FCP Quality Assurance organization.

6.5.2.1 Sampling Procedures – Radiological Air Particulates

The air filters from the high-volume air monitoring stations are collected and analyzed according to the following procedures, which incorporate the requirements of the SCQ listed below and the Environmental Regulatory Guide for Radiological Effluent Monitoring:

Standard Operating Procedure	
ADM-02	Field Project Prerequisites (DOE 2005b)
SMPL-08	High Volume Air Monitoring (DOE 2003d)
EQT-18	Calibration of Graseby GMW High-Volume Air Sampler (DOE 2004b)
ADM-09	Air Monitoring Data Review and Analysis (DOE 2004a)
EW-0002	Chain of Custody/Request for Analysis Record for Sample Control (DOE 2004c)

Table 6-5 provides the technical specifications for radiological air particulate monitoring using high-volume air monitoring equipment and filter media.

TABLE 6-5

TECHNICAL SPECIFICATIONS FOR RADIOLOGICAL AIR PARTICULATE MONITORING

Monitor Type	Flow Rate	Filter Type	Gauge/Meters	Indicator
High-volume continuous	45 cfm	Multi-ply polypropylene	Hours Flow Rate Set Point	Low Flow Warning Light

Sample collection is accomplished by using high-volume air monitoring stations that continuously collect samples of airborne particulates. Any changes in flow rate are accounted for by the automatic flow controller in the monitor and are documented on a flow chart recorder that continuously records flow data. Air monitoring equipment must meet the following criteria per DOE guidance and industry practice:

- Environmental air samplers shall be mounted in locked, all-weather stations with the sampler discharge positioned to prevent the recirculation of air
- The air sampling system shall have a flow-rate meter, and the total air flow or total running time should be indicated
- The air sampling rate should not vary by more than 10 percent of the monitor set point of 45 cfm for the collection of a given sample
- Linear flow rate across air particulate filters should be maintained between 20 and 50 meters per minute (m/min)
- Air sampling systems shall be flow-calibrated, tested, and routinely inspected according to written procedures. Flow calibration shall be at least as often as recommended by the manufacturer.

The monitors are inspected and calibrated at least once a year according to recommendations from the manufacturer. All units placed in the field are tracked via a field tracking log that tells when calibrations were last completed and the date of the next scheduled calibration. Fenceline monitors are checked daily to ensure continuous operation.

6.5.2.2 Quality Control Sampling Requirements – Radiological Air Particulates

Quality control samples will be taken according to the frequency recommended in the SCQ. These samples will be collected and analyzed in order to evaluate the possibility that some controllable practice, such as a sampling or analytical practice, may be responsible for introducing bias in the project's analytical results. The following quality assurance samples will be collected under this sampling program:

Air Particulate Samples

- One blank sample will be submitted for analysis with each batch of biweekly filters for uranium analyses and with each set of quarterly composite samples.
- The laboratory is also required to perform analyses on method blanks, matrix spikes, and laboratory control samples as required by the SCQ for the corresponding ASL and analytical method. For the quarterly composite samples analyzed under ASL E, a method blank, duplicate, matrix spike, and laboratory control sample will be analyzed for each batch of samples.

6.5.2.3 Decontamination

The decontamination of the air monitoring equipment is necessary only for those monitors deployed in the former production and waste storage areas. At a minimum, decontamination for these monitors is conducted under the radiological controls program for releasing equipment from the site. Radiological surveys are performed when equipment is required to be released for transport and/or analysis. These surveys are conducted according to established radiological control procedures.

6.5.2.4 Waste Dispositioning

Contact wastes that are generated by the field technicians during field sampling activities are collected, maintained, and dispositioned as necessary, depending upon the location of waste generation (e.g., the former production area or off site). Radiological control procedures govern the disposal of contact wastes generated during air monitoring activities.

6.5.3 Sampling Program – Radon Monitoring

This sampling program is designed to collect measurements of radon concentrations, considering the radon-generating materials contained or processed on site. Sample locations on site, at the Fernald site boundary, and off site provide representative measurements for assessing compliance with established limits. In addition, data collected will be used to assess radon concentrations both on site and at the site boundary during final remediation activities. As such, field procedures and analytical methods are designed to support the necessary level of data quality.

Data are recorded hourly and compiled into daily averages. The data from the monitors are collected at ASL A. Section 6.4.2.2 provides greater detail on sampling design.

6.5.3.1 Sampling Procedures – Radon Monitoring

The continuous environmental radon monitors are operated according to the following procedures that incorporate the requirements of the SCQ and the Environmental Regulatory Guide for Radiological Effluent Monitoring:

Standard Operating Procedure

ADM-02	Field Project Prerequisites (DOE 2005b)
SMPL-09	Pylon AB-5, Continuous Environmental Radon Monitoring (DOE 2005d)
SMPL-25	Pylon CRM-2, Continuous Environmental Radon Monitoring (DOE 2002d)
ADM-14	Evaluating Continuous Radon Monitoring Data (DOE 2005a)
ADM-09	Air Monitoring Data Review and Analysis (DOE 2004a)

Sitewide CERCLA Quality (SCQ) Assurance Project Plan

Section 4	Quality Assurance Objectives
Section 5	Field Activities
Section 6	Sampling Requirements
Section 7	Sample Custody
Section 8	Calibration Procedures and Frequency
Appendix I	Field Calibration Requirements
Appendix K	Sampling Methods

Continuous environmental radon monitors are calibrated as a unit at least once per year (as specified per sampling procedures) with National Institute of Standards and Technology traceable sources. Monitors are tracked upon deployment in the field via an equipment tracking log and field logbooks. The instrument background reading is also recorded for use in data evaluation and reporting. In addition, an equipment maintenance/calibration logbook is used to track and schedule units requiring maintenance and/or calibrations.

Table 6-3 provides a sample and analytical summary for the radon monitoring program. The continuous environmental radon monitors used at the Fernald site are alpha scintillation detectors, consisting of a continuous passive radon detector attached to either a Pylon AB-5 or CRM-2. They are passive devices, meaning radon diffuses into the continuous passive radon detector without the aid of a pump. Alpha particles generated by radioactive decay of the radon and its daughters interact with the inside surface of the detector, producing photons of light. The light photons interact with a photo-multiplier tube that generates electrical pulses. The number of pulses in a given time period is proportional to a radon concentration. The monitors are set to collect measurements of one-hour duration.

6.5.3.2 Quality Control Sampling Requirements – Radon Monitoring

Quality control practices for the continuous environmental radon monitors will be maintained per established maintenance and calibration schedules outlined in the applicable operating procedures.

Quality control data will be recorded on process control charts and only instruments demonstrating acceptable performance will be used in the field to collect data. At a minimum, the continuous environmental radon monitors will be source checked monthly. Acceptable performance is defined as generating source check results that fall within three standard deviations of the mean expected efficiency in accordance with typical industry standard practices. If the source check results for an instrument fall outside the three standard deviation control limit, then that instrument will not be used again until it is examined, repaired, and calibrated, if necessary.

6.5.4 Sampling Program – Direct Radiation (TLDs)

This sampling program is designed to measure the direct radiation at the Fernald site from locations that are representative of radiological environmental conditions at select locations on site, at the facility fenceline, and at a background location (refer to Figure 6-4). The data collected under this program will be used to assess the collective effect of current remediation activities on the air pathway. As such, field procedures and analytical methods are designed to support the necessary level of data quality.

Three TLDs are deployed quarterly at each location and submitted for analysis to a vendor laboratory. External gamma radiation measurements are recorded from each TLD. All TLDs are analyzed at ASL B.

6.5.4.1 Sampling Procedures – Direct Radiation (TLDs)

The TLDs are collected from environmental monitoring locations according to the following operating procedures that incorporate the requirements of the SCQ and the Environmental Regulatory Guide for Radiological Effluent Monitoring:

Standard Operating Procedures

ADM-02	Field Project Prerequisites (DOE 2005b)
SMPL-10	Environmental Direct Radiation Monitoring (DOE 2004d)
EW-0002	Chain of Custody/Request for Analysis Record for Sample Control (DOE 2004c)
ADM-09	Air Monitoring Data Review and Analysis (DOE 2004a)

Sitewide CERCLA Quality (SCQ) Assurance Project Plan

Section 4	Quality Assurance Objectives
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Section 7	Sample Custody
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Table 6-4 provides a sample and analytical summary for the direct radiation monitoring program.

Sample collection is accomplished using Panasonic UD-814 dosimeters or equivalent dosimeters. Environmental TLDs must meet the following criteria as per DOE guidance:

- Environmental TLDs shall be mounted at one meter above ground.
- The frequency of exchange should be based on predicted exposure rates from site operations.
- The exposure rate should be long enough (typically one calendar quarter) to produce a readily detectable dose.
- Annealing, calibration, readout, storage, and exposure periods used should be consistent with the ANSI standard recommendations.

All TLDs placed in the field are tracked via a field tracking log which tells when and where dosimeters were deployed as well as scheduled collection date.

6.5.4.2 Quality Control Sampling Requirements – Direct Radiation (TLDs)

Quality control samples will be collected and analyzed in order to evaluate the possibility that some controllable practice, such as sampling or analytical practice, may be responsible for introducing bias in the project's analytical results. Quarterly data from the three TLDs at each location must agree within 15 percent or will be considered suspect and invalid data. The following quality assurance practices will be conducted under this sampling program:

- TLD reader is calibrated semiannually and quality control checks are performed prior to reading each batch of TLDs.
- Quarterly, spiked dosimeters with a known amount of gamma radiation are submitted for analysis (agreement within 25 percent of known dose).
- The Fernald site will participate in inter-laboratory comparisons conducted by DOE. The comparison studies require the Fernald site to submit a set of TLDs that are then exposed (along with TLDs from other study participants) to a known amount of environmental radiation. The TLDs are then returned to the Fernald site for processing. The results from all participants are then compared to known value of radiation and the 30 percent performance specification from ANSI-N545 (ANSI 1975).

6.5.4.3 Decontamination

Unless TLDs are collected from known areas of high contamination, decontamination of environmental TLDs is not necessary because the units are self-contained. Only the units that hold the TLD and that have been stationed in the former production area are required to undergo cleaning and decontamination if deemed necessary upon a radiological survey. Radiological surveys are performed when equipment and/or samples are required to be released from the former production area for transport and/or analysis. These surveys are conducted in accordance with established radiological control procedures.

6.5.4.4 Waste Dispositioning

Contact waste generated by the field technicians during sample collection activities is collected, maintained, and dispositioned as necessary, depending upon the location of waste generation (e.g., the former production area or off site). Contact waste generated outside of radiological control areas will be placed in a clean trash dumpster. Contact waste generated within radiological control areas will be disposed of in a designated radiological contact waste container.

6.5.5 Change Control

Changes to the medium-specific plan will be at the discretion of the project team leader. Prior to implementation of field changes, the project team leader or designee shall be informed of the proposed changes and circumstances substantiating the changes. Any changes to the medium-specific plan must have written approval by the project team leader or designee, Quality Assurance representative, and the Field Manager prior to implementation. If a Variance/Field Change Notice is required, then it will be completed according to Section 15.3 of the SCQ. The Variance/Field Change Notice form shall be issued as controlled distribution to team members and will be included in the field data package to become part of the project record.

6.5.6 Health and Safety Considerations

The FCP Health and Safety organization is responsible for the development and implementation of health and safety requirements for this medium-specific plan. Hazards (such as physical, radiological, chemical, and biological) typically encountered by personnel when performing the specified field work will be addressed during team briefings.

All involved personnel will receive adequate training to the health and safety requirements prior to implementation of the field work required by this medium-specific plan. Safety meetings will be conducted prior to beginning field work to address specific health and safety issues. All Fluor Fernald employees and subcontractor personnel who will be performing field work required by this medium-specific plan are required to have completed applicable training.

For areas that are subject to more restrictive radiological controls where the potential for exposure is greater, radiation work permits are necessary and will be obtained prior to the field work being performed in those areas. A radiological control technician will be assigned to each field crew performing any activities in an area requiring a radiation work permit.

6.5.7 Data Management

Field documentation and analytical results will meet the IEMP data reporting and quality objectives, conform to appropriate sections and appendices of the SCQ, and comply with specific site procedures, such as the Data Validation procedure.

Data documentation and validation requirements for data collected in 2006 for the IEMP fall into two categories, depending upon whether the data are field- or laboratory-generated. Field data validation will consist of verifying medium-specific plan compliance and appropriate documentation of field activities. Laboratory data validation will consist of verifying that data generated are in compliance with medium-specific plan ASLs. Specific requirements for field data documentation and validation, and laboratory data documentation and validation are in accordance with SCQ and site procedures.

There are five analytical levels (ASL A through ASL E) defined in Section 2 of the SCQ. For 2006, field data documentation will be at ASL A and laboratory data documentation will be at ASL B. For some air programs, a more conservative ASL is required for laboratory data to meet regulatory commitments in order to meet required detection limits, or to ensure data quality objectives are met. The specific air monitoring ASL requirements are detailed in the sampling programs subsections above and in Appendix C.

At a minimum, 10 percent of the IEMP data will undergo validation to ensure that analytical data are in compliance with the ASL method criteria being requested and in order to meet data quality objectives. The percentage of data validated could increase in order to meet data quality objectives.

Data will be entered into a controlled database using a double-key or other verification method to ensure accuracy. The hard copy data will be managed in the project file in accordance with FCP record keeping procedures and DOE Orders.

6.5.8 Quality Assurance

Assessments of work processes shall be conducted to verify quality of performance, and may include audits, surveillances, inspections, tests, data verification, field validation, and peer reviews. Assessments shall include performance-based evaluation of compliance to technical and procedural requirements, and corrective action effectiveness necessary to prevent defects in data quality. Assessments may be conducted at any point in the life of the project. Assessment documentation shall verify that work was conducted in accordance with IEMP, SCQ, and FCP Quality Assurance Program requirements.

Recommended quarterly quality assurance assessments or surveillances shall be performed on tasks specified in the medium-specific plan. These assessments may be in the form of independent assessments or self-assessments, with at least one independent assessment conducted annually. Independent assessments are the responsibility of designated project Quality Assurance personnel. Self-assessments are performed by project personnel in order to evaluate the overall quality of work performance. The project team leader and Quality Assurance personnel will coordinate assessment activities and comply with Section 12 of the SCQ. The project personnel or Quality Assurance representative shall have "stop work" authority if significant adverse effects to quality conditions are identified or work conditions are unsafe.

Only laboratories on the approved laboratory list will be used for sample analyses in accordance with Section 12 and Appendix E of the SCQ.

6.6 IEMP AIR MONITORING DATA EVALUATION AND REPORTING

This section provides the methods to be used in analyzing the data generated by the IEMP air assessment program in 2006. It summarizes the data evaluation process and actions associated with various monitoring results. The planned reporting structure for IEMP-generated air monitoring data in the annual site environmental report is also provided.

6.6.1 Data Evaluation

Data resulting from the IEMP air monitoring program will be evaluated to meet the program expectations identified in Section 6.4.1. Based on these expectations, the following questions will be answered for all air monitoring programs:

- Are the program and reporting requirements of DOE Order 5400.1 being met?

DOE Order 5400.1 requires that DOE implement and report on an environmental protection program for the Fernald site. The air assessment program is one component of the sitewide IEMP monitoring program. This IEMP and the annual site environmental report fulfill the requirements of this DOE Order.

- Are the program emissions ALARA?

The programs (air particulate monitoring, radon monitoring, and direct radiation monitoring) are designed to provide continual assessments of the collective emissions accompanying multiple concurrent remediation projects in order to determine if the emissions are ALARA, and provide necessary early-warning feedback regarding the cumulative sitewide effectiveness of project-specific emissions controls. Early warnings of the effectiveness of emissions controls enable the projects to focus their emission control efforts, in keeping with the ALARA philosophy.

- Are community concerns being met through the air monitoring IEMP program?

The IEMP fulfills the needs of the Fernald community by presenting air monitoring results in the annual site environmental report.

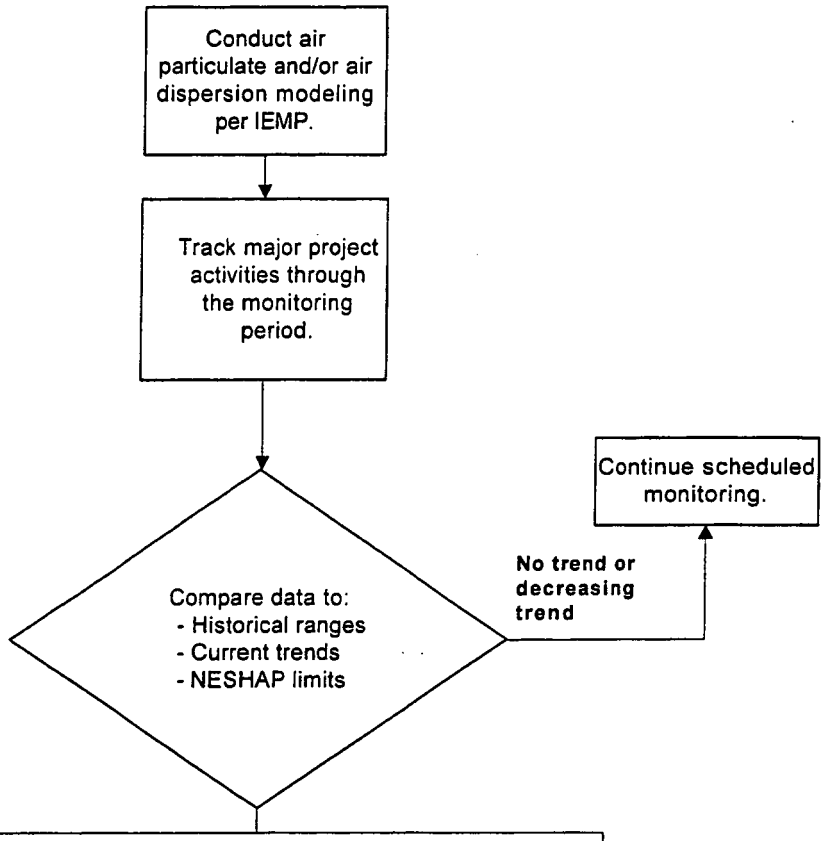
Specific air program (i.e., radiological air particulate, radon, and direct radiation) evaluation process questions are identified in the following subsection.

6.6.1.1 Radiological Air Particulate Data Evaluation

Based on the expectations in Section 6.4.1, the following questions will be answered for the radiological air particulate program:

- Are the collective emissions from multiple concurrent remediation projects ALARA and sufficient for early-warning feedback to the respective projects for emission control measures?
- Do the air inhalation dose calculations indicate potential air emissions are below the NESHAP public dose limit?

Biweekly uranium, and monthly and quarterly composite data from all air monitoring locations will be compared to historical air measurements and trend analysis will be performed to assess the collective effectiveness of emission control measures. Basic statistics, such as minimum, maximum, and mean, will be routinely generated per sample location (as the data are received from the laboratory). The data generated from individual sampling events will be trended by sample location over time via statistical methods (when sufficient data have been generated). Monitoring results will be evaluated in light of project operations active during the period and the associated meteorological conditions (e.g., wind roses, precipitation levels, etc.) in order to correlate monitoring results with upwind project activities. In addition, any project-specific monitoring and operations data will be used to support this data evaluation. If monitoring data indicate an increasing trend which, if sustained, could result in an exceedance of the 10-mrem NESHAP standard, then immediate notification will be made to the projects suspected of contributing to the increased emissions (based on the monitoring locations exhibiting the elevated results, the prevailing meteorological conditions, and project activities conducted during the sampling period) and action will be taken at the project level to further control fugitive emissions. If increasing trends are identified but indicate the NESHAP standard is not in jeopardy of being exceeded (based on current trend analysis and the anticipated schedule of project activities), then projects will review remediation activities and the application of the sitewide BAT determination for fugitive dust control to ensure all project activities are compliant. Additional fugitive dust controls may be implemented as provided for in the BAT determination based on the project review. Figure 6-5 provides a schematic of the specific



If concentration is trending above historical ranges,[a] but not expected to exceed NESHAP limit:	
IEMP Actions	Potential Project Actions
Review pertinent project-specific data. Identify probable source(s) and alert associated project(s). Continue scheduled monitoring. Report information to EPA/ OEPA in next annual report.	Review performance/ inspection data for engineered controls. Determine if emission controls meet design specifications. Estimate duration of source activities. Repair/enhance emission controls, if necessary.

[a] These determinations will be based on the significance of the trend and the projected scope and duration of the source activity.

If concentration is trending above historical ranges,[a] and potential exceedance of NESHAP limit exists:	
IEMP Action	Potential Project Action
Review pertinent project-specific data. Identify probable source(s) and alert associated project(s). Evaluate need for increasing sampling frequency and/or analytical regime to track performance of corrective actions. Make notification to EPA and OEPA (as necessary) and report information to EPA/OEPA in next annual report.	Review performance/ inspection data for engineered controls. Determine if emission controls meet design specifications. Estimate duration of source activities. Repair/enhance existing emission controls. Implement additional emission controls as necessary. Modify project schedule as necessary to limit emission rate.

FIGURE 6-5. IEMP AIR PARTICULATE DATA EVALUATION AND ASSOCIATED ACTIONS

decision-making process for the radiological air particulate monitoring program. Additionally, this information will support the collective decision-making process as outlined in Section 1.0.

- Do the results of quarterly composite radionuclide concentrations indicate that the dose limit of NESHAP Subpart H may be exceeded?

Data evaluation will consist of direct comparison of the quarterly composite data to the NESHAP Subpart H, Appendix E, Table 2 values. If, after considering the planned remediation activities for the rest of the year, exceeding the 10-mrem/year limit is likely, then increased emission control measures (modification and/or curtailment of remediation activities) will be initiated.

- Are modifications or adjustments in program focus necessary?

The quarterly composite results will be compared to the NESHAP Appendix E, Table 2 values. If the comparison indicates a contaminant other than uranium, radium, or thorium is contributing the largest percentage of dose, then modifications to the IEMP air monitoring and analytical schedule may be proposed in order to better monitor the major contributors to inhalation dose. The biweekly total particulate measurements will be used to evaluate the filter loading and may result in changes to the sampling frequency if excessive loading is observed based on total particulate concentrations in conjunction with diminishing flow rates through the filter.

6.6.1.2 Radon Data Evaluation

Data resulting from the radon monitoring program will be evaluated with respect to the program expectations identified in Section 6.4.1 and radon monitoring design summary in Section 6.4.2.2. Based on these expectations, the following questions will be answered through the radon data evaluation processes indicated by the text following each of the questions:

- Are radon concentrations below the limits set in DOE Order 5400.5 and 10 CFR 834?

Data from the alpha scintillation continuous radon monitoring locations will be compared to the annual limits (0.5 pCi/L above background at the site fenceline and 30 pCi/L sitewide), and short-term (100 pCi/L) limits of DOE Order 5400.5. The data generated from individual sampling events will be trended by sample location over time via statistical methods (when sufficient data have been generated).

If historical data are available from or near a particular IEMP sample location, then the IEMP-generated trends will be evaluated with respect to the historical trends in order to assess whether current conditions are similar to the past, increasing or decreasing. Meteorological data (e.g., wind roses and temperature inversions) from the sampling period will be used to determine which radon source is likely to have

contributed to the observed data. In addition, any project-specific monitoring and operational data from radon source areas will be used to support this data evaluation. If trends indicate that radon concentrations will exceed DOE Order 5400.5 or 10 CFR 834, then actions shown in Figure 6-6 will be implemented. Integration of radon air monitoring information generated by project-specific monitoring (i.e., the Operable Unit 4 remediation facilities) will occur as necessary in interpreting the sitewide radon data via the IEMP data evaluation process. The findings of data evaluations will be shared with project personnel. Those personnel responsible radon emission sources will be informed of the findings as indicated on Figure 6-6.

- Are modifications or adjustments in the radon program focus necessary?

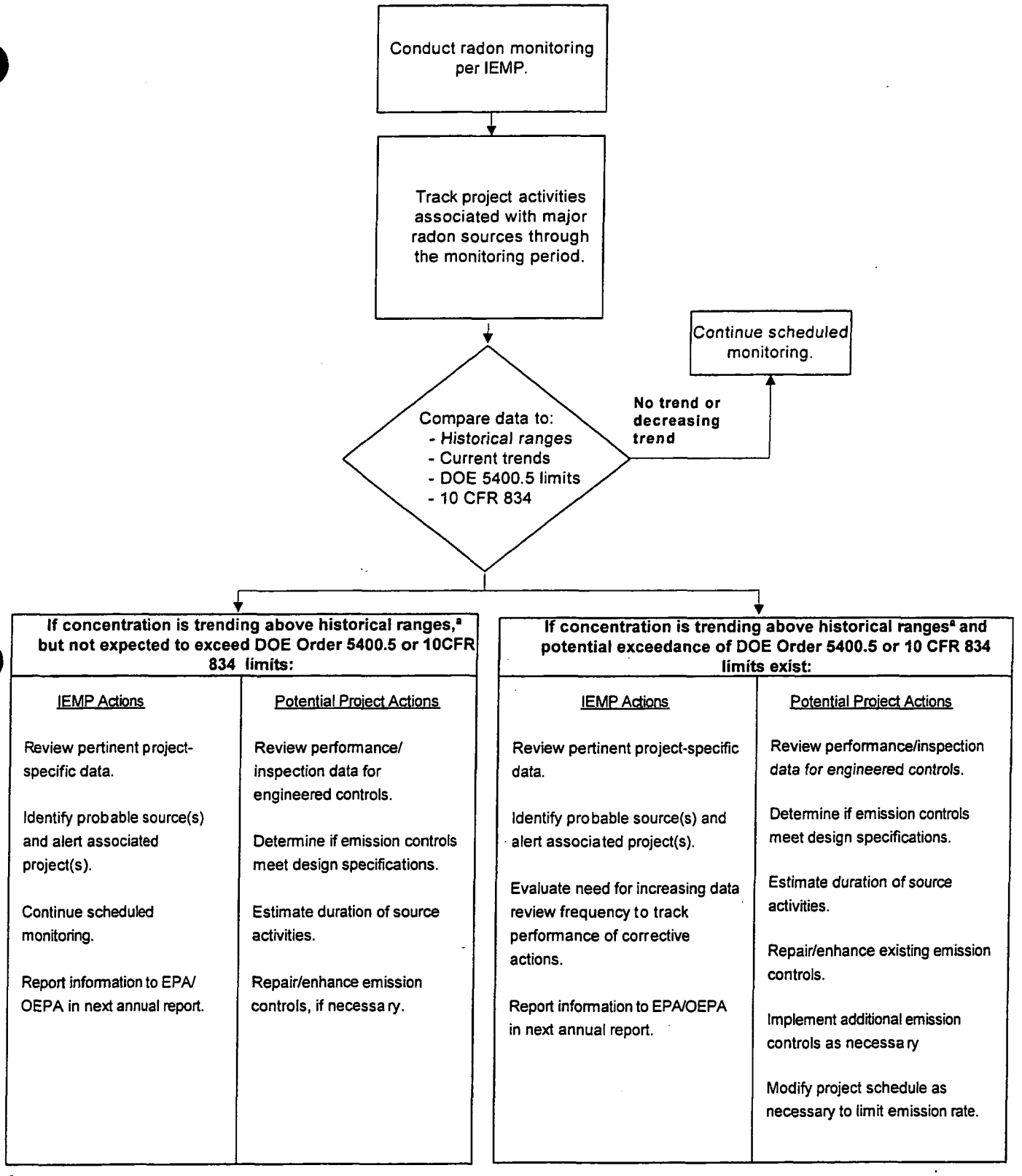
Changes to the monitoring program will be evaluated based on the expected changing configuration of the primary radon source materials at the site (most importantly the Silos 1 and 2 material). Revisions to the program will be proposed through the annual review and biennial revision process as outlined in Section 1.0.

6.6.1.3 Direct Radiation Monitoring Data Evaluation

Data resulting from the direct radiation monitoring program will be evaluated with respect to the program expectations identified in Section 6.4.1 and direct radiation monitoring design summary in Section 6.4.2.3. Based on these expectations, the following questions will be answered through the direct radiation data evaluation processes indicated by the text following each of the questions:

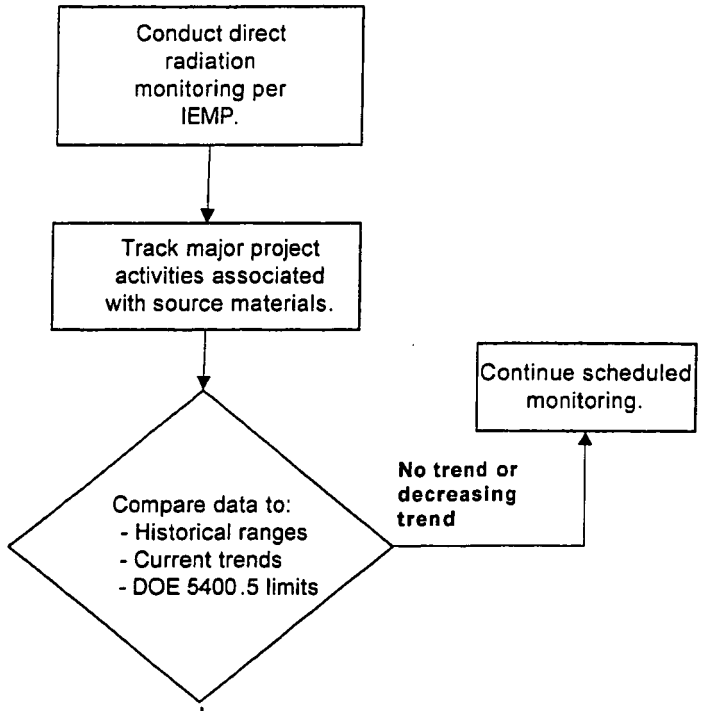
- Do direct radiation levels indicate a significant increase that could contribute to an exceedance of the 100-mrem/year, all pathway dose limit from DOE Order 5400.5?

The data generated from individual TLD locations will be trended over time. Historic TLD monitoring data will be used to assess whether current trends are similar to the past, increasing, or decreasing. In addition, any project-specific and operational data from areas with sources of direct radiation will be used to support the evaluation and interpretation of TLD results. Data from the TLD locations will be used to assess the direct radiation component of the all pathway dose (refer to Appendix C). If trends indicate a significant increase above historical ranges that could contribute to an exceedance of the 100-mrem/year, all pathway dose limit, then actions shown in Figure 6-7 will be implemented. Direct radiation monitoring information generated by project-specific occupational monitoring will be used as necessary in interpreting the sitewide direct radiation data via the IEMP data evaluation process. The findings of the ongoing data evaluations will be shared with project personnel. Personnel responsible for direct radiation sources will be informed of the findings as indicated on Figure 6-7.



[a]For those constituents/locations with limited historical data, IEMP data will be compared to background concentrations.

FIGURE 6-6. IEMP RADON DATA EVALUATION AND ASSOCIATED ACTIONS



If radiation levels are trending above historical ranges,[a] but not expected to exceed DOE Order 5400.5 limits:		If radiation levels are trending above historical ranges[a] and potential exceedance of DOE Order 5400.5 limits exist	
IEMP Actions	Potential Project Actions	IEMP Actions	Potential Project Actions
Review pertinent project-specific data.	Review performance/ inspection data for engineered controls.	Review pertinent project-specific data.	Review performance/inspection data for engineered controls.
Identify probable source(s) and alert associated project(s).	Determine if controls meet design specifications.	Identify probable source(s) and alert associated project(s).	Determine if controls meet design specifications.
Continue scheduled monitoring.	Estimate duration of source activities.	Evaluate need for increasing sampling frequency .	Estimate duration of source activities.
Report information to EPA/ OEPA in next annual report.	Repair/enhance controls, if necessary.	Report information to EPA/OEPA in next annual report.	Repair/enhance existing controls.
			Implement additional controls as necessary.

[a] These determinations will be based on the significance of the trend and the projected scope and duration of the source activity.

FIGURE 6-7. IEMP TLD DATA EVALUATION AND ASSOCIATED ACTIONS

- Are modifications or adjustments in program focus necessary?

Changes to the direct radiation monitoring program will be evaluated based on the changing configuration of source materials (primarily the Silos 1 and 2 waste materials) processed at the site. Revisions to the program will be proposed through the annual review and biennial revision processes as outlined in Section 1.0.

6.6.2 Reporting

The IEMP air monitoring program will meet the reporting requirements for the NESHAP Subpart H, 10 CFR 834, and the FFA compliance, as follows:

- The NESHAP Subpart H report has been incorporated into the annual site environmental report.
- The quarterly FFA reporting is being fulfilled via the IEMP Data Information Site.
- Monthly trending of the annual limit of 0.5 pCi/L above background.

IEMP air program data will be reported on the IEMP Data Information Site in the form of electronic files and in the annual site environmental report. Additional information on IEMP data reporting is provided in Section 7.3.3.

The IEMP Data Information Site data are in the form of searchable data sets and/or downloadable data files. This site will be updated every four weeks, as data become available.

The annual site environmental report will be issued each June for the previous year. This comprehensive report will discuss a year of IEMP data previously reported on the IEMP Data Information Site. The air monitoring portion of the annual site environmental report will consist of the following:

- An annual summary of data from the IEMP air monitoring program
- Constituent concentrations for each sample location
- Statistical analysis summary for each constituent, as warranted by data evaluation
- Status of regulatory compliance with NESHAP Subpart H
- Summary of FFA radon information
- Information that indicates an impact at or beyond the Fernald site boundary at a location not covered by the IEMP monitoring network
- Information that indicates the exceedance of an ARAR at an on-site location (for example, the radon limit of 100 pCi/L)
- Information that is relevant to explaining significant changes in the data from the IEMP air monitoring network.

Air data will continue to be provided to the EPA and OEPA electronically via the IEMP Data Information Site as the data become available.

Section 7.0

7.0 PROGRAM SUMMARY AND REPORTING

7.1 INTRODUCTION

This section summarizes the IEMP, highlighting two key program areas: program design and integrated reporting strategy. The program design section explains the technical approach taken in developing the IEMP and outlines the strategy for reviewing and revising the IEMP. The reporting section integrates the reporting discussions in Sections 3.0 through 6.0 and provides an overview of the entire IEMP reporting strategy.

As indicated in Section 1, the IEMP will become an attachment to the Comprehensive Legacy Management and Institutional Control Plan. Additionally, post-closure activities, including environmental monitoring and reporting, will be managed by the DOE Office of Legacy Management.

7.2 PROGRAM DESIGN

As discussed throughout this document, the IEMP combines remediation-based environmental monitoring requirements that have been activated by the ARARs and to-be-considered requirements (contained in the Fernald site's CERCLA remedy decision documents), as well as other ongoing monitoring programs required by other regulatory requirements. In combining these elements, the IEMP establishes a sitewide environmental monitoring program that is aligned with the broad range of remediation activities being implemented, and continues to meet the effluent and surveillance monitoring requirements of DOE Orders 5400.1 and 5400.5.

IEMP medium-specific monitoring programs were developed through a systematic evaluation of existing monitoring scopes, technical considerations, pertinent regulatory drivers, and critical Fernald site stakeholder concerns. Programmatic boundaries between the IEMP and project-specific monitoring were identified during this evaluation to clearly delineate the scope and geographic extent of the IEMP monitoring and reporting responsibilities.

