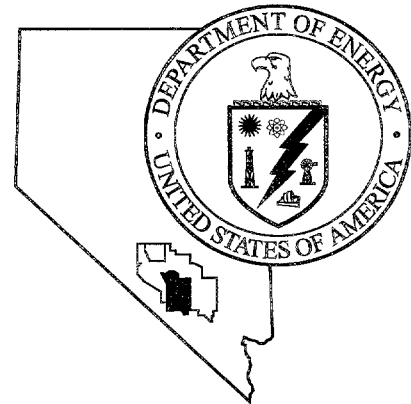


Nevada
Environmental
Restoration
Project

DOE/NV--623



Corrective Action Plan for
Corrective Action Unit 321:
Area 22 Weather Station
Fuel Storage
Nevada Test Site, Nevada

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June 2000

Environmental Restoration
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CORRECTIVE ACTION UNIT 321:
AREA 22 WEATHER STATION
FUEL STORAGE,
NEVADA TEST SITE, NEVADA**

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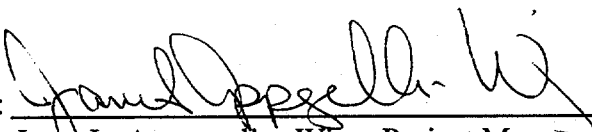
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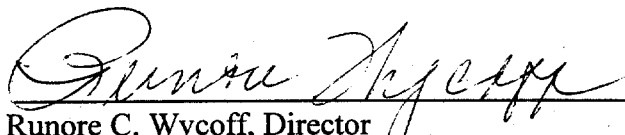
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**CORRECTIVE ACTION PLAN FOR
CORRECTIVE ACTION UNIT 321:
AREA 22 WEATHER STATION
FUEL STORAGE,
NEVADA TEST SITE, NEVADA**

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Janet L. Appenzeller-Wing, Project Manager
Industrial Sites Project

Date: 6/11/00

Approved By: 
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ACRONYMS AND ABBREVIATIONS

BN	Bechtel Nevada
CADD	Corrective Action Decision Document
CAP	Corrective Action Plan
CAU	Corrective Action Unit
DOE	U.S. Department of Energy
FFACO	Federal Facility Agreement and Consent Order
ft	feet
m	meters
mg/kg	milligrams per kilogram
NDEP	Nevada Division of Environmental Protection
NTS	Nevada Test Site
REOP	Real Estate/Operations Permit
SSHASP	Site-Specific Health and Safety Plan
TPH	Total Petroleum Hydrocarbons

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EXECUTIVE SUMMARY

The Area 22 Weather Station Fuel Storage is identified in the Federal Facility Agreement and Consent Order as Corrective Action Order (CAU) 321. The CAU is located in Area 22 of the Nevada Test Site (NTS) and includes Corrective Action Site 22-99-05, Fuel Storage Area.

The Fuel Storage Area consists of a bermed area that was used to store fuel and other petroleum products in support of the former Camp Desert Rock Facility which was operational from 1951 to 1958.

Characterization activities done in February 1999 indicated that the only constituent of concern was petroleum hydrocarbons. Concentrations of petroleum hydrocarbons as diesel exceeding the Nevada Division of Environmental Protection regulatory action level of 100 milligrams per kilogram (mg/kg) were detected at two locations. The concentrations detected were 124 mg/kg and 377 mg/kg.

Clean closure of the site involves the excavation and disposal of impacted soil. The soil will be disposed in the NTS Area 6 Hydrocarbon Landfill. Upon completion of excavation, soil samples will be collected from the excavated areas to verify that the petroleum hydrocarbons have been removed. The excavated areas will then be backfilled and regraded. Post-closure care is not required because this is a clean closure.

