Work Plan

Alternative Area 2 Excavation Depths and Volumes

Introduction

EPA's October 12, 2012 letter to the West Lake Landfill Operable Unit 1 (OU-1) Respondents states that, during an early consultation with the National Remedy Review Board (NRRB), the NRRB indicated that the deeper radiological detections in borings WL-210 and WL-235 are unreliable. Consequently, EPA has asked that the volume of radiologically-impacted material (RIM) considered for possible excavation under the "complete rad removal" alternatives be revised to exclude deeper intervals in soil borings WL-210 and WL-235 in Area 2.

Evaluation of the soil sample analytical results and the downhole gamma logging data during preparation of the SFS indicated that soil containing radionuclides above the levels used to identify material to be included within the scope of the two "complete rad removal" alternatives was potentially present within a deeper depth interval beneath the southwestern portion of Area 2. Specifically, elevated gamma peaks were identified on the downhole gamma logs at depths of 47.5 feet (ft) below ground surface (bgs) in WL-210 and 22.5 ft bgs in WL-235; however, the Remedial Investigation (RI) [EMSI, 2000] states (on p. 97) that boring WL-210 was re-logged because during the first logging attempt, material was knocked into the hole and that the presence of this material may have been the cause of a small poorly defined peak at the bottom of this boring. The RI also states (again on p. 97) that the presence of a poorly defined peak at the bottom of WL-235 may also be the result of RIM at shallow depths having been knocked into this borehole during drilling or logging activities.

Although the RI raised possible questions about the representativeness of the downhole gamma logs for the deeper intervals of these two borings, a soil sample obtained from boring WL-210 detected the presence of total Thorium-230+232 at a depth of 40 ft bgs at a level (18.6 pCi/g) above the cleanup level (7.9 pCi/g) used to evaluate potential excavation alternatives A duplicate sample obtained from this same depth interval contained total thorium at 11.6 pCi/g. These samples were obtained from a depth of 40 ft, 10 feet above the bottom of the borehole. In addition, these samples were obtained during drilling of the borehole, prior to the downhole logging activities that may have resulted in surficial material being knocked into the hole. Therefore, these sample results likely represent actual conditions at the 40 ft depth interval in boring WL-210. The RI sampling did not include collection of a soil sample from the deeper portion of the WL-235.

Although uncertainty exists regarding the representativeness of the downhole gamma logs at these two locations, the soil sample result from the 40 ft depth in WL-210 combined with the downhole gamma logs were used to define an area and volume of a deeper interval of RIM occurrence beneath the southwestern portion of Area 2. This material and the associated overburden material that would need to be removed to allow for excavation of this RIM, were included within the overall volumes of materials that would need to be excavated if one of the "complete rad removal" alternatives were to be

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implemented at the site. (Note: Deeper intervals of radiologically-impacted material were also identified beneath other portions of Area 2 but are not the subject of this re-evaluation).

Because of the uncertainty associated with the downhole gamma logging at these two locations, EPA has indicated that the NRRB believes the radiological detections in the deeper portions of these two borings are unreliable. EPA has therefore requested that the volumes of materials that may be removed under a "complete rad removal" alternative be re-estimated to exclude the deeper depth intervals in borings WL-210 and WL-235.

Approach

The following approach will be used to develop a revised excavation volume for Area 2:

1. Revise the calculated volume of material to be excavated under the "complete rad removal" alternatives to eliminate deeper intervals in soil borings WL-210 and WL-235 and consequently to eliminate removal of the deeper interval of RIM material from the southwestern portion of Area 2; and

2. Develop revised estimates of the potential risks to workers and the public, revised projected construction schedules, and revised cost estimates for excavation and offsite or onsite disposal based on exclusion of the potential deeper occurrences of RIM beneath the southwestern portion of Area 2.

