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**INTEROFFICE CORRESPONDENCE**

DATE: November 8, 1991  
TO: Distribution  
FROM: J. M. Kersh, E&WM, Bldg. 111, X4111 *J. M. Kersh*  
SUBJECT: ORDERS FOR GUIDANCE FOR CONSTRUCTION ON OR NEAR INDIVIDUAL HAZARDOUS  
SUBSTANCE SITES (IHSSs) - JMK-0807-91

The EG&G Environmental Management Department is developing a formal procedure for plant-wide control of construction and excavation on Individual Hazardous Substance Sites (IHSSs).

In the interim the following orders are to be implemented immediately.

The role of Environmental Management (EM) is to determine if any proposed construction activities will impact designated Individual Hazardous Substance Sites (IHSS, formerly referred to as SWMUs), and to provide guidance for preparation of sampling plans and to direct sampling and laboratory analysis to satisfy EM responsibilities to the EPA and CDH. Additional sampling that may be required by Health and Safety, will be the responsibility of H&S. The project originator, not EM, is responsible for the cost of any of the sampling and analysis deemed required by Environmental Management to meet regulatory agency requirements.

Construction and/or excavation restrictions are applicable to all IHSSs. Several pre-construction restrictions, based on guidance correspondence issued jointly by the EPA and CDH, are presently as follows:

- 1) All proposed construction in IHSS's must be presented to Environmental Management. This will include site drawings showing proposed excavation and construction, as well as an excavation plan showing the placement of excavated soils. This plan will be reviewed by Environmental Management for compliance to EPA and CDH guidance for construction on IHSSs.
- 2) IHSS boundaries are not legally defined (i.e., boundaries cannot be staked to the nearest foot) and therefore are subject to interpretation. Solid Waste Management Unit maps that are presently in circulation are to be used for preliminary planning only. If a determination of an IHSS boundary is required in the field, this determination must be made by designated Environmental Management personnel, identified below.
- 3) Environmental Management must be consulted prior to the start of Title I engineering to determine whether the IHSS is impacted. Additionally, all projects involving excavation must be reviewed by EM to determine whether an IHSS will be impacted by possible groundwater inflow.

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- 4) If a proposed construction project has been deemed by Environmental Management to impact an IHSS, a sampling plan will be required and sampling will be done at EM's direction. At the completion of sampling, a risk assessment will be completed using analytical data from samples taken. This is to make a determination if the soils are considered, by law, as hazardous material, which will affect the disposition of the spoils.

Due to the time to accomplish these pre-construction requirements, several months should be added to the front end of all construction projects anticipated to impact an IHSS.

It should be noted here that EPA and CDH do not intend to "approve" construction plans. Their guidance letters still point out the liability of the DOE (and its contractors) to meet environmental laws and regulations. Additionally, they point out that ultimate remediation of the IHSS in which the construction is done may require the removal of the facilities constructed on the site.

Guidance has also been given for physical construction restrictions within the IHSSs. These are provided as follows for design considerations:

- 1 ) All waste spoils (e.g., soil, concrete fragments, pavement fragments) within the SWMU must remain within that specified unit. There are now provisions for moving soils off of IHSSs in special circumstances where the soil can be characterized as non-hazardous material. This determination can only be made by Environmental Management after sampling and risk analysis is completed. Additional time should be planned for projects if this is to be considered. The soil to be left in the IHSS may be graded, mounded, and/or used as backfill, as long as it can be demonstrated that there will be no danger of distribution off of the IHSS by erosion, wind, or hydraulic (surface or subsurface) action. Removal of spoils from the immediate area of the excavation must be called out in the excavation plan.
- 2) Treatment of waste spoils (soil) and redistribution back into the unit is prohibited.
- 3 ) Soil brought into the IHSS is to be considered waste spoils, and therefore cannot be removed from the unit once brought in. Transfer of soils between SWMUs is restricted. (Proposed law may allow this in the future under certain circumstances, but should not be considered as an option.)
- 4 ) Excavation in or near SWMUs must consider possible encounters with contaminated groundwater. Pumping of this groundwater off the IHSS onto other areas is prohibited without proper authorization. Additionally, design of excavations that encounter potentially contaminated groundwater may require sampling points (sampling wells) that will remain after construction. All incidental waters that interfere with construction must be tested before they can be removed. Ron Henry of the Surface Water Division, extension 4368, should be contacted to arrange for sampling and approval to remove these waters.

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- 5 ) Excavations in or near IHSSs that may encounter contaminated groundwater must be conducted to ensure that future migration of groundwater out of the IHSS will not occur.
- 6 ) Spoils that cannot be properly graded, mounded, or used as backfill may be placed in appropriate containers and stored on the IHSS.

The guidelines presented by EPA and CDH are subject to change; therefore, it is imperative that all IHSS construction be coordinated through M. B. Arndt or Jim Koffer of Environmental Management. Mike can be reached at extension 4294, and Jim can be reached at x5949.

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