



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

August 8, 2002

Mr. Gerald Boyd
Assistant Manager for Environmental Management
DOE-Oak Ridge Operations
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. Boyd:

Recommendations on Remediation Effectiveness Reports General Outline

At our August 3, 2002, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed recommendations.

We appreciate your consideration of our recommendations and look forward to receiving your written response.

Sincerely,

A handwritten signature in black ink that reads "Norman A. Mulvenon".

(for) David V. Mosby
Chair

Enclosure

cc/enc: Jason Darby, DOE-ORO
Pat Halsey, DOE-ORO
Connie Jones, EPA Region 4
John Owsley, TDEC



Recommendations Remediation Effectiveness Reports General Outline

BACKGROUND

The Oak Ridge Reservation (ORR) Federal Facility Agreement (FFA) established between the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the Tennessee Department of Environment and Conservation (TDEC) in 1992 provides that all environmental restoration activities will be performed under the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA). As remediation became the dominant activity it was agreed that all CERCLA actions along with the assessment of each action's performance are best understood and tracked in a single document. The Remediation Effectiveness Report (RER) is a FFA document intended to collate all ORR CERCLA decision requirements, compare pre- and post-remediation conditions at CERCLA sites, and present the results of any required post-decision monitoring. The RER is issued annually to update the performance histories of completed actions and to add descriptions of new decisions and field activities.

In 2001, the RER played the additional role of being the first Reservation-wide CERCLA Five-Year Review. The report consolidated the five-year reviews of multiple CERCLA-decision sites into a single year and also incorporates ongoing remediation activities for that fiscal year. The 2001 Five-Year Review came 10 years after the first CERCLA decisions were made on the ORR. The next CERCLA Five-Year Review will be in 2006 and it will again be part of the RER for that year.

The Oak Ridge Site Specific Advisory Board (ORSSAB) discussed the utility of the RER and Five-Year Review and how it might be used in the Stewardship assessment protocol process. This dialogue formulated the following recommendation.

DISCUSSION

The Public Involvement Plan for CERCLA Activities at the ORR (DOE/OR/01-1950&D2) - Page 11 identifies the ORSSAB Stewardship Committee as the informal citizens board for stewardship. The committee will continue to perform this function until the ORSSAB completes its mission and is disbanded. At that time, it is anticipated that a formal citizens board for stewardship will be constituted. The Stewardship Committee charged the Stewardship Status Team (SST), a working group, with looking at the RER and how it works as a tracking device for post-decision monitoring, the status of the RER outline, the CERCLA 5-year Review ingredient of the RER, and how it all might be used in the assessment protocol process.

One conclusion was to codify the RER Outline in the FFA Annotated Outlines in order to insure that annual assessments by the Citizens Board for Stewardship would have consistency and rigor. The SST compared team generated outlines (wish lists of a sort) with the RER outline currently being followed. After discussion and modification, the Remediation Effectiveness Reports General Outline (see attached) was developed. The content does not differ from the current RER Outline, but the order and definitions are more refined. This same outline would also be used for the CERCLA Five-year Reviews.

RECOMMENDATIONS

ORSSAB recommends that DOE adopt a similar, if not the exact same outline, as shown in the attachment, Remediation Effectiveness Reports General Outline and codify the final outline in the FFA Annotated Outlines. This RER Outline codification would make sure that all entries contain the same material allowing easy assessment and evaluation. In addition, this same outline would carry forward to be used for the CERCLA Five-Year Reviews. The assessment protocol process is an integral part of measuring remediation effectiveness. Consistency and stability of the RER Outline (and CERCLA Five-Year Review) will guide future generations to make effective evaluations of remedial actions requiring stewardship.

ORSSAB proposes that DOE continue open dialogue with the ORSSAB Stewardship Committee (and the SST) to resolve any changes to the recommended outline by mutual agreement to be formally endorsed by ORSSAB.

Attachment



Remediation Effectiveness Reports General Outline

This annotated outline was written as a guide for annual remediation effectiveness investigations and reports for CERCLA¹ actions that result in residual contamination. It is also applicable to CERCLA Five-Year Reviews which are expected to be incorporated with Remediation Effectiveness Reports.² Wherever details would be voluminous, precise references to documents and data are to be provided.

1. Project Title
2. Documentation and Dates [footnote document; include any changes or revisions to documents, such as addenda or Explanations of Significant Differences (ESDs), in this section and in the bibliography]. titles
Record of Decision (ROD) or Action Memorandum (AM)
Remedial Action Report (RAR) [as well as any Phased Construction Completion Reports (PCCRs)] or Removal Action Report (RmAR).

3. Project Description

This section should provide a summary of the remedial (removal) action. While brief, the description should be comprehensive enough that a person unfamiliar with the action is able to understand the project setting and the rationale for the work. References to applicable sections of related documents should be included.

Remedial Action Objectives.

Type of remedial (removal) action – describe the work performed (e.g., soil removal, capping, engineered controls).

Geographic location – map and coordinates and surrounding features.

Baseline risk – highlight site conditions prior to remediation; include types and quantities of known waste; potential pathways for human and environmental exposure; assumptions used in the baseline risk assessment (e.g., toxicity, bioavailability). Summarize the overall quantitative risk.

Contaminated material removed from site – amount and disposition.

End use of site – include planned land, groundwater, and surface water uses.

Access controls required following the action.

Project information location.

Site manager – name and contact information.

4. Residual Risk

Brief description of residual contamination and associated risk. Describe potential exposure pathways.

5. Site Inspection and Monitoring

Evaluate site conditions using current monitoring plans and reports to demonstrate that Remediation Action Objectives are being attained.

6. Site Stewardship Requirements

List and evaluate the effectiveness of stewardship activities agreed to or implied in CERCLA documents or elsewhere (e.g., deeds, transfer agreements, Land Use Control Implementation Plans).

Institutional land use and access controls

Physical access controls

Site remediation maintenance

Site inspections, routine and specially initiated after natural disasters.

Responsibility for stewardship. (e.g., stewards)

Location and accessibility of remedial action documents and other important information.

Funding for stewardship activities

7. Deficiency Followup

Outline the status of followup for deficiencies identified through inspection, monitoring or changes in assumptions or information between Remediation Effectiveness Reports.

8. Recommendations relative to maintaining the Remedial Action Objectives or altering future Remedial Effectiveness Reports.

¹ Comprehensive Environmental Response, Compensation, and Liability Act.

² The purpose of the Five-Year Review is to determine 1) if the remedy is functioning as intended by the decision documents, 2) if the assumptions used at the time of the remedy selection are valid, and 3) if other information has come to light that could call into question the protectiveness of the remedy (including technology advances). The 2001 Remediation Effectiveness Report/CERCLA Five-Year Review (DOE/OR/01-1941&D2) describes the first consolidated Five-Year Review. The next Five-Year Review is scheduled for the year 2006 and at five-year intervals after that. Table 1.3 on page 1-27 of the 2001 RER summarizes the requirements of a Five-Year Review.