Deliverables

The following deliverables will be prepared pursuant to this task

1. Interim Deliverable – A brief memorandum will be prepared summarizing the revisions to the RIM extent and volumes resulting from exclusion of the deeper interval beneath the southwestern portion of Area 2. If the re-evaluation of the volume material results in significant changes in the amounts of materials that would be excavated under the "complete rad removal" alternatives, this memorandum will also include evaluations of potential risks, revised calculations of greenhouse gas emissions, revised anticipated project schedules, and revised anticipated costs for the two "complete rad removal" alternatives based on the assumption that the deeper intervals in borings WL-210 and WL-235 are not included in the volume of RIM material under the two "complete rad removal" alternatives.

2. SFS Revisions – The existing SFS text, tables and appendices will be amended to include the results of alternative development and evaluation based on exclusion of the deeper intervals in borings WL-210 and 235 in conjunction with the existing discussions that include these depth

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intervals as presented in the current SFS report. Subject to EPA comments on the Interim Deliverable, the following specific revisions to the December 2011 SFS report are anticipated:

a. Amend the text of the SFS as follows:
   i. Section 5.3.1 – Include as part of the descriptions of the excavation and disposal alternatives the volumes of RIM and overburden material to be excavated if the reported deeper occurrences in borings WL-210 and WL-235 are not considered in addition to the total volumes already presented in this section
   ii. Sections 6.2.2 and 6.2 3 – Include as part of the descriptions of the excavation and disposal alternatives the volumes of RIM and overburden material to be excavated if the reported deeper occurrences in borings WL-210 and WL-235 are not considered in addition to the total volumes already presented in this section
   iii. Sections 6.2.2.5 and 6.2.3.5 – Add to the discussions of Short-Term Effectiveness, in particular the Protection of the Community, Protection of Workers, and Time Until RAOs are Achieved, discussions relative to the reduced volume of material and consequently reduced time frames that would be associated with excavation and disposal alternatives if the reported deeper occurrences in borings WL-210 and WL-235 are not considered
   iv. Sections 6.2.2.7 and 6.2.3.7 – Add to the discussion of Cost, the estimated costs to implement the excavation and disposal alternatives based on the reduced volume of material and consequently reduced time frames that would be associated with excavation and disposal alternatives if the reported deeper occurrences in borings WL-210 and WL-235 are not considered
   v. Sections 7.2.3 (Short Term Effectiveness) and 7.2.5 (Cost) – Revise the comparative analysis of alternatives to reflect the differences between the short-term risks, schedules and costs that result from inclusion or exclusion of the deeper intervals in borings WL-210 and WL-235

b. Amend the Appendices to the SFS as follows:
   i. Appendix B – Develop and include an alternative excavation plan that does not include excavation of the deeper intervals at WL-210 and WL-235 and calculate the revised volume of RIM and overburden material to be excavated.
   ii. Appendix H – Develop and include estimates of the potential risks to the community and workers based on the volumes of RIM and overburden material to be excavated and revised construction schedules if the deeper intervals in borings WL-210 and WL-235 are not considered
   iii. Appendix I – Prepare additional estimates of Greenhouse Gas Emissions associated with the "complete rad removal" alternatives under a scenario where the deeper intervals in borings WL-210 and WL-235 are not considered

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iv Appendix J – Prepare additional construction schedules for the "complete rad removal" alternatives under a scenario where the deeper intervals in borings WL-210 and WL-235 are not considered

v. Appendix J – Prepare additional estimates of the construction costs (both fiscally constrained and not-fiscally constrained) for the "complete rad removal" alternatives under a scenario where the deeper intervals in borings WL-210 and WL-235 are not considered

Clarifications by EPA

No additional information or clarifications are being requested from EPA at this time relative to this task.

Anticipated Schedule

It is anticipated that it will take approximately two months to develop the interim summary memorandum.

Preparation of a Supplemental SFS report that includes the results of the revised Area 2 excavation volumes and associated evaluations, as described in the interim deliverable summary memorandum, will be performed once EPA comments on the interim deliverable are received and in conjunction with revisions to the existing SFS report required to address the results of the various other additional tasks EPA has requested.

References

Engineering Management Support, Inc. (EMSI), 2011, Supplemental Feasibility Study, Radiologically-Impacted Material Excavation Alternative Analysis, West Lake Landfill Operable Unit-1, December 16.

EMSI, 2000, Remedial Investigation, West Lake Landfill Operable Unit-1, April 10.

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