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1.0 INTRODUCTION

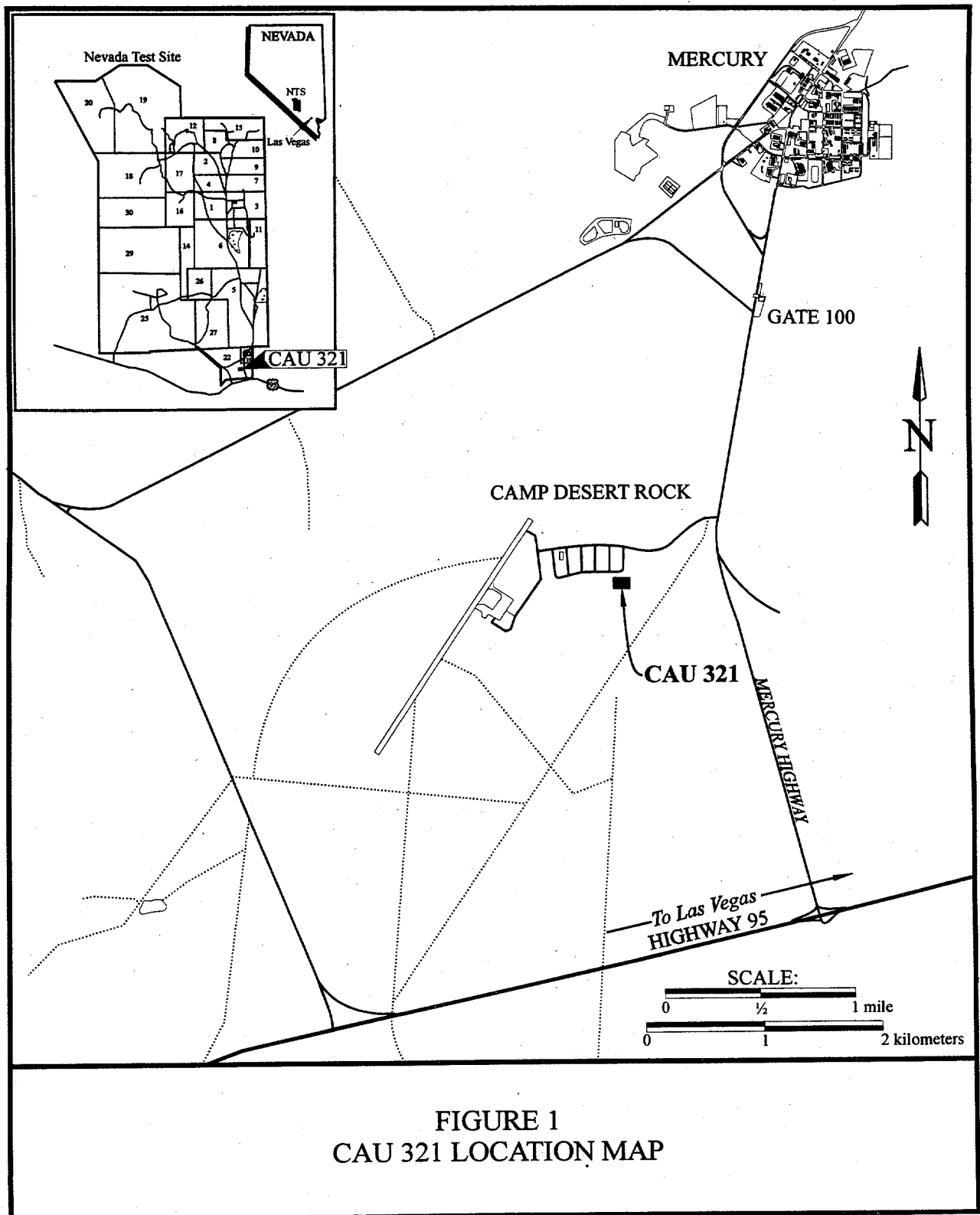
The Area 22 Weather Station Fuel Storage is located in Area 22 of the Nevada Test Site (NTS) (Figure 1). The site is listed in the Federal Facility Agreement and Consent Order (FFACO, 1996) as Corrective Action Order (CAU) 321 and includes Corrective Action Site 22-99-05, Fuel Storage Area.