7.2.1 Programmatic Boundaries

Programmatic boundaries between the sitewide environmental monitoring program and the remediation projects have been identified as part of the IEMP. As discussed in Section 1.0, these boundaries are defined for monitoring and reporting activities. The IEMP presents a sitewide monitoring approach focused on assessing the collective impacts of remediation activities. As such, a fundamental

programmatic boundary exists between the global monitoring approach of the IEMP and the primary focus of the individual remediation projects (i.e., emissions control monitoring).

The IEMP is designed to provide accurate, accessible, and manageable environmental monitoring information during remediation to support the following:

- Continued compliance with the monitoring and reporting requirements contained in DOE Orders 5400.1 and 5400.5
- Fulfilling additional sitewide monitoring and reporting requirements activated by the CERCLA ARARs for each record of decision, including determining when environmental restoration activities are complete and cleanup standards have been achieved
- Monitoring the performance of the Great Miami Aquifer groundwater remedy, including determination of when restoration activities are complete
- Providing a reporting interface for various project-specific emission control monitoring activities that, because of ARARs, will be implemented at project locations under approved project-specific remedial design plans
- Providing a consolidated reporting mechanism for environmental data.

The following list summarizes the activities that fall outside the scope of the IEMP:

- Project-specific emission control monitoring for both point and area sources (except for ambient radon monitoring in the Silos Projects area)
- The soil remediation pre-certification and certification sampling program, which will be conducted as part of the work scope of the Demolition, Soil, and Disposal Project
- The ambient air sampling and direct radiation measurements conducted for worker health and safety purposes as part of the occupational monitoring program
- The spill and chemical release reporting required under Title III of the Superfund Amendments and Reauthorization Act.

7.2.2 IEMP Monitoring Summary for 2006

The 2006 IEMP monitoring scope for groundwater, surface water, sediment, and air has been described in detail in Sections 3.0 through 6.0. The summary that follows is intended to provide the basis for each medium's monitoring program. Evaluation of each program will form the basis for any IEMP program modifications in the future.

Groundwater: The groundwater monitoring program for the Great Miami Aquifer provides for monitoring water quality and water levels in monitoring wells distributed over the aquifer restoration area, along the Fernald site's downgradient property boundary, and at a few private well locations. These wells provide a monitoring network to track the progress of the aquifer restoration and to monitor groundwater quality in the area of the on-site disposal facility. The analytical requirements for this monitoring program are based on the FRLs documented in the Record of Decision for Remedial Actions at Operable Unit 5.

Surface Water: The surface water and treated effluent monitoring program is designed to assess the impacts of remediation activities on surface water. The non-radiological discharge monitoring and reporting related to the NPDES Permit have been incorporated into the IEMP. The radiological discharge monitoring related to the FFCA has also been incorporated into the IEMP.

Sediment: The IEMP sediment sampling program determines whether substantial changes to current residual contaminant conditions occur in the sediment along the Great Miami River. On-property sediment will be assessed through the stream corridors certification process; however, results will be summarized through IEMP reports. Sediment sampling will continue at the Great Miami River sample points for uranium to verify that no adverse impacts have occurred to sediment.

Air: The air monitoring program consists of three distinct sampling elements: airborne particulate monitoring stations, radon monitoring locations, and direct radiation monitoring locations. Each element has a network of monitoring locations on site, at the Fernald site boundary, and off site that are used to measure the collective sitewide effects of remediation activities. The analytical requirements for the air monitoring program focus on the principal contaminants of each monitoring element.

7.2.3 Program Review and Revision

As stated in Section 1.0, the IEMP will be updated or revised annually with any program changes. This approach allows the plan to focus on the current scheduled site remediation activities.

To facilitate timely changes to the IEMP program, a schedule of annual reviews and biennial revisions has been incorporated into the IEMP. Revisions will incorporate all changes initiated as a result of the annual review process. Revisions will identify any program modifications that are necessary as a result of progressive findings of the IEMP, and any changes to existing regulatory agreements or requirements applicable to sitewide monitoring.

In addition to the IEMP-sponsored review and revision obligations, an independent review and assessment mechanism exists through the Cost Recovery Grant reached between OEPA and DOE. The Cost Recovery Grant provides a way for OEPA to conduct an independent review of DOE environmental monitoring programs. OEPA's role, as defined in the Cost Recovery Grant, is to independently verify the adequacy

and effectiveness of DOE's environmental monitoring programs through program review and independent data collection. Results of the OEPA review are summarized in an annual report that will be considered during the IEMP's annual review process. Modifications to the scope or focus of the IEMP, as a result of OEPA's activities, will be incorporated as necessary via the annual IEMP review process.

7.3 REPORTING

As stated in Section 1.0, a primary objective of the IEMP is to successfully integrate the numerous routine environmental reporting requirements under a single comprehensive framework. The IEMP centralizes, streamlines, and focuses sitewide environmental monitoring and associated reporting under a single controlling document.

7.3.1 Regulatory Drivers for Reporting Monitoring Data

An analysis of regulatory drivers and policies was conducted by examining ARARs within each operable unit's record of decision, Fernald site compliance agreements, and DOE Orders applicable to monitoring each medium. These regulatory drivers are identified in Sections 3.0 through 6.0 of the IEMP and were evaluated for reporting requirements. The following reporting drivers are in the IEMP reporting strategy:

- DOE Order 5400.1, General Environmental Protection Program Requirements, which requires DOE facilities to submit annual site environmental reports that summarize the environmental monitoring data results
- The September 7, 2000, OEPA Director's Findings and Orders (OEPA 2000), which requires continuation of the groundwater monitoring program as specified in this IEMP to meet RCRA/Ohio hazardous waste regulations for groundwater monitoring
- The current NPDES Permit for the Fernald site, which requires monthly reports to demonstrate compliance with provisions in the NPDES Permit
- The 1986 FFCA, which requires, per an agreement made with the EPA and OEPA in January 1996, submittal of quarterly data reports. Note that this requirement is being fulfilled through the posting of all IEMP data to the IEMP Data Information Site as the data become available.
- NESHAP 40 Code of Federal Regulations 61, Subpart H, which requires submittal of an annual NESHAP report to demonstrate compliance with emission standards for radionuclides other than radon
- The Federal Facility Agreement (FFA), Control and Abatement of Radon-222 Emissions, signed November 19, 1991, which requires, per an agreement made with EPA and OEPA in January 1996, submittal of the continuous air monitoring data in selected on-site areas in a quarterly progress report. Note that this requirement is being fulfilled through the posting of data to the IEMP Data Information Site as the data become available.

7.3.2 Reporting Responsibilities

Under the IEMP consolidated reporting concept, each project is responsible for maintaining records of its project-specific monitoring program and reporting the data as defined in the appropriate controlling project-specific document. Concurrently, the data generated by sitewide environmental monitoring will be maintained and managed by the IEMP program. Project-specific data and interpretations thereof are being transmitted to the IEMP program, as necessary, to provide a status to the regulators, to support the annual review and biennial revision to the IEMP, and to support IEMP-sponsored annual site environmental reports. IEMP data are communicated to the remediation projects as warranted by evaluation of the IEMP data.

7.3.3 IEMP Reporting

The IEMP reporting frequency will be annual with a continued emphasis on timely data reporting in the form of electronic files. A password-protected IEMP Data Information Site, established in 2000, provides the regulatory agencies with timely access to electronic data as they become available from the laboratories and the data verification process. The reporting schedule includes the annual site environmental report, which will continue to be submitted by June 1 to provide a comprehensive evaluation of IEMP data for both the regulatory agencies and the public.

The IEMP Data Information Site

The password-protected IEMP Data Information Site allows the regulatory agencies access to data in a timely manner. The data are uploaded on the IEMP Data Information Site after analysis, analytical validation, entry into Fernald site data systems, and review by environmental media personnel. These data are provided in downloadable files; in some cases, user-defined queries for specific data sets are available. The IEMP Data Information Site data files also include a comment field that can be used to flag certain results. The use of the IEMP Data Information Site for reporting IEMP data provides the agencies with access to IEMP data sooner than through the annual reports. In addition to the environmental media addressed in the IEMP, water quality and water accumulation rate data from the on-site disposal facility are included on the IEMP Data Information Site.

Annual Site Environmental Reports

The annual site environmental report will continue to be submitted to EPA and OEPA on June 1 of each year. It will continue to document the technical monitoring approach, to summarize the data for each environmental medium, and to summarize CERCLA, RCRA, and waste management activities. The report will also include water quality and water accumulation rate data from the on-site disposal facility

monitoring program. The summary report serves the needs of both the regulatory agencies and the public. The accompanying detailed appendices compile the information reported on the IEMP Data Information Site, and are intended for a more technical audience including the regulatory agencies.

Table 7-1 identifies the media that are being reported under the IEMP and the associated reporting schedule. Any program modifications that may be warranted prior to the annual review will be communicated to EPA and OEPA.

TABLE 7-1
IEMP REPORTING SCHEDULE FOR 2006

	2006											
	First Quarter			Second Quarter			Third Quarter			Fourth Quarter		
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
GROUNDWATER/OSDF[a]	✶	✶	✶	✶	✶	✶ ✪	✶	✶	✶	✶	✶	✶
SURFACE WATER[b]	✶	✶	✶	✶	✶	✶ ✪	✶	✶	✶	✶	✶	✶
NPDES Permit Compliance	✧	✧	✧	✧	✧	✧	✧	✧	✧	✧	✧	✧
SEDIMENT[c]						✪					✶	
						✪						
AIR[d]						✪						

✶=Extranet Reporting
✪=Annual Reporting
✧=Monthly Reporting

[a]Encompasses aquifer restoration operational assessment, aquifer conditions, and on-site disposal facility groundwater monitoring.
[b]Encompasses NPDES, FFCA, and IEMP characterization monitoring.
[c]Sediment data will be collected annually at the Great Miami River in 2006.
[d]Encompasses all air monitoring programs including FFA and NESHAP Subpart H.

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APPENDIX A

THE REVISED GROUNDWATER MONITORING APPROACH

A.1 INTRODUCTION

This appendix provides detailed justification for the groundwater sampling program presented in Section 3.0. The groundwater sampling program was initiated in August of 1977 and remained relatively unchanged until January 1, 2003. A revised groundwater monitoring program was initiated in January 2003. The revised program is based on the results and findings derived from evaluating groundwater data that had been collected under the Integrated Environmental Monitoring Plan (IEMP) from 1997 through 2001. The general absence of final remediation level (FRL) exceedances during the first five years of sampling under the IEMP program, led to the initiation of the revised program in 2003. This revised program will continue in 2005 and 2006.

The sampling program objectives are, and have always been, to develop and use a representative monitoring strategy to successfully track remedy progress and ultimately determine groundwater restoration completion while satisfying regulatory commitments and administrative requirements.

Conservative constituent selection criteria were developed to define the sampling program. These criteria included categorizing the 50 FRL constituents according to their fate and transport mobility characteristics, and identifying the location-specific distribution of each constituent's FRL exceedances in the aquifer. The initial basis for each constituent's distribution was sampling results from 1988 through 1995 from the IEMP, Revision 0 (DOE 1997). This sampling was conducted in support of the Operable Unit 5 Remedial Investigation/Feasibility Study reports (DOE 1995a and b) and subsequent, pre-IEMP programs. The constituent FRL exceedance distributions were updated with IEMP data through 1999 in the IEMP, Revision 2 (DOE 2001a), and with IEMP data through 2001 in the IEMP Revision 3 (DOE 2003). The distribution of the constituent-specific FRL exceedances was evaluated zone by zone to identify the geographic distribution of the exceedances. The five established zones, 0 through 4, include areas both inside and outside the 10-year, time-of-travel remediation footprint and are comprised of the following general areas:

- Zone 0 – The area outside of Zones 1 through 4
- Zone 1 – Waste storage area
- Zone 2 – South Field
- Zone 3 – Northeastern portion of the site
- Zone 4 – Southern portion of the South Plume.

Figure A-1 shows the areas covered by each zone along with the 10-year, time-of-travel remediation footprint. The following sections provide a summary of the IEMP groundwater data results and findings (refer to Section A.2), the groundwater monitoring approach (refer to Section A.3), and general conclusions (refer to Section A.4).

A.2 IEMP GROUNDWATER RESULTS AND FINDINGS

The summary results and findings of the IEMP groundwater data (1997 through 2003) are provided in two tables: Table A-1 presents overall information for the 50 constituents with FRLs; Table A-2 provides specific information for the constituents that have FRL exceedances. Figures A-2 through A-17 provide constituent-specific locations of wells that have exceedances with respect to the site and the aquifer zones.

IEMP Groundwater Data for the 50 FRL Constituents

Table A-1 summarizes groundwater sampling results since the inception of IEMP program and contains the following information:

- Column 1 lists the 50 constituents for which FRLs were established in the Operable Unit 5 Record of Decision.
- Column 2 lists the respective FRL concentration for each of the constituents.
- Column 3 identifies the basis for each FRL constituent (i.e., risk, applicable or relevant and appropriate requirement [ARAR], background, or detection limit) as defined in the Operable Unit 5 Feasibility Study Report.
- Column 4 documents the number of samples that have been analyzed for each constituent since the start of IEMP sampling.
- Column 5 notes the number of samples that have had a concentration greater than the FRL for each constituent.
- Column 6 notes the percent of the samples for each constituent that have had a concentration greater than the FRL.
- Column 7 identifies the zones where FRL exceedances have been observed and the number of wells in each zone that had exceedances.
- Column 8 shows the concentration range for each constituent that had FRL exceedances.

As shown in the table, 35 of the constituents have not had any FRL exceedances while 15 of the 50 FRL constituents have had at least one FRL exceedance. Of the 15 constituents having FRL exceedances, the following observations are noted:

- As expected, uranium is by far the predominant constituent of concern with approximately 25 percent of the sample results exceeding the FRL
- Two other constituents have greater than 5 percent of their sample results above the FRL (zinc approximately 7 percent and manganese approximately 6 percent)
- Six constituents (nickel, lead, molybdenum, technetium-99, nitrate, and arsenic) have between 1 and 2 percent of their sample results above their respective FRL
- Five constituents (boron, carbon disulfide, trichloroethene, antimony, and fluoride) have more than one FRL exceedance, but all five have less than 1 percent of their sample results exceeding their respective FRL
- One constituent, vanadium, has a one-time exceedance in 1998 in one well.

IEMP Groundwater Data for the FRL Exceedances

Figures A-2 through A-17 show the geographic distribution for the 15 constituents with FRL exceedances. There are 126 wells, and these maps show that:

- Uranium is the constituent with the greatest number exceedances in the greatest number of wells. These exceedances have occurred in Zones 1 through 4.
- Both zinc and manganese have exceedances in Zones 0 through 4 in 36 and 27 wells, respectively. The remaining 12 constituents have exceedances in fewer than nine wells, with vanadium having an exceedance in only one well.
- Four constituents have exceedances in only one zone. They are boron – Zone 2 (South Field); molybdenum – Zone 1 (waste storage area); technetium-99 – Zone 1 (waste storage area); and trichloroethene – Zone 1 (waste storage area).
- Five constituents (boron, molybdenum, nitrate/nitrite, technetium-99, and trichloroethene) have exceedances solely inside the 10-year, time-if-travel remediation footprint; nine constituents have exceedances both inside and outside the footprint; and vanadium has an exceedance in one well outside the footprint.

With the exception of uranium, these constituents had exceedances in a limited number of wells, and the spatial distribution of these exceedances indicates many of these constituents are not associated with a plume.

Table A-2 identifies the frequency of FRL exceedances for each well and constituent that had an exceedance since the inception of the IEMP. This table contains the following information:

- Column 1 lists the 15 non-uranium constituents which have had FRL exceedances since the inception of the IEMP.
- Column 2 lists the wells that have FRL exceedances for each of the constituents.
- Column 3 identifies the corresponding zone for each well with an exceedance.
- Column 4 identifies the frequency with which each constituent is monitored at the well of interest.
- Columns 5 through 9 show for each year and quarter (August 1997 through December 2003) the distribution of each constituent/well FRL exceedance. An "X" indicates when an exceedance occurred.

From review of Table A-2, the following observations can be made for the non-uranium constituents with more than one FRL exceedance:

- Since 2001 there were fewer FRL exceedances than for the previous years
- The reduction in the number of exceedances starting in 2001 is particularly striking for metals; this may be attributable to sample filtering. Filtering of samples requiring metals analysis was instituted in 2001 according to the IEMP, Revision 2 for samples with turbidity greater than 5 NTU. The 2001 filtered sample results indicate that previous metals results from unfiltered, turbid samples may be biased high due to dissolution of fine particles suspended in the sample by the sample preservative.
- Most constituents do not have concentrations that are consistently above their respective FRLs. The constituents with consistent exceedances include: boron (Zone 2), manganese (Zones 0, 1, and 3), molybdenum (Zone 1), nickel (Zone 3), nitrate/nitrite (Zone 1), technetium-99 (Zone 1), trichloroethene (Zone 1), and zinc (Zones 0 and 2).

  Note: Consistent exceedances are considered to be any constituent/well combination that has at least four consecutive exceedances. Sampling frequencies, which are identified in Table A-2, have been factored into this evaluation.

Conclusions

All the information presented in the referenced tables and figures identifies the general absence of FRL exceedances for many of the FRL constituents since the inception of IEMP sampling. This absence of FRL exceedances resulted in a revision to the IEMP groundwater sampling program beginning in 2003 in order to focus on the constituents that continue to exceed their respective FRLs in the areas where these exceedances are occurring. In revising the sampling program, it was necessary to ensure the objectives of the groundwater sampling program continue to be achieved. Therefore, the monitoring approach will ensure that the constituents with FRL exceedances will continue to be monitored in order to track the progress of the remedy and to determine whether it is necessary to change the design of the aquifer remedy. Additionally, constituents that have not had FRL exceedances will continue to be monitored to ensure that remediation of the source operable units is not adversely impacting aquifer conditions. Monitoring requirements will also continue to satisfy regulatory commitments and administrative requirements.

A.3 MONITORING APPROACH

This section provides the details associated with the monitoring approach:

- Section A.3.1 – Monitoring FRL constituents with exceedances
- Section A.3.2 – Monitoring FRL constituents without exceedances
- Section A.3.3 – Monitoring to satisfy regulatory commitments and administrative requirements

Each section provides the constituents to be monitored along with sampling frequencies and locations.

A.3.1 Monitoring FRL Constituents With Exceedances

The same monitoring approach implemented in January 2003 will be continued in 2005 and 2006. Prior to January 2003, constituents with exceedances have been monitored as frequently as quarterly or at least annually. Slow groundwater flow rates and the resultant slow plume migration rates justify going to a semiannual sampling schedule. Specifically, on average the uranium contamination only travels 33-83 feet per year. Therefore, monitoring semiannually should be sufficient to track the groundwater remedy.

To successfully address the monitoring of constituents with FRL exceedances, the two criteria were considered: geographic location (i.e., zones) of exceedances; and consistency and recentness of exceedances.

For the 15 constituents shown to have exceedances, the following monitoring is recommended:

1. Uranium, which is the primary constituent of concern and has the greatest number of wells with exceedances, will be monitored sitewide. Monitoring locations are presented in Figure A-18. Review of Figure A-18 indicates that the spatial distribution and density of monitoring wells will be sufficient to ensure that remedy performance is successfully monitored.

2. Constituents that have FRL exceedances in multiple zones (i.e., antimony, arsenic, fluoride, lead, manganese, nickel, and zinc) will be monitored as follows:

   - At a minimum, all constituents will be monitored at locations that include existing property boundary/on-site disposal facility wells along the eastern perimeter of the site and those wells along the eastern/southern boundary of the South Plume. Area C in Figure A-19 shows the configuration of this monitoring network, which lies in Zones 0, 2, 3, and 4, and outside of the 10-year, time-of-travel remediation footprint. Monitoring at these locations will ensure that the progress of the remedy is being tracked and will help determine whether to change the design of the aquifer remedy.

     Note: Carbon disulfide and nitrate/nitrite are considered to have legitimate exceedances in only one zone (Zone 1) and are discussed below (item #3).

   - In addition to being monitored in Zones 0, 2, 3, and 4, constituents that have exceedances in multiple zones were evaluated with respect to Zone 1 to determine if monitoring should be conducted to address consistent/recent exceedances in this area. Monitoring will be addressed in this zone, in addition to the monitoring at the property/plume boundary, to ensure that the constituents exhibiting consistent/recent exceedances are being monitored near potential sources. From review of Table A-2, it appears that only manganese in Zone 1 has recent and consistent exceedances. Therefore, it will be monitored in this zone at wells that have exceedances. Refer to Area A in Figure A-19 for the locations to be monitored in Zone 1. In addition to manganese, nickel had an exceedance in 2002. Nickel will also be monitored in Zone 1.

3. Constituents that have FRL exceedances in only one zone will be monitored only in that zone. The monitoring will consist of the following: carbon disulfide, molybdenum, nitrate/nitrite, technetium-99, and trichloroethene in Zone 1 (waste storage area); and boron in Zone 2 (South Field). Specific monitoring locations will be based on the wells that have exceedances. Refer to Areas A and B in Figure A-19 for the monitoring locations in Zones 1 and 2, which will be monitored for these constituents.

Note: Carbon disulfide has exceedances primarily in Zone 1. The two wells with exceedances outside Zone 1 were property boundary Wells 2432 and 3069. These wells were sampled quarterly and exceedances were minimally above the FRL (6 μg/L with respect to the 5.5 μg/L FRL). For Well 2432, there have been no additional exceedances since the occurrence during first quarter 1999. With regard to the one exceedance that occurred during fourth quarter 2001 for Well 3069, a duplicate result during the sampling event was below the FRL (refer to Figure A-5). No additional exceedances for carbon disulfide have occurred at Well 3069 since 2001.

Nitrate/nitrite has exceedances primarily in Zone 1. One well, 2017, which is located in Zone 2, had a one-time exceedance in 1998.

4. Vanadium had a one-time exceedance in 1998 during IEMP quarterly sampling at one well, 2426 (refer to Table A-2). This constituent will be monitored less frequently than semiannually due to the lack of exceedances. Monitoring for this constituent is addressed in Section A.3.2.

Summary

Table A-3 consolidates the information above pertaining to non-uranium constituents that have FRL exceedances, and identifies whether these constituents have single or multiple zone exceedances. The table identifies the constituents that have consistent/recent exceedances (i.e., manganese in Zone 1) and the monitoring program under which these constituents will be monitored.

The monitoring program ensures that all FRL exceedances are monitored at sufficient frequencies (semiannually) and locations, that the remedy progress is being tracked, that monitoring near potential sources is occurring, and that data are being collected to determine whether the remedy needs to be modified. Specifically, uranium will be monitored sitewide to track the overall remedy and determine when restoration is complete. Monitoring for non-uranium constituents both inside and outside the 10-year, time-of-travel remediation footprint is addressed by sampling constituents that have:

- Exceedances in only one zone (carbon disulfide, molybdenum, nitrate/nitrite, technetium-99, and trichloroethene in Zone 1; and boron in Zone 2). This sampling addresses the objectives of monitoring near potential sources and tracking of remedy progress.

- Multiple zone exceedances (antimony, arsenic, fluoride, lead, manganese, nickel, and zinc) at the property/plume boundary, which encompasses Zones 0, 2, 3, and 4. This sampling tracks remedy progress and indicates whether a change to the remedy is necessary. Additionally, sampling for constituents with multiple-zone exceedances that prove to be consistent/recent in Zone 1 (i.e., manganese, nickel) will be performed near potential sources to track the remedy progress.

A.3.2 Monitoring FRL Constituents Without Exceedances

Non-uranium FRL constituents with no exceedances since the inception of the IEMP will be monitored less frequently (i.e., every five years). All 50 FRL constituents were monitored in 2001 at approximately 90 locations, with the exception of the two dioxins and chromium VI, which were sampled at 19 and five locations, respectively. The lack of exceedances identified in this extensive 2001 sampling effort, along with the Fernald-area groundwater flow rates, justify the frequency of monitoring every five years. In 2006 the entire list of constituents with FRLs will be sampled (47 at all IEMP groundwater sampling locations, and three at select locations based on previous commitments as described below) to ensure tracking the remedy progress and to determine if any changes to the remedy design are necessary.

The following are some specific monitoring requirements for dioxins (i.e., octachlorodibenzo-p-dioxin and 2,3,7,8-tetrachlorodibenzo-p-dioxin) and chromium VI as part of the five-year monitoring:

- Sampling for dioxins will be at four locations in the waste storage area (2010, 2648, 2649, and 2821). In 2001, 19 locations (2008, 2009, 2010, 2016, 2032, 2027, 2045, 2046, 2048, 2385, 2648, 2649, 2821, 3009, 3032, 3045, 3046, 3385, and 3821) were monitored (refer to DOE letter #DOE-0642-01, "Request to Reduce the Number of IEMP Groundwater Monitoring Wells to be Sampled for Dioxin," dated June 13, 2001 [DOE 2001b]). Of the 19 locations that were sampled for dioxins in 2001, none had detected dioxin results. Based on the results of the 2001 dioxin sampling, monitoring for dioxins should be reduced to the only remaining potential source area for dioxin, the waste pits.

- Even though re-injection was discontinued in late 2004, sampling for chromium VI will still take place in 2006 as part of the five year sampling effort in Monitoring Wells 22301, 22302, and 22303 as identified in the IEMP, Revision 3. These wells are located within 25 feet of the once active re-injection wells.

A.3.3 Monitoring to Satisfy Regulatory Commitments and Administrative Requirements

The monitoring protocol outlined in Sections A.3.1 and A.3.2 will satisfy regulatory requirements currently identified in the IEMP, Revision 2, Table 3-1 by continuing:

- Routine monitoring to ensure remedy performance and to evaluate impacts of remediation activities to the Great Miami Aquifer

- Routine monitoring at wells located at the property boundary to ensure remedy performance and to evaluate impacts of remediation activities to the Great Miami Aquifer

- Routine monitoring to ensure remedy performance and to evaluate impacts of remediation activities to the Great Miami Aquifer

- Monitoring private wells to support the annual dose assessment that evaluates the contribution of the groundwater pathway to the annual dose to the public

- Routine sampling of the South Plume wellfield in terms of the total volume extracted and the amount of uranium removed.

With respect to administrative requirements, monitoring for Paddys Run Road Site constituents will continue. With respect to constituents and locations, no change will be made to the current Paddys Run Road Site sampling program (refer to the shaded part of Area C in Figure A-19 for monitoring locations). Monitoring will be conducted semiannually concurrently with the property/plume boundary sampling activity. Sampling for Paddys Run Road Site plume constituents (i.e., phosphorous, arsenic, potassium, sodium, benzene, ethyl benzene, isopropyl benzene, toluene, and total xylene) will continue in order to document the influence, or lack thereof, that the remedial groundwater pumping is having on the Paddys Run Road Site plume.

A.4 CONCLUSIONS

The sampling approach is considered conservative because constituents that had FRL exceedances during sampling under the IEMP will be monitored semiannually in areas of concern. Additionally, those constituents that have not exceeded their FRL will continue to be monitored every five years. The sampling activities will still ensure that the groundwater sampling program objectives of satisfying regulatory commitments, developing and using representative monitoring constituent lists to successfully track remedy progress, and ultimately determining when groundwater restoration activities are complete will continue to be met.

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TABLE A-1

GROUNDWATER FRL EXCEEDANCES BASED ON SAMPLES AND LOCATIONS SINCE IEMP INCEPTION (FROM AUGUST 1997 THROUGH 2003)

(1) Constituents	(2) Groundwater FRL[a]	(3) Basis for FRL[b]	(4) No. of Samples[c]	(5) No. of Samples >FRL[c,d]	(6) Percent of Samples >FRL	(7) Zones with FRL Exceedances (No. of Wells with exceedances in each Aquifer Zone)[c,d,e]	(8) Range above FRL[c,d,e]
Uranium, Total	30 µgL	A	3355	850	25.34%	1(14) 2(38) 3(3) 4(16)	30.13 J/1160 NV
Zinc	0.021 mg/L	B	1061	77	7.26%	0(10) 1(5) 2(14) 3(5) 4(2)	0.0212 NV/13.6 -
Manganese	0.90 mg/L	B	1238	77	6.22%	0(5) 1(6) 2(10) 3(5) 4(4)	0.916 -/105 J
Nickel	0.10 mg/L	A	1070	20	1.87%	0(1) 1(1) 2(7) 3(1)	0.101 -/1.54 -
Technetium-99	94 pCi/L	R*	1379	24	1.74%	1(3)	101.08 -/1352.266 J
Nitrate[f]	11 mg/L	B	1888	27	1.43%	1(5) 2(1)[g]	11.4 -/331 NV
Lead	0.015 mg/L	A	1070	13	1.21%	0(2) 1(2) 2(4) 3(2)	0.0157 -/0.201 -
Arsenic	0.050 mg/L	A	1288	13	1.01%	0(1) 1(1) 2(1) 4(4)	0.0547 -/0.125 -
Molybdenum	0.10 mg/L	A	800	8	1.00%	1(1)	0.207 -/0.69 -
Boron	0.33 mg/L	R	1849	15	0.81%	2(2)	0.331 -/1.16 -
Antimony	0.0060 mg/L	A	1071	7	0.65%	0(4) 1(1) 2(2)	0.00601 -/0.0196 J
Trichloroethene	0.0050 mg/L	A	1245	8	0.64%	1(2)	0.0207 -/0.120 -
Carbon disulfide	0.0055 mg/L	A	994	5	0.50%	0(1)[h] 1(3) 2(1)[h]	0.006 -/0.014 -
Fluoride	4 mg/L	A	1291	4	0.31%	0(2) 1(1) 3(1)	5.3 -/12.3 -
Vanadium	0.038 mg/L	R	951	1	0.11%	0(1)	0.0664 J[i]
1,1-Dichloroethane	0.28 mg/L	A	86	0	0%	NA	NA
1,1-Dichloroethene	0.0070 mg/L	A	447	0	0%	NA	NA
1,2-Dichloroethane	0.0050 mg/L	A	704	0	0%	NA	NA
2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.000010 mg/L	D	19	0	0%	NA	NA
4-Methylphenol	0.029 mg/L	R	86	0	0%	NA	NA
4-Nitrophenol	0.32 mg/L	R	86	0	0%	NA	NA
alpha-Chlordane	0.0020 mg/L	A	654	0	0%	NA	NA
Aroclor-1254	0.00020 mg/L	D	86	0	0%	NA	NA
Barium	2.0 mg/L	A	194	0	0%	NA	NA
Benzene	0.0050 mg/L	A	885	0	0%	NA	NA
Beryllium	0.0040 mg/L	A	877	0	0%	NA	NA
bis(2-Chloroisopropyl) ether	0.0050 mg/L	D	341	0	0%	NA	NA
bis(2-Ethylhexyl)phthalate	0.0060 mg/L	A	86	0[j]	0%	NA[j]	NA
Bromodichloromethane	0.10 mg/L	A	653	0	0%	NA	NA
Bromomethane	0.0021 mg/L	R	86	0	0%	NA	NA
Cadmium	0.014 mg/L	B	994	0	0%	NA	NA

TABLE A-1
(Continued)

(1) Constituents	(2) Groundwater FRL[a]	(3) Basis for FRL[b]	(4) No. of Samples[c]	(5) No. of Samples >FRL[c,d]	(6) Percent of Samples >FRL	(7) Zones with FRL Exceedances (No. of Wells with exceedances in each Aquifer Zone)[c,d,e]	(8) Range above FRL[c,d,e]
Carbazole	0.011 mg/L	R	341	0	0%	NA	NA
Chloroethane	0.0010 mg/L	D	86	0	0%	NA	NA
Chloroform	0.10 mg/L	A	86	0	0%	NA	NA
Chromium VI	0.022 mg/L	R	12	0	0%	NA	NA
Cobalt	0.17 mg/L	R	878	0	0%	NA	NA
Copper	1.3 mg/L	A	86	0	0%	NA	NA
Mercury	0.0020 mg/L	A	1993	0[k]	0%	NA	NA
Methylene chloride	0.0050 mg/L	A	84	0	0%	NA	NA
Neptunium-237	1.0 pCi/L	R*	1606	0	0%	NA	NA
Octachlorodibenzo-p-dioxin	1.0E-7 mg/L	D	19	0	0%	NA	NA
Radium-226	20 pCi/L	A	194	0	0%	NA	NA
Radium-228	20 pCi/L	A	86	0	0%	NA	NA
Selenium	0.050 mg/L	A	991	0	0%	NA	NA
Silver	0.050 mg/L	A	856	0	0%	NA	NA
Strontium-90	8.0 pCi/L	A	1394	0	0%	NA	NA
Thorium-228	4.0 pCi/L	R*	992	0	0%	NA	NA
Thorium-230	15 pCi/L	R*	86	0	0%	NA	NA
Thorium-232	1.2 pCi/L	R*	902	0	0%	NA	NA
Vinyl chloride	0.0020 mg/L	A	653	0	0%	NA	NA

[a]From Operable Unit 5 Record of Decision, Table 9-4.
[b]From Operable Unit 5 Feasibility Study, Table 2-16:
A = ARAR-based
B = Based on 95th percentile background concentrations
D = Based on lowest achievable detection limit
R = Risk-based Preliminary Remediation Goal (PRG)
R* = Risk-based Preliminary Remediation Level includes the radionuclide risk-based PRG plus its 95th percentile background concentration.
[c]Based on filtered and unfiltered samples from the August 1997 through 2003 IEMP groundwater data.
[d]Sample results having a -, J, or NV qualifier were used:
- = result is confident as reported
J = result is quantitatively estimated
NV = result is not validated
[e]NA = not applicable
[f]Nitrate/nitrite results are evaluated with respect to the nitrate FRL.
[g]Since the IEMP inception, there has been only one nitrate/nitrite exceedance at Well 2017 (in 1998) (refer to Figure A-12).
[h]Since the IEMP inception, there has been one isolated exceedance for carbon disulfide at two locations (refer to Figure A-5).
[i]Since the IEMP inception, there has been only one vanadium exceedance at Well 2426 (in 1998) (refer to Figure A-16).
[j]Of the 86 samples analyzed for bis(2-Ethylhexyl)phthalate, a common laboratory containment, five had results above the FRL. The FRL results above are all considered suspect due to laboratory analysis issues, laboratory blank and field blank contamination, or field duplicate results being non-detected. The five exceedancs are as follows: 0.014J mg/L, Well 2398 and 0.010J mg/L, Well 3390 in Aquifer Zone 2; 0.016J mg/L, Well 2109 in Aquifer Zone 3; and 0.008J mg/L, Well 2125 and 0.13J mg/L, Well 3095 in Aquifer Zone 4.
[k]The mercury exceedance is suspect, due to negative MS/MSD recoveries. In fact, the MS/MSD (i.e., spiked samples) results were both extremely below the original sample result.

