


Date: August 1, 1997
To: Carla Beckman 6-4484
From: Roger Jones  6-8590
Subject: Information regarding the CFA-677 Pumphouse

The CFA-677 Pumphouse is located at the identified CERCLA regulated site CFA-42 at Waste Area Group 4 (Central Facilities Area). Currently a CERCLA Non-Time Critical Removal Action (NTCRA) is proceeding at this site which is being performed per requirements of the INEEL Federal Facility Agreement and Consent Order (FFA/CO). The scope of this NTCRA includes the removal of contaminated soil that exceeds environmental health and safety risk based levels. During the excavation of this contaminated soil, the overlying tanks, pumphouse and fueling rack need to be removed to finalize and complete the soil removal action. To permit this action to proceed, we are requesting DOE-ID authorization to perform destruction without notice per 41 CFR 101-47.503-3 (c) and (d).

During the week of July 7, 1997 the CERCLA WAG 4 project team received the results of their earlier field sampling. Risk assessment analysis of this data demonstrated there is a risk to human health and the environment posed by contaminants (petroleum) around and under the pumphouse and associated tanks and fueling rack. The associated risk assessment used the current Risk Based Corrective Action guidance as approved by the State of Idaho. Based on this recent risk assessment, it has been determined by DOE-ID that the contaminants in this area must be removed in order to protect human health and the environment. In accordance with the INEEL FFA/CO, an Action Memorandum directing and authorizing this remediation this fiscal year was issued by DOE-ID (see reference #1 attached). Consequently the fueling rack, pumphouse and tanks will be removed during this remediation.

At present, the subcontractor is mobilized at the site and is completing the initial work to begin excavating soils. The pumphouse, fueling rack, and tanks is currently planned for demolition during the week of August 4. The remediation field work at this site is estimated to require approximately 3 to 4 weeks to complete.

Justification for the removal of the pumphouse, tanks, and fueling rack is based on the risk assessment (see reference #2 attached) which verified there is a risk to human health and the environment posed by the contaminants in the subsurface, thereby resulting in the CERCLA removal action. It is also important to note that the LMITCO project team is attempting to complete all work at this site in a timely manner so that the Cost Plus Award Fee (CPAF), which specifies minimal carryover of FY-97 dollars into FY-98, is not impacted.

A list of the project control documents, which are complete and have been approved for implementation by all the appropriate parties (DOE, EPA, Idaho Department of Environmental Quality, LMITCO, etc.), is attached. These cover risk assessment, remedial alternatives, planned remediation, health and safety, and environmental controls for this project.

The DOE-ID CERCLA WAG Manager involved in authorizing this CERCLA removal action is Ms. Carol Hathaway (526-4049).

If there is anything more I may do to support this action, please advise.

(Signature on original)



Roger K. Jones
LMITCO Environmental Restoration Program
ES&H Compliance Officer

REFERENCE

1. ***Action Memorandum for the WAG 4 Miscellaneous Sites 1997 Non-Time-Critical Removal Action (CFA-13, -15, -17, -47, and -42)***, Idaho National Engineering Laboratory, U.S. Department of Energy Idaho Operations Office, Revision 0, July, 1997.
2. ***Engineering Evaluation/Cost Analysis for WAG 4 Miscellaneous Sites 1997 Non-Time-Critical Removal Action (CFA-13, -15, -17, -47, and -42)***, Idaho National Engineering Laboratory, U.S. Department of Energy Idaho Operations Office, DOE/ID-10582, Revision 1, July, 1997, LaTray, D. A., S. P. Jones, B. H. Becker, D. A. Heilman, and J. D. Folker
3. ***Field Sampling Plan for WAG 4 Miscellaneous Sites 1997 Non-Time-Critical Removal Action (CFA-13, -15, -17, -47, and -42)***, DOE/ID-10583, Revision 0, May, 1997, Wells, R. P., S. P. Jones, D. A. LaTray
4. ***Health and Safety Plan for (CFA-13, -15, -17, -47, and -42)***, INEL/EXT-97-00474, Lockheed Martin Technologies Company, Revision 0, May, 1997, Gurney L. W., and R. F. Haight
5. ***NEPA Environmental Checklist, CFA Miscellaneous Sites Characterization and Non-Time-Critical Removal Action***, LMITCO Environmental Restoration/Parsons, U.S. Department of Energy Idaho Operations Office, NEPA-CFA-97-006, Revision 1, March 31, 1997.
6. ***Storm Water Pollution Plan, WAG 4 Miscellaneous Sites 1997 Non-Time-Critical Removal Action (CFA-13, -15, -17, -47, and -42)***, LMITCO Environmental Restoration/Parsons, U.S. Department of Energy Idaho Operations Office, NEPA-CFA-97-006, March, 1997.