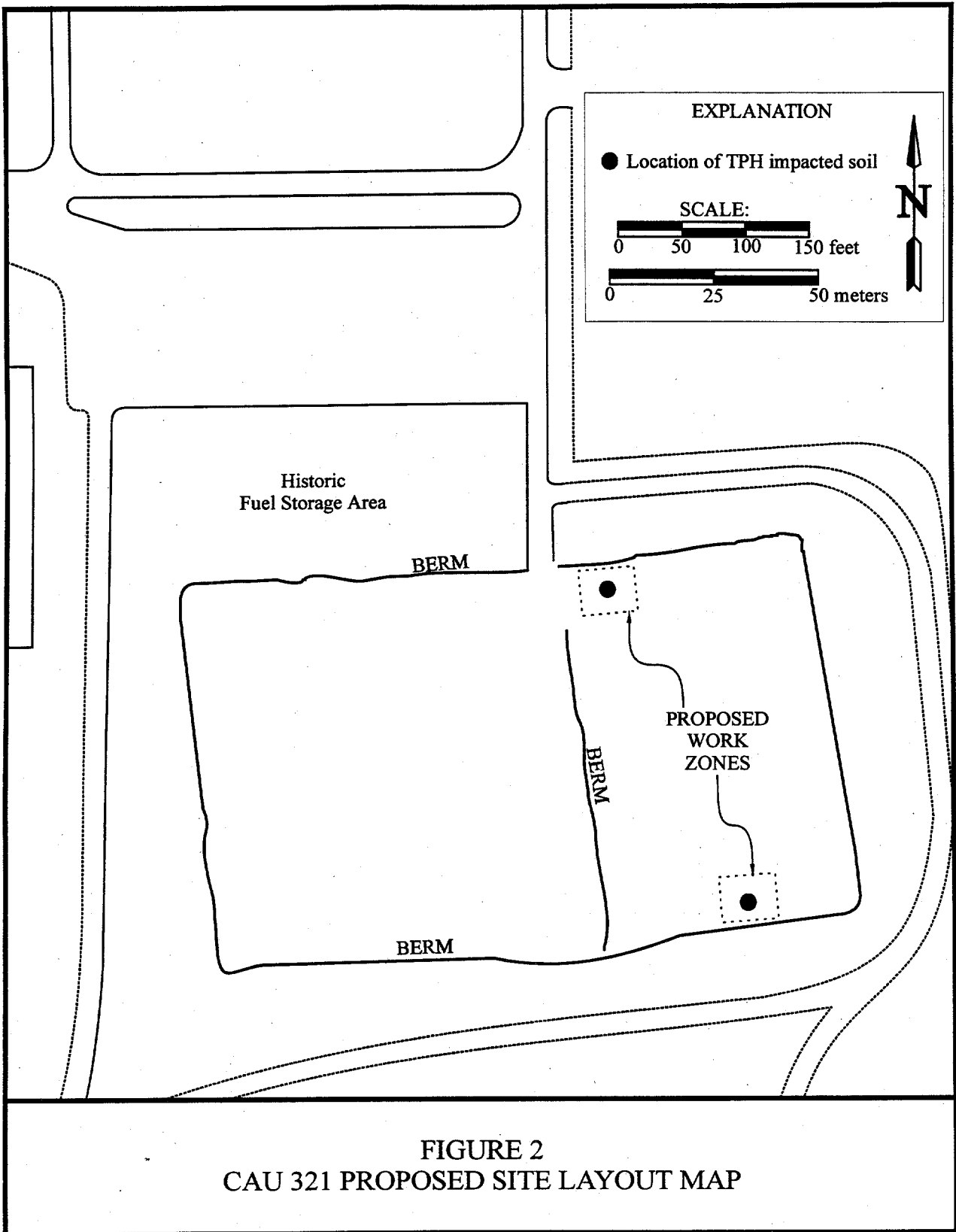
The site history for the CAU is provided in the Corrective Action Investigation Plan (U.S. Department of Energy [DOE], 1999a). The Fuel Storage Area consists of an approximately 99-by 165-meter (m) (325-by 540-feet [ft]) bermed area (Figure 2). It was used to store fuel and other petroleum products in support of the former Camp Desert Rock Facility which was operational from 1951 to 1958.

1.1 PURPOSE

The purpose of this Corrective Action Plan (CAP) is to provide the strategy and methodology to close the Area 22 Weather Station Fuel Storage. The CAU will be closed following state and federal regulations and the FFACO (1996). Site characterization was done during February 1999. Soil samples were collected using a direct-push method. Soil samples were collected at 0.6-m (2-ft) intervals from the surface to 1.8 m (6 ft) below ground surface. The results of the characterization were reported in the Corrective Action Decision Document (CADD) (DOE, 1999b).

Soil sample results indicated that two locations in the bermed area contain total petroleum hydrocarbons (TPH) as diesel at concentrations of 124 milligrams per kilogram (mg/kg) and 377 mg/kg. This exceeds the Nevada Division of Environmental Protection (NDEP) regulatory action level for TPH of 100 mg/kg (Nevada Administrative Code, 1996). The TPH-impacted soil will be removed and disposed as part of the corrective action.





1.2 SCOPE

The approved corrective action alternative was chosen in the CADD (DOE, 1999b). The approved alternative includes clean closure by excavation and disposal. The scope of the approved corrective action alternative consists of the following activities:

- Preplanning and site preparation.
- Excavating and removing impacted soil.
- Collecting verification soil samples.
- Backfilling the excavation to surface grade with clean fill.
- Disposing of excavated materials following applicable federal, state, and DOE regulations following Section 2.3 of this CAP.
- Preparing a Closure Report to document the closure activities described above.