TABLE A-2

GROUNDWATER FRL EXCEEDANCES FROM 1997 THROUGH 2003 BY QUARTER[a]

Constituent	Well	Aquifer Zone	1997		1998				1999				2000[c]				2001				2002				2003[a]	
			3[b]	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1/2	3/4
Antimony (N)																										
	22208	0																								
	2386	2						x																		x
	2426	0																x								
	2429	0																								
	2431	0																								x
	2551[d]	2																								x
	3032	1		x									x													
Arsenic (N)																										
	2010	1												x												
	2385	2													x											
	2426	0			x	x																				
	2625	4												x												
	2636	4		x	x		x		x	x																
	2898	4											x								x					
	2900	4											x													
Boron (MP)																										
	2045	2								x		x		x												
	2049	2	x	x			x	x	x	x	x	x	x	x		x								x		
Carbon disulfide (N)																										
	2027	1										x														
	2492	0							x[e]																	
	2649	1						x																		
	3069	2																		x[f]						
	3821	1										x														
Fluoride (MP)																										
	2424	0						x																		
	2431	0						x																		
	3821	1						x																		
	2067	3						x																		
Lead (N)																										
	2054	3												x												
	2385	2													x											
	2431	0											x													
	2648	1		x																						
	3032	1		x																						
	3045	2	x								x															
	3067	3																			x					

TABLE A-2
(Continued)

Constituent	Well[a]	Aquifer Zone	1997		1998				1999				2000[c]				2001				2002				2003[a]	
			3[b]	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1/2	3/4
Lead (N) (cont.)	3068[h]	2	x																							
	3387	2					x				x															
	3733	0	x													x										
Manganese (N)																										
	2010	1												x				x							x	x
	2027	1												x												
	2054	3		x										x												
	2118	3										x		x												
	22198	0																					x			
	22204	0																							x	
	22299	2									x															
	22301	2									x															
	22303	4					x																			
	2385	2					x				x				x											
	2386	2					x																			
	2389	3										x		x				x				x				
	2397	2													x					x						
	2417	3													x								x[i]			
	2424	0													x											
	2426	0			x	x					x														x	x
	2429	0														x										
	2430[k]	3	x		x	x									x	x						x				
	2431	0			x	x																				
	2432	0														x			x	x		x			x	
	2648	1		x				x				x		x				x								
	2898	4													x							x				
	2899	4																				x				
	2900	4													x											
	3027	1		x				x				x			x											
	3032	1		x										x		x										
	3045	2	x								x				x											
	3068[h]	2	x																							
	3385	2	x				x																			
	3387	2					x				x															
	3397	2	x																							
	3821	1										x		x				x				x			x	x
	3880	4					x																			

TABLE A-2
(Continued)

Constituent	Well[a]	Aquifer Zone	1997		1998				1999				2000[c]				2001				2002				2003[a]	
			3[b]	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1/2	3/4
Mercury (MP)																										
	22206	3																				x[j]				
Molybdenum (N)																										
	2649	1		x				x				x		x				x				x			x	x
Nickel (N)																										
	2054	3												x												
	22198	0										x														
	2385	2													x											
	2386	2					x				x				x											
	2387	2					x				x				x											
	2398	3	x		x	x	x	x			x	x														
	2434	2																		x						
	2649	1																				x				
	3387	2					x																			
	4398	2							x																	
Nitrate/Nitrite (MP)																										
	2017	2					x[k]																			
	2648	1				x						x		x			x									x
	2649	1		x		x		x		x		x		x		x	x	x	x	x	x	x		x	x	x
	2821	1										x													x	
	23064	2																						x[l]		
	3009[g]	1				x																				
	3821	1														x										
Technetium-99 (MP)																										
	2648	1										x					x	x							x	
	2649	1		x		x		x		x		x		x		x	x	x	x	x	x	x		x	x	x
	2821	1										x												x	x	x
Trichloroethene (N)																										
	2649	1						x				x		x				x				x			x	x
	3009[g]	1										x														
Vanadium (N)																										
	2426	0				x[m]																				

TABLE A-2
(Continued)

Constituent	Well[a]	Aquifer Zone	1997		1998				1999				2000[c]				2001				2002				2003[a]	
			3[b]	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1/2	3/4
Zinc (N)																										
	2010	1																								
	2031[f]	0												x												
	2054	3		x												x										
	2068[g]	2	x											x												
	2106	2	x												x											
	2118	3		x																						
	2199	0																								
	2204	0																							x	
	2385	2					x																		x	
	2398	2				x									x											
	2424	0					x	x	x				x													
	2426	0			x	x							x													
	2429	0																								
	2430[g]	3																							x	
	2431	0					x	x					x		x	x										
	2432	0							x				x													
	2434	2						x							x											
	2551[d]	2											x													
	2648	1		x				x																		
	2733	0								x																
	2900	4													x											
	3027[h]	1		x																						
	3032	1		x																						
	3045	2	x								x				x											
	3067	3													x											
	3068[h]	2	x																							
	3069	2										x														
	3106	2			x																					
	3385	2	x				x				x				x											
	3387	2	x				x				x				x							x				
	3397	2	x				x								x											
	3402	2													x											
	3426	0								x		x														
	8429	0							x	x																
	3431	0																			x					

TABLE A-2
(Continued)

Constiuent	Well[a]	Aquifer Zone	1997		1998				1999				2000[c]				2001				2002				2003[a]	
			3[b]	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1/2	3/4
Zinc (N) (cont.)	3733	0																								
	3821	1						x																	x	
	3899	4																								
	4067	3					x	x	x	x	x	x						x								
	4426	0								x																
	41217	0					x																			
	62433	2																				x				

Note: Highlighting indicates well is outside the 10-year, time-of-travel remediation footprint.

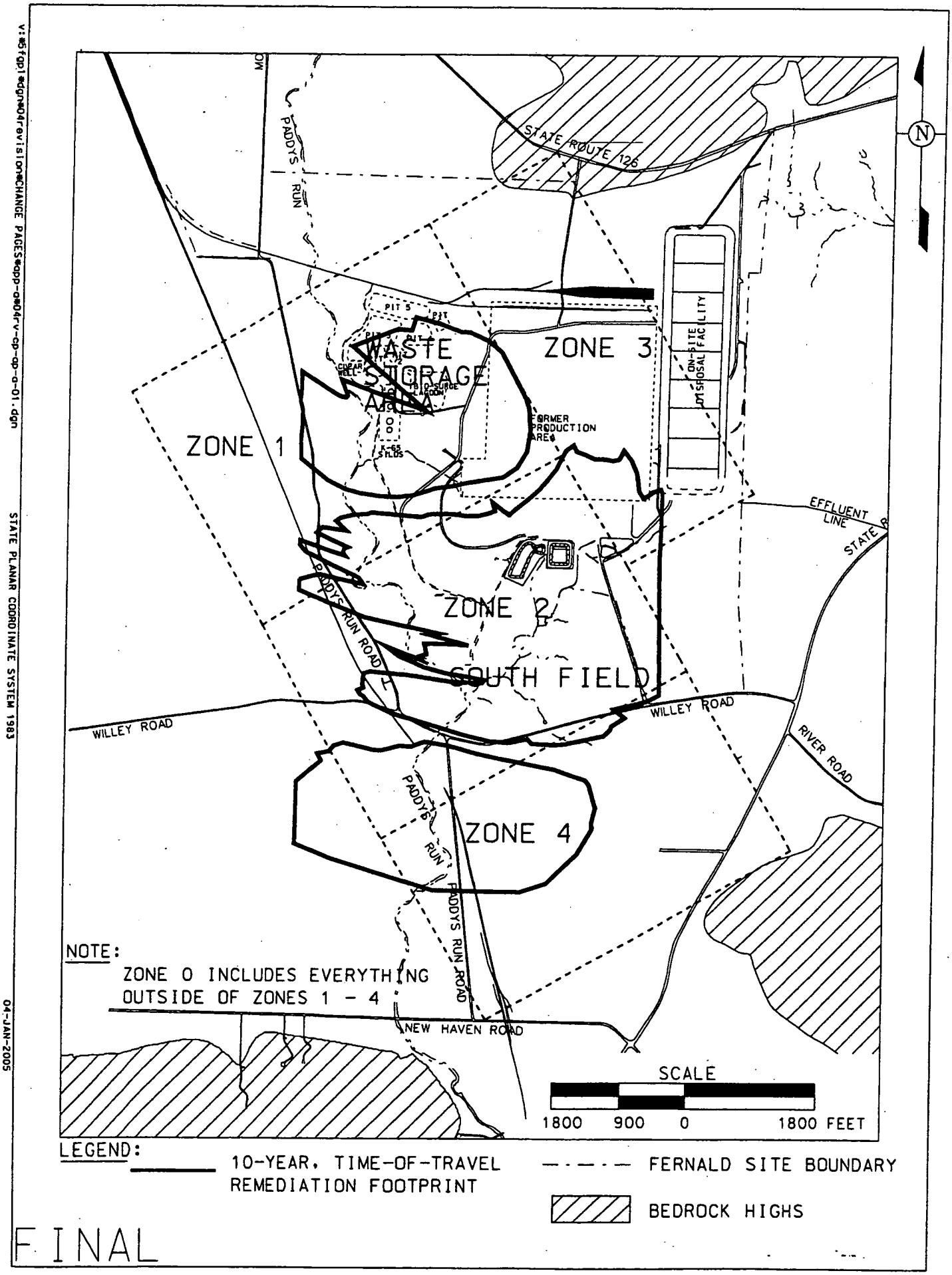
[a]All monitoring became semiannual with the inception of the IEMP, Rev. 3 in 2003.
[b]Sampling for the IEMP was initiated in August 1997.
[c]Those constituents that have exceedances in multiple zones and have had exceedances based on annual 2000 sample results will be evaluated for persistence with 2002 data.
[d]As identified in the IEMP, Rev. 2, Monitoring Well 2551 was plugged and abandoned in 2000 after the landowner chose not to renew the access agreement.
[e]Monitoring Well 2432 had a carbon disulfide exceedance (6 µg/L with respect to the 5.5 µg/L FRL) in the first quarter of 1999. At no other time has this well had an exceedance and, therefore, is not considered an exceedance in Zone 0.
[f]Monitoring Well 3069 had a one-time carbon disulfide exceedance (6 µg/L with respect to the 5.5 µg/L FRL) in fourth quarter 2001. The field duplicate result (5 µg/L) from this well was below the FRL. At no other time has the well had an exceedance and, therefore, is not considered an exceedance in Zone 2.
[g]In 2003 this well was plugged and abandoned.
[h]In 2000 this well was plugged and abandoned.
[i]This well is not scheduled for sampling as per IEMP, Rev. 3; however, Monitoring Well 22204 (which is in the vicinity of this well) will continue to be monitored as part of the Property/Plume Boundary and OSDF monitoring programs. Therefore, manganese will be addressed in the area.
[j]Monitoring Well 22206 had a mercury exceedance (0.0167 mg/L with respect to the 0.0020 mg/L FRL) in second quarter 2002. The mercury exceedance is suspect due to negative MS/MSD recoveries, and the MS/MSD (i.e., spiked samples) results were both extremely below the original sample result. At no other time has this well had an exceedance and, therefore, is not considered an exceedance in Zone 3.
[k]Monitoring Well 2017 had a nitrate/nitrite exceedance (331 mg/L with respect to the 11 mg/L FRL) in third quarter 1998. At no other time has this well had an exceedance and, therefore, is not considered an exceedance in Zone 2. Results are usually less than 1 mg/L. (NA = not applicable)
[l]The nitrate/nitrite exceedance, minimally above the FRL (12.4 mg/L versus the 11 mg/L FRL), more than likely is not attributable to the Fernald site because the monitoring well is both south of the site and in an agricultural area. Additionally, nitrate/nitrite exceedances have been limited to the waste storage area (Zone 1).
[m]Monitoring Well 2426 had a vanadium exceedance (0.0664 mg/L with respect to the 0.038 mg/L FRL) in second quarter 1998. At no other time has this well had an exceedance and, therefore, is not considered to be an exceedance in Zone 0.

TABLE A-3

IEMP NON-URANIUM CONSTITUENTS WITH FRL EXCEEDANCES, LOCATION OF EXCEEDANCES, AND REVISED MONITORING PROGRAM

Parameter	Aquifer Zones with Exceedances	Monitoring Program
Antimony	Multiple Zones	Property/Plume Boundary
Arsenic	Multiple Zones	Property/Plume Boundary
Boron	Aquifer Zone 2 (South Field)	South Field
Carbon Disulfide	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Fluoride	Multiple Zones	Property/Plume Boundary
Lead	Multiple Zones	Property/Plume Boundary
Manganese	Multiple Zones[a]	Property/Plume Boundary, Waste Storage Area
Molybdenum	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Nickel	Multiple Zones	Property/Plume Boundary Waste Storage Area
Nitrate/Nitrite	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Technetium-99	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Trichloroethene	Aquifer Zone 1 (Waste Storage Area)	Waste Storage Area
Zinc	Multiple Zones	Property/Plume Boundary

[a]There are consistent/recent exceedances of manganese in Zone 1; therefore, this constituent will be monitored in the waste storage area.



FINAL

FIGURE A-1. GROUNDWATER AQUIFER ZONES AND AQUIFER RESTORATION FOOTPRINT

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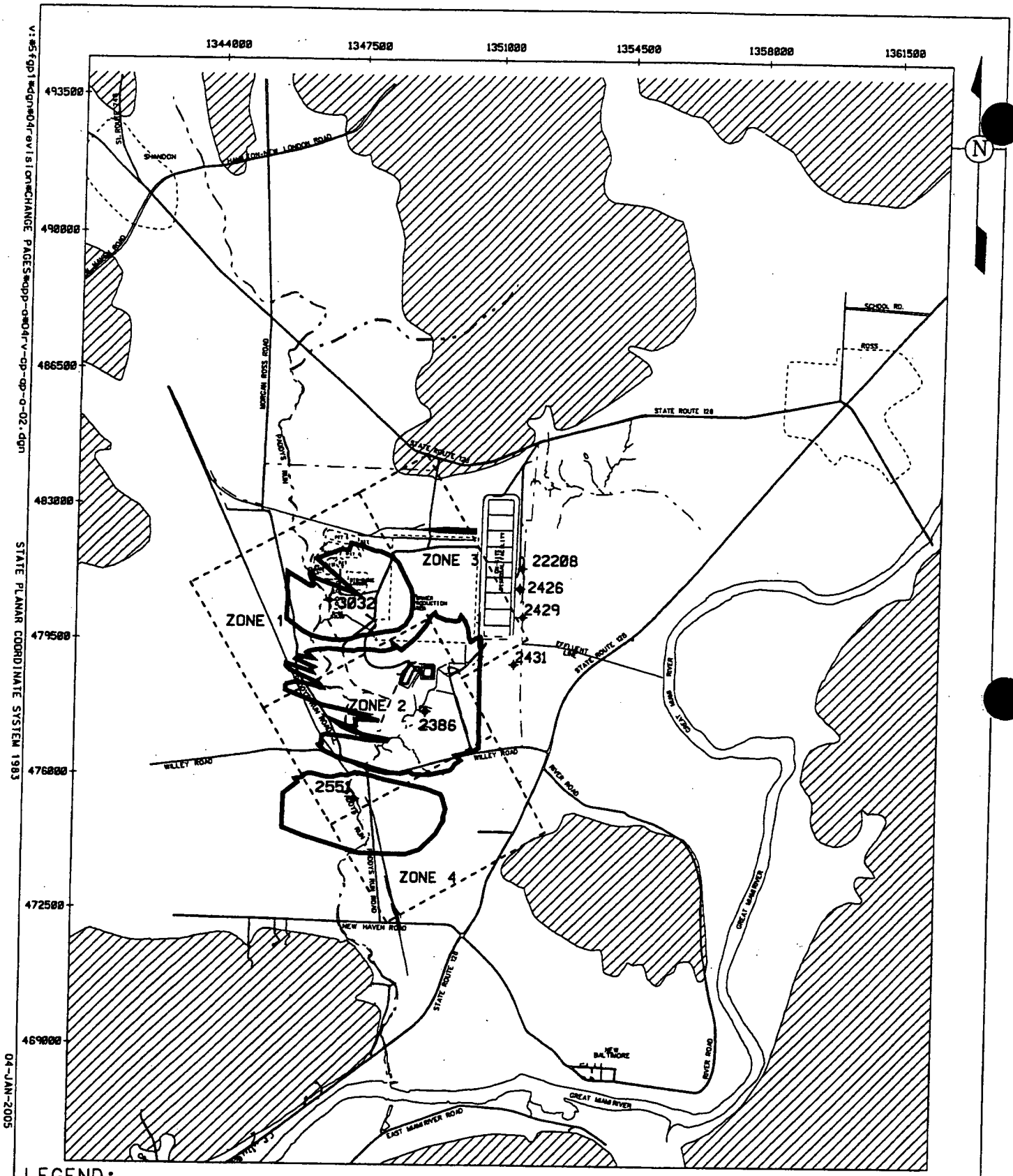
STATE PLANAR COORDINATE SYSTEM 1983
04-JAN-2005



LEGEND:

- - - - - FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

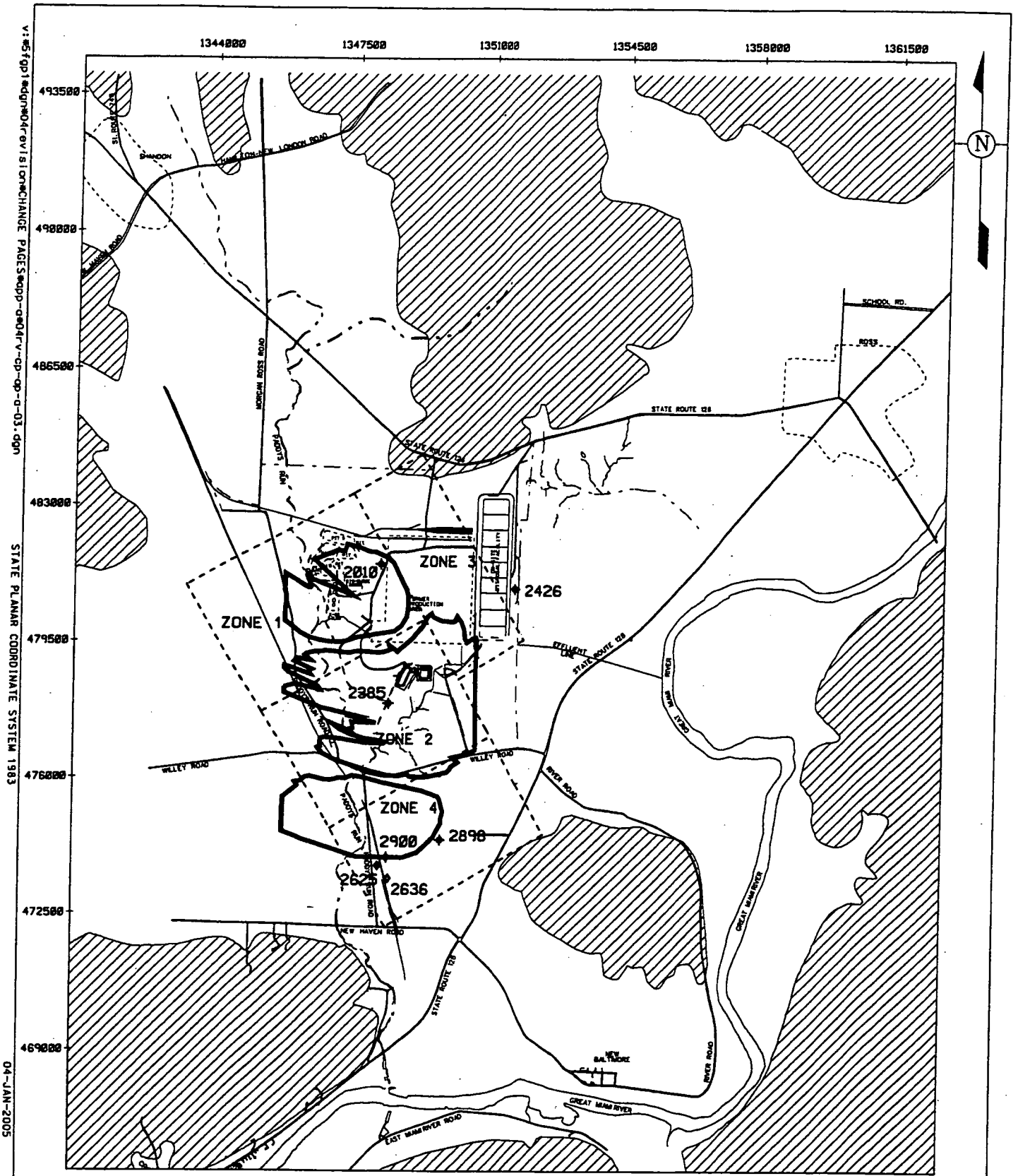
NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-2. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR ANTIMONY



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-3. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR ARSENIC

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04-JAN-2005

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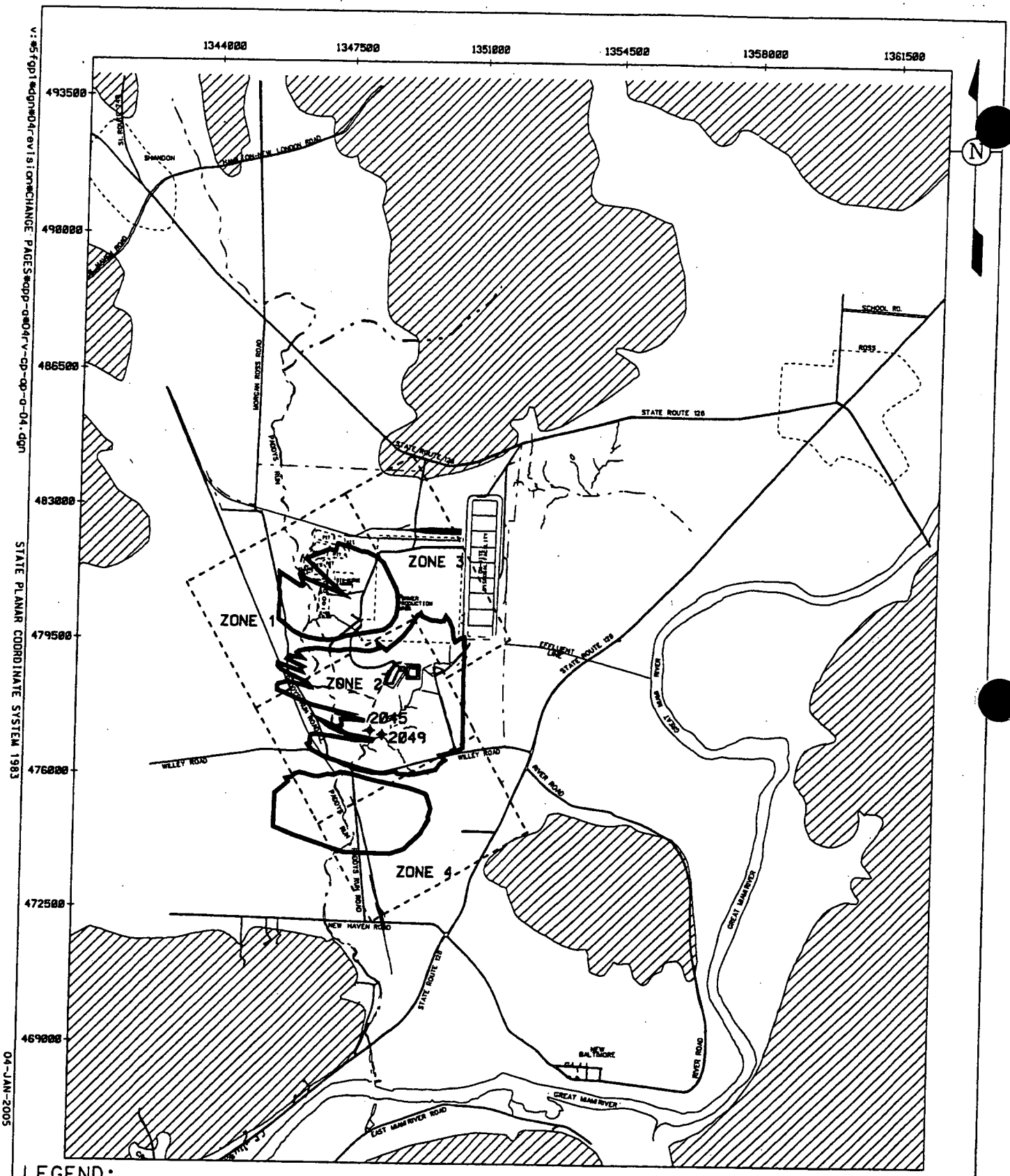


LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE:

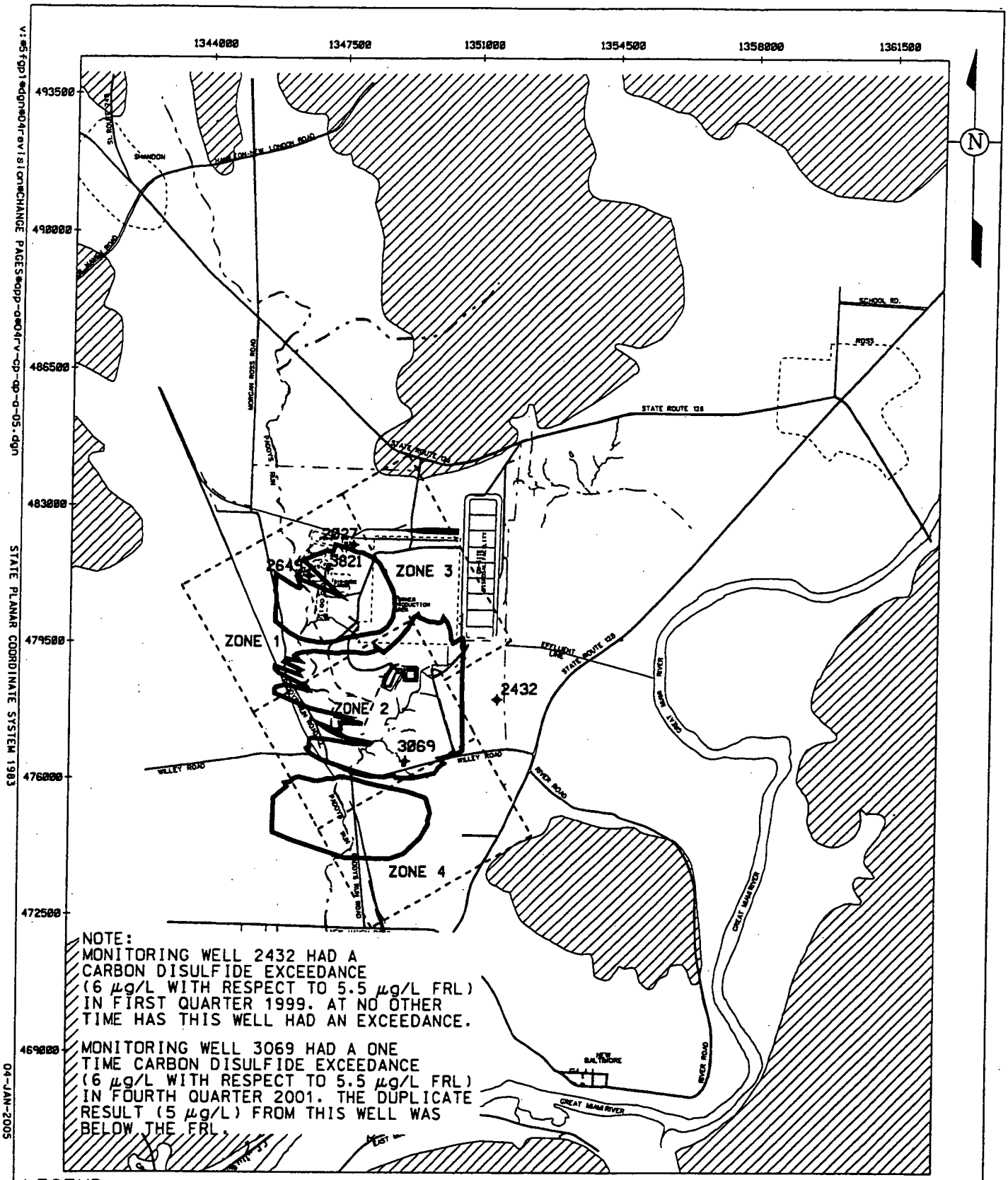
ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-4. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR BORON



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-5. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR CARBON DISULFIDE

STATE PLANAR COORDINATE SYSTEM 1983

04-JAN-2005

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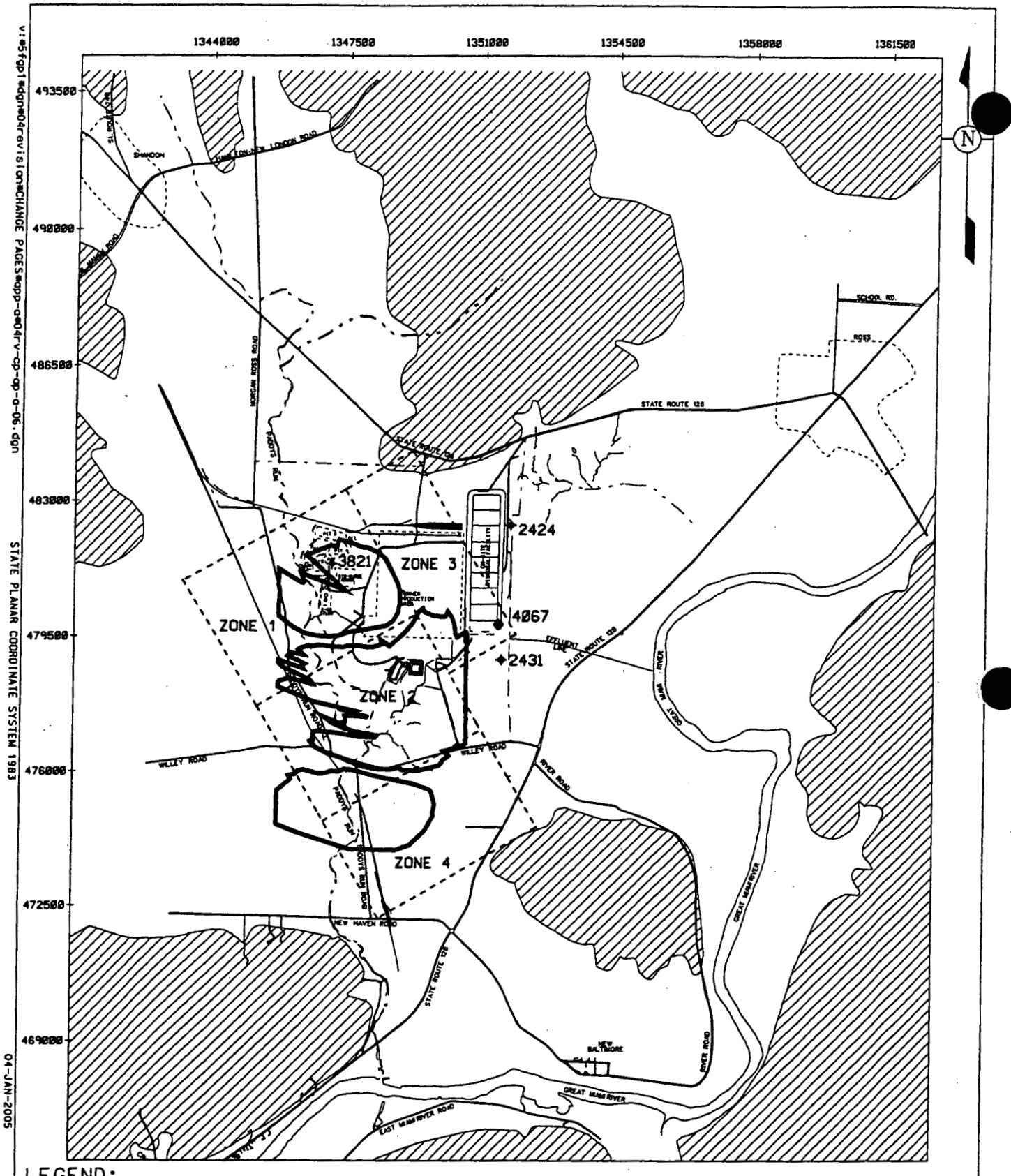


LEGEND:

- — · — · — FERNALD SITE BOUNDARY
- 3120 ✦ MONITORING WELL
- 10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT
- BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

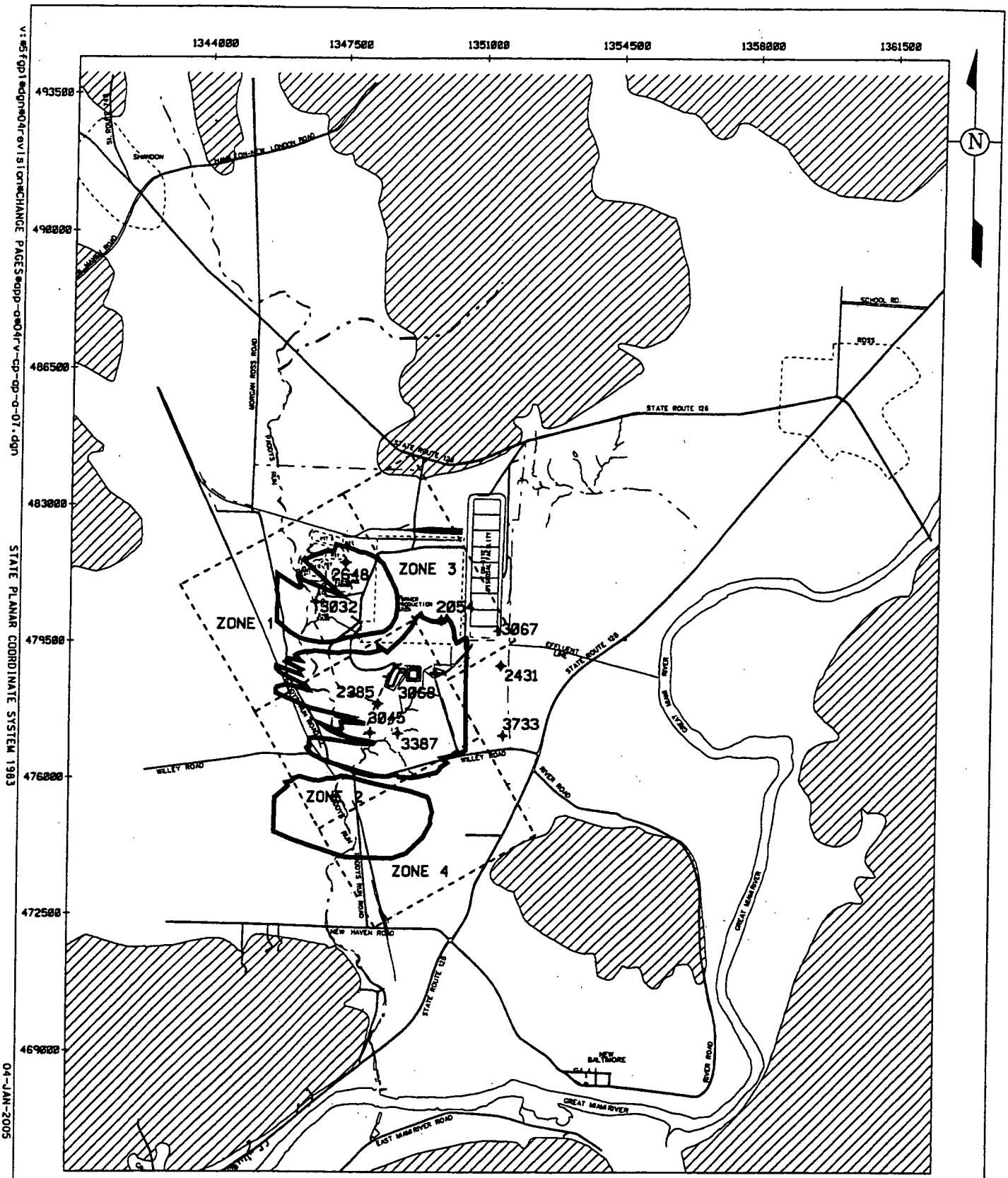
3500 1750 0 3500 FEET

FINAL

STATE PLANAR COORDINATE SYSTEM 1983

04-JAN-2005

FIGURE A-6. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR FLUORIDE



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-7. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR LEAD

