MINOR

OPERATION AND MAINTENANCE

ACTIVITY PLAN

O&M 22-008

Power Pole Installation in the 725-1N

Abrasive Blasting Operations Area

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

Prepared by: _____ Date: 12/16/2021

J.D. Hope

Environmental Compliance Authority

Reviewed by: _____ Date: 16 Dec 2021

Benjamin Yurgiewicz

Construction Manager

1. INTRODUCTION

This Operations and Maintenance (O&M) Plan addresses soil disturbing activities necessary to install two additional electrical power service poles in support of providing additional electrical power needed to operate a newly installed HVAC unit at building 725-2N Paint Barn. The power poles will be installed within the buffer area of the site evaluation area site index No. 354 CMN-100 Construction Sandblast Area.

The installation of the power poles will be on the east side of building 725-2N and is permitted via Site Clearance Permit No. 2021-0409. SRNS Site Utilities will install the pole and electrical power feed to the facility. 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. 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. Silt fences are established and maintained to protect the outfall from runoff. The proposed activity is to be conducted on the east side of building 725-2N and is within the unit boundary.

3. O&M ACTIVITY

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

Installation of two electrical power service poles on the east side of building 725-2N for the purpose of providing the necessary power to operate the newly installed HVAC unit for the facility.

B. <u>O&M ACTIVITY SAMPLING AND MONITORING FOR HEALTH AND SAFETY</u>

No sampling and monitoring for health and safety reasons is required for this planned work scope. The work is within in the buffer area of the site evaluation area. There are no known or suspect radiological conditions or concerns. The work is outside of the boundary of the Abrasive Blasting Operations Area.

C. **HEALTH AND SAFETY PLAN**

A Health and Safety Plan will not be required for this work activity. Worker safety is covered in the Assisted Hazard Analysis (CON 3622 R0), Work Order #01833504-2 and reviewed in the Pre-job briefing.

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

A Characterization and Sampling Plan for the Affected Area is not required. The work is within the buffer area of the site evaluation area and is not with in the boundary of the Abrasive Blasting Operations Area. In the event of finding unexpected contamination or unknown substances, a Time-Out will be called. The ECA will be notified. The ECA will notify the SRNS On-Scene Coordinator (OSC) Miran Tyrrell with any planned further actions as needed.

E. **CONTAMINATED MATERIALS MANAGEMENT AND DISPOSAL**

A small amount of excavated soil is to be expected resulting from the excavation process involved with the placement of the power poles. There are reasons to expect any contaminated materials to be generated under this planned work activity.

F. **ENVIRONMENTAL PLANS AND PERMIT MODIFICATIONS**

The Environmental Evaluation Checklist for this activity is **EEC # PBU-N-2020-0031, 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 on page 4 of 4) 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.

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

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 #01833504-2

4. AHA CON-3622 R0

5. EEC #PBU-N-2020-0032, Rev. 1