1.3 CORRECTIVE ACTION PLAN CONTENTS

This document is divided into the following sections in accordance with the approved FFACO Corrective Action Plan outline:

- Section 1.0 - Introduction
- Section 2.0 - Detailed Statement of Work
- Section 3.0 - Schedule
- Section 4.0 - Post-Closure Plan
- Section 5.0 - References

The appendices of this document have been modified from the approved FFACO outline. The following FFACO outline appendices have not been included or revised as indicated below:

- Appendix A1: Engineering Specifications and Drawings

This appendix is not necessary for the site as there are no construction or engineered cover requirements for closure.

- Appendix A2: Sampling and Analysis Plan

The sampling and analysis requirements for the site are detailed in Section 2.4, "Clean-up Verification," therefore, a separate sampling and analysis plan is not included as an appendix.

- Appendix A3: Project Organization

This appendix is identified as Appendix A.

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2.0 DETAILED STATEMENT OF WORK

2.1 APPROVED ALTERNATIVE IMPLEMENTATION

This section describes how the approved alternative will be implemented at the Area 22 Weather Station Fuel Storage. The approved alternative includes clean closure with excavation and disposal of impacted soils, verification sampling, and regrading of the site. In addition to field activities, planning and site preparation are also required.

2.1.1 PREPLANNING AND SITE PREPARATION

Prior to beginning excavation activities, the following planning and preparation activities will be accomplished:

- Preparation of planning documents such as the Site-Specific Health and Safety Plan (SSHASP), and the Field Management Plan.
- Site preparation including utility clearance, work permits, and delineation of excavation boundaries.
- Identification and approval of a water source for dust suppression and other construction activities.
- Scheduling and coordination of work with construction and waste management.

2.1.1.1 SSHASP/Hazard Analysis

A SSHASP, Preliminary Hazard Assessment, and Hazard Assessment will be prepared. A copy of the SSHASP will be kept on-file in the Bechtel Nevada (BN) Environmental Restoration and the BN Environmental, Safety, and Health Division Offices in Mercury, Nevada. The original document will be kept by the site Health and Safety Officer or designee at the work site. The SSHASP will be available on-site for review and signature by all workers prior to beginning work at the site. The SSHASP will provide a detailed, job-specific plan covering protection against accidents or exposure of workers to contamination. It will also discuss weather/air monitoring, accident reporting, emergency procedures, and physical and environmental hazards. The work will also be performed following the BN Environment, Safety, and Health Manual (BN, 1999). In addition, the Material Safety Data Sheets file will be maintained by the Health and Safety Officer and will be available on-site.

2.1.1.2 Field Management Plan

A Field Management Plan will be prepared for the closure activities. The plan will outline how the work will be accomplished and provide a detailed schedule for the project. In addition, it will identify the responsible parties for each aspect of the project and determine how decisions will be made. A copy of the Field Management Plan will be placed on file at the BN Environmental Restoration offices in Mercury, Nevada, and a copy will also be available at the project field site.

2.1.1.3 National Environmental Policy Act Documentation

A National Environmental Policy Act checklist, and any subsequent documentation, will be completed prior to beginning excavation activities at the site. If necessary, a follow-up survey will be performed and will report on the condition of existing trees, shrubs, grassed areas, cultural resources, sacred sites, and wildlife immediately adjacent to the area which may be affected by construction activities, equipment and material storage areas, and access routes. Based on the findings of this survey, the excavation activities at the Fuel Storage Area will follow all applicable federal, state, and local laws, regulations, and permits for protection of the environment.

2.1.2 FIELD ACTIVITIES

2.1.2.1 Excavation of Soil Containing Petroleum Hydrocarbons

A total of approximately 6 cubic meters (8 cubic yards) of soil in two locations has been impacted with TPH as diesel (Figure 2). The soil will be removed from these locations by excavating. The depth of the excavations is not anticipated to exceed 1.8 m (6 ft). The soil will be stockpiled at each location, then loaded into a dump truck, and transported to the NTS Area 6 Hydrocarbon Landfill for disposal. The waste will be managed following Section 2.3 of this CAP.

During excavation, the soil and excavated area will be examined visually for stains or discoloration that may be the result of petroleum hydrocarbons discharged in this area. The soil and excavated area will also be screened using a photoionization detector for health monitoring and for field screening soil samples. Any areas identified as impacted above remediation levels will be removed.