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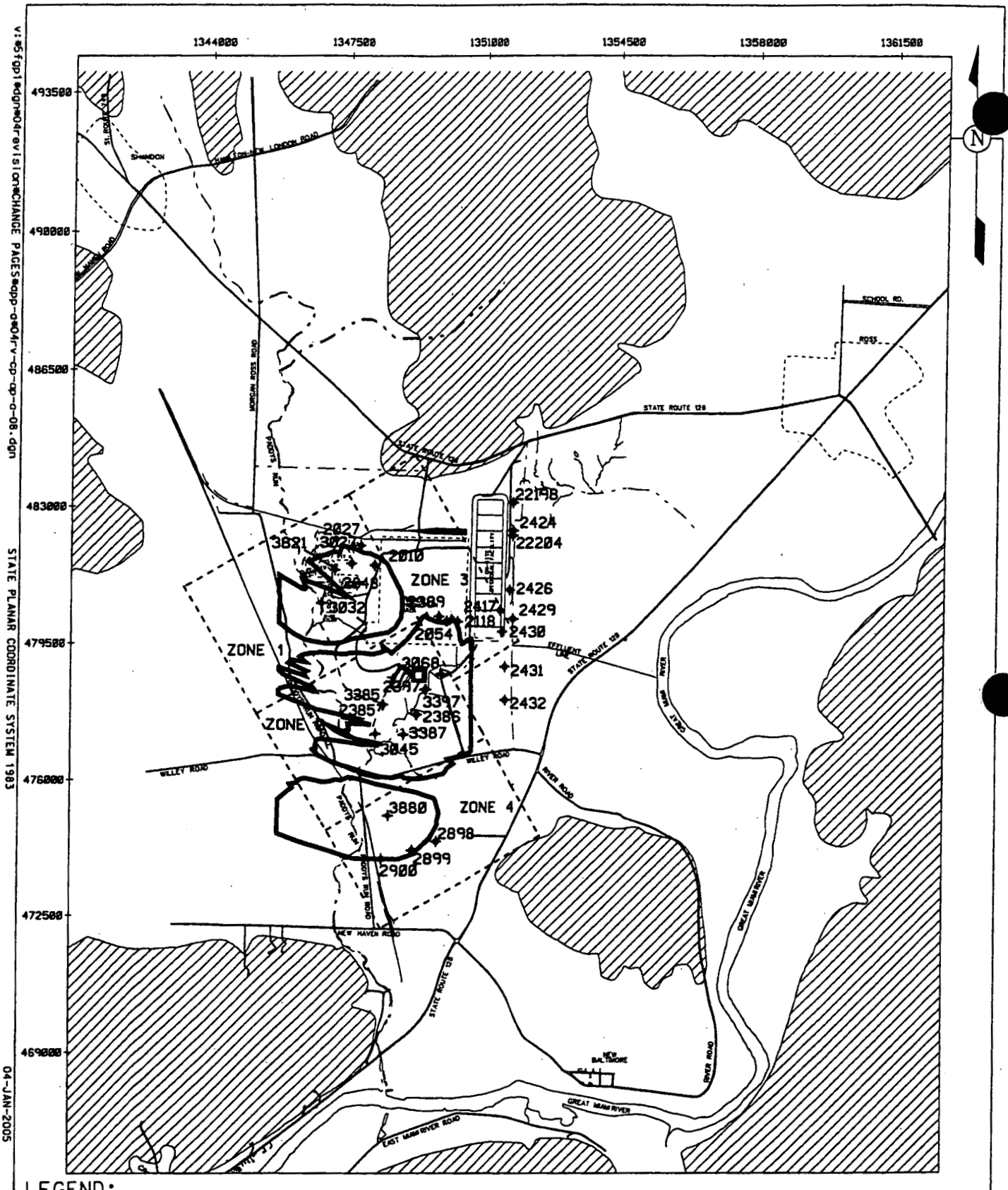
STATE PLANAR COORDINATE SYSTEM 1983

04-JAN-2005



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE:

ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-8. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR MANGANESE

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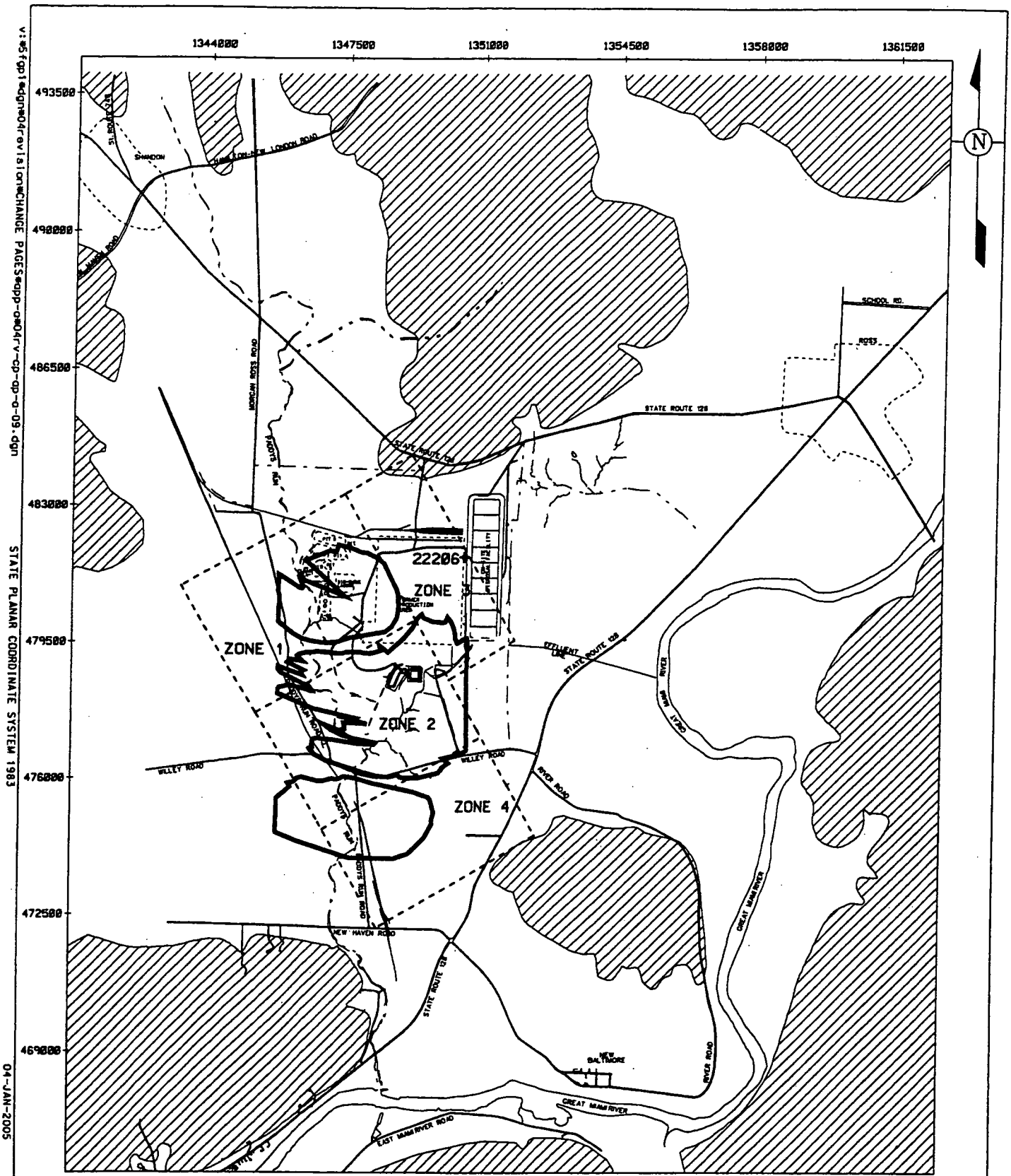
STATE PLANAR COORDINATE SYSTEM 1983

04-JAN-2005



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

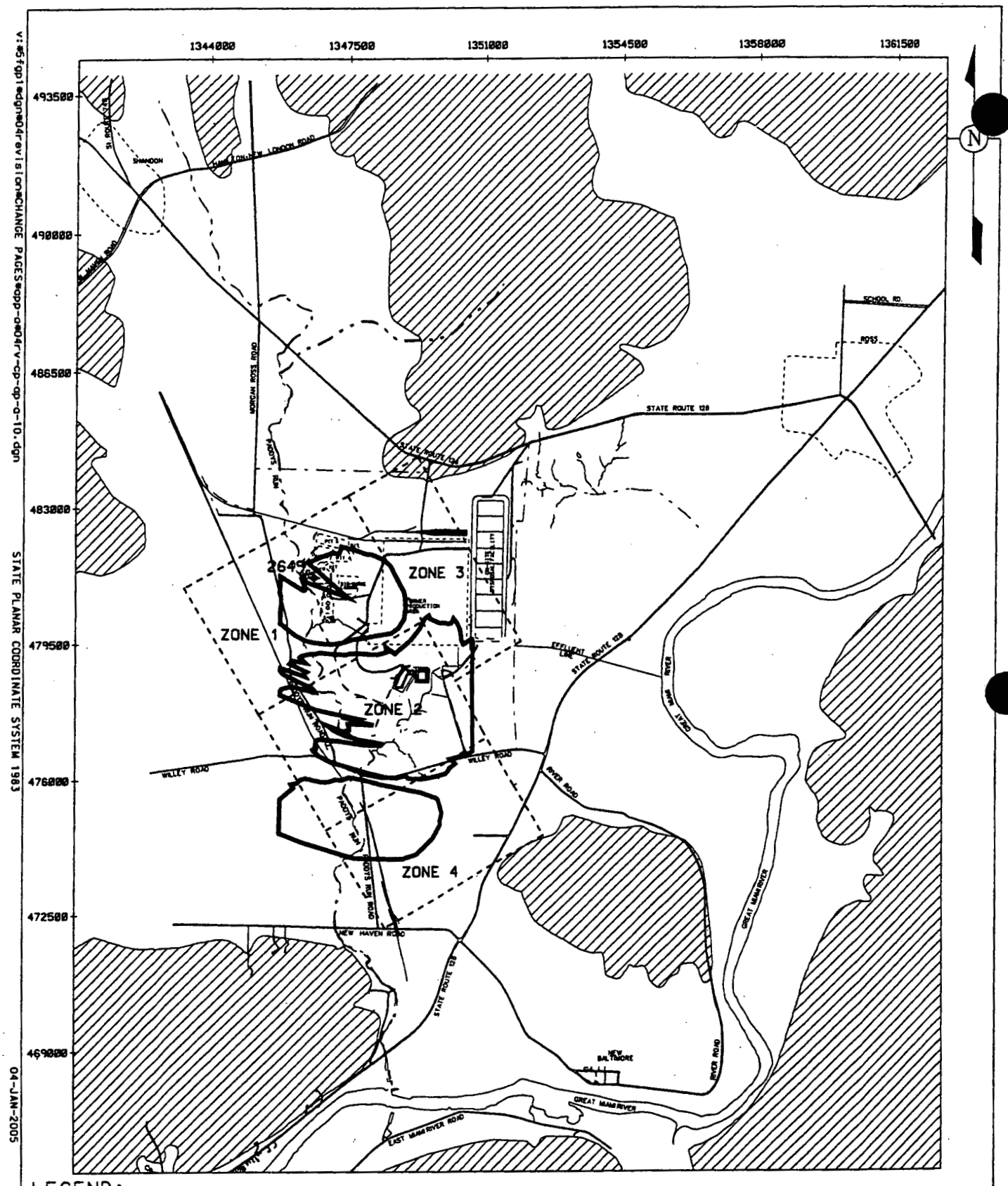
NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-9. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR MERCURY



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-10. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR MOLYBDENUM

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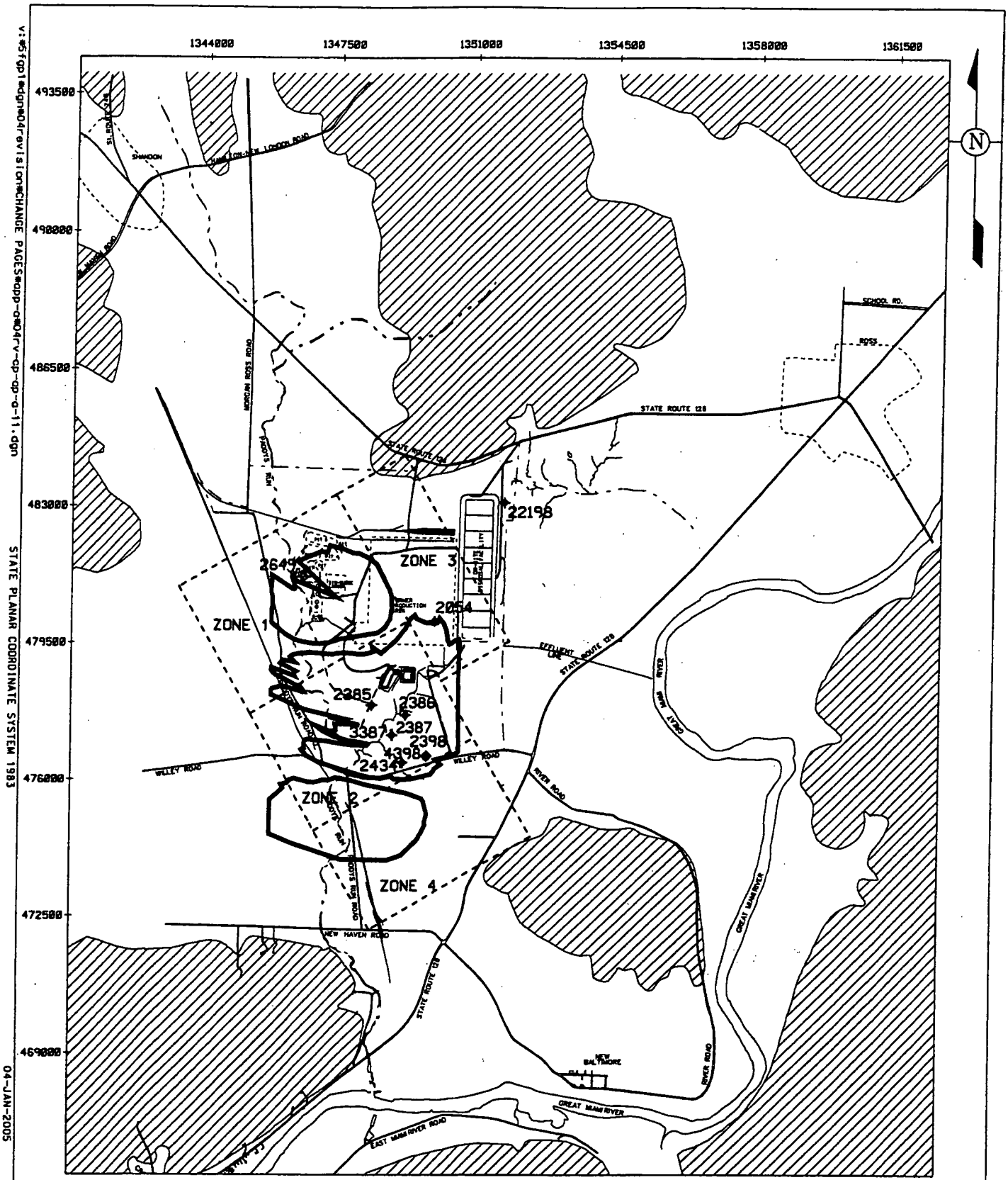
STATE PLANAR COORDINATE SYSTEM 1983
04-JAN-2005



LEGEND:

- — · — · — FERNALD SITE BOUNDARY
- 3120 ✦ MONITORING WELL
- 10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT
- BEDROCK HIGHS

NOTE:

ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-11. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR NICKEL

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STATE PLANAR COORDINATE SYSTEM 1983
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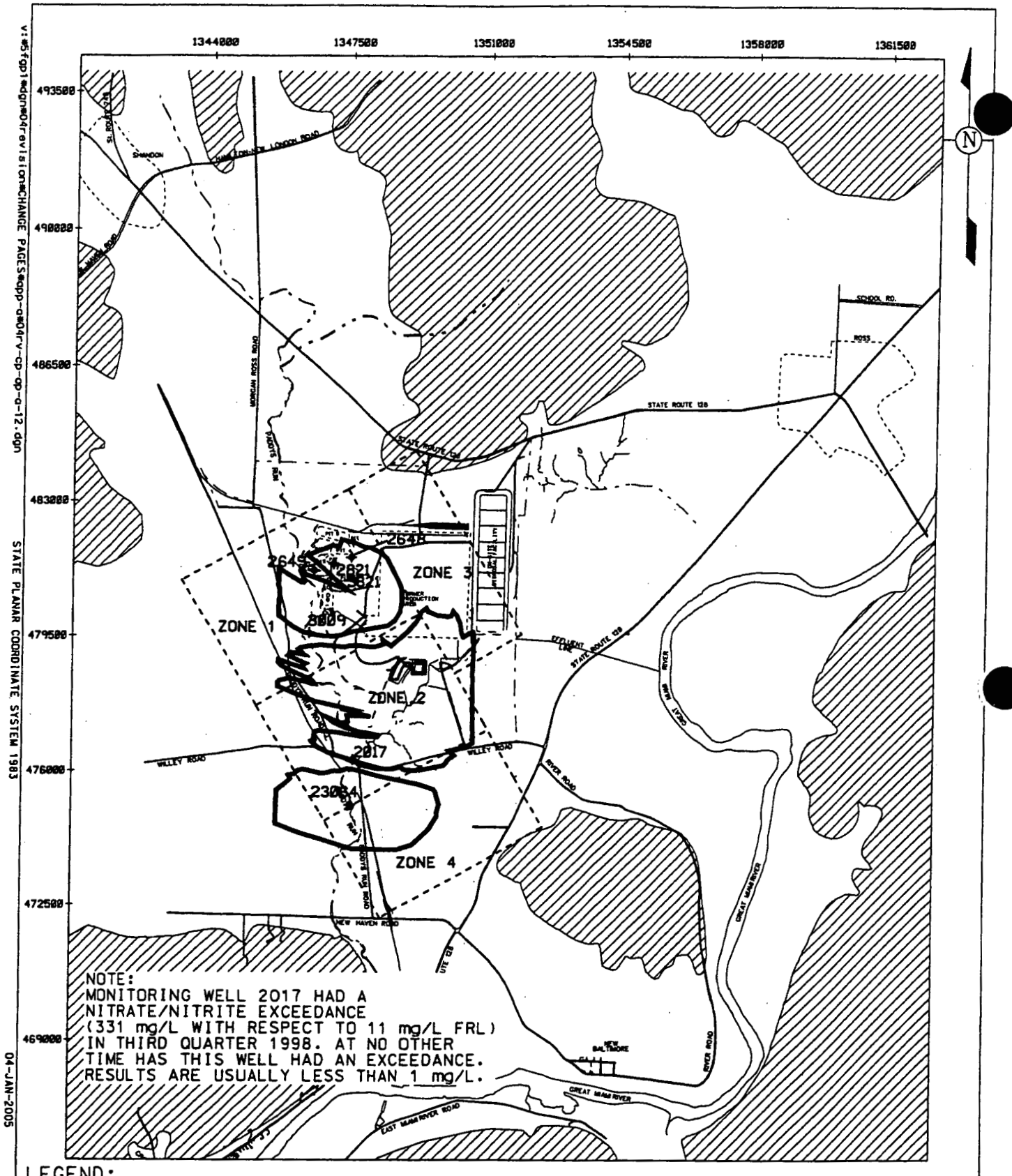

LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE:
ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

FIGURE A-12. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR NITRATE/NITRITE

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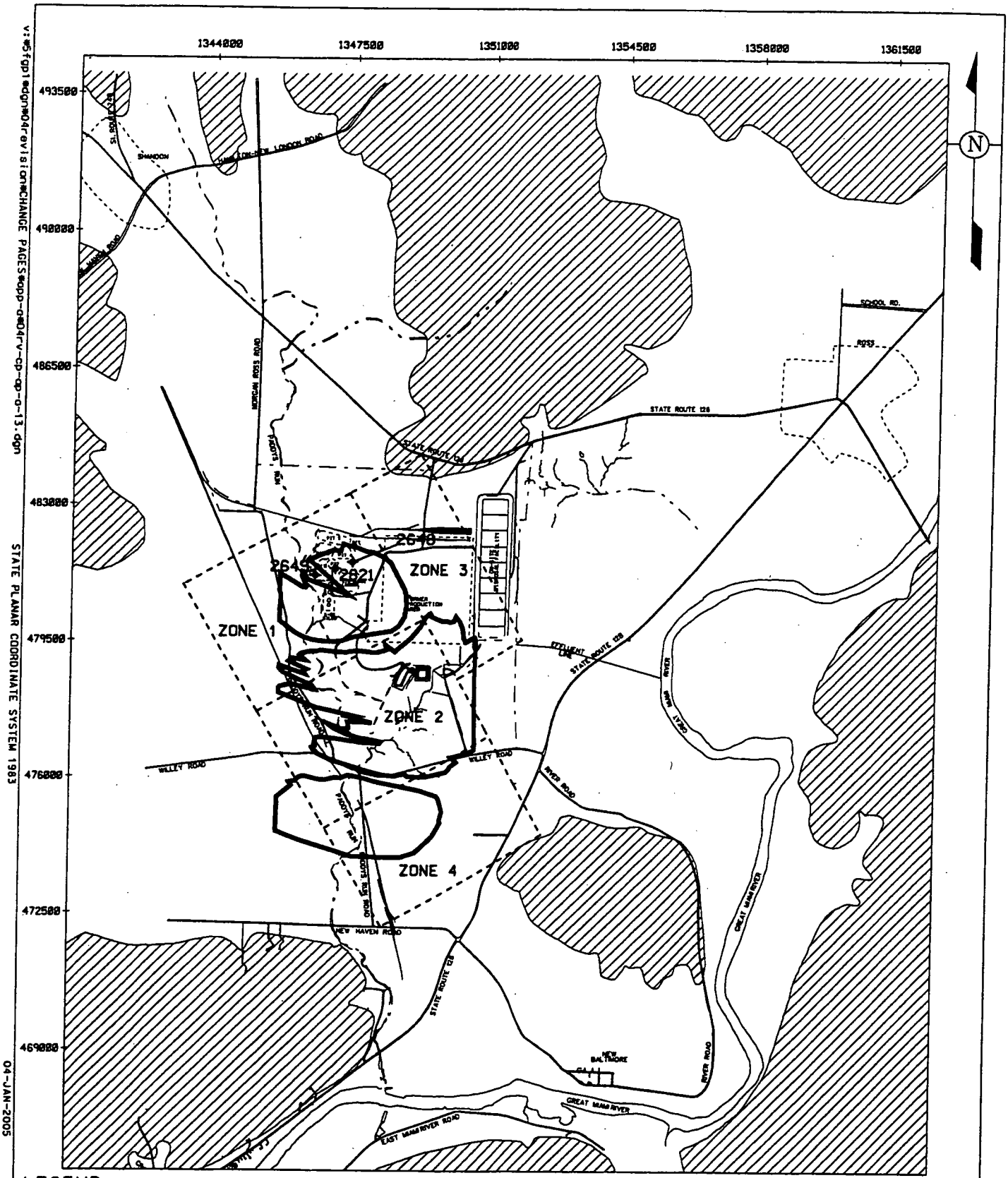
STATE PLANAR COORDINATE SYSTEM 1983
04-JAN-2005



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

STATE PLANAR COORDINATE SYSTEM 1983

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FIGURE A-13. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR TECHNETIUM-99

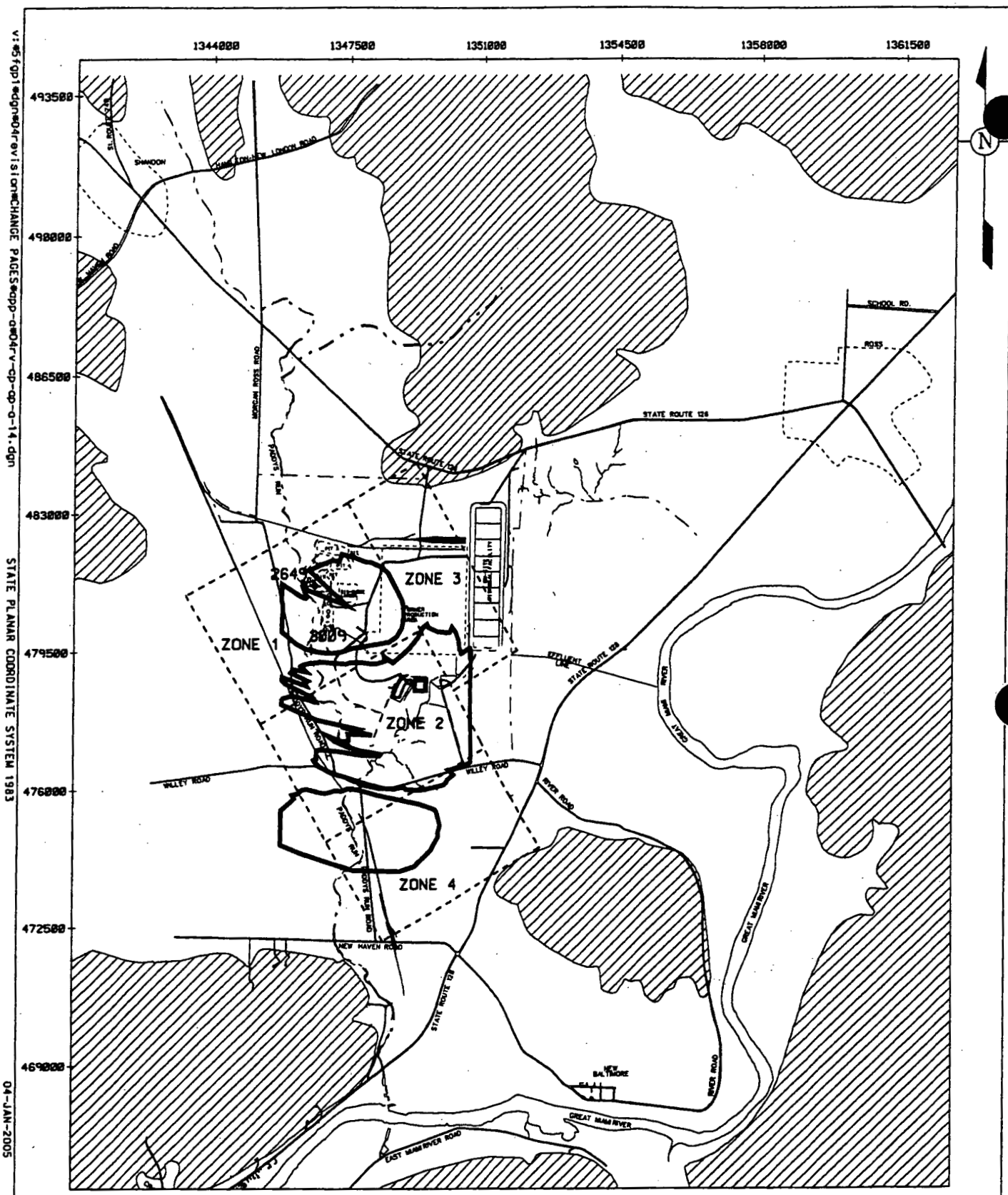
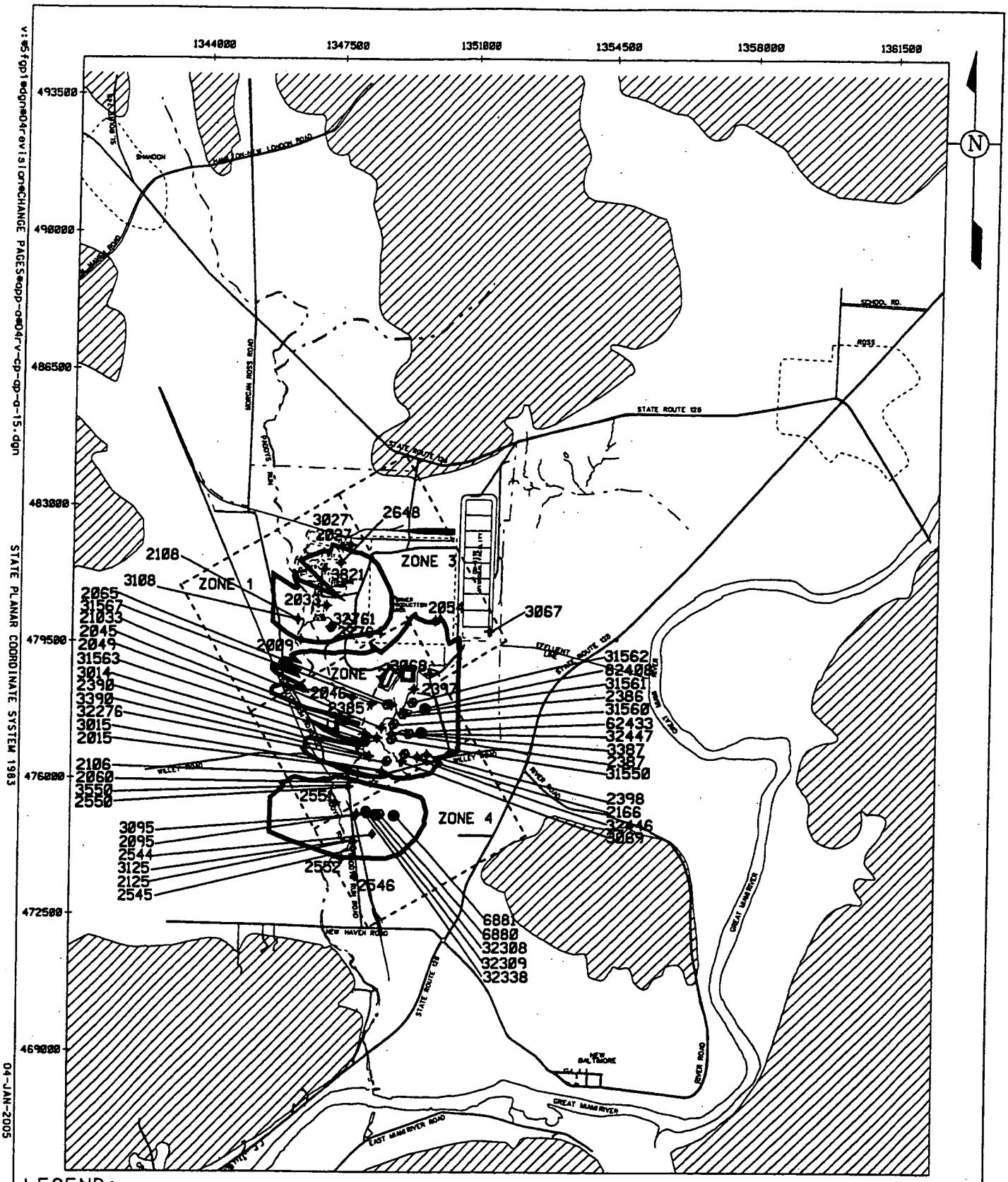


FIGURE A-14. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR TRICHLOROETHENE



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR, TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

FINAL

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STATE PLANAR COORDINATE SYSTEM 1983

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FIGURE A-15. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR URANIUM, TOTAL

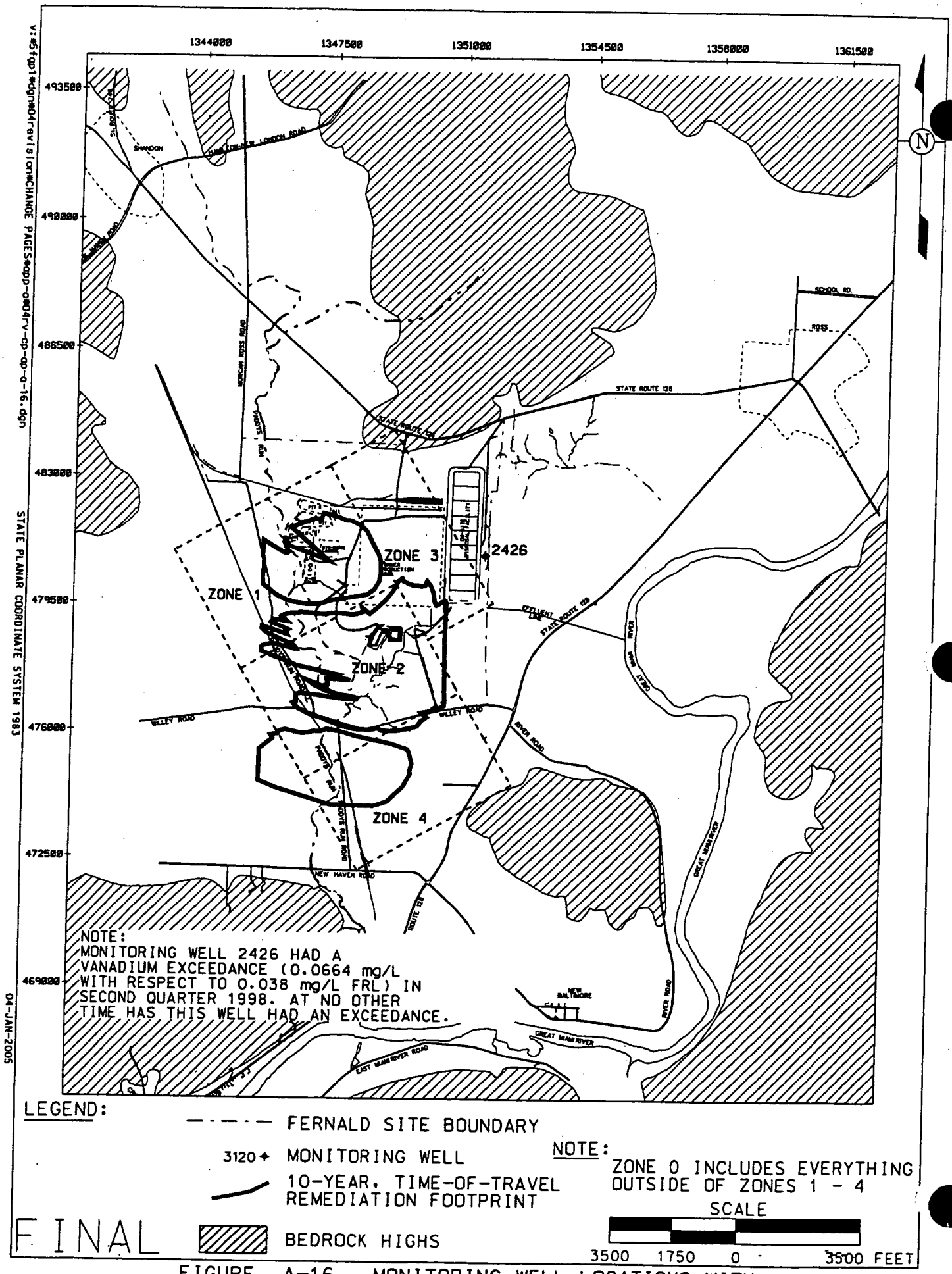
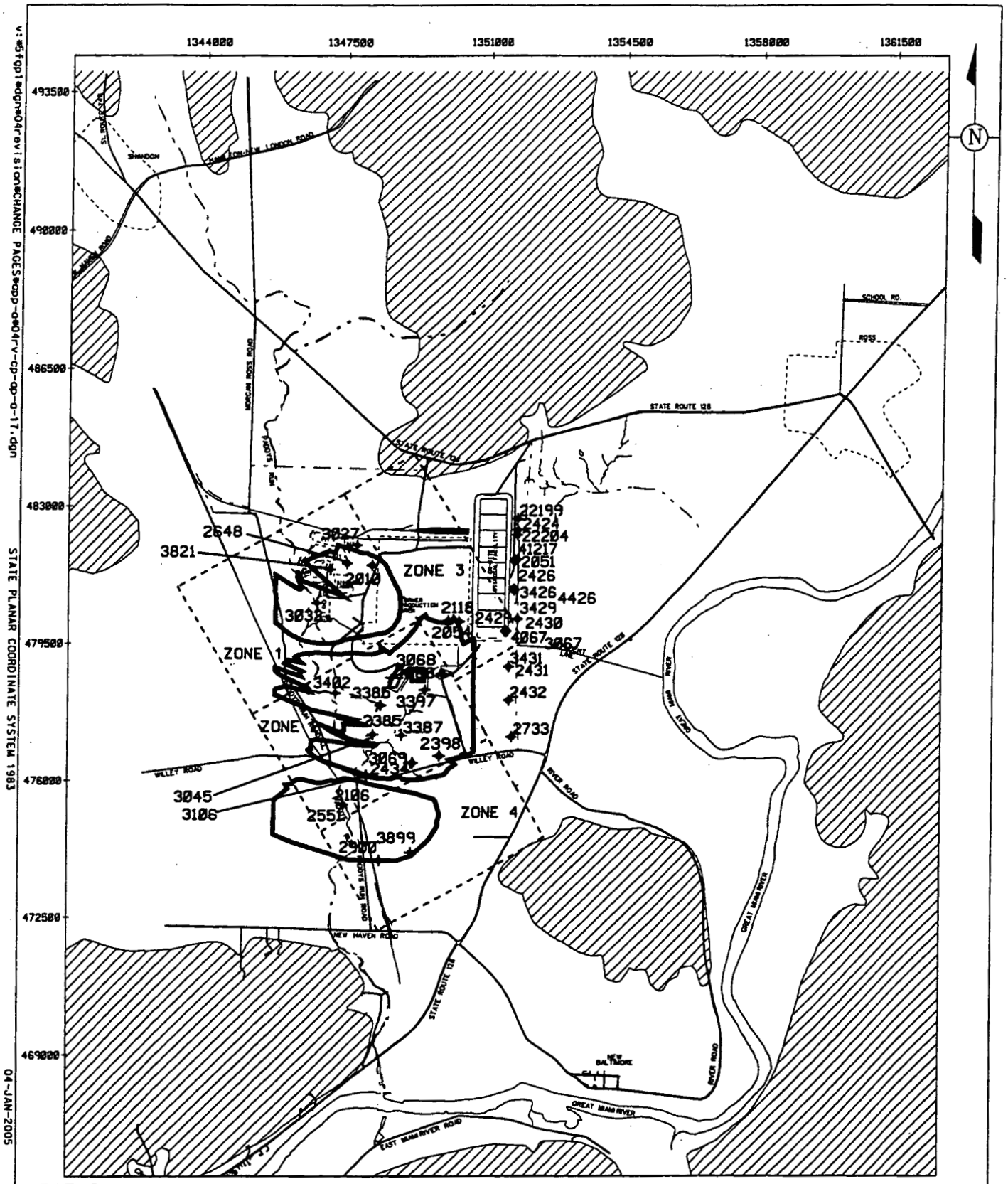


