

**Comprehensive Legacy Management and Institutional Control Plan (S03496-12.0)**  
**Revision 12, January 2019**  
**Variations for Calendar Year 2020 and 2021**

| Variance Number | Variance Title    | Significant? <sup>a</sup><br>(Y/N) | Affected Volume/Attachment and Section   | Variance Date                     | Regulatory Approval Date       |                                 |
|-----------------|-------------------|------------------------------------|--|-----------------------------------|--------------------------------|---------------------------------|
|                 |                   |                                    |  |                                   | EPA                            | Ohio EPA                        |
| 2020-01         | Document Revision | Y                                  | Volume I, Section 1,1, Purpose and Organization of the LMICP and Volume II, Section 1.6, Updates to the Institutional Control Plan | 11/19/2019                        | 1/8/2020                       | 1/13/2020                       |
| 2020-02         | Prohibited Items  | Y                                  | Volume II, Figure 2, Fernald Preserve Prohibited Activities and Items.   | 9/18/2019                         | 1/8/2020                       | 1/13/2020                       |
| 2020-03         | Inspection Timing | Y                                  | Vol II, Section 3.2, Fernald Preserve Inspections and PCCIP, Section 6.2.1.1   | 11/19/2019                        | 1/8/2020                       | 1/13/2020                       |
| 2020-04R1       | Lidar             | Y                                  | PCCIP, Section 3.3 OSDF As-Built   | <del>9/18/2019</del><br>9/22/2020 | <del>1/8/2020</del><br>Pending | <del>1/13/2020</del><br>Pending |
| 2020-05         | Leachate Volume   | Y                                  | GWLMP, Section 3.2.2 Leachate Monitoring Compliance Strategy   | 11/19/2019                        | 1/8/2020                       | 1/13/2020                       |
| 2020-06         | Accumulation Rate | Y                                  | GWLMP, Section 4.4.2.1, Flow Monitoring in the LCS and LDS   | 9/18/2019                         | 1/8/2020                       | 1/13/2020                       |
| 2020-07         | Contact List      | N                                  | Community Involvement Plan, Appendix A, Contact List   | 11/19/2019                        | 1/8/2020                       | 1/13/2020                       |

<sup>a</sup> Per the *Fernald Preserve Quality Assurance Project Plan* (DOE 2014): A **significant variance** is required when activities change the scope of the project and that change must be reviewed by the regulatory agencies. An **informational variance** is used for changes such as providing clarification, incorporating additional information, correcting errors or documenting resampling efforts.

# Variance

**Variance number:** 2020-04R1 **Significant:**  Yes  No  
**Document number:** LMS/FER/S04396-12.0 **Page:** 1 of 1  
**Document title:** Fernald Preserve Comprehensive Legacy Management and Institutional Controls Plan, PCCIP **Date:** 9/22/2020

## Variance

**Requirements:** Per PCCIP, Section 3.3, OSDF As-Built (Page 20).

"To support each CERCLA Five-Year Review, aerial surveys of the site will be conducted via light detection and ranging (lidar) or equivalent technology every 5 years, beginning in 2019. These aerial surveys will allow for comparison of topography over time to detect changes in the OSDF cap that may not be observable during field walkdowns."

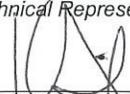
**Variance:**

"To support each CERCLA Five-Year Review, aerial surveys of the site will be conducted via light detection and ranging (lidar) or equivalent technology every 5 years, beginning in 2019 **the spring of 2020 2021 after the prescribed burn of the northern half of the cell OSDF cap. The aerial survey was originally planned to occur in the spring of 2020; however, due to weather and reduced site staffing and activities to prevent the spread of COVID-19 this did not occur.** These aerial surveys will allow for comparison of topography over time to detect changes in the OSDF cap that may not be observable during field walkdowns."

**Justification:**

Postponing the lidar survey of the OSDF until after the prescribed burn will allow a better survey to be completed.

**Requested By:** Lisa McHenry  **Date:** 9-22-2020

| Variance Approvals                  |   |   |                  | Variance Approvals                  |   |                                 |             |
|-------------------------------------|---|---|------------------|-------------------------------------|---|---------------------------------|-------------|
| <b>Required</b>                     | <b>KATHLEEN FRITTS (Affiliate)</b>  |   |                  | <b>Required</b>                     | <b>MARY SIZEMORE (Affiliate)</b>  |                                 |             |
|                                     | Digitally signed by KATHLEEN FRITTS (Affiliate) Date: 2020.09.23 15:42:25 -04'00' |   |                  |                                     | Digitally signed by MARY SIZEMORE (Affiliate) Date: 2020.09.23 15:40:02 -04'00' |                                 |             |
| <b>Yes</b>                          | <b>No</b>   | <b>K. Fritts</b>  | <b>Date</b>      | <b>Yes</b>                          | <b>No</b>   | <b>M. Sizemore</b>              | <b>Date</b> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>  | <u>Quality Assurance</u>  | <u>Date</u>      | <input checked="" type="checkbox"/> | <input type="checkbox"/>  | <u>Environmental Compliance</u> | <u>Date</u> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>  | <u>J. Homer</u>    | <u>9-22-2020</u> | <input type="checkbox"/>            | <input checked="" type="checkbox"/>   | <u>Environmental Sampling</u>   | <u>Date</u> |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/>   | <u>Laboratory Technical Representative</u>  | <u>Date</u>      | <input type="checkbox"/>            | <input checked="" type="checkbox"/>   | <u>Aquifer Restoration</u>      | <u>Date</u> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>  | <u>K. Voisard</u>  | <u>9-22-2020</u> | <input type="checkbox"/>            | <input type="checkbox"/>  | <u>Other</u>                    | <u>Date</u> |
|                                     |   | <u>Environmental Monitoring, Data Management and Reporting</u>  | <u>Date</u>      |                                     |   |                                 | <u>Date</u> |

**Revision Required**  Yes  No **Document No. and Title:** \_\_\_\_\_

|                     |  |  |
|---------------------|--|--|
| <b>Distribution</b> | <input checked="" type="checkbox"/> Records Management | <input checked="" type="checkbox"/> EPA      |
|                     | <input checked="" type="checkbox"/> Post to Web Page   | <input checked="" type="checkbox"/> Ohio EPA |