2.1.2.2 Decontamination of Equipment

Sampling equipment will be decontaminated off-site prior to the start of field activities. Equipment will be decontaminated using Alconox™ and water followed by a deionized water rinse. Equipment will be air dried and placed into clean plastic bags.

Any other equipment that becomes contaminated during the excavation process will be decontaminated on-site over the impacted soil piles with a solution of Alconox™ and water, and rinsed with clean water.

2.1.2.3 Backfilling and Grading of Site

The excavated areas will be backfilled with clean fill soil and leveled to existing grade to minimize surface obstructions and ponding.

2.2 CONSTRUCTION QUALITY ASSURANCE/QUALITY CONTROL

Construction activities consist of excavation and earth moving. Permeability and compaction testing will not be necessary. As a result, no construction quality assurance/quality control is required.

2.3 WASTE MANAGEMENT

Waste streams generated at CAU 321 will include soil and debris containing petroleum hydrocarbons, and nonhazardous sanitary trash. Petroleum hydrocarbon-impacted waste will be disposed of in the NTS Area 6 Hydrocarbon Landfill. Nonhazardous waste, such as sanitary trash, will be disposed of in the NTS Area 23 Sanitary Waste Landfill.

2.3.1 SITE CONTROL

Where appropriate, temporary fencing will be constructed around the work areas. Warning signs will be posted. Only properly trained personnel wearing appropriate personal protective equipment will enter the work areas. The proposed work areas and site layout are provided in Figure 2.

2.3.2 PERSONNEL TRAINING

Title 29 Code of Federal Regulations 1910.120 (U.S. Environmental Protection Agency, 1996) details the occupational safety and health requirements that will be followed for personnel supporting excavation activities. All personnel will be required to read, understand, and sign the SSHASP prior to working at the site. A tailgate safety briefing will be held every morning and, as needed, as activities or circumstances change. Only trained and qualified personnel will operate heavy equipment. In addition, all personnel entering the work areas will require 40-hour Occupational Safety and Health Administration training with updated 8-hour refresher training as necessary.

2.3.3 WASTE MINIMIZATION

For the duration of the project, site workers will adhere to the BN Waste Minimization and Pollution Prevention Program. Care will be taken to segregate waste from non-waste materials, when possible, to avoid the generation of additional regulated waste.

2.4 CLEAN-UP VERIFICATION

2.4.1 VERIFICATION SAMPLING

Verification sampling is required for a site closure. A verification program must support the field decision that any remaining constituents of concern are less than remediation standards and provide the regulator with confidence that sufficient samples have been collected to verify the site has been remediated. For the Area 22 Weather Station Fuel Storage, the approved CADD (DOE, 1999b) indicated that TPH as diesel is the only constituent of concern above remediation standards. All verification samples will be analyzed for TPH as diesel using U.S. Environmental Protection Agency Method 8015B Modified. The closure criteria will be based on the presence of hydrocarbons in the verification samples. The TPH as diesel concentration will not exceed 100 mg/kg for any sample. If this criteria is not met, additional excavation and verification sampling will be done. A two-week analytical turnaround time will be requested for all samples.

A total of two verification samples (one from each excavation) will be collected. Samples will be collected from the bottom of each excavation. For excavations up to 1.2 m (4 ft) deep, samples will be collected by hand using a decontaminated stainless steel scoop. If excavations exceed 1.2 m (4 ft) in depth, the samples will be collected as grab samples from the soil in the decontaminated bucket of the excavation equipment. All samples will be placed in pre-cleaned 250-milliliter glass jars.

All samples will be labeled with a unique sample number using the following nomenclature:

FS-1

Where:

- FS is the site location.
- 1 is the sample number.

All samples will be cooled to 4°C (40°F) and transported to the BN Analytical Services Laboratory under strict chain-of-custody procedures.

2.4.2 QUALITY CONTROL SAMPLES

One quality control sample (blind replicate) will be collected. It will be labeled with its own distinct sample number so that the laboratory will not be able to identify it as a quality control sample. The data packages provided by the laboratory will be evaluated by qualified personnel.

2.5 PERMITS

Permits required for this project include an Excavating and Penetration Permit and a Real Estate/Operations Permit (REOP).