FIGURE A-16. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR VANADIUM



LEGEND:

— · — · — FERNALD SITE BOUNDARY

3120 ✦ MONITORING WELL

10-YEAR. TIME-OF-TRAVEL REMEDIATION FOOTPRINT

BEDROCK HIGHS

NOTE: ZONE 0 INCLUDES EVERYTHING OUTSIDE OF ZONES 1 - 4

SCALE

3500 1750 0 3500 FEET

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FIGURE A-17. MONITORING WELL LOCATIONS WITH CONCENTRATIONS ABOVE THE FRL FOR ZINC

STATE PLANAR COORDINATE SYSTEM 1983

04-JAN-2005

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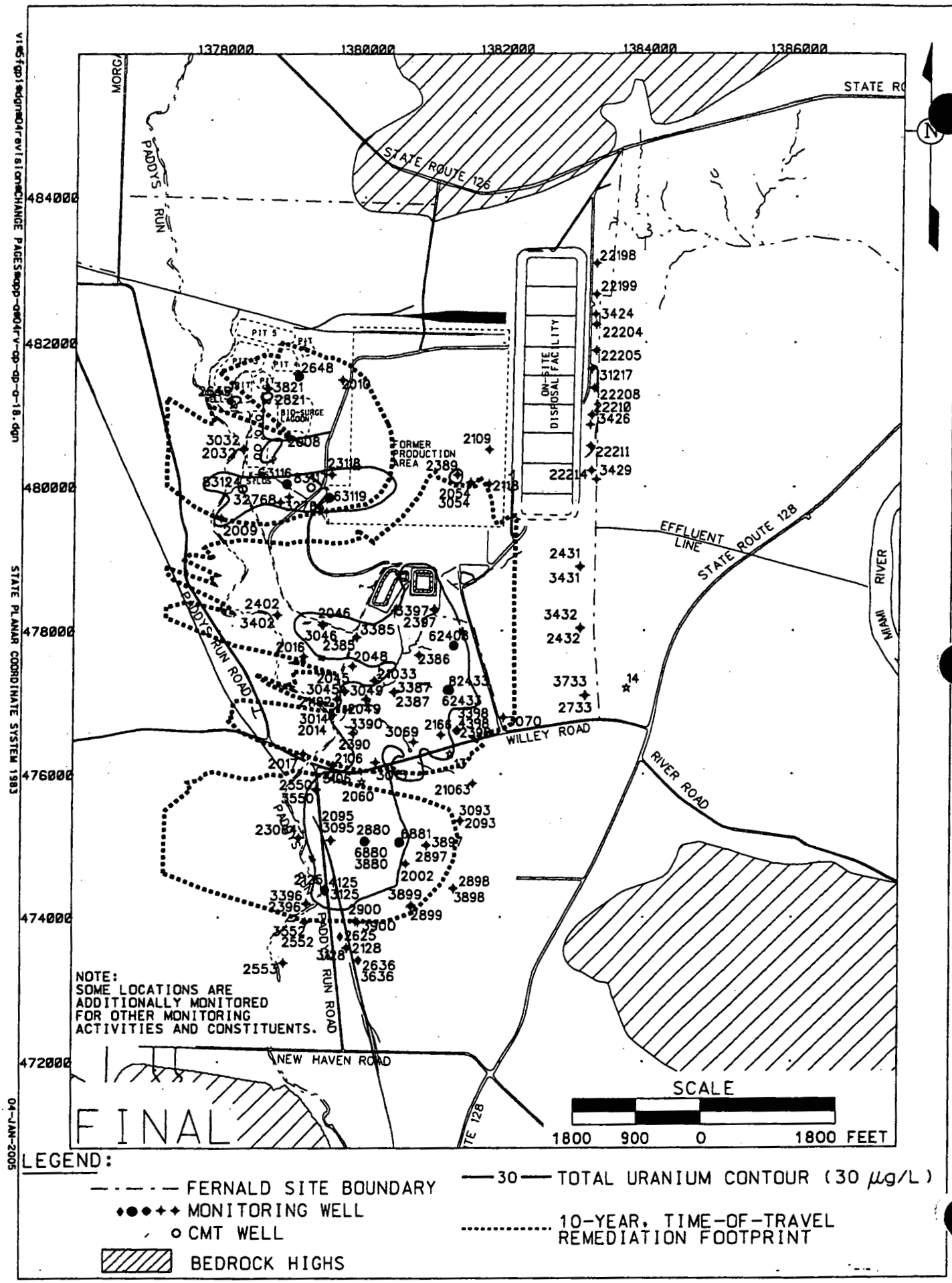


FIGURE A-18. LOCATIONS FOR SEMIANNUAL TOTAL URANIUM MONITORING

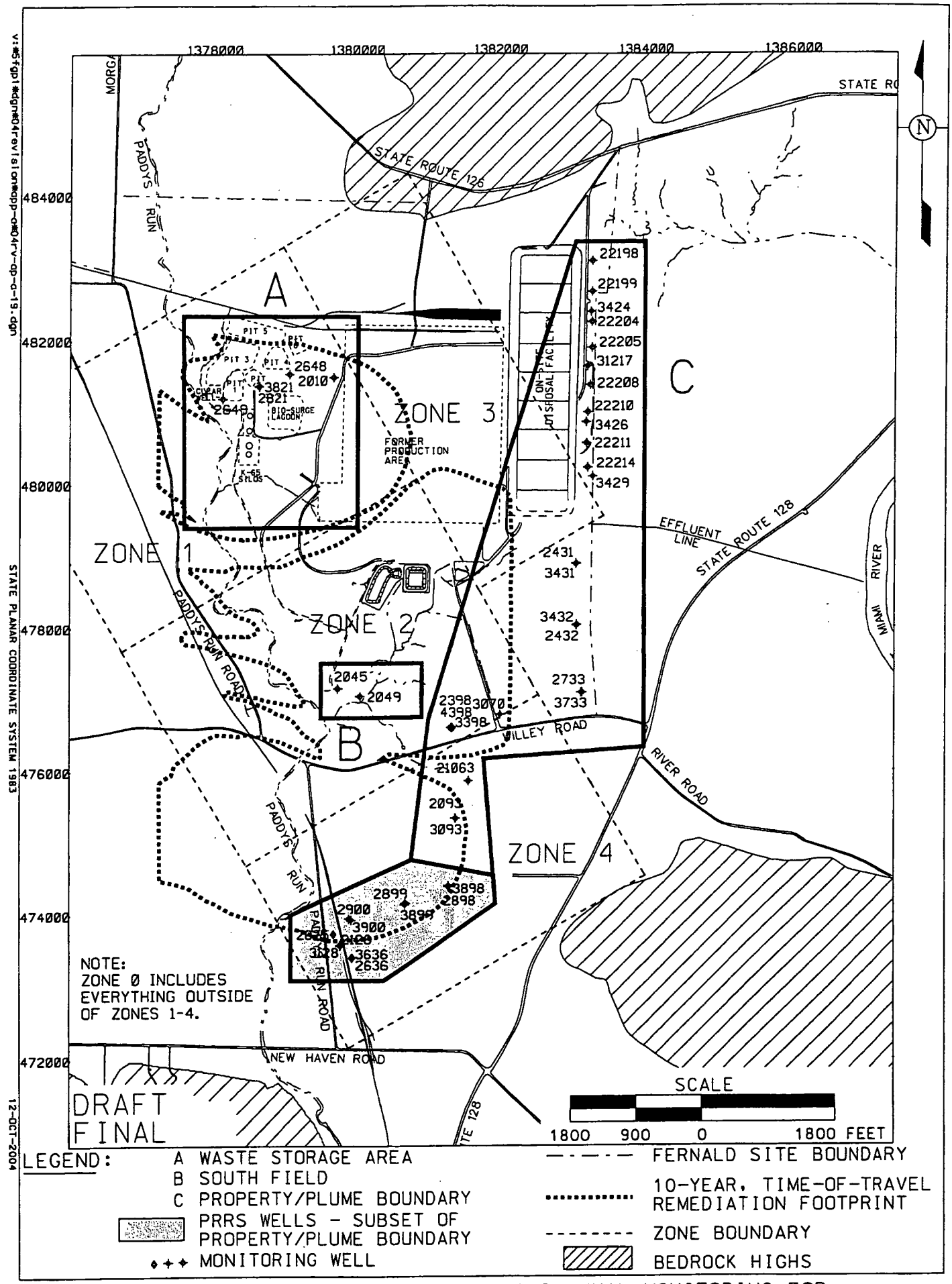


FIGURE A-19. LOCATIONS FOR SEMIANNUAL MONITORING FOR PROPERTY/PLUME BOUNDARY, SOUTH FIELD, AND WASTE STORAGE AREA

Appendix B

APPENDIX B

SURFACE WATER FINAL REMEDIATION LEVEL (FRL) EXCEEDANCES

APPENDIX B

SURFACE WATER FINAL REMEDIATION LEVEL (FRL) EXCEEDANCES

This appendix provides further information regarding the final remediation level (FRL) exceedances. As discussed in Section 4.4.2.3, a limited number of constituents have been detected above their respective FRLs at several surface water sample locations. To better quantify the actual number and location of exceedances, data collected under the IEMP (from August 1997 through December 2003) were compiled and compared to FRLs to determine the number and locations of the exceedances. Table B-1 itemizes the Fernald site FRL exceedances based on IEMP characterization monitoring.

This appendix also provides figures that document the particular sample location where FRLs have been exceeded. Figures B-1 through B-9 show, by constituent, those locations with FRL exceedances. The figures also show FRL exceedances at background locations to document non-site exceedances; they also show exceedances from constituents previously monitored (i.e., constituents removed from monitoring as documented in IEMP, Revision 3, Appendix B) to provide an historical perspective.

TABLE B-1
EVALUATION OF CONSTITUENTS SELECTED FOR IEMP CHARACTERIZATION DUE TO FRL EXCEEDANCES

Location	Currently Monitored COCs	Basis for Selection of Constituent Code[a, b]	No. of Analyses[c]	No. of FRL Exceedances[c]	Date of Last FRL Exceedance (No. of samples since exceedance)[c]
SWP-02 (Paddys Run)	**Radionuclides:**				
	Technetium-99	M	32	0	-
	Thorium-228	WP	12	0	-
	Thorium-230	WP	12	0	-
	Thorium-232	WP	12	0	-
	Total Uranium[d]	PC	32	0	-
SWP-03[e] (Paddys Run at Downstream Property Boundary)	**Inorganics:**				
	Chromium, Total	S	30	5	11/12/2003 (0)
	Copper	S	30	2	9/27/2002 (5)
	Cyanide	M	21	0	-
	Mercury	M	28	1	04/13/1998 (22)
	Silver	M	30	0	-
	Zinc	M	23	0	-
	Radionuclides:				
	Radium-226	M	28	0	-
	Strontium-90	M	23	0	-
	Technetium-99	M	30	0	-
	Thorium-228[f]	WP	12	0	-
	Thorium-230[f]	WP	12	0	-
	Thorium-232[f]	WP	12	0	-
	Total Uranium[d]	PC, M	42	0	-
SWD-01 (Northeast Drainage)	**Inorganics:**				
	Cyanide	M	33	0	-
	Mercury	M	22	0	-
	Radionuclides:				
	Total Uranium[d]	PC, M	19	0	-

TABLE B-1
(Continued)

Location	Currently Monitored COCs	Basis for Selection of Constituent Code[a, b]	No. of Analyses[c]	No. of FRL Exceedances[c]	Date of Last FRL Exceedance (No. of samples since exceedance)[c]
SWD-02 (Storm Sewer Outfall Ditch)	**Radionuclides:**				
	Strontium-90	M	26	0	-
	Technetium-99	M	27	0	-
	Total Uranium[d]	PC, M	59	0	-
SWD-03 (Waste Storage Area)	**Inorganics:**				
	Copper	S	35	3	10/5/2002 (4)
	Cyanide	M	24	0	-
	Mercury	M	21	0	-
	Silver	M	24	1	4/4/2000 (14)
	Zinc	M	24	3	10/5/2002 (4)
	Radionuclides:				
	Technetium-99	M	24	0	-
	Thorium-228	WP	12	0	-
	Thorium-230	WP	12	0	-
	Thorium-232	WP	12	0	-
	Total Uranium[d]	PC	58	0	-
PF 4001 (Parshall Flume - Treated Effluent)	**Inorganics:**				
	Cadmium	S	606	2	12/19/2003 (3)
	Cyanide	M	519	0	-
	Mercury	M	84	0	-
	Silver	M	609	0	-
	Radionuclides:				
	Radium-226	M	32	0	-
	Strontium-90	M	26	0	-
	Technetium-99	M	82	0	-
	Total Uranium[d]	PC, M	2333	0	-

TABLE B-1
(Continued)

Location	Currently Monitored COCs	Basis for Selection of Constiuent Code[a, b]	No. of Analyses[c]	No. of FRL Exceedances[c]	Date of Last FRL Exceedance (No. of samples since exceedance)[c]
SWRB 4002O	**Inorganics:**				
(Storm Water Retention	Beryllium	S	9	0	-
Basin)	Cadmium	S	9	0	-
	Cyanide	M, S	8	0	-
	Manganese	S	9	0	-
	Mercury	M, S	9	0	-
	Radionuclides:				
	Radium-226	M	8	0	-
	Radium-228	S	8	0	-
	Strontium-90	M	5	0	-
	Technetium-99	M, S	5	0	-
	Uranium, Total[d]	PC, M	5	0	-
STRM 4003	**Radionuclides:**				
(Drainage to Paddys Run)	Total Uranium[d]	PC, M, S	24	0	-
STRM 4004	**Radionuclides:**				
(Drainage to Paddys Run)	Total Uranium[d]	PC, M, S	20	0	-
STRM 4005	**Radionuclides:**				
(Drainage to Paddys Run)	Total Uranium[d]	PC, M, S	51	0	-
STRM 4006	**Radionuclides:**				
(Drainage to Paddys Run)	Total Uranium[d]	PC, M, S	22	0	-

Shading indicates location-specific consituents of concern that were monitored during excavation of the waste pits to assess thorium releases as a whole. With the end of excavation, this monitoring is no longer required.

[a]M = based on modeling; PC = primary constituent of concern; S = sporadic exceedances; WP = waste pits excavation monitoring

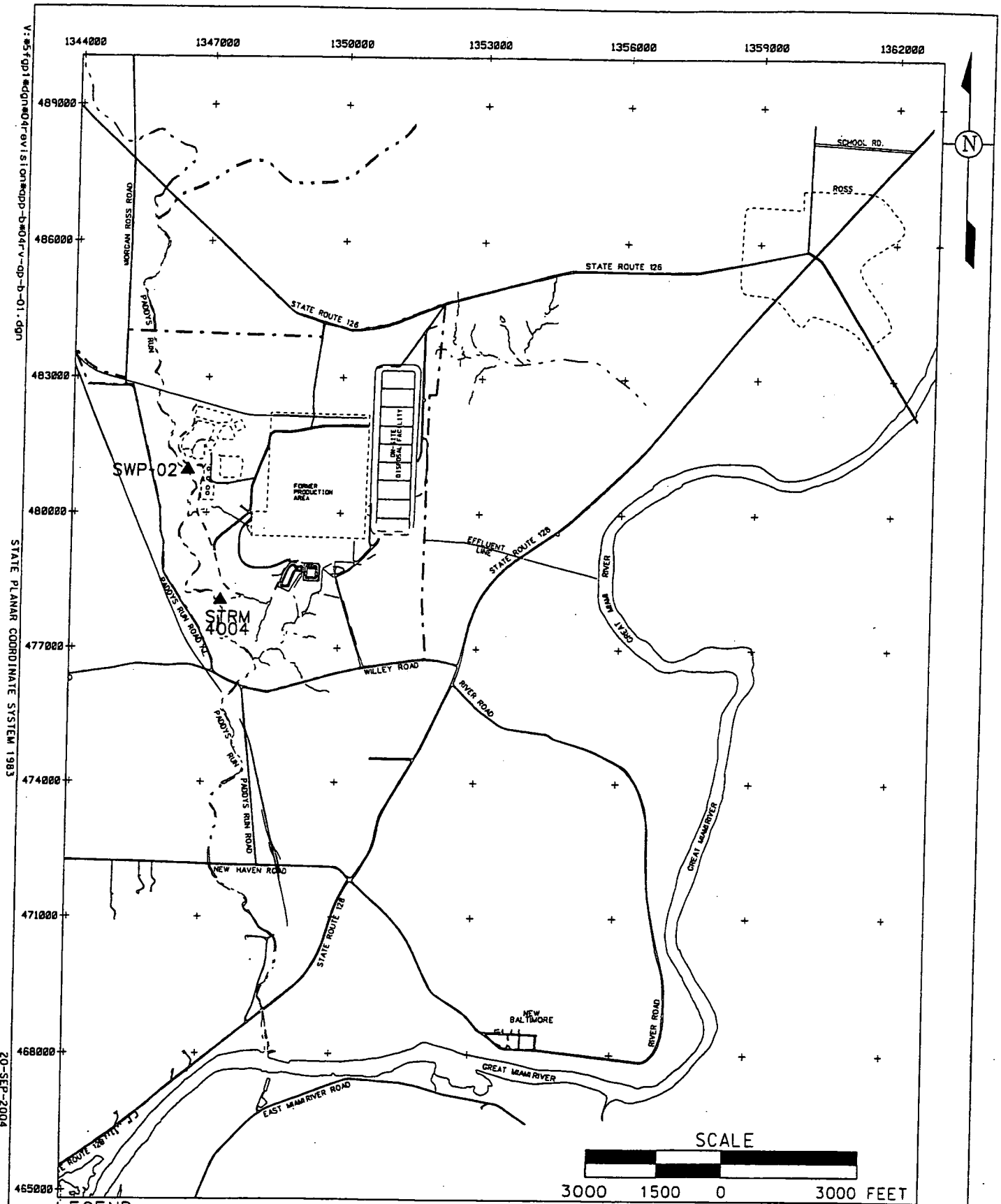
[b]Those constituents monitored based on Modeling (M) will continue to be monitored even if there has been no FRL/BTV exceedance.

[c]Based on analytical data from August 1997 through December 2003.

[d]Total uranium will continue to be monitored quarterly whether there is a basis or not (i.e., M, S, I) and the monitoring criteria will be identified as :

[e]Beryllium , cadmium, manganese, and radium-228 are being added to the program, but not to this table. This location is the last one suface water is monitored on Paddys Run prior to leaving the site; therefore, these constituents are being monitored at this location in order to be conservative.

[f]These constituents of concern were added during excavation of the waste pits. Even thought wate pit excavation has ended, these constituents of concern were retained at this downstream property boundary location in order to be conservative.



LEGEND:

FERNALD SITE BOUNDARY

DRAFT FINAL

▲ 1997-2003 IEMP EXCEEDANCE

FIGURE B-1. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR BERYLLIUM

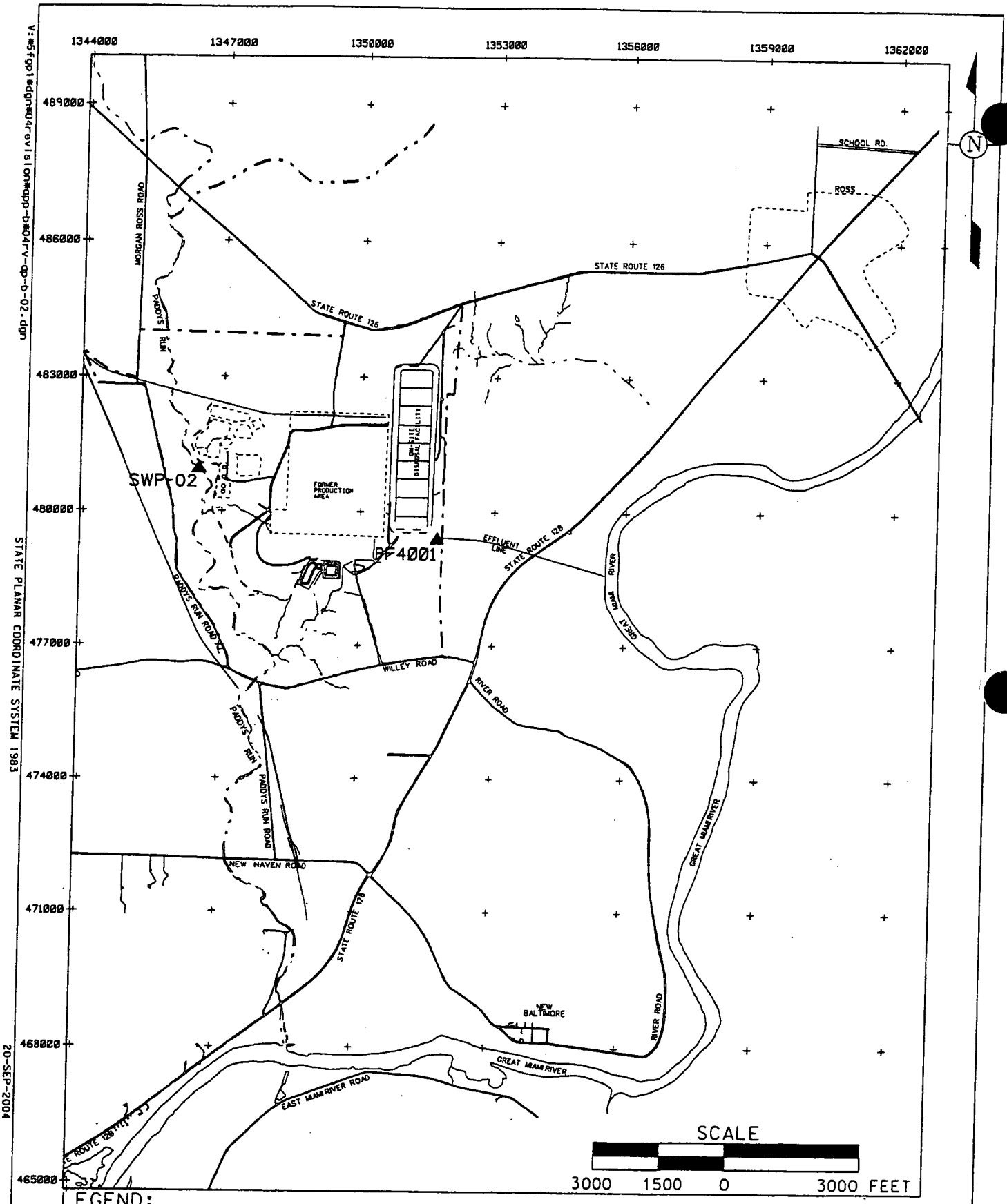


FIGURE B-2. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR CADMIUM

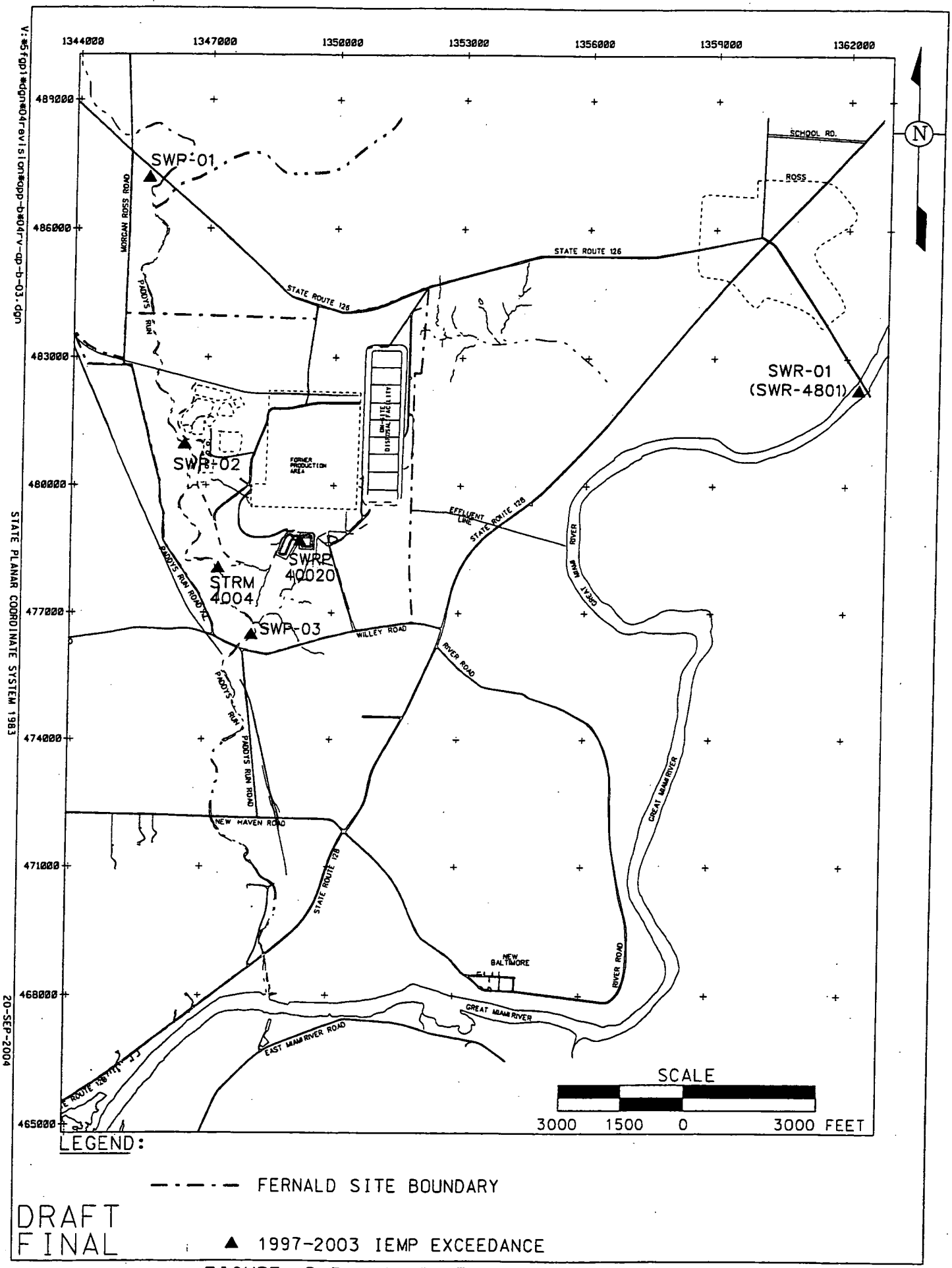
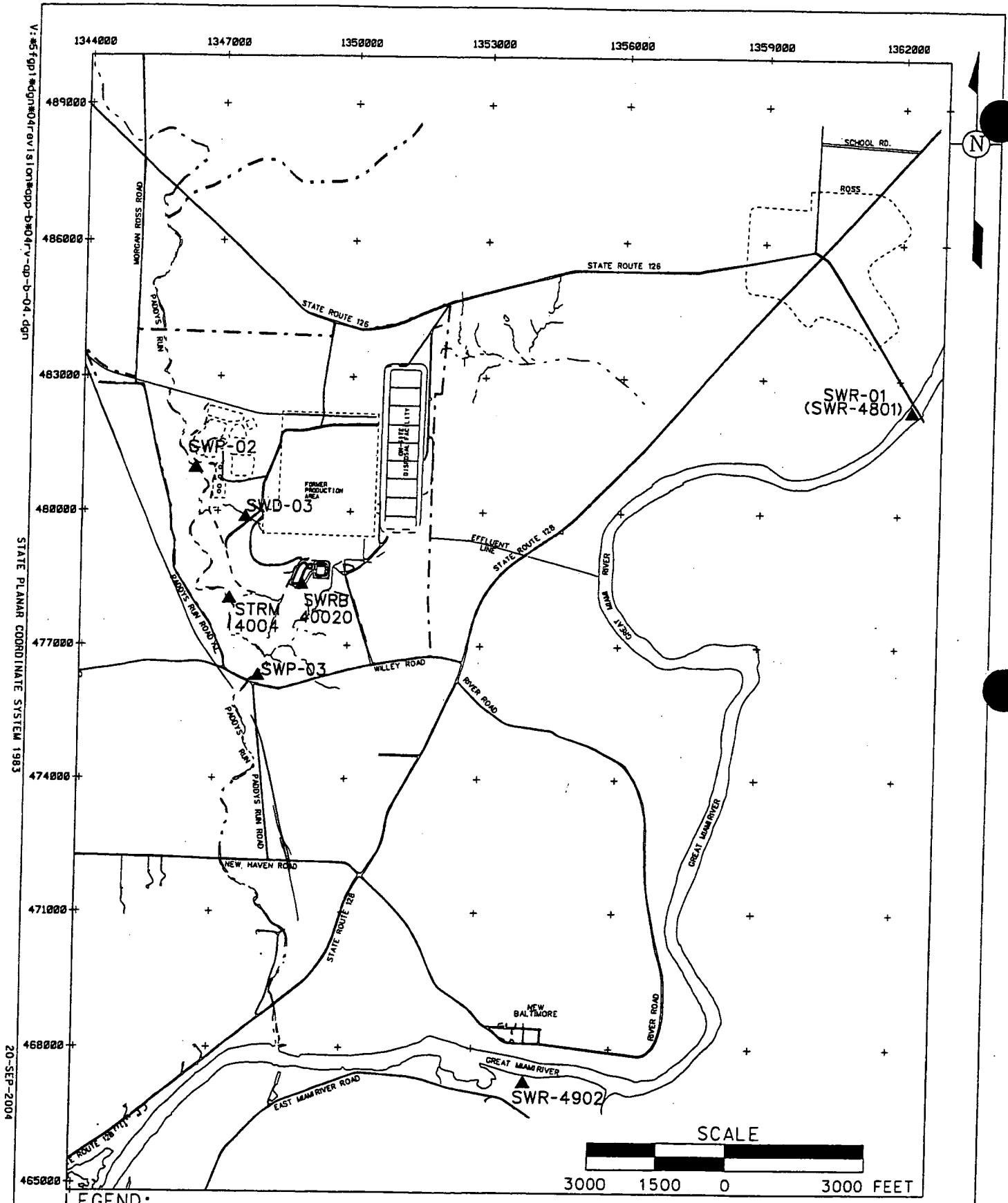


FIGURE B-3. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR TOTAL CHROMIUM



LEGEND:

FERNALD SITE BOUNDARY

▲ 1997-2003 IEMP EXCEEDANCE

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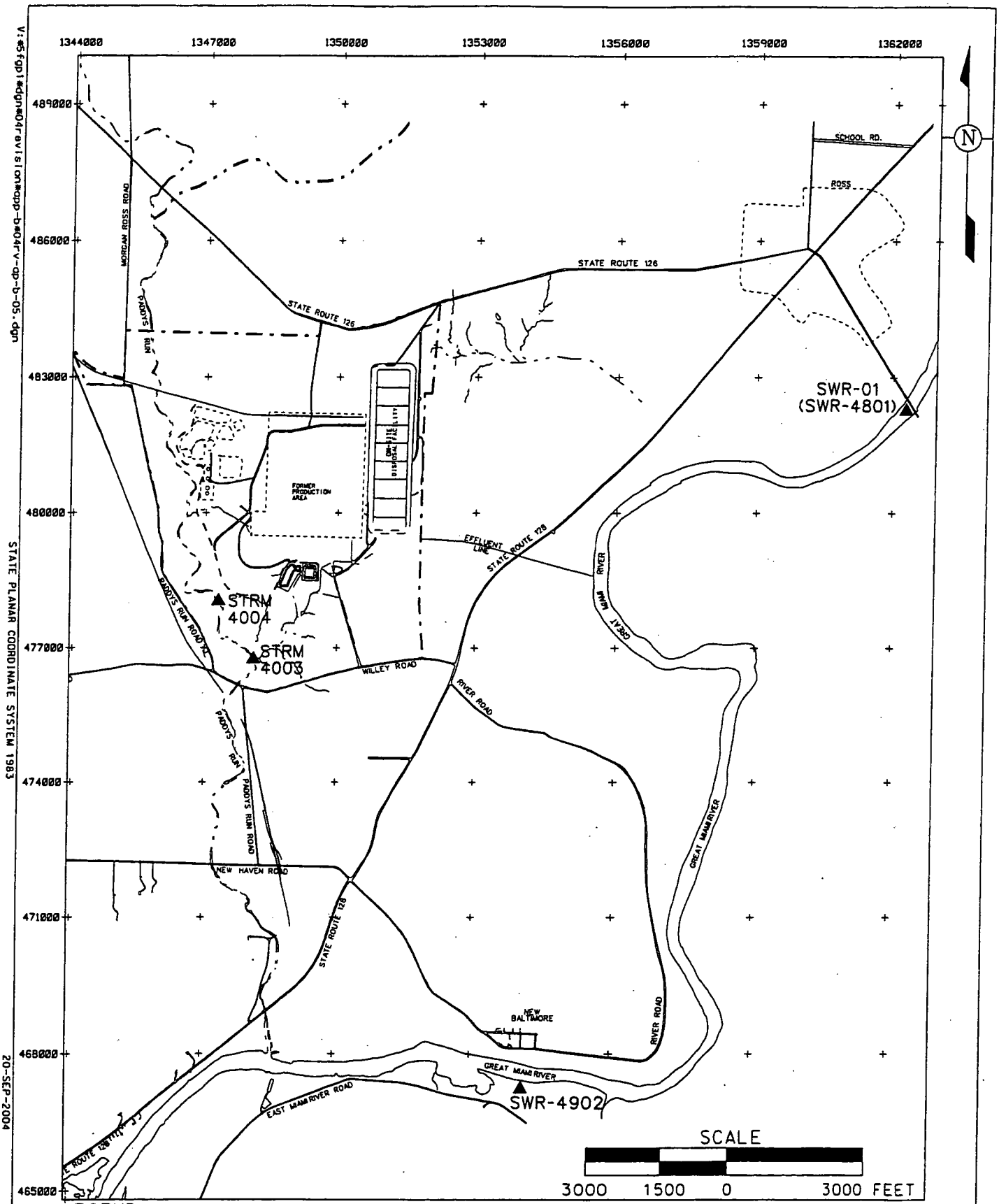
FINAL

