MINOR

OPERATION AND MAINTENANCE

ACTIVITY PLAN

O&M 21-008

Spent Material Clean-up in the 725-1N Abrasive Blasting Operations Area

(Site Index No. 354 "CMN-100 Construction Sandblast Area")

Prepared by: _____ Date: 3/25/21

J.D. Hope

Environmental Compliance Authority

Reviewed by: _____ Date: 3/29/2021

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Construction Manager

1. INTRODUCTION

This Operations and Maintenance (O&M) Plan addresses soil disturbing activities necessary to maintain operation of the 725-1N Abrasive Blasting Operations by removing spent blast material from the Abrasive Blasting Area located in N-Area / Central Shops.

The removal of the spent material is from RCRA/CERCLA Site Index No. 354 "CMN-100 Construction Sandblast Area". The spent material covers an area that is both concrete pad and exposed earth. Heavy equipment will be used to collect and move the spent blast material into skid pans. The concrete pad will not be disturbed by these housekeeping efforts. While there is no intent on disturbing the soil beneath the spent material, the potential does exist. The area of potential disturbance is less than 10% of the waste unit area, characterizing it as "minor intrusive". An O&M plan is required per WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U),* December 15, 1996. An O&M plan provides added protection to human health and the environment and minimizes impact to long-term characterization and remediation efforts.

2. AREA DESCRIPTION AND CONDITIONS

The proposed activity is within RCRA/CERCLA Site Index No. 354 "CMN-100 Construction Sandblast Area". The unit is west and south of 725-2N and adjacent to 725-1N. The proposed activity is to be conducted in the yard space between the two buildings, barricaded by ropes and signs. The yard space is mostly covered by concrete pad with some exposed earth. Blasting operations are also included as industrial activities contributing to the N-06 Industrial Stormwater outfall. Silt fences are established and maintained to protect the outfall from runoff. This site is also listed as a Title V Air Operating Permitted source as Emission Unit N-001 "725-1N Abrasive Blasting Operations".

Unit 354 is in the FFA because of potential metals contamination from previous use. The constituents of concern are lead and chromium.

3. O&M ACTIVITY

A. <u>O&M ACTIVITY</u>

Housekeeping is necessary for continued blasting operations. Spent blasting will be collected, sampled, characterized and disposed per applicable requirements and procedures.

B. O&M ACTIVITY SAMPLING AND MONITORING FOR HEALTH AND SAFETY

Unit 354 is in the FFA because of potential metals contamination (lead and chromium). This area does not have a radiological history. The spent material will be sampled prior to disposal. Small amounts of soil may be included in the spent material. Since the spent material will be sampled for all RCRA metals, the soil's constituents of concern will be addressed as well.

C. HEALTH AND SAFETY PLAN

The CERCLA SME (Bette Ross) concurred that no HASP is required for this activity.

Worker safety is covered in the Assisted Hazard Analysis (CON 3521 R0), Work Order 1863044 and reviewed in the Pre-job briefing.

D. CHARACTERIZATION AND SAMPLING PLAN FOR THE AFFECTED AREA OF WITHIN THE UNIT

Unit 354 is in the FFA for potential metals contamination. Industrial Hygiene will review the work order and Assisted Hazard Analysis (AHA) to determine worker protection. For disposal of the collected material, samples will be analyzed for RCRA waste determination. No radiological work is conducted in this area.

If unexpected contamination is found, a Time-Out will be called. The ECA will be notified. The ECA will notify the SRNS On-Scene Coordinator (OSC) Miran Tyrrell, who may request additional work scope and sampling from soil disturbed by the activity.

E. CONTAMINATED MATERIALS MANAGEMENT AND DISPOSAL

A small amount of excavated soil is to be expected in the spent blast material. The collected material will be sampled and analyzed for RCRA metals, which include the FFA constituents of concern (lead and chromium). Disposal will be in accordance with federal and state regulations and site procedures with guidance from the GCO and ECA.

F. ENVIRONMENTAL PLANS AND PERMIT MODIFICATIONS

The Environmental Evaluation Checklist for this activity is **EEC # PBU-N-2017-0003, Rev. 1.**
The EEC outlines potential impacts to applicable permits and environmental regulations.

4. CONTINGENCY PLAN

During implementation of the activity, if conditions change at any time such that the activity is no longer considered "minor" (as defined in Reference 2) or any other unanticipated event occurs, the Project Manager, the Construction Manager or ECA shall:

- Stop work, secure the area, contain and stabilize the area if it is safe to do so.
- Immediately notify the SRNS-OSC and request a path forward. If necessary, the SRNS-OSC will notify the DOE-OSC and receive concurrence on the path forward
- Make any necessary changes to work authorization documents.
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5. DOCUMENTATION AND REPORTING

The facility will transmit the following documentation to the SRNS-OSC within twenty (20) days of the completion of the activity:

- A statement that the activity is complete
- sampling and characterization data
- quantity of spent material collected for disposal
- disposition path and associated manifests and LDR notices (as necessary)

References

1. WSRC-OS-94-42, *Federal Facility Agreement for the Savannah River Site,* Administrative Document Number 89-05-FF, effective August 16, 1993. (Revision 0, Appendix C for Fiscal Year 2017)

2. WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U),* December 15, 1996.

3. Work Order #01863044

4. AHA CON-3521 R0