2.5.1 EXCAVATING AND PENETRATION PERMIT

An approved Excavating and Penetration Permit (BN-0084) will be obtained prior to excavation. The permit contains a justification for the trenching operation and a checklist of pertinent organizations who must inspect the site so that the trenching will not impact utilities or cause a hazardous situation to workers. A copy of this permit will be kept at the project site by the construction superintendent.

2.5.2 REOP

A REOP will be completed prior to starting field activities. This DOE permit authorizes BN the right of occupancy and use of the DOE real estate (Area 22 Weather Station Fuel Storage) for closure activities.

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3.0 SCHEDULE

3.1 PROJECT SCHEDULE

A project schedule is provided in Table 1. The schedule will require modifications if conditions exist that are outside the assumptions on which the schedule is developed. The DOE will keep the NDEP apprised of any conditions that may impact the project schedule. In the event that the project schedule requires modifications, the DOE will consult with NDEP personnel prior to making any changes.

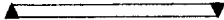





3.2 FIELD WORK CLOSURE SCHEDULE

A tentative schedule for planned field work consists of the following:

- Prefield Activities July 2000
- Excavation Activities August 2000
- Waste Disposal August 2000
- Verification Sampling August 2000
- Final Site Restoration August 2000

Field work will be done in the safest and most efficient manner possible. Sufficient flexibility has been placed in the project schedule to account for minor difficulties (weather, equipment breakdown, etc.). The schedule may require modification if conditions exist that are outside the assumptions on which the scope and schedule are developed.

TABLE 1 - PROJECT SCHEDULE FOR CAU 321 CLOSURE

Activity Description	Orig Dur	Early Start	Early Finish	FY00			
				JUN	JUL	AUG	SEP
321 Area 22 Weather Station Fuel Storage							
Area 22 Weather Station Fuel Storage							
Prefield Activities	16	03JUL00*	31JUL00				
Excavation Activities	6	01AUG00*	09AUG00				
Waste Disposal	6	01AUG00	09AUG00				
Verification Sampling	6	01AUG00	09AUG00				
Final Site Restoration	2	10AUG00	14AUG00				
M/S - CAU 321 Site Restoration Complete	0		14AUG00				

Sheet 1 of 1

4.0 POST-CLOSURE PLAN

The clean closure of the Area 22 Weather Station Fuel Storage is expected to remove waste to levels below the remediation standard. Therefore, post-closure care is not required.

4.1 INSPECTIONS

Because this is a clean closure, all constituents of concern will have been removed to the remediation standard. Inspections will not be required following closure and the land can be released for unrestricted use.

4.2 MONITORING

Because this is a clean closure, post-closure monitoring is not required at the Area 22 Weather Station Fuel Storage as all constituents of concern will have been removed to the remediation standard. The land can be released for unrestricted use.

4.3 MAINTENANCE AND REPAIR

The site will be clean closed. Maintenance or repairs will not be necessary at the site following closure.

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5.0 REFERENCES

BN, see Bechtel Nevada.

Bechtel Nevada, 1999. Environment, Safety, and Health Manual, Las Vegas, NV.

DOE, see U.S. Department of Energy.

EPA, see U.S. Environmental Protection Agency.

Federal Facility Agreement and Consent Order (FFACO) of 1996. Prepared by Nevada Division of Environmental Protection, U.S. Department of Energy, and U.S. Department of Defense.

NAC, see Nevada Administrative Code.

Nevada Administrative Code, 1996, NAC 445A.2272, "Contamination of soil: Establishment of action levels," As adopted by the Nevada Environmental Commission, September, Carson City, NV.

U.S. Department of Energy, Nevada Operations Office, 1999a, Corrective Action Investigation Plan for Corrective Action Unit 321: Area 22 Weather Station Fuel Storage, Nevada Test Site, Nye County, Nevada, Rev. 0, DOE/NV--531, Las Vegas, NV.

U.S. Department of Energy, Nevada Operations Office, 1999b, Corrective Action Decision Document for Corrective Action Unit 321: Area 22 Weather Station Fuel Storage, Nevada Test Site, Nevada, Revision 0, DOE/NV--554, Las Vegas, NV.

U.S. Environmental Protection Agency, 1996, Title 29 Code of Federal Regulations 1910.120, Hazardous Waste Operations and Emergency Response, Washington, D.C.

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APPENDIX A
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The identification of the project Health and Safety Officer and the Quality Assurance Officer can be found in the appropriate DOE plan. However, personnel are subject to change and it is suggested that the Project Manager be contacted for further information. The Task Manager will be identified in the FFACO Biweekly Activity Report prior to the start of field activities.

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