FIGURE B-4. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR COPPER



LEGEND:

FERNALD SITE BOUNDARY

▲ 1997-2003 IEMP EXCEEDANCE

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STATE PLANAR COORDINATE SYSTEM 1983

20-SEP-2004

FIGURE B-5. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR LEAD

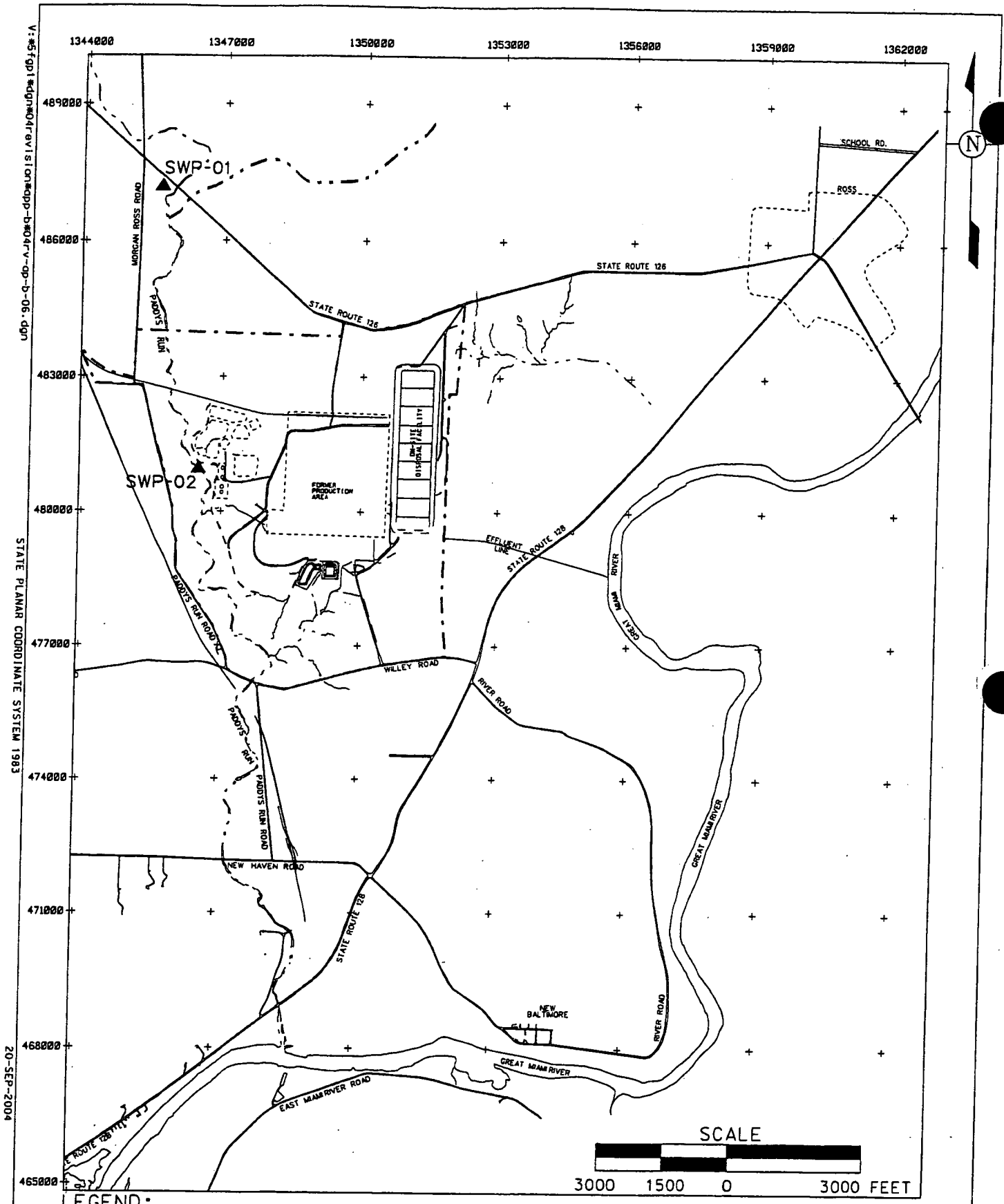
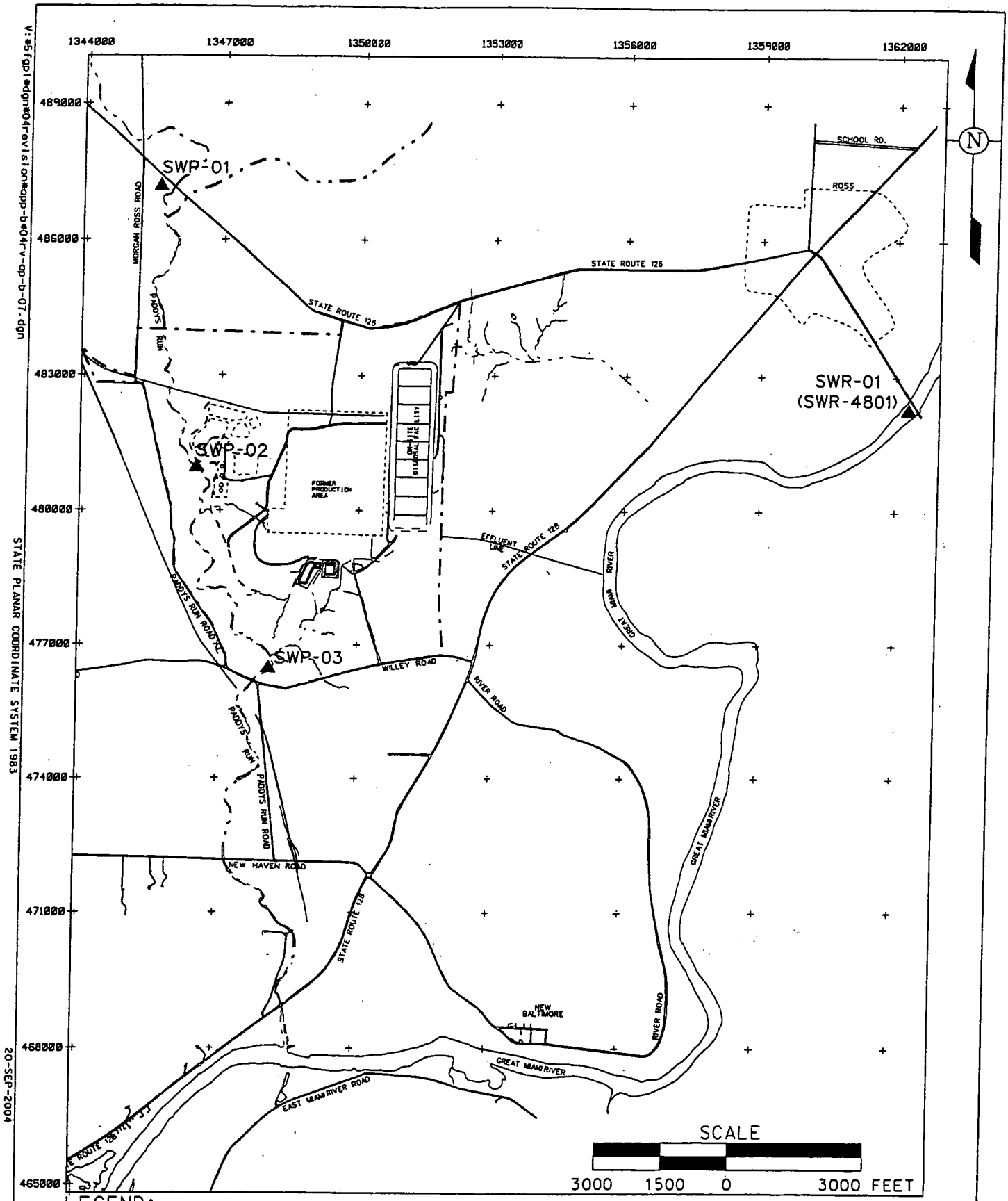


FIGURE B-6. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR MANGANESE



LEGEND:

FERNALD SITE BOUNDAF

1997-2003 IEMP EXCEEDANCE

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FIGURE B-7. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR MERCURY

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STATE PLANAR COORDINATE SYSTEM 1983

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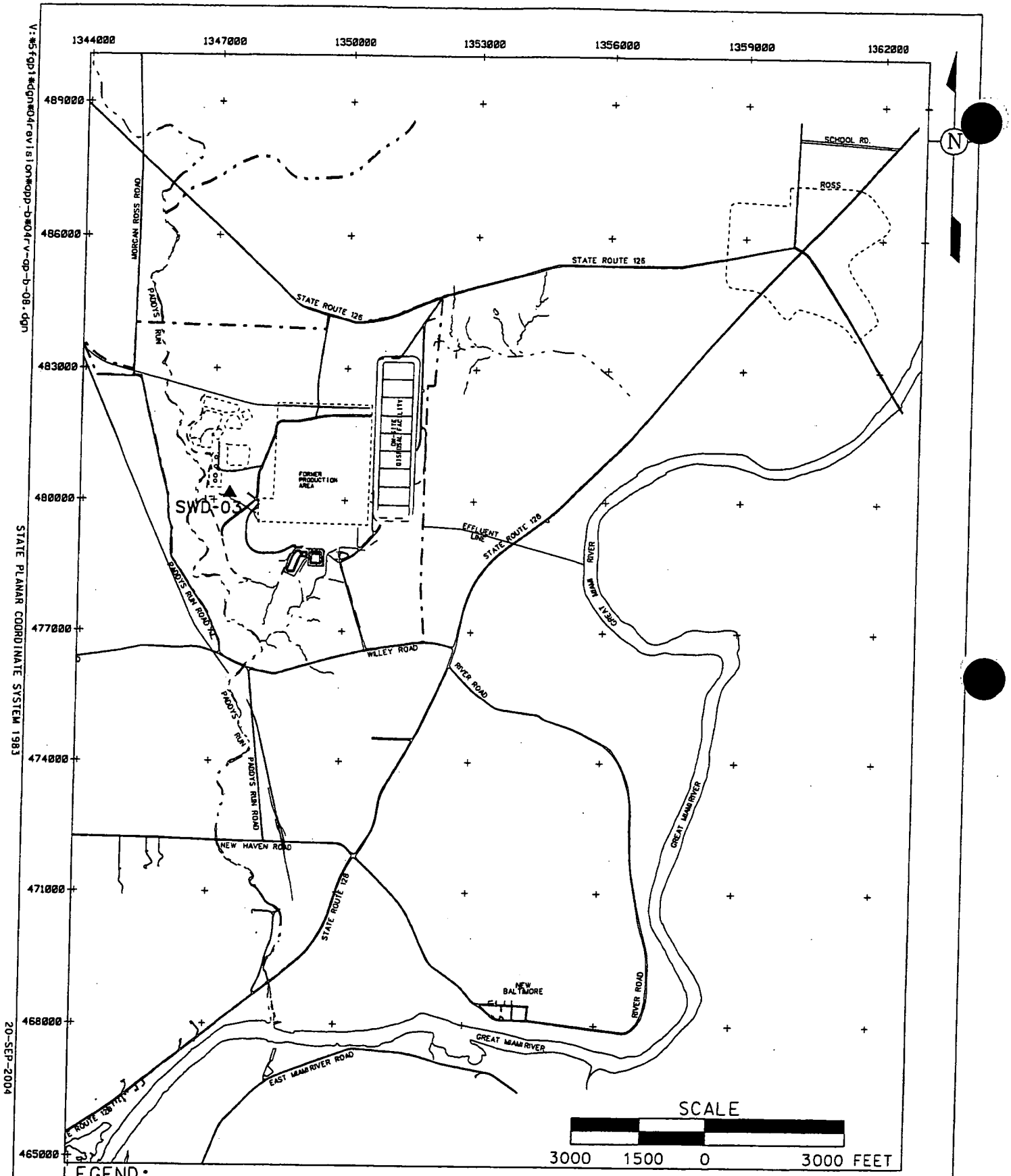

LEGEND:

FERNALD SITE BOUNDARY

1997-2003 IEMP EXCEEDANCE

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STATE PLANAR COORDINATE SYSTEM 1983

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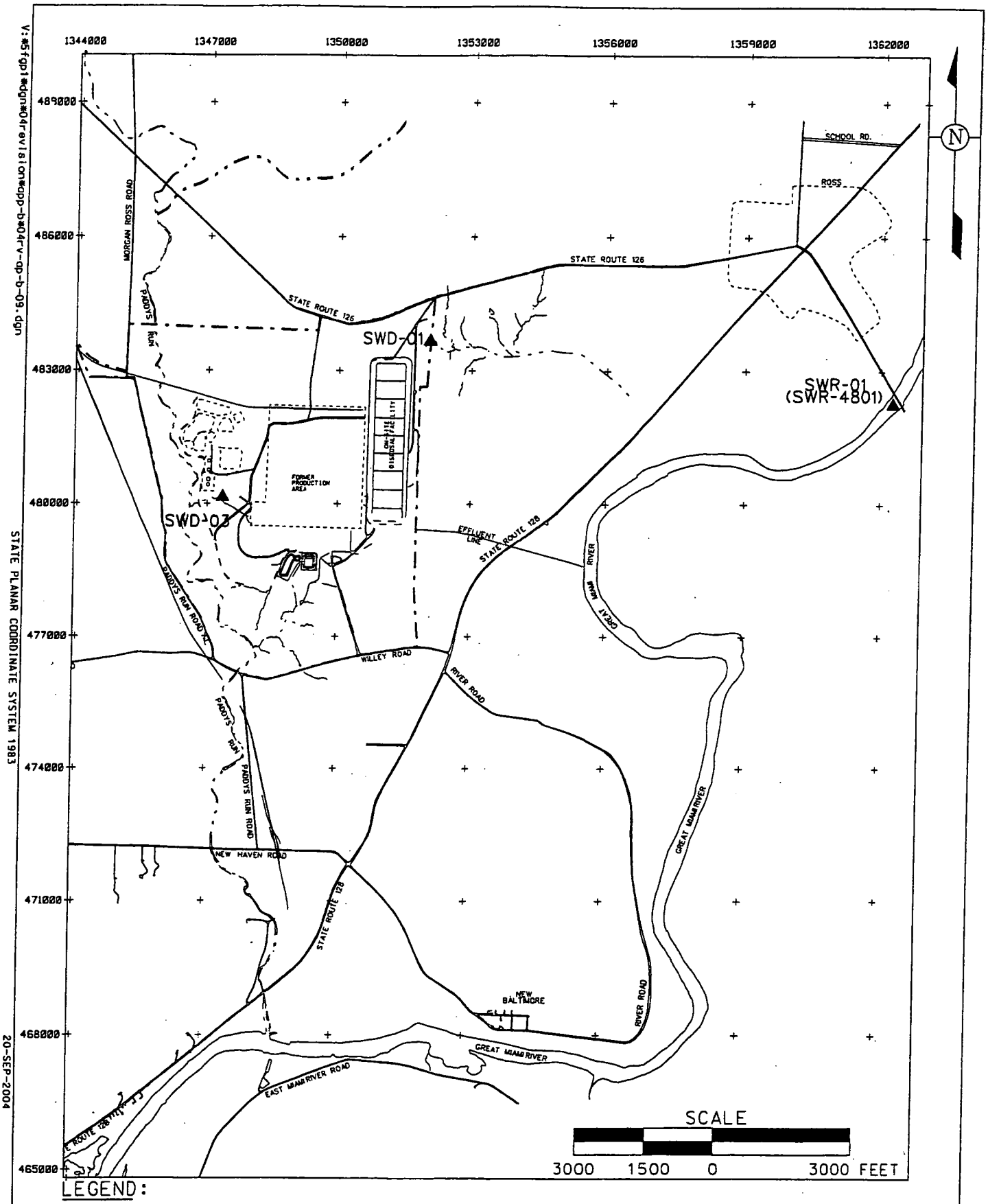
FIGURE B-8. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR SILVER



LEGEND:

FERNALD SITE BOUNDARY

▲ 1997-2003 IEMP EXCEEDANCE

DRAFT
FINAL

FIGURE B-9. SURFACE WATER LOCATIONS WITH FRL EXCEEDANCES FOR ZINC

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STATE PLANAR COORDINATE SYSTEM 1983

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Appendix C

APPENDIX C

DOSE ASSESSMENT

APPENDIX C
DOSE ASSESSMENT

C.1 INTRODUCTION

This appendix describes the technical approach for conducting the annual radiological dose assessment to meet the intentions of U.S. Department of Energy (DOE) Order 5400.5 (DOE 1993a) and the air pathway compliance determination (for 40 Code of Federal Regulations [CFR] 61 National Emissions Standards for Hazardous Air Pollutants [NESHAP] Subpart H) during the active remediation of the Fernald Closure Project (FCP). The Integrated Environmental Monitoring Plan (IEMP) will be the mechanism for conducting and reporting the annual sitewide radiological dose assessments.

The application of effective source and emission control measures, coupled with appropriate initial planning and ongoing preventive tracking, will form the cornerstone of the FCP's environmental safeguards during remediation. The objective of the dose assessment under the IEMP is to support these safeguards during remediation and to provide appropriate feedback, when necessary. The FCP's current compliance-based method for conducting the site's annual dose assessment (which, by definition, is performed at the end of the calendar year to report the results of past activities) will be supplemented with tracking and evaluating actual monitoring data collected at the Fernald site boundary during the year to identify any need for improving source emission control measures to ensure that the annual NESHAP dose limit is never reached.

C.2 REGULATORY DRIVERS AND REQUIREMENTS

Radiological dose assessments are prepared annually to establish that doses to the public from routine operations and emissions are in compliance with the dose limits set by the U.S. Environmental Protection Agency (EPA) and DOE regulations and orders. Before 1998, radiological dose assessments conducted at the end of the year were based on computer modeling results that used measured and estimated releases of airborne radioactive materials from significant sources. Since 1998, radiological dose assessments have been based on environmental monitoring results in order to provide a more accurate estimate of dose attributable to fugitive emissions. This section describes the various radiological dose limits and guidelines defined in the applicable or relevant and appropriate requirements (ARARs) and other regulatory requirements accompanying the FCP's remediation activities.

In addition to the regulatory drivers for the FCP's annual dose assessment, the need for a dose tracking procedure that can be used as a preventive tool has been identified. Dose tracking is needed to help prevent exceedance of the annual radiological dose limits and to identify the expected significant contributors for each year's combination of remediation activities. Based on the dose tracking results, any additional source control measures or adjustment in project-specific activities can be made as necessary to ensure that the Fernald site's contributions to annual dose remain within prescribed limits.

C.2.1 ARARs and Other Regulatory Drivers

This subsection summarizes the ARARs and other regulatory drivers for the dose assessment and associated dose limits. A sitewide radiological dose assessment is needed to demonstrate compliance with the following limits and guidelines from DOE Order 5400.5, which incorporates dose assessment standards in 40 CFR 61 NESHAP, Subpart H:

- The exposure of members of the public to radiation sources as a consequence of all routine activities at a DOE site shall not cause, in a year, an effective dose equivalent greater than 100 millirem (mrem). This annual effective dose equivalent is defined as the sum of direct external exposure for the year, plus the committed effective dose equivalent for intakes experienced during the year.

- The guideline includes doses from remediation activities and naturally occurring radionuclides released by DOE processes, but not radon and its decay products. All pathways that could significantly contribute to the exposure are to be included in the calculations. Significant exposures are considered to be 1 percent (one mrem) of the 100-mrem dose limit or greater.

- The exposure of members of the public to radioactive materials released to the atmosphere as a consequence of all activities at a DOE site shall not cause, in a year, an effective dose equivalent greater than 10 mrem. Because this guideline implements the dose limits of 40 CFR 61 Subpart H, doses caused by radon-222 and its decay products are not included. The same annual effective dose equivalent definition applies as above.

  Note: The radon effluent guidelines of DOE Order 5400.5 also implement the EPA flux regulations of 40 CFR 61, Subpart Q, which apply to radon-producing wastes during storage or disposal. These guidelines are expressed in terms of radon concentrations in air and radon flux at the surface of radon-producing wastes, not in terms of dose to humans or other organisms.

- The liquid effluents from DOE activities shall not cause private or public drinking water systems to exceed the drinking water radiological limits in 40 CFR 141 which says that effluents must not cause the drinking water radiological limits to exceed any of the following independent limits: man-made beta/gamma-emitting radionuclides at an annual average concentration that would cause an annual dose equivalent of 4 mrem to the total body or any internal organ; combined radium-226 and radium-228 at any time totaling 5 picoCuries per liter (pCi/L); or gross alpha activity (including radium but excluding radon and uranium) of 15 pCi/L at any time.

- The absorbed dose to native aquatic organisms shall not exceed one rad per day from exposure to the radioactive material in liquid wastes discharged to natural waterways. For the purposes of satisfying this requirement, the term "native aquatic organisms" (which is not otherwise defined by DOE) is interpreted to mean insects, macro-invertebrates (i.e., crayfish, shellfish, etc.), finned fish, and mammals.

C.2.2 Remediation Support Requirements

During remediation of the Fernald site, routine dose assessments using actual monitoring data will also be conducted more frequently to verify the effectiveness of the source control measures implemented by individual remediation projects and to prevent exceedance of the annual dose limits.

During the year, actual monitoring data at fenceline monitoring locations (defined in Section 6.0) will be evaluated at least quarterly. When determined necessary, the source emission control measures for selected remediation projects will be revised to reduce the chance of exceeding the annual dose limit. At the end of the year, the actual air monitoring data will also be used to directly determine the annual dose for the 40 CFR 61 NESHAP, Subpart H compliance demonstration.

C.3 GENERAL TECHNICAL APPROACH

This section presents a discussion of the general technical approach to be followed for performing the dose tracking and actual annual dose assessment. The discussion includes an explanation of exposure pathways and media important to the dose assessment, surveillance, and characterization of these pathways; and the dose calculation procedure.

C.3.1 Exposure Pathways During Remediation

Establishment of representative exposure pathways is important for performing the dose assessment. A typical exposure pathway consists of a specific source, medium of transport, and a defined receptor. During the course of remediation, conditions at the Fernald site's contaminant sources may be altered both temporarily (during the action) and permanently (as a result of the action). Therefore, representative definitions of remediation-specific exposure pathways are needed to support accurate projections of radiological dose. Because contaminant source conditions can vary each year due to the mix of remediation activities in a given year, representative definitions of remediation-specific exposure pathways will be reevaluated each year during the initial annual sitewide planning and dose projection.

C.3.1.1 Remedial Project-Specific Sources

The remedial operations present new potential emissions sources in addition to the traditional sources (e.g., stack emissions) evaluated for NESHAP compliance. Following is a list of the major types of remediation operations that may have significant emissions:

- Building decontamination and dismantling
- Soil and waste pit material excavation
- Waste handling and treatment
- Construction and operation (i.e., waste placement) of the on-site disposal facility
- Waste transportation.

It is important to emphasize that the scope of the IEMP does not include the project-specific emission control monitoring (such as fugitive dust monitoring); such monitoring will be performed by the individual projects. The individual projects will also be responsible for applying the appropriate emission controls within a remediation activity to achieve compliance with project-specific regulatory requirements for workers' protection and environmental emissions. As a feedback mechanism for the projects, in the event that the routine IEMP dose tracking results indicate a pending unacceptable annual cumulative impact, follow-up project-specific analyses will be conducted to determine the possible causes. The results of the analyses will be provided to the specific remedial projects who will be responsible for further adjusting their control measures or activities to bring cumulative projections within acceptable limits.

C.3.1.2 Medium-Specific Pathways

Effective source control measures for each remedial action will be implemented and maintained during FCP remediation. (The IEMP monitoring and dose tracking activities are designed to appraise the cumulative effectiveness of these control measures.) As a result of the FCP's continuing obligation to apply such measures and because of the maturity of several remediation projects, the potential impacts of remediation activities are not expected to appreciably increase in any of the medium-specific pathways from historic levels. Therefore, the historic monitoring results summarized in the past annual site environmental reports can be used to select the FCP's significant exposure pathways (i.e., those pathways with the potential to contribute more than one percent of the all-pathway combined dose limit of 100 mrem, as prescribed by DOE guidelines) to be routinely monitored and included in the annual dose calculation procedure under the scope of the IEMP.

According to the past five annual dose assessments and remedial investigation/feasibility studies performed at the Fernald site, the potential exposure pathways to human receptors are through the air (inhalation and ingestion) and by direct radiation. These potential medium-specific pathways are summarized below:

Air Pathway

Significant exposure (i.e., above 1 percent of the all-pathway combined dose limit of 100 mrem) to humans through the air pathway during remediation may result from:

- Inhalation of contaminated fugitive dust from soil excavation, building decontamination and dismantling, temporary soil storage piles, on-site disposal facility construction, and waste pits (dose attributable to airborne emissions is subject to 40 CFR 61, Subpart H limit of 10 mrem per year)

- Inhalation of stack and vent releases

  Note: Exposure through consumption of meats and milk from animals that consumed contaminated feed (assuming all contamination was by air deposition instead of irrigation using contaminated water) has been shown to be consistently insignificant according to existing monitoring data.

Direct Radiation Pathway

Exposure from direct radiation may result from:

- Direct radiation from materials stored at the FCP, especially materials in the K-65 Silos
- Direct radiation from contaminated soil and sediment.

C.3.1.3 Potential Receptors

Potential receptors to be considered in the radiological dose assessment during the FCP remediation will include actual and hypothetical off-property residents. The hypothetical receptors are usually selected to demonstrate the worst possible dose at locations of the measured or calculated maximum air concentrations even when there is no actual receptor at those locations. The NESHAP compliance demonstration will be based on fenceline measurements, although there are no actual receptors on the fenceline. The IEMP air monitoring network focuses on monitoring at the fenceline to ensure limits are not exceeded, thereby ensuring the levels at the actual off-property residents are also below the limits. The exposure scenarios and parameters (i.e., duration of exposure and potential food sources) will be generally conservative as used in the previous dose assessments.

C.3.2 Routine Surveillance of Pathways

The environmental media that have the potential to lead to a significant annual dose (greater than 1 percent of the DOE all-pathway combined dose limit of 100 mrem) at the Fernald site boundary and representative potential receptor locations will be routinely sampled and analyzed for the constituents contributing to the dose. Sections 3.0 through 6.0 describe the medium-specific monitoring programs under the IEMP. All the significant pathways listed in Section C.3.1.2 will be monitored under the IEMP.

In general, the routine surveillance under the IEMP will include both environmental sampling/analysis and dose assessment/feedback to the remediation projects. The frequency of monitoring and evaluation will be selected to satisfy the regulatory drivers as well as remediation support requirements.

The data for the dose assessment will be based on measurements of radionuclide concentrations in environmental media at on-property and boundary/receptor monitoring locations (as presented in Sections 3.0 through 6.0), rather than in effluent samples obtained at specific sources (i.e., stacks), for the following reasons:

- Dose assessments based on measured radionuclide concentrations in environmental media are less uncertain than those based on effluent measurements. Assessments based on environmental monitoring avoid the use of the transport and bioaccumulation models required by effluent-based calculations, thereby reducing the overall uncertainty in the results.

- The potential exists for unmonitored releases from the Fernald site, and the impact of all releases must be accounted for. Examples of potential unmonitored releases include releases from open waste pits, fugitive releases from remediation activities, and any releases from demolition projects in the former production area. In an effluent-based method, releases from such pathways must be conservatively estimated, which again contributes to the uncertainty of the results and over-estimates the impact.

- Calculations based on environmental measurements directly account for impact from multiple sources. Using environmental monitoring results as input for the dose assessment accounts for all sources of environmental contaminants, without the need for assumptions regarding the impacts of multiple facilities.

- Despite the lower concentrations in environmental media compared to effluent samples, adequate dose sensitivity can be achieved. Environmental sampling frequencies, sample sizes, and analytical methods have been selected to obtain sufficient sensitivity in order to support the required dose calculations.

The air pathway dose calculation, which is required to demonstrate compliance with EPA's NESHAP Subpart H standards, will also be based on environmental monitoring data instead of stack emissions

measurements and subsequent air dispersion modeling through 2005, and followed by modeling in 2006 after the major remediation projects have been completed.

As part of its integration responsibilities, the IEMP serves to consolidate the FCP's environmental monitoring, preventive tracking/feedback, and reporting requirements in order to assess the air exposure pathway.

C.3.3 Dose Assessment Approach

C.3.3.1 Air Monitoring for NESHAP Subpart H Compliance

This section describes the technical approach for demonstrating compliance with NESHAP Subpart H using environmental measurements of radionuclide air concentrations at the Fernald site boundary. It also addresses each of the criteria for environmental measurement compliance programs as described in 40 CFR 61.93 (b)(5) and the basic requirements issued by EPA for NESHAP Subpart H environmental measurements at the Fernald site.

Criterion I: The air at the point of measurement shall be continuously sampled for collection of radionuclides.

Of the 18 continuously operating high-volume air monitoring stations (16 fenceline, one background, and one for thorium tracking), 17 will be used for the collection of radionuclides for the purpose of demonstrating NESHAP compliance. The air monitoring stations sample air at approximately 1.3 cubic meters per minute (m^3/minute) using a 0.3 micron filter. The air monitoring stations contain a flow rate chart recorder and a hour-meter that provides a record of the monitors operation over the sampling period. The air monitoring stations are routinely checked to ensure normal operation. Figure 6-1 identifies the location of the air monitoring stations. Monitoring locations have been selected based on wind rose sectors and potential receptor locations.

Criterion II: Those radionuclides released from the facility, which are the major contributors to the effective dose equivalent, must be collected and measured as part of the environmental measurement program.

The IEMP air monitoring program consists of the following sampling and analytical regime:

- Table C-1 identifies the analysis regime for samples collected from each air monitoring station.

TABLE C-1

ANALYSIS REGIME

Constituent	Frequency	Method	HAMDC[a] (pCi/m^3)
Total Particulate	Biweekly	Gravimetric	-
Total Uranium	Biweekly	KPA	3E-05
Thorium-228	Monthly	Alpha Spec.	7E-06
Thorium-230	Monthly	Alpha Spec.	7E-06
Thorium-232	Monthly	Alpha Spec.	7E-06

Quarterly composite samples will be prepared from the biweekly samples for each monitor. The composite samples will be analyzed at ASL E by an off-site laboratory for the following constituents of concern. Table C-2 provides the basis for the frequency of analysis and selection of constituents.

TABLE C-2

QUARTERLY ANALYSIS REGIME

Constituent	Method[a]	HAMDC[b] (pCi/m^3)	HAMDC as Percent of Appendix E, Table 2 Values
Uranium-238	Alpha Spec.	9E-05	1.1
Uranium-234	Alpha Spec.	9E-05	1.3
Uranium-235/236	Alpha Spec.	9E-05	1.2
Thorium-228	Alpha Spec.	7E-06	0.2
Thorium-230	Alpha Spec.	7E-06	0.2
Thorium-232	Alpha Spec.	7E-06	1.1
Radium-226	Gamma Spec./Alpha Spec. Analysis	2E-04	6.1

[a]Or other EPA-approved methods
[b]HAMDC = Highest allowable minimum detectable concentration as specified in the Sitewide CERCLA Quality Assurance Project Plan (SCQ) (DOE 2003) or as specified in analytical contracts with off-site laboratories. The HAMDCs required by the FCP provide adequate sensitivity to detect below 10 percent of the corresponding NESHAP standard for each radionuclide of interest.

Frequency of Analysis

Quarterly analysis of composite samples is performed in order to meet the following needs of the IEMP air monitoring program:

- Sufficient air sample volumes to detect the low concentrations of contaminants in the air
- Periodic confirmation that contaminant concentrations are below the levels that would cause a dose of 10 mrem/year.

Large volumes of air must be sampled from both the background and blank concentrations in order to readily detect and distinguish the presence of a contaminant at low concentrations. Because filter loading limits the volume of air that can be sampled with a single filter, quarterly composite sampling is used to create a sample that represents a large volume of air.

Quarterly measurements provide a means to check the concentrations of contaminants several times during the year. Activities or work practices will be adjusted if quarterly measurements indicate that the 10-mrem/year limit might be exceeded.

Basis for Quarterly Composite Analytical Suite

The isotopes selected for quarterly analysis represent the major contributors to dose based on the following considerations:

- Radionuclides which are stored in large quantities at the Fernald site and which will be handled or processed during the remediation effort (uranium, thorium-232, thorium-230, and radium-226)
- Radionuclides which have been the major contributors to dose based on recent environmental filter measurements (uranium and thorium-230)
- Radionuclides which, due to their concentration in waste and contaminated soil, will be the major contributors to dose if the waste or soil is released in the form of fugitive dust (uranium, thorium-228, and thorium-230).

The large quantities of uranium compounds stored at the Fernald site, combined with the potential for release during the remediation effort, are the basis for including them as major contributors to dose. The waste products from the chemical processes used to produce uranium metal at the Fernald site contain comparatively high levels of thorium-230 and radium-226. These wastes were either stored in the K-65 Silos (with the intent of recovering the radium-226) or disposed of in the waste pits. The high concentrations of thorium-230 in the waste pit material are documented in the Remedial Investigation Report for Operable Unit 1 (DOE 1994). The K-65 Silos contents and the high levels of radium-226 and thorium-230 are characterized in the Remedial Investigation Report for Operable Unit 4 (DOE 1993b). The inclusion of radium-226 and thorium-230 as major contributors is based, in part, on the quantity of wastes that contain high levels of these radionuclides.

