MINOR

OPERATION AND MAINTENANCE

ACTIVITY PLAN

O&M 25-011

Spent Material Clean-up & Minor Maintenance at 725-1N

Abrasive Blasting Operations Area

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

Prepared by: _____ Date: 4/28/25

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Reviewed by: _____ Date: 4/29/25

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1. INTRODUCTION

This Operations and Maintenance (O&M) Plan addresses potential soil disturbance during the clean-up and disposal of the spent/used abrasive blasting materials generated during sandblasting activities at the 725-1N Abrasive Blasting Operations Area. It is also written to cover the maintenance needed to remove and replace the existing silt fence materials on the south end of the blasting area.

The removal of the used abrasive blasting material and silt fence repairs is from the RCRA/CERCLA Site Index No. 354 "CMN-100 Construction Sandblast Area". The spent blasting material covers an area that is both a concrete pad and exposed earth. Heavy equipment will be used to collect and move the material into skid pans for disposal. The concrete pad will not be disturbed by these housekeeping efforts. There is no intent to disturb the open soil areas beneath some of the material, however the potential does exist and would be minimal. PMCS Construction personnel will also be digging a minimal (3 to 6 inches) trench depth during the installation of the replacement silt fence. No grass of soil will be removed from the area while performing this portion of the work. 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 725-1N and is within the unit boundary.

3. O&M ACTIVITY

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

Housekeeping is necessary for continued blasting operations. Spent/used blasting material will be collected, sampled, characterized, and disposed of

per applicable requirements and procedures. Silt fence will be maintained in good repair.

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

Unit 354 is in the FFA because of potential metals contamination (lead and chromium). This area does not have a radiological history. The spent blasting material will be sampled prior to disposal. Small amounts of soil may be included in the spent materials collected. Since the spent materials will be sampled for all RCRA metals, the soil's constituents of concern are addressed. Sampling and monitoring are not for human health and safety reasons and is for disposal purposed only. The work is within in the buffer area of the site evaluation area. There are no known or suspect radiological conditions or concerns.

C. <u>HEALTH AND SAFETY PLAN</u>

A Health and Safety Plan will not be required/written for this work activity. Worker safety is covered in the Assisted Hazard Analysis **(CON-4559), Work Order #02163908** and reviewed in the Pre-job briefing.

D. <u>CHARACTERIZATION AND SAMPLING PLAN FOR THE AFFECTED AREA OF WITHIN THE UNIT</u>

A Characterization and Sampling Plan for the area affected during the silt fence work is not required. The work is within the buffer area of the site evaluation area and within 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) or designee with any planned further actions as needed.

E. <u>CONTAMINATED MATERIALS MANAGEMENT AND DISPOSAL</u>

A small amount of excavated soil is to be expected resulting from the clean-up process. There are no reasons to expect any contaminated materials to be generated under this planned work activity. Any soil material collected will be sampled along with the used blasting material and analyzed for RCRA metals. Disposal will be in accordance with state and federal regulations and site procedures with guidance from the GCO and ECA.

F. <u>ENVIRONMENTAL PLANS AND PERMIT MODIFICATIONS</u>

The Environmental Evaluation Checklist for this activity is **EEC # LSES-N-2025-00028.** 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 #02163908

4. AHA CON-4559

5. EEC #LSES-N-2025-00028