Sectored Clean-up Work Plan
For Housekeeping Category
Waste Sites

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February 2000

Environmental Restoration
Division

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SECTORED CLEAN-UP WORK PLAN
FOR HOUSEKEEPING CATEGORY WASTE SITES

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February 2000
SECTORED CLEAN-UP WORK PLAN
FOR HOUSEKEEPING CATEGORY WASTE SITES

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# TABLE OF CONTENTS

ACRONYMS AND ABBREVIATIONS .......................................................... vii
EXECUTIVE SUMMARY .......................................................................... ix

1.0 INTRODUCTION .................................................................................. 1
  1.1 Sectored Clean-up Work Plan Objectives ........................................ 1
  1.2 Sectored Clean-up Work Plan Contents ......................................... 2
  1.3 Housekeeping Category Site Description ...................................... 2
  1.4 Regulatory Drivers ......................................................................... 3
  1.5 Definitions ..................................................................................... 3

2.0 HOUSEKEEPING CATEGORY STRATEGY ......................................... 7
  2.1 Sectors ........................................................................................... 7
  2.2 Sectored Clean-up Approach ........................................................... 7
  2.3 Grouping Corrective Action Sites .................................................... 9
  2.4 Newly Discovered Sites .................................................................. 10
  2.5 Prioritization .................................................................................. 11
  2.6 Waste Management, Minimization, and Disposal ......................... 11
    2.6.1 ACM ..................................................................................... 12
    2.6.2 Auctionable, Recyclable, and/or Salvageable Waste ............... 12
    2.6.3 Hazardous Waste .