Based on planned activities and the radiological characteristics of materials (soil and waste) to be processed, uranium and thorium-230 are expected to continue to be the major contributors to the air pathway dose during the near term (2005 and 2006). However, DOE recognizes that as the remediation

progresses, new sources of emissions may change the mix of major contributors. The potential to change the list of major contributors exists through the excavation of the waste pits, demolition of buildings within the former production area, and to a lesser extent, the removal and handling of the silo's contents.

The major contributors from the waste pits were estimated by calculating the radionuclides relative contributions to dose assuming resuspension of the waste pit material in the form of fugitive dusts. Average concentrations of waste pit materials were used to represent the radiological characteristics of the fugitive dusts. The radiological characteristics of the K-65 Silos were not used because the process to remove the silo contents is not expected to generate emissions in the form of fugitive dusts. Table C-3 lists the expected major contributors to dose during waste pit excavation.

Thorium-228 was added to the list of major contributors based on its greater-than-5-percent contribution from Waste Pits 1, 2, and 4. Based on process knowledge, small quantities of transuranics (e.g., neptunium-237 and plutonium-239/240) and fission products (strontium-90, technetium-99, and cesium-137) shown in Table C-3 were introduced into the waste pits from recycled uranium and not from irradiated fuel. These radionuclides have been well characterized in the FCP wastes and will not be major contributors to air inhalation dose.

TABLE C-3

ESTIMATED PERCENTAGE CONTRIBUTION TO INHALATION DOSE ASSUMING RESUSPENSION OF WASTE PIT MATERIAL

Constituent	Waste Pit 1	Waste Pit 2	Waste Pit 3	Waste Pit 4	Waste Pit 5	Waste Pit 6
Cesium-137	0	0	0	0	0.2	0
Neptunium-237	0	0	0	0	3.4	0
Plutonium-238	0	0	0	0	0.1	0
Plutonium-239/240	0	0	0	0	0.3	0.1
Radium-226	1.1	4.8	2.9	0.3	3.4	0
Radium-228	0.2	1.1	1.2	0.4	0.5	0.2
Ruthenium-106	0	0	0	0	0	0
Strontium-90	0	2.0	0	0.1	0	0
Technetium-99	0	0	0.1	0	1.2	0
Thorium-228	5.2	6.1	2.8	7.4	0.7	0
Thorium-230	47.1	40.0	77.3	9.8	66.6	0.2
Thorium-232	16.2	9.1	8.4	9.5	2.5	0
Uranium-234	5.1	14.3	2.6	9.1	10	8.8
Uranium-235/236	0.7	6.6	.2	1.6	0.4	1.7
Uranium-238	24.4	16.1	4.6	61.7	10.7	88.9

DOE will monitor the changing mix of contributors by comparing the quarterly composite results to the NESHAP Appendix E, Table 2 values. If the fractions of the measured concentration to the corresponding NESHAP limit indicate a contaminant other than uranium is contributing the largest percentage of dose, then DOE will propose changes to the IEMP air monitoring and analytical schedule in order to better monitor the mix of major contributors.

Consideration of Decay Chain Daughter Products

Uranium-238, thorium-232, and uranium-235 are initial radionuclides in the uranium, thorium, and actinide decay chains, respectively. Table C-4 shows the decay chains and the half-lives of the daughter products.

Note: Doses caused by radon-222 and its respective decay products formed after the radon is released from the facility are not included in the NESHAP dose limit of 10 mrem/year and will not be measured as part of the NESHAP Subpart H compliance demonstration. A description of the FCP radon monitoring program is included in Section 6.0.

TABLE C-4

URANIUM, THORIUM, AND ACTINIDE DECAY CHAINS

Isotope	Half-Life	Isotope	Half-Life	Isotope	Half-Life
Uranium-238	4.5×10^{9} years	Thorium-232	1.4×10^{10} years	Uranium-235	7.1×10^{8} years
Thorium-234	24 days	Radium-228	5.7 years	Thorium-231	25.64 hours
Protactinium-234m	1.2 minutes	Actinium-228	6.13 hours	Protactinium-231	3.25×10^{4} years
Uranium-234	2.5×10^{5} years	Thorium-228	1.9 years	Actinium-227	21.6 years
Thorium-230	8.0×10^{4} years	Radium-224	3.64 days	Thorium-227	18.2 days
Radium-226	1622 years	Radon-220	55 seconds	Francium-223	22 minutes
Radon-222	3.8 days	Polonium-216	0.16 second	Radium-223	11.4 days
Polonium-218	3.05 minutes	Lead-212	10.6 hours	Radon-219	4.0 seconds
Lead-214	26.8 minutes	Bismuth-212	60.5 minutes	Polonium-215	1.77×10^{-3} seconds
Bismuth-214	19.7 minutes	Polonium-212	3.04×10^{-7} seconds	Lead-211	36.1 minutes
Polonium-214	1.6×10^{-4} sec.	Lead-208	Stable	Bismuth-211	2.16 minutes
Thallium-210	1.3 minutes			Thallium-207	4.79 minutes
Lead-210	22 years			Lead-207	Stable
Bismuth-210	5 days				
Polonium-210	138 days				
Lead-206	Stable				

The majority of uranium and thorium received and processed during the production era of the FCP had been separated from their decay chain daughters prior to shipment to the Fernald site. As a result, decay chain daughter products were not in equilibrium with the parent concentrations in the bulk of the materials received on site for processing. (Equilibrium is the condition where the daughter concentration [in Curies per gram (Ci/g)] is equal to the parent's concentration [in Ci/g].)

Radioactive decay laws govern the ingrowth of the daughters from the purified parent. Daughter product ingrowth is based on the length of time the parent-bearing material has been stored on site. As a general rule, the daughter of a long-lived parent (e.g., uranium-238, thorium-232, or uranium-235) grows into equilibrium with the parent in about 10 daughter half-lives. For example, using data from the table above, thorium-234 would reach equilibrium with uranium-238 in about 240 days (10 x 24 days).

Considering the half-lives in the table above and the 40-year production history of the FCP, a number of daughters can be conservatively considered to be present in equilibrium concentrations with their parents. These radionuclides (thorium-234, radium-228, actinium-228, radium-224, and thorium-231) will be considered to be in equilibrium with their parent concentrations measured in the quarterly composite. The equilibrium-based concentration for these radionuclides will be compared to the corresponding 40 CFR 61 Subpart H, Appendix E, Table 2 value as described in Criterion IV. Other radionuclides (protactinium-231, actinium-227, and their decay products) have not had sufficient time to reach equilibrium with their parent. In fact, due to the 32,500-year half-life of protactinium-231, none of the decay chain daughters have had time for significant ingrowth. Therefore, concentrations of decay chain daughters in the uranium-235 chain below thorium-231 will be considered to be zero in the quarterly composite samples.

Criterion III: Radionuclide concentrations that would cause an effective dose equivalent of 10 percent of the standard shall be readily detectable and distinguishable from background.

As indicated in Table C-2, the detection limits for the major contributors to dose are less than 10 percent of NESHAP Appendix E, Table 2 values and will, therefore, be readily detectable if present. The analysis of samples from the background monitors will provide the data to distinguish fenceline and potential receptor monitoring results from background.

Criterion IV: Net measured radionuclide concentrations shall be compared to the concentration levels in Table 2 of Appendix E to determine compliance with the standard. In the case of multiple radionuclides being released from the facility, compliance shall be demonstrated if the value for all radionuclides is less than the concentration level in Table 2, and the sum of the fractions that result when each measured concentration value is divided by the value in Table 2 for each radionuclide is less than one.

Annual average radionuclide concentrations at each monitoring location will be determined for each radionuclide by dividing the sum of the radionuclide mass values, obtained via quarterly laboratory analysis, by the total volume of air drawn through the filter. As described above, decay chain daughter products will be assumed to be in equilibrium with the measured parent concentration. Concentrations will be corrected for background to obtain the net measured concentration. The resulting net annual average concentrations will be divided by the corresponding 40 CFR 61 Subpart H, Appendix E, Table 2 values. The resulting fractions will be summed per monitoring location to demonstrate compliance. Compliance with the Subpart H standard will be documented in a summary that will be submitted as part of the annual site environmental reports.

Managing Analytical Results

The analysis of environmental air samples may result in contaminant concentrations being reported at levels that are at or below the minimum detectable concentration (MDC). Contaminant concentrations, which are at or below MDC, are statistically indistinguishable from concentrations found in a blank sample. Air sample results that are reported at or below the MDC will, therefore, be considered non-detects (zero) for the purpose of demonstrating compliance with the NESHAP dose limit.

Detectable contaminant concentrations will be corrected to net detectable concentrations using the background concentration measured during the same sampling period. Background air monitoring results that are at or below MDCs will not be used.

Criterion V: A quality assurance program shall be conducted that meets the performance requirements described in Appendix B, Method 114.

All environmental sample collection and analysis conducted in support of the remediation effort at the Fernald site are subject to the quality assurance requirements of the SCQ. This EPA-approved plan and its incorporation into the IEMP sampling plan meet the Quality Assurance Program requirements of Appendix B, Method 114.

Criterion VI: Use of environmental measurements to demonstrate compliance with the standard is subject to prior approval by EPA. Applications for approval shall include a detailed description of the sampling and analytical methodology and show how the above criteria will be met.

The IEMP and its appendices provide a description of the sampling and analytical methodology and explains how the criteria will be met. DOE submitted an application to use environmental measurements to demonstrate compliance with the NESHAP Subpart H standard to EPA in May 1997. EPA approved the application in August 1997.

C.3.3.2 All-Pathway Dose Calculations

This section describes the technical approach for demonstrating compliance with the 100-mrem/year, all-pathway dose limit in DOE Order 5400.5. Estimates of annual dose are based on the measured, background-corrected concentration of a contaminant in each environmental medium.

The general form of the dose assessment equation is:

$$D = C_{i,m} * I_m * DCF_i$$

where

D = Dose (mrem/year)

$C_{i,m}$ = Background-corrected concentration of radionuclide "i" in medium "m" (pCi/kg or pCi/L)

I_m = Intake (ingestion) rate for medium (kg/year)

DCF_i = Dose conversion factor for radionuclide "i" (mrem/year*pCi)

The detailed calculation of doses from the various environmental media is governed by FCP procedure ADM-08, Estimating Radiological Pathway Dose (DOE 2004). Doses from all the media monitored under the IEMP also will be calculated according to relevant sections in this procedure. In general, air inhalation dose and direct radiation dose will be separately calculated and then combined into the DOE all-pathway annual dose.

C.4 REPORTING

The types, frequency, and procedure of dose assessment reporting during FCP remediation are summarized in this section. Based on the objective of the dose assessment described in Section C.1, there will be three interfacing and reporting mechanisms in which the dose assessment results will be presented. Each of these three reporting processes is described in the following subsections.

C.4.1 Project-Specific Interfaces

Project-specific emission monitoring results collected by remediation projects for workers' health and safety concerns will be used to determine significant contributors among the ongoing remedial actions. Therefore, an interface between the IEMP and ongoing remediation projects will be maintained in order to gather project-specific data and to provide feedback for adjusting/implementing source control measures. Data review and evaluation will generally follow the receipt of each set of project-specific monitoring results.

C.4.2 Regulatory Interfaces

The IEMP air monitoring data will be posted to the IEMP Data Information Site. When the monitoring data indicate a need for adjusting or implementing project-specific source control measures, the regulatory agencies will be notified by the specific remediation projects. The modifications and the effectiveness of the improved source control measures will also be documented.

C.4.3 Annual Reporting

The NESHAP Subpart H Annual Report will be issued as part of the annual site environmental report, according to reporting schedule in Section 7.0 of the IEMP. Annual summaries of the monitoring results, calculated doses from airborne emissions and calculated direct radiation dose will be included in the report. Comparisons of the pathway-specific doses and the combined annual radiological doses to the regulatory dose limits will also be presented.

C.5 SUMMARY

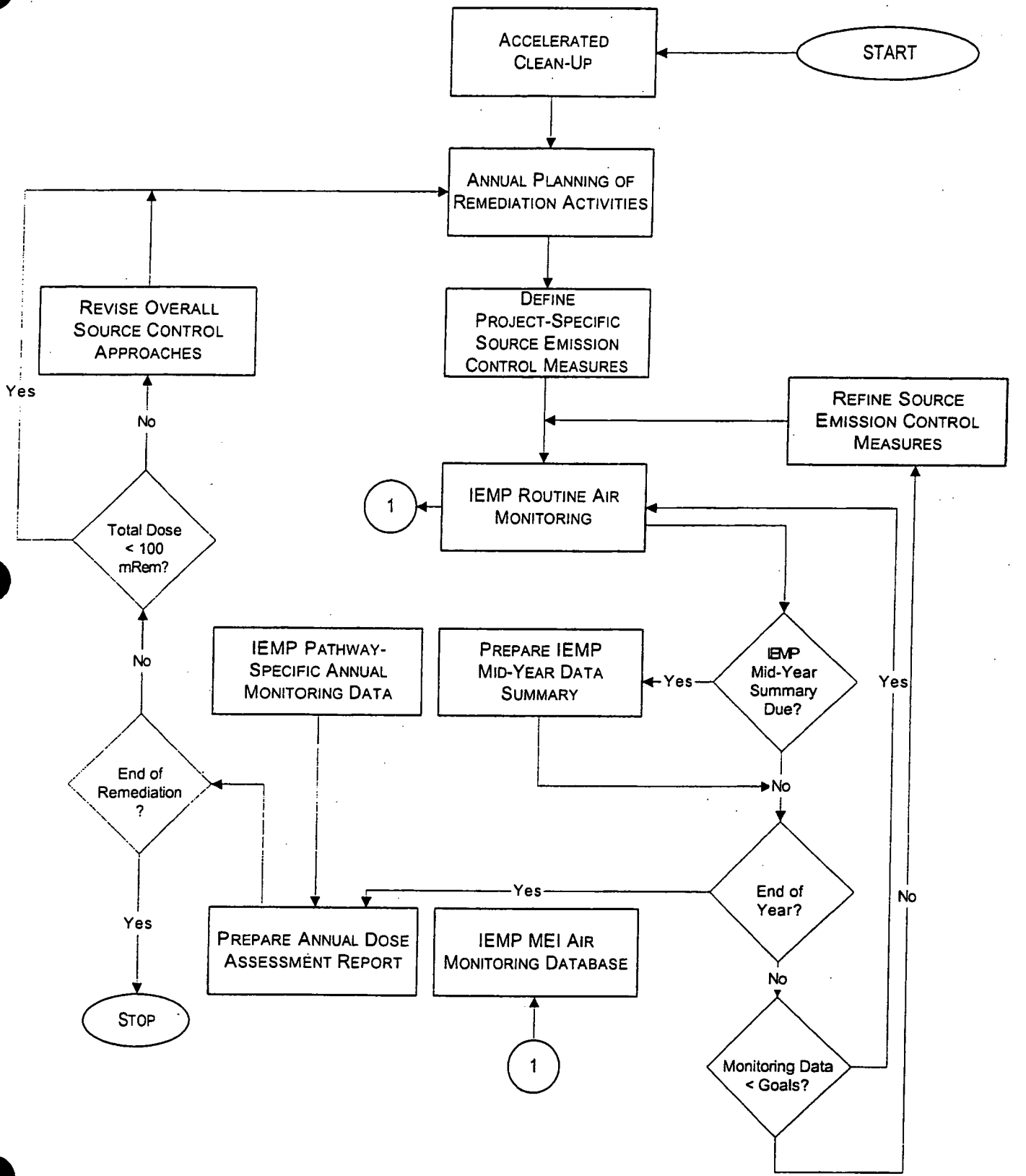
Figure C-1 shows the major tasks in the sitewide dose tracking and annual dose assessment processes during the FCP remediation described in this appendix. Table C-5 further summarizes the responsibilities of the IEMP and specific remediation projects to fully implement the sitewide air-pathway dose tracking and annual dose assessment processes.

TABLE C-5

SITEWIDE DOSE TRACKING AND ANNUAL ASSESSMENT TASKS

Tasks	Project Responsibilities
	IEMP
• Annual Sitewide Planning	Evaluate planned remediation activities and source conditions at beginning of the year
• Routine Fenceline Monitoring	Conduct routine air monitoring at background and fenceline locations
• Preventive Tracking/Feedback	Directly compare routine monitoring results to annual dose benchmarks; report and evaluate any exceedances
• NESHAP Compliance Demonstration	Based on actual monitoring data, calculate annual doses at monitoring locations.
• Reporting	Prepare summaries and the annual NESHAP report
	Remediation Project
• Annual Planning	Specify project-specific remedial schedule and activities at beginning of the year
• Maintain Fugitive Dust and/or Emission Source Control	Maintain/improve effective fugitive dust and emission source control measures within the project boundary
• Health and Safety Monitoring	Conduct routine remedial worker health and safety monitoring

FIGURE C-1
SITEWIDE IEMP/DOSE TRACKING AND ASSESSMENT ROAD MAP



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Appendix D

APPENDIX D
NATURAL RESOURCE MONITORING PLAN

APPENDIX D
NATURAL RESOURCE MONITORING PLAN

D.1 INTRODUCTION AND OBJECTIVES

The purpose of the Natural Resource Monitoring Plan (NRMP) is to outline a comprehensive plan for monitoring natural resources at the Fernald site. Monitoring requirements related to natural resources includes the following: (1) monitoring the status of several priority natural resource areas to maintain compliance with applicable regulations; (2) monitoring of completed restoration projects per Natural Resource Restoration Design Plans (NRRDP) requirements; and (3) monitoring impacts to natural resources from site activities. The results of this monitoring will be used to inform the U.S. Environmental Protection Agency (EPA), Ohio Environmental Protection Agency (OEPA), and the Fernald Natural Resource Trustees of the status of natural resources are the Fernald site. Monitoring results will be reported in the annual site environmental reports.

D.2 ANALYSIS OF REGULATORY DRIVERS

As shown in Table D-1, regulatory drivers for the management of natural resources and associated impact monitoring include six areas: endangered species protection; wetlands/floodplain regulations; cultural resource management; the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) natural resource trusteeship process; the National Environmental Policy Act (NEPA); and approved NRRDPs.

D.2.1 Threatened and Endangered Species

The federal laws and regulations listed below mandate that any action authorized, funded, or carried out by the U.S. Department of Energy (DOE) cannot jeopardize the continued existence of any threatened or endangered (i.e., listed) species or result in the destruction or adverse modification of the constituent elements essential to the conservation of a listed species within a defined critical habitat. Additional requirements may apply if it is determined that a proposed activity could adversely affect these species or their habitat. These laws and regulations include the Endangered Species Act (16 United States Code [U.S.C.] §1531, et seq.) and its associated regulations (50 Code of Federal Regulations [CFR] 17 and 50 CFR 402).

State law also protects endangered species by prohibiting the taking or destruction of any state-listed endangered species. These laws are found in Ohio Revised Code §1518 and §1531, as well as in Ohio Administrative Code §1501.

TABLE D-1

FERNALD SITE NATURAL RESOURCE MONITORING

DRIVER	ACTION
Endangered Species Act Ohio Endangered Species Regulations	The IEMP describes management of existing habitat and follow-up surveys.
Clean Water Act — Section 404	The IEMP describes the monitoring of mitigated wetlands.
National Historic Preservation Act Native American Graves Protection and Repatriation Act Archaeological Resources Protection Act	The IEMP describes the monitoring of cultural resources.
CERCLA Executive Order 12580 National Contingency Plan	The IEMP describes the CERCLA Natural Resources Trusteeship process.
NEPA	The IEMP discusses the substantive requirements of NEPA for protecting sensitive environmental resources.
Agency approved NRRDPs	The IEMP discusses restored area monitoring.

D.2.2 Wetlands/Floodplains

Executive Order 11990 (Protection of Wetlands) and Executive Order 11988 (Protection of Floodplains), which are implemented by DOE Regulation 10 CFR 1022, "Compliance with Floodplain/Wetlands Environmental Review Requirements," specify the requirement for a Floodplain/Wetland Assessment in cases where DOE is responsible for providing federally undertaken, financed, or assisted construction and improvements that may impact floodplains or wetlands. This regulation further requires that DOE exercise leadership to minimize the destruction, loss, or degradation of wetlands; and preserve and enhance the natural and beneficial values of wetlands.

Pursuant to Section 404 of the Clean Water Act and 33 CFR § 323.3, any activity that results in the discharge of dredged or fill material out of or into a wetland or water of the United States requires permit authorization by the Army Corps of Engineers. These permits can be in the form of either nationwide permits (33 CFR Part 330) or individual permits (33 CFR Part 323) depending on the nature of the activity.

Section 401 of the Clean Water Act and 33 CFR §325.2(b)(1)(ii) also require that a Section 401 State Water Quality Certification be obtained to authorize discharges of dredged and fill material under a Section 401 permit. In Ohio, the Section 401 State Water Quality Certification program is administered by OEPA pursuant to Chapter 3745-32 of the Ohio Administrative Code.

D.2.3 Cultural Resource Management

Management of cultural resources, particularly archeological sites, is mandated by the National Historic Preservation Act (16 U.S.C. §470), the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001, et seq.), and the Archeological Resources Protection Act (16 U.S.C. §470aa-470ll). The associated regulations for the above laws are found in 36 CFR 800, 43 CFR 10, and 43 CFR 7, respectively. These laws and associated regulations ensure that archeological resources on federal land are appropriately managed. Section 106 of the National Historic Preservation Act ensures that DOE takes into consideration the effect of its undertakings on properties eligible for listing on the National Register of Historic Places. The Native American Graves Protection and Repatriation Act and 43 CFR 10 require that the rightful control of Native American cultural items discovered on federal land be relinquished to the appropriate, culturally affiliated tribe. Federal land is defined as "land that is owned or controlled by a federal agency." Cultural items are defined as "human remains, associated funerary objects, unassociated funerary objects, sacred objects, and objects of cultural patrimony." The Archeological Resources Protection Act and 43 CFR 7 ensure that competent individuals carry out archeological excavations in a scientific manner.

DOE signed a Programmatic Agreement with the Advisory Council on Historic Preservation and the Ohio Historic Preservation Office that streamlines the National Historic Preservation Act, Section 106 consultation process. Monitoring provisions will be included as part of this agreement to ensure that appropriate management is implemented for any eligible properties at the Fernald site.

D.2.4 The CERCLA Natural Resource Trusteeship Process

CERCLA, Executive Order 12580, and the National Contingency Plan collectively require certain federal and state officials to act on behalf of the public as trustees for natural resources. Natural Resource Trustees for the Fernald site are the Secretary of DOE; the Secretary of the U.S. Department of the Interior; and officials of the OEPA, appointed by the governor of Ohio.

The role of the Natural Resource Trustees is to act as guardians for public natural resources at or near the Fernald site. The trustees are responsible for determining if natural resources have been injured as a result of a release of a hazardous substance or oil spill from the site, and if so, how to restore, replace, or acquire the equivalent natural resources to compensate for the injury. As the responsible party, DOE is

potentially liable for costs related to natural resource injury, in addition to costs associated with remediation of the site.

Since June 1994, the Fernald Natural Resource Trustees have been meeting to evaluate and determine the feasibility of integrating the trustees' concerns with future remediation activities. The trustees have identified their desire to resolve DOE's liability by integrating restoration activities with remediation.

The Fernald Natural Resource Trustees have chosen to focus on a restoration-based approach to resolve DOE's liability for natural resource impacts. To accomplish this, the trustees have signed a Memorandum of Understanding that establishes implementation of a Natural Resource Restoration Plan (NRRP) (DOE 2002) as the primary means of settlement for an existing natural resource damage claim by OEPA against DOE. The NRRP sets forth a conceptual design for a series of ecological restoration projects that will eventually encompass approximately 904 acres of the Fernald site. Detailed designs are generated through NRRDP written for each restoration project. Results of NRMP monitoring will be taken into consideration during the design of these area-specific restoration projects. NRRDPs will have project-specific monitoring requirements to determine the success of the restoration project. As stated in Section D.1, this monitoring will be summarized in the site environmental reports. Detailed results of restoration monitoring will be reported annually through the consolidated monitoring report for restored areas at the Fernald site.

In April 1998, the Fernald Natural Resource Trustees (including OEPA) tentatively agreed that reporting associated with natural resources would be provided in annual site environmental reports and through correspondence between DOE and the Fernald Natural Resource Trustees. It was also agreed that quantitative monitoring of impacted habitats associated with natural resources will not be necessary because the proposed settlement identifies that natural resource restoration will be performed for all on-property areas outside the on-site disposal facility, the Operable Unit 4 supplemental projects, and the area under consideration for community development/use.

D.2.5 National Environmental Policy Act

In addition to the regulatory drivers summarized above, aspects of natural resource management and monitoring are mandated through the incorporation of substantive NEPA requirements into remedial action planning. In June 1994, DOE issued a revised secretarial policy on NEPA compliance. This policy called for the integration of NEPA requirements into the CERCLA decision-making process. Therefore, requirements for the protection of sensitive environmental resources including threatened and endangered species and cultural resources are to be considered throughout remediation activities.

D.2.6 Natural Resource Restoration Design Plans

NRRDPs were written for each ecological restoration project completed on site. The design documents were submitted to EPA and the Fernald Natural Resource Trustees for approval prior to the commencement of restoration activities in a given area. In addition to describing the restoration activities, they also outline the monitoring requirements for each project area once restoration activities were completed. Following is a list of the NRRDPs that are associated with the areas that require monitoring following closure of the site (i.e., physical completion scheduled for June 2006).

- Weltand Mitigation Project (Phase II) NRRDP (Area 6, Phase I)
- Borrow Area NRRDP Wetland Mitigation (Phase III)
- Area 8, Phase III NRRDP (Paddys Run West)
- Paddys Run East NRRDP
- Silos NRRDP
- Former Production Area NRRDP
- Waste Pits Area and Paddys Run NRRDP

D.3 PROGRAM EXPECTATIONS AND DESIGN CONSIDERATIONS

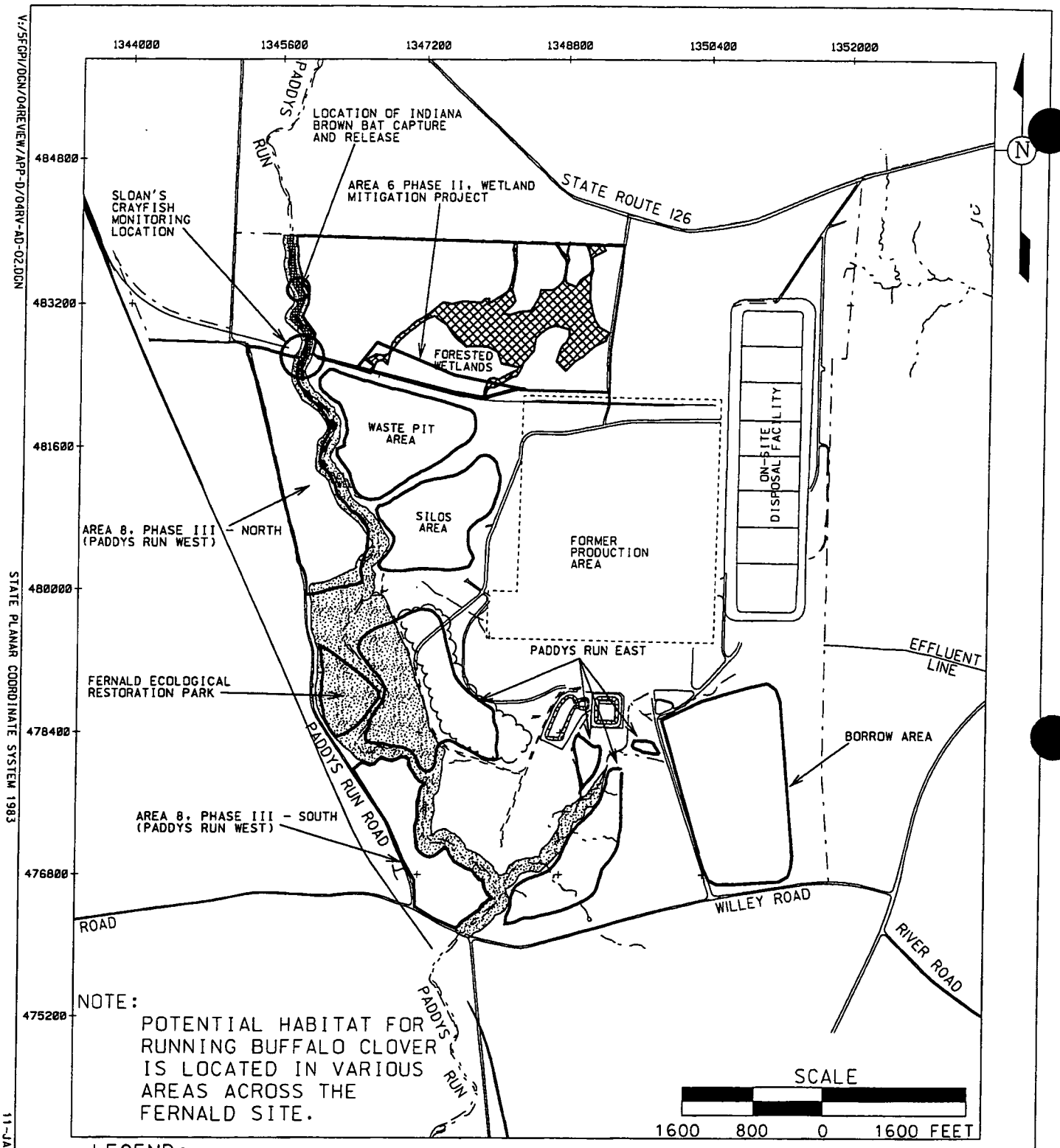
The expectations of the monitoring and reporting as outlined in the NRMP are as follows:

- Provide a mechanism to monitor the status of the Fernald site's natural resources to remain in compliance with applicable laws and regulations
- Monitor restored areas to ensure requirements of the NRRDPs are being met and restored areas continue to develop and function as designed.

The results of the monitoring outlined in this NRMP will be compiled and reported to the EPA and OEPA. Results will be reviewed to ensure that ecologically restored areas are performing as designed. In the event that results indicate that a restored area is not functioning as intended, decisions will need to be made by the DOE Office of Legacy Management in consultation with the EPA, OEPA, and Natural Resource Trustees regarding appropriate corrective actions.

D.4 NATURAL RESOURCE MONITORING PLAN

Monitoring was implemented during remediation activities to identify impacts to natural resources at the Fernald site with particular emphasis placed on meeting regulatory requirements for NEPA, threatened and endangered species, wetlands/floodplains, and cultural resources. To accommodate natural resource monitoring, priority natural resource areas have been established across the Fernald site (refer to Figure D-1). Fernald site personnel conducted all natural resource monitoring during remediation, with



LEGEND:

- FERNALD SITE BOUNDARY
- PADDYS RUN AND TRIBUTARIES RIPARIAN CORRIDOR
- SLOAN'S CRAYFISH AREA
- POTENTIAL INDIANA BROWN BAT HABITAT
- WETLANDS

FINAL

FIGURE D-1. PRIORITY NATURAL RESOURCE AREAS

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oversight from the DOE Office of Environmental Management. Monitoring will continue during post-closure, but will be carried out under the DOE Office of Legacy Management.

Outside expertise may be used in limited circumstances depending on the type of monitoring to be conducted. A description of the monitoring strategies to be implemented at the Fernald site is provided below.

D.4.1 Threatened and Endangered Species

The state-listed threatened Sloan's crayfish (*Orconectes sloanii*) and the federally endangered Indiana brown bat (*Myotis sodalis*) are the only threatened or endangered species to have a known population at the Fernald site. However, there is the potential for other state-listed and federally listed threatened and endangered species to have habitat ranges that encompass and/or occupy the Fernald site. Therefore, monitoring will continue to track the status of the Sloan's crayfish and Indiana brown bat populations and their habitats as well as several other listed species that potentially could use the Fernald site.

D.4.1.1 Sloan's Crayfish

The state-listed threatened Sloan's crayfish is a small crayfish found in the streams of southwest Ohio and southeast Indiana. It prefers streams with constant (though not necessarily fast) current flowing over rocky bottoms. A large, well-established population of Sloan's crayfish is found at the Fernald site in the northern reaches of Paddys Run. In dry periods, the crayfish retreat to the deeper pools that remain, primarily upstream of the train trestle. A significant population of Sloan's crayfish also resides in an off-property section of Paddys Run at New Haven Road. The Sloan's Crayfish Management Plan, which is included as Attachment D.1 to this appendix, provides additional information on the Sloan's crayfish population at the Fernald site.

This species resides with one other competing species of crayfish (*Orconectes rusticus*) that is generally considered more aggressive. In addition, the Sloan's crayfish is sensitive to siltation in streams.

Impacts on Sloan's crayfish are similar to those on other aquatic organisms in Paddys Run. Impacts of concern would include excavation and alteration of the streambed along with increased siltation and runoff into Paddys Run. Visual field observations after every storm event were conducted from August 1996 through December 1997 to identify any impact of sediment loading on the Sloan's crayfish population in Paddys Run from Fernald site activities. Visual observations of Sloan's crayfish populations were resumed in September 1998 when construction activities began in the vicinity of the waste storage area. In general, site activities have not impacted the Paddys Run crayfish population. However, on several occasions an elevated amount of sediment runoff was observed in the northern drainage ditch following rain events.

Because the instances were of short duration (less than 24 hours), no impacts to the Sloan's crayfish occurred. The source of the elevated sediment was traced to the rail yard sedimentation basin. Several corrective measures were implemented, including repair of eroding fill around an inlet pipe and seeding of exposed soil. As a result of these corrective actions, incidents of increased turbidity into Paddys Run were reduced to one or two times a year. Because of this, OEPA agreed to suspend visual observations unless remediation activities in the immediate vicinity of the northern drainage ditch had the potential to adversely impact turbidity.

Additionally, as a condition of the Fernald site's National Pollutant Discharge Elimination System (NPDES) permit, visual observations of sediment controls must be carried out weekly and after any storm event pursuant to the Fernald site's Storm Water Pollution Prevention Plan (DOE 2003). A storm event is defined as "any event in which more than 0.5 inch of rainfall occurs in a 24-hour period." An inspection form is completed after each visual observation to ensure that sediment controls are properly functioning. Fernald site natural resource personnel worked with the personnel conducting the visual observations of sediment controls to ensure controls remain in place.

The Sloan's crayfish population in Paddys Run was surveyed several times to monitor trends in the long-term status of the population. A survey in the summer of 2001 revealed a significant population of Sloan's crayfish in Paddys Run. The survey involved the use of nets to capture and identify species in Paddys Run. This survey, coupled with the results from several previous population surveys, demonstrated that Sloan's crayfish populations were not impacted by site activities. Researchers have observed a slight reduction in the number of Sloan's crayfish over the years. However, the reduction was attributed to the regional trend of increased competition from *Orconectes rusticus* rather than site-specific activities. Currently, no additional surveys for Sloan's crayfish are planned.

Attachment D-1, the Sloan's Crayfish Management Plan, describes in greater detail the requirements listed above. A contingency plan is also included which calls for the upstream relocation of affected crayfish populations, if necessary. Requirements of the Sloan's Crayfish Monitoring Plan will be followed should disturbance of the stream occur in the future.

D.4.1.2 Indiana Brown Bat

Good-to-excellent summer habitat for the federally listed endangered Indiana brown bat (*Myotis sodalis*) has been identified north of the train trestle along Paddys Run. The habitat provides an extensive mature canopy from older trees and the presence of water throughout the year. In 1999, one adult female was captured along Paddys Run and released. Potential impacts to Indiana brown bat habitat would include tree removal and/or stream alteration in the northern on-property sections of Paddys Run. Because the

bats use loose-bark trees for their maternal colonies, removal of trees would impact this species by eliminating its summer habitat.

The habitat of the Indiana brown bat was monitored during remediation activities to identify any unanticipated impacts during remediation. A follow-up survey was conducted in the summer of 2002 as a result of remediation activities north of the train trestle along Paddys Run. No Indiana brown bats were found during this survey.

If at anytime following closure monitoring is determined appropriate, then monitoring methods for the Indiana brown bat would consist of mistnetting in areas suitable as bat flyways and where canopy occurs. Mistnetting would occur between May 15 and August 15, because some bats begin to disperse for winter shelter in late August. Data recorded at each sampling site would include type of habitat, water depth and permanence, type of bottom, tree species and size, and presence of hollow trees or trees with loose bark in the vicinity.

In addition to mistnets, bat detectors (which indicate bat activity) would be used during all sampling to detect echolocation calls near the net. The number of calls on the detector would be recorded to indicate the effectiveness of the nets in relation to bat activity. Bat detectors can also be used to sample areas of marginal habitat to determine if netting should be attempted.

D.4.1.3 Running Buffalo Clover

Surveys conducted in 1994 of the federally listed endangered running buffalo clover (*Trifolium stoloniferum*) found no individuals of this species at the Fernald site. However, because running buffalo clover is found nearby in the Miami Whitewater Forest, the potential exists for this species to establish at the Fernald site. The running buffalo clover prefers habitat with well-drained soil, filtered sunlight, limited competition from other plants, and periodic disturbance. This plant is a perennial that forms long stolons, rooting at the nodes. The plant is also characterized by erect flowering stems, typically three to six inches tall, with two leaves near the summit topped by a round flower head. In the event surveys are necessary, they would be conducted between May and June, which is the optimal time frame for blooms. An appropriate number of transects would be walked in suspect areas to identify the running buffalo clover. If populations are discovered, then best management practices will be used to minimize impending impacts, if any.

The U.S. Fish and Wildlife Service announced plans to delist running buffalo clover from its endangered status. However, because of its status as an endangered species in the State of Ohio, the plant would still require monitoring.

D.4.1.4 Spring Coral Root

The state-listed threatened spring coral root (*Corallorhiza wisteriana*) is a white and red orchid that blooms in April and May, and grows in partially shaded areas of mesic deciduous woods, such as forested wetlands and wooded ravines. Although surveys conducted in 1994 and 1995 indicated no individuals were present, suitable habitat exists in portions of the northern woodlot.

A floristic analysis for the northern woodlot and associated northern, forested wetland was conducted in 1998. This analysis showed that no spring coral root was present in the northern woodlot.

D.4.2 Wetlands/Floodplains

Approximately 11.87 acres of on-property wetlands adjacent to the former production area were impacted as a result of contaminated soil excavation. The 26-acre northern forested wetland area and associated drainage characteristics were avoided and protected during remediation activities. A mitigation ratio of 1.5:1 (i.e., 1.5 acres of wetlands replaced for every one acre of wetland disturbed) was negotiated between DOE and the appropriate agencies (i.e., EPA, OEPA, U.S. Fish and Wildlife Service, and Ohio Department of Natural Resources). As a result of this agreement, 17.8 acres of new wetlands had to be established to compensate for the impacts during remediation.

Wetland mitigation was initiated at the Fernald site in 1999. Approximately 6 acres of wetlands were constructed within a 12-acre ecological restoration project along the North Access Road. Monitoring requirements for this wetland area have been completed. Two other wetland mitigation projects have been completed: Area 6, Phase I; and the Borrow Area. Monitoring for these two project areas will be required post-closure and will be carried out under the DOE Office of Legacy Management. More detailed monitoring requirements are discussed in the NRRDP for each project.

D.4.3 Cultural Resource Management

All field personnel must comply with the procedure, Unexpected Discovery of Cultural Resources (DOE 2001), if cultural resources are uncovered during ground disturbing activities. In the event that ground-disturbing activities must occur post-closure, limited monitoring will occur in all areas that have been surveyed to identify any unexpected discoveries of human remains (refer to Figure D-2). More intensive field monitoring will take place only in areas known to have a high potential for archaeological sites as determined by previous investigations. In most instances, discovery of human remains in previously surveyed areas will require data recovery work. Disturbance of previously unsurveyed areas will require at least a Phase I investigation. An annual summary of all cultural resource field activities is provided separately from the IEMP under the Programmatic Agreement for Archeological Activities at

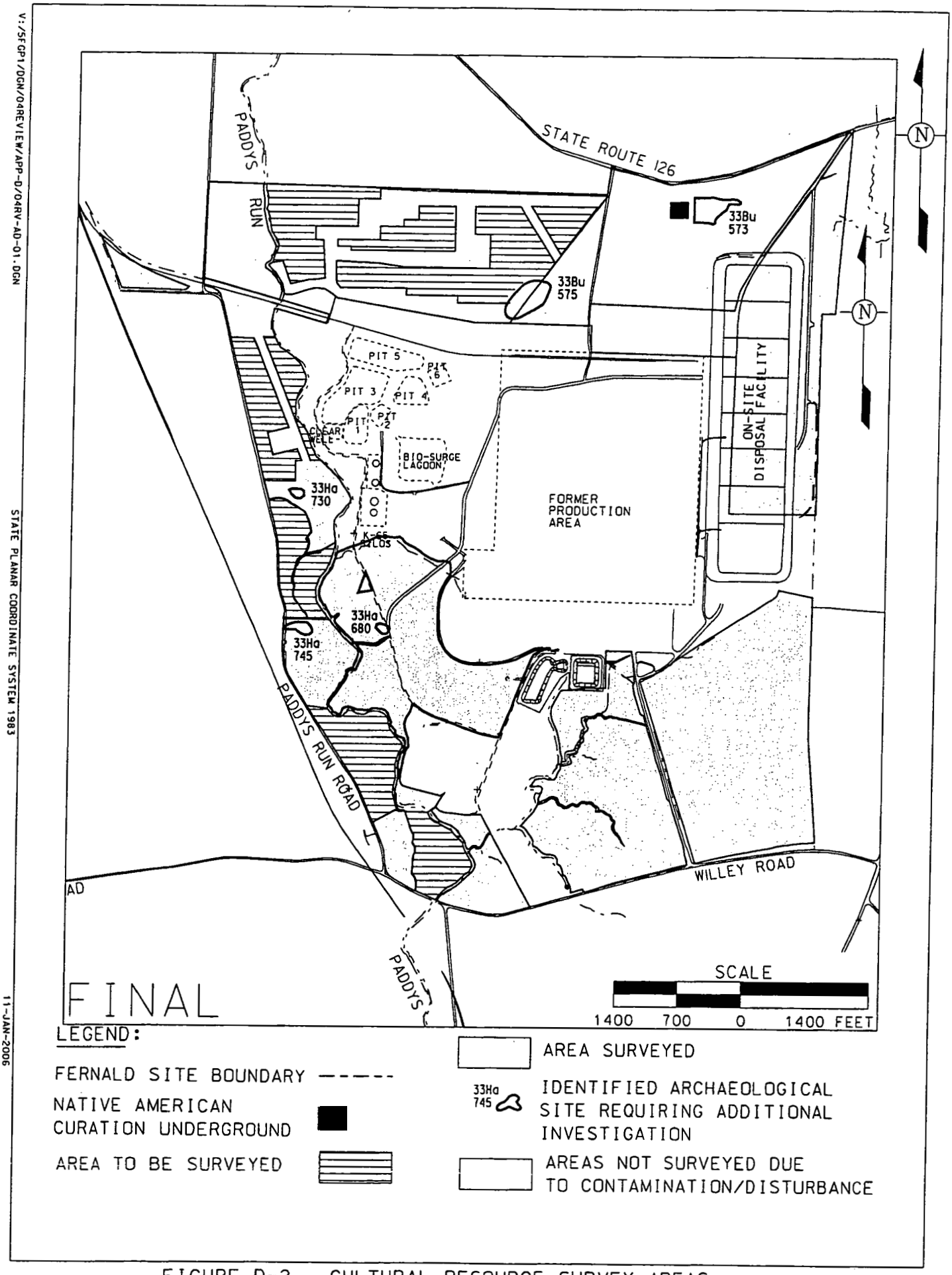

FIGURE D-2. CULTURAL RESOURCE SURVEY AREAS

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the Fernald Site. Monitoring of cultural resource areas will continue beyond site closure to ensure that the areas are not being disturbed, as is described in the Institutional Controls Plan.

D.4.4 Habitat Monitoring

As stated in Section D.2.4, the Natural Resource Trustees have tentatively agreed that habitat impact monitoring is not necessary. If renegotiation with the trustees becomes necessary, then quantitative quarterly habitat impact tracking may be resumed. A narrative summary of habitat impacts will be provided in the annual site environmental reports.

D.4.5 Restored Area Monitoring

Restored area monitoring is required following the completion of natural resource restoration work. Monitoring of restored areas involved two phases, implementation phase and functional phase monitoring. However, only implementation phase monitoring is currently ongoing at the site.

Implementation phase monitoring is conducted to ensure that restoration projects are completed pursuant to their NRRDP and to determine vegetation survival and herbaceous cover. There must be 80 percent survival of all planted vegetation in any given restored area, determined by mortality counts. There must be 90 percent cover for any seeded area, with 50 percent being native species.

Functional phase monitoring was conducted to evaluate the progress of a restored community against pre-restoration baseline conditions and an ideal reference site. Woody and herbaceous vegetation were evaluated for species richness, density, and frequency. Size of woody vegetation was also recorded. Currently, no further functional monitoring is scheduled for any restored area. The last round of functional monitoring was conducted in the fall of 2005.

D.4.5.1 Implementation Phase Monitoring

To determine vegetation survival, mortality counts are conducted at the end of the first growing season. Each container grown tree and shrub will be inspected and assigned one of four categories: alive, resprout, vitality, or dead. Trees and shrubs will be considered "alive" when their main stem and/or greater than 50 percent of the lateral stems are viable. "Resprout" trees and shrubs will have a dead main stem, with one or more new shoots growing from the stem or the root mass. Plants will be categorized as "vitality" when less than 50 percent of its lateral branches are alive. "Dead" trees will have no signs of life at all.

For seeded areas within a restoration project, the Natural Resource Trustees agreed to a 90 percent cover survival rate for cover crops (necessary for slope stabilization and erosion control) and 50 percent survival rate for native species at the end of the implementation monitoring period as a goal.

All seeded areas are evaluated within each restoration project. Depending on the size of the restoration project, seeded areas may be grouped into habitat-specific sub-areas. For each distinct area, at least three one-meter square quadrats are randomly distributed and surveyed. Field personnel will estimate the total cover and list all species present within each quadrat. The data collected will be used to determine total cover, percent native species composition, and relative frequency of native species, as described below.

For total cover, the quadrat-specific cover estimates will be averaged. Percent native species composition will be calculated by dividing the total number of species surveyed into the total number of native species present. The relative frequency of native species will be determined as follows. First, DOE will record the number of times each species appears in a quadrat. To obtain the frequency, the number of times a species appears in a quadrat will be divided by the total number of quadrats surveyed. Next, the frequencies of all native species will be summed and divided by the total of all frequencies within a given area.

By collecting the information described above, DOE will evaluate implementation phase success of seeded areas based on two criteria. First, 90 percent cover must be met by the end of the first growing season. Second, the goal of 50 percent native species composition or relative frequency must be obtained by the end of the implementation monitoring period. These criteria address both erosion control and native community establishment, which are the two primary goals of seeding in restored areas.

Projects completed by the spring of 2005 were monitored in the summer of 2005, the results of which will be reported in the 2005 Consolidated Monitoring Report issued by the DOE Office of Environmental Management. Projects completed in the fall of 2005 or spring of 2006 will need to be monitored beyond site closure. That monitoring will be carried out under direction of the DOE Office of Legacy Management.

D.4.5.2 Implementation Monitoring for Mitigation Wetlands

There are two wetland mitigation projects that will require implementation monitoring, the Borrow Area and Area 6, Phase I. The requirements for the wetland areas are for three years following completion, instead of just one as with the other restoration areas. The monitoring requirements are also more extensive. Monitoring includes water level measurements, water quality sampling, soil sampling, and

wetland plant (herbaceous cover) surveys. Implementation monitoring for mitigation wetlands beyond the spring of 2006 will be carried out under the DOE Office of Legacy Management.

Table D-2 shows projects that require implementation monitoring after site closure (i.e., physical completion). Implementation monitoring requirements are spelled out in the NRRDPs for each project (refer to Section D.2.6).

TABLE D-2
REQUIRED IMPLEMENTATION MONITORING

PROJECT	MONITORING	YEAR
Area 6, Phase I; Wetland Mitigation, Phase II	Implementation – water levels, water quality, wetland plant survey, soil	2006, 2007
Borrow Area; Wetland Mitigation, Phase III – subareas 3, 4, and 8	Implementation – water levels, water quality, wetland plant survey, soil	2006, 2007, 2008
Borrow Area – remainder	Implementation – mortality counts and percent cover	2006
Paddys Run West (Area 8, Phase III)	Implementation – mortality counts and percent cover	2006
Paddys Run East	Implementation – mortality counts and percent cover	2006
Silos	Implementation – mortality counts and percent cover	2006
Former Production Area – 4B, 5, 6, 7; Main Drainage Corridor; and the Storm Water Retention Basin	Implementation – mortality counts and percent cover	2006
Waste Pits Area	Implementation – mortality counts and percent cover	2006

D.4.5.3 Functional Monitoring

Currently, negotiations are still ongoing for the Natural Resource Damage Settlement. The negotiations include functional monitoring requirements. At this time, no further functional monitoring is scheduled for any restoration area. However, the outcome of the settlement may require that functional monitoring be resumed. In that case, details of the functional monitoring methodology and the areas that require functional monitoring would be included in the next revision of the Comprehensive Legacy Management and Institutional Controls Plan and this IEMP. If functional monitoring of restored areas is resumed at the Fernald site, the monitoring activities would be carried out under the DOE Office of Legacy Management.

D.4.6 Natural Resource Data Evaluation and Reporting

The results of natural resource monitoring will be integrated with the annual reporting, a commitment in the IEMP. Annual site environmental reports will provide appropriate updates on unexpected impacts to natural resources and the results of specific natural resource monitoring that have been implemented (e.g., monitoring of crayfish, cultural resources, etc.). Significant findings as a result of natural resource monitoring will be communicated to EPA and OEPA as needed.

REFERENCES

U.S. Department of Energy (DOE), 2003, "Storm Water Pollution Prevention Plan," PL-3083, Revision 3, Fernald Closure Project, Cincinnati, OH, May.

U.S. Department of Energy (DOE), 2002, "Natural Resources Restoration Plan", Draft Final, Fernald Environmental Management Project, DOE, Fernald Area Office, Cincinnati, OH.

U.S. Department of Energy (DOE), 2001, "Unexpected Discovery of Cultural Resources," EP-0003, Revision 4, Fluor Fernald, Cincinnati, OH, July 26.

Appendix D.1

ATTACHMENT D.1
SLOAN'S CRAYFISH MANAGEMENT PLAN

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ATTACHMENT D.1
SLOAN'S CRAYFISH MANAGEMENT PLAN

D.1 INTRODUCTION

The purpose of this plan is to provide a management strategy for the state-threatened Sloan's crayfish *(Orconectes sloanii)* and its associated habitat at the Fernald site. Remedial work at the Fernald site has the potential to result in increased sediment loading to Paddys Run in the area inhabited by the Sloan's crayfish. Therefore, the DOE has prepared a management plan to meet the intent of state and federal regulations governing the management of threatened and endangered species and to fulfill the DOE's role as a Natural Resource Trustee.

D.1.1 Background

The Sloan's crayfish has been listed as threatened in the State of Ohio. Populations of the Sloan's crayfish are known to reside only in southeastern Indiana and southwestern Ohio (St. John 1993). The Sloan's crayfish resides in streams with constant flow and flat, rocky bottoms covered with broken or rounded stones. A decline in the species has been noted in streams that have been affected by urbanization, construction, and other forms of human-made stress. Crayfish breathe through gills; therefore, increases in sediment loading in streams they inhabit will decrease their chances for survival.

The species was discovered in the northern portion of Paddys Run at the Fernald site (refer to Figure D.1-1) during surveys conducted by Dr. F. Lee St. John in September 1993 and May 1994 (St. John 1993, 1994). The surveys for the crayfish were among several conducted at the site during that time frame. Remediation of the Fernald site is being undertaken pursuant to CERCLA and will involve the excavation of large portions of the site and the construction of new treatment and disposal facilities. The Sloan's crayfish has been identified as a species that requires special consideration during the planning and implementation of remediation activities at the Fernald site.

D.1.2 Management Objectives

The primary objective in managing the Sloan's crayfish population at the Fernald site is to ensure that adequate habitat is available within Paddys Run for the continued existence of the population upon completion of remediation. This will be accomplished through preservation and/or post-remedial restoration. In addition, efforts to protect the current population from degradation during remediation activities will also be employed to the extent practicable. As discussed in greater detail below, the combination of adequate controls to minimize sediment loading remediation activities, coupled with the

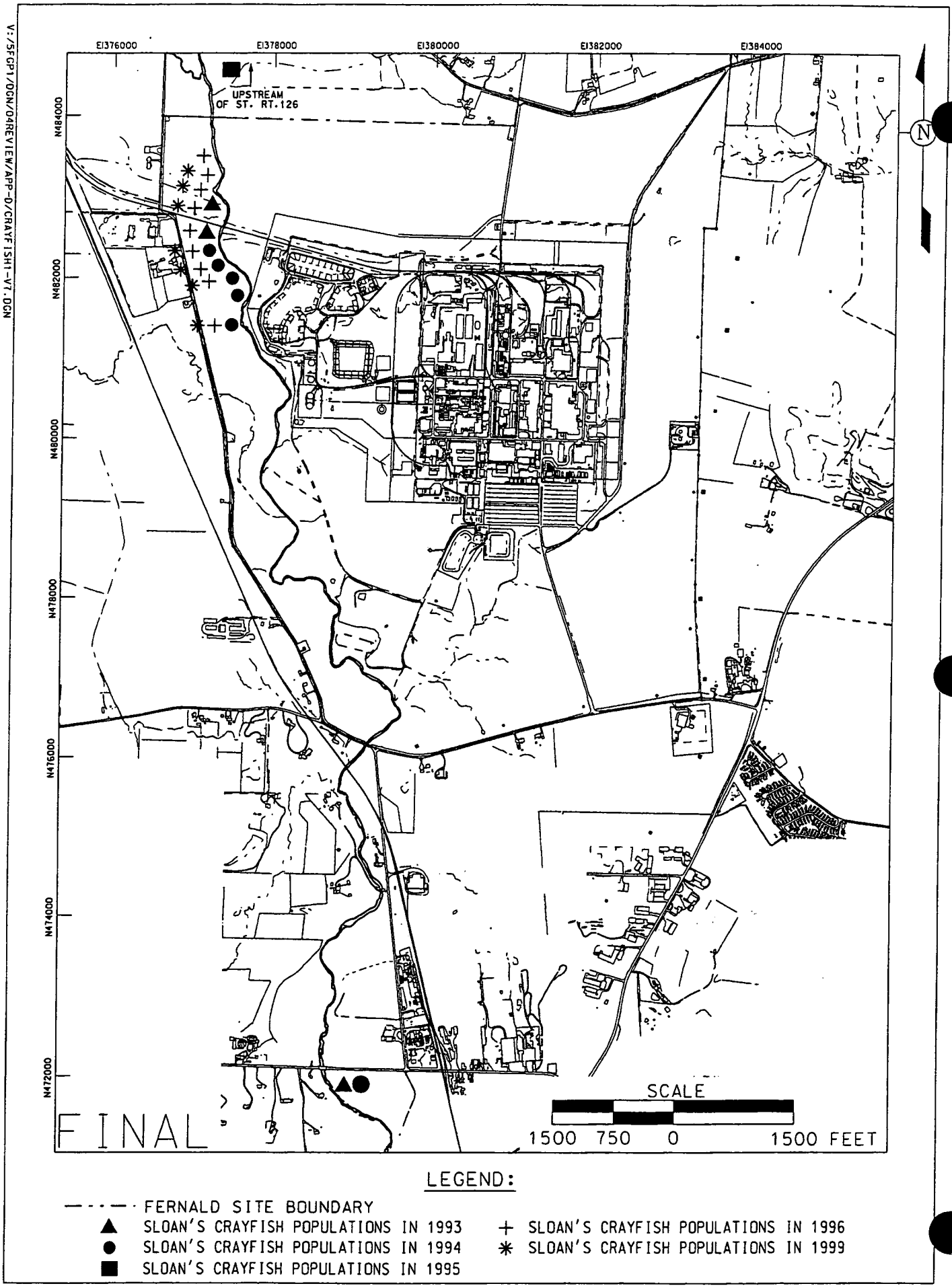

FIGURE D.1-1. SURVEY RESULTS FOR SLOAN'S CRAYFISH

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availability of a "refuge area" for the crayfish population upstream, will minimize short-term degradation to the crayfish population. In addition, field monitoring will be initiated to identify potential impacts to the portions of Paddys Run containing the population. If it is determined that impacts to the stream may result in the long-term degradation of the population, then DOE will notify the appropriate agencies and relocate individual crayfish.

The objectives of this management plan are to undertake all measures practicable to protect the species within Paddys Run and to minimize stress to the species by relocating only if necessary. DOE believes the most important aspect of the management plan is to ensure that an optimal habitat exists for the crayfish post-remediation. This would be accomplished through preserving and/or enhancing existing habitat or restoring habitat if the existing habitat is impacted during remediation. Future Fernald site remediation activities may also involve excavation activities that will potentially impact the population. Therefore, this plan of action may be incorporated by reference into future work plans.

D.2 MANAGEMENT PLAN

There are three phases to the protection of the Sloan's crayfish and its associated habitat within Paddys Run; the first two phases are avoidance measures while the last phase is a mitigation effort. In the first phase, several controls will be installed to prevent excessive sedimentation into Paddys Run. In the second phase, the area of Paddys Run upstream of the train trestle and the confluence of the northern drainage ditch will be preserved as a refuge for Sloan's crayfish to the maximum extent practicable (refer to Figure D.1-2). In the third phase, mitigation of appropriate habitat, if required, after remediation activities has been completed. All three phases of Sloan's crayfish protection are discussed in more detail below.

D.2.1 Sedimentation Controls

The primary source of surface water runoff from the Fernald site to the Sloan's crayfish habitat in Paddys Run is from the westerly flowing drainage area located directly north of the railroad tracks on the northern side of the former production area. The confluence of this drainage area and Paddys Run is an NPDES-permitted storm water outfall (STRM 4006) and is subject to semiannual monitoring under the terms and conditions of the new site NPDES Permit (OEPA Permit No. 1IO00004*GD). This ditch was also identified as a jurisdictional wetland during the 1993 delineation of the Fernald site.

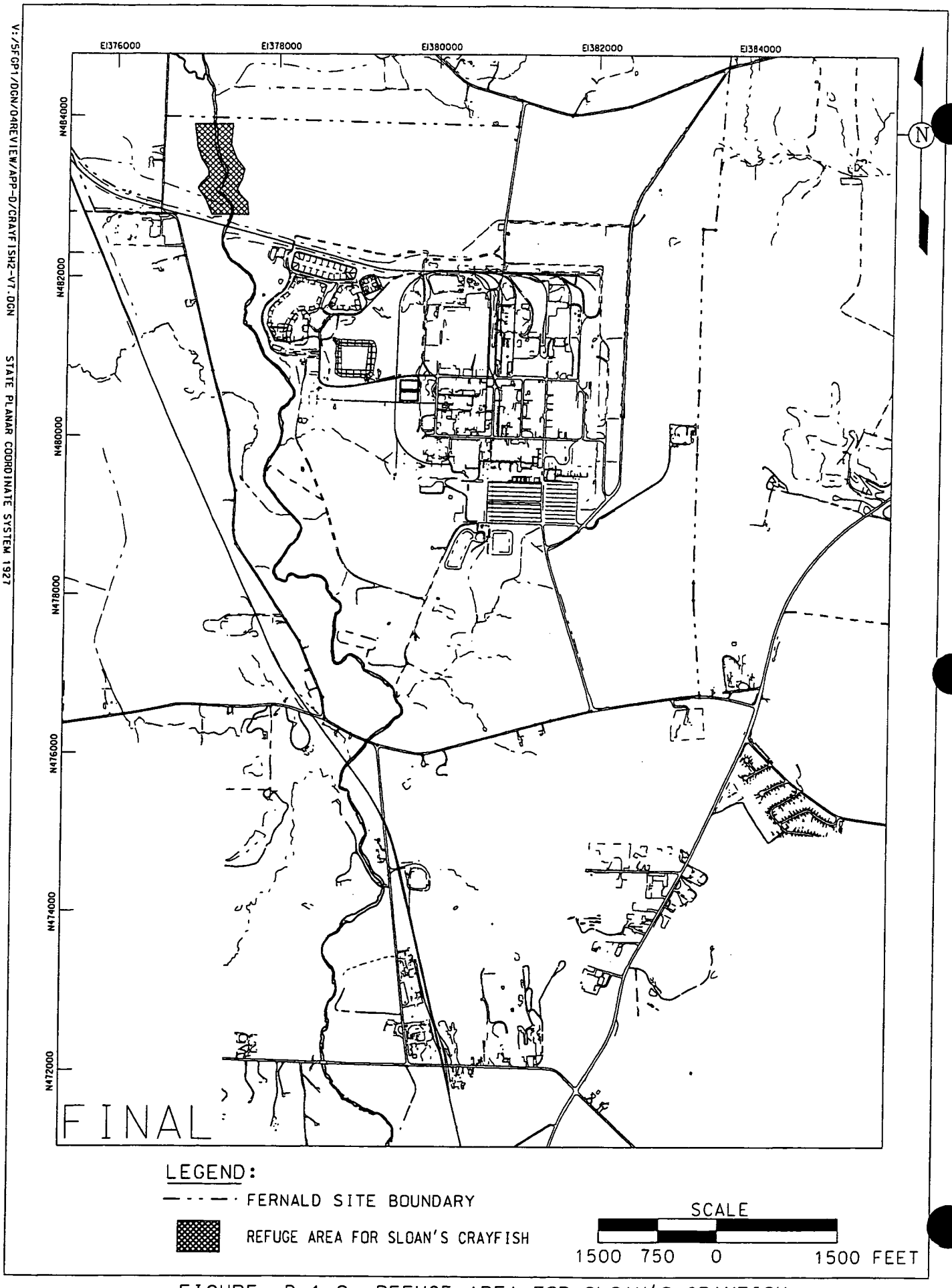

FIGURE D.1-2. REFUGE AREA FOR SLOAN'S CRAYFISH

Between now and site closure, large-scale earthmoving activities associated with the remedial actions for Operable Units 1, 2, and 5 are planned within several watershed basins in the northern of the site that ultimately drain to Paddys Run through the northern drainage ditch described above. Erosion control devices will conform to the requirements of the site NPDES Permit, the Fernald site's Storm Water Pollution Prevention Plan (DOE 2003), and various applicable or relevant and appropriate requirements (ARARs) identified in the Operable Units 1, 2, and 5 Records of Decision. Specifications for sedimentation and erosion control devices are being incorporated into the remedial design packages for these activities in an effort to avoid or minimize erosion and sedimentation to the northern drainage ditch and Paddys Run. As part of CERCLA Remedial Design packages for Operable Units 1, 2, and 5, these erosion and sedimentation designs are subject to review and approval by the EPA and OEPA. Once established in the field, DOE will inspect these controls, at a minimum, weekly to ensure their effectiveness in accordance with the requirements of the Storm Water Pollution Prevention Plan. Given that the extensive erosion and sedimentation controls described above will be established, adverse impacts to Sloan's crayfish habitat in Paddys Run will be avoided and minimized to the maximum extent practicable.

D.2.2 Refuge Preservation

The area of Paddys Run immediately north of the train trestle and the confluence of the northern drainage ditch to the Fernald site property line will be preserved as a refuge for Sloan's crayfish to the maximum extent practicable (refer to Figure D.1-2). Appropriate habitat exists in this area, as evidenced by several studies that have identified Sloan's crayfish upstream of the northern drainage ditch (St. John 1993, 1996, and 1999).

St. John reported in the Addendum to the Report on the Status of the Sloan's Crayfish (St. John 1994) that Sloan's crayfish repopulation within Paddys Run is governed by downstream migration rather than upstream migration or repopulation in situ.

The preservation of the upstream portion of Paddys Run is also the primary protection effort for the Indiana brown bat (*Myotis sodalis*), a federally listed endangered species for which suitable habitat exists within the riparian areas north of the train trestle. This area will be considered a priority natural resource area, and a maximum effort will be made to preserve the stream and its associated habitat in its present state.

D.2.3 Restoration Commitment

Once remediation activities have been completed within the area of influence for Paddys Run, the stream will be restored to suitable Sloan's crayfish habitat, if necessary (refer to Figure D.1-3). This stream restoration will take place in accordance with the sitewide NRRP, as agreed to by the Fernald Natural Resource Trustees. It is expected the upstream refuge will act as the catalyst for the repopulation of impacted sections of Paddys Run, where pools and riffles will be reestablished.

D.3 FIELD MONITORING

Field monitoring will be conducted to determine the effectiveness of the sedimentation controls discussed above. Sedimentation controls will be inspected at least weekly in accordance with the Storm Water Pollution Prevention Plan. Based on visual observations of sediment loading into Paddys Run in 1996 and 1997, DOE determined that the current sedimentation control program adequately protected the Sloan's crayfish. Visual observations resumed in 1998 as a result of construction activities in the vicinity of the waste storage area. Following corrective actions to the railyard sediment basin, which reduced incidents of increased turbidity to once or twice a year, OEPA agreed to suspend visual observations until remediation activities in the immediate vicinity of the northern drainage ditch have the potential to adversely impact turbidity.

D.4 CONTINGENCY PLAN

This contingency plan includes provisions for relocating individual Sloan's crayfish. Relocation will be dependant upon field observations of Paddys Run as discussed above. These relocation provisions include the establishment of locations within Paddys Run, along with the frequency and methodology for relocation.

Relocation is an unproven technique that may result in harm to individuals. Problems associated with relocation include alteration of stream habitat from netting and species removal activity and loss of individuals from the stress of relocation. In addition, an otherwise healthy community could be impacted by the introduction of relocated species.

D.4.1 Relocation

The crayfish will be relocated further upstream within Paddys Run. Optimal habitat for the crayfish is a stream with constant current flowing over a rocky bottom, which occurs upstream of the train trestle in Paddys Run and within the refuge area illustrated in Figure D.1-2.

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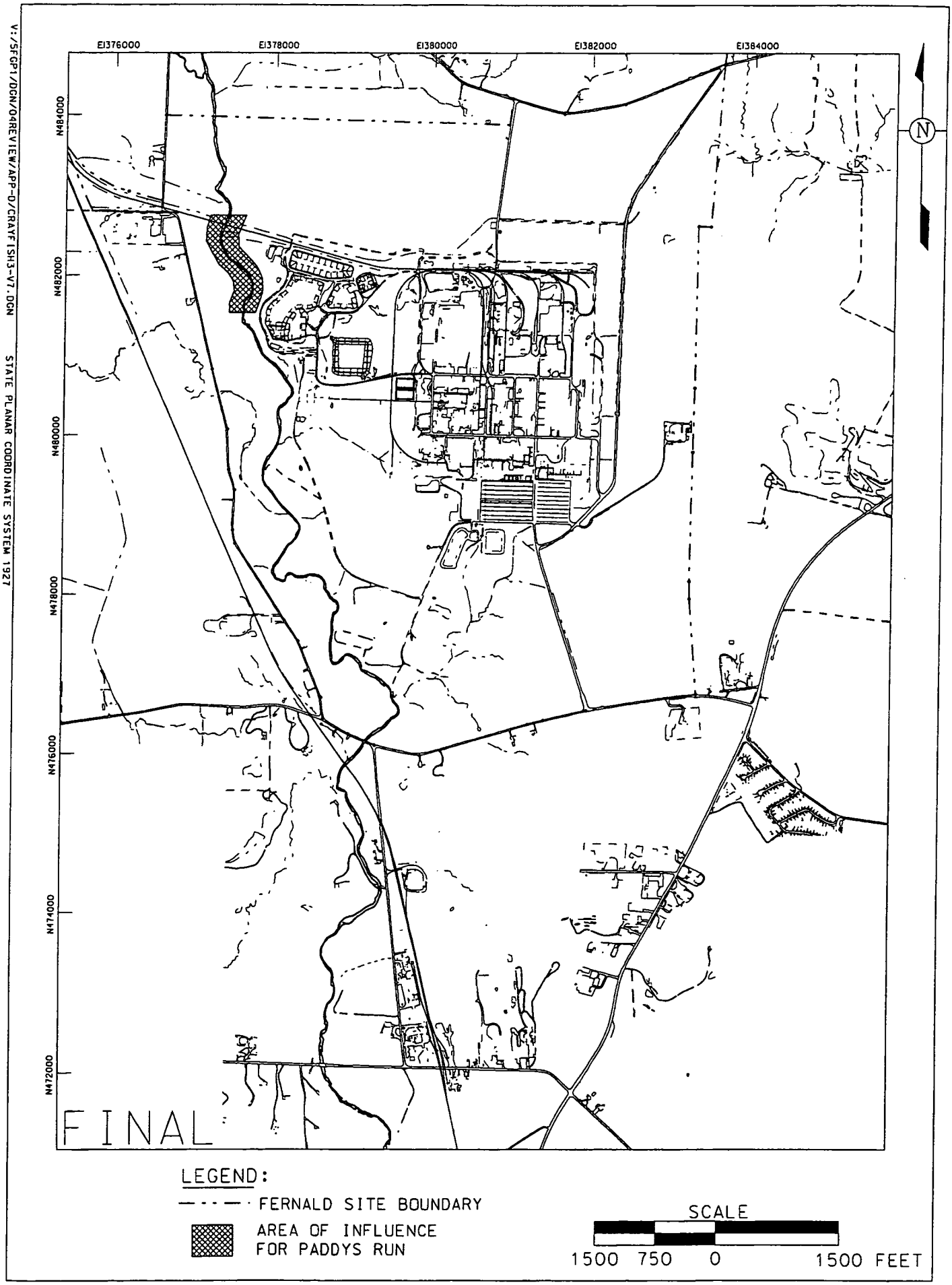

FIGURE D.1-3. AREA OF INFLUENCE FOR PADDYS RUN

D.4.2 Frequency

Crayfish will be relocated as appropriate, up to a frequency of every two months, depending on stream conditions. If visual observations of the Paddys Run tributary indicate increased turbidity into Paddys Run for several consecutive days, then the crayfish will be relocated. If turbid tributary conditions persist two months after the initial relocation, then the crayfish will be relocated again.

D.4.3 Methods

Crayfish will be obtained by seining Paddys Run with a minnow seine (1.2 x 1.8 meters; 0.64 centimeter mesh). Pools and riffles will be seined several times in an effort to capture as many individuals as possible. Upon capture, crayfish will be placed in a plastic container containing existing stream water and transported upstream for free release. The location selected for release will be pre-determined based on the suitability of habitat.

D.5 REPORTING

Sloan's crayfish monitoring activities will be reported through the Integrated Environmental Monitoring Plan annual site environmental reports, which will provide an update on Sloan's crayfish population surveys and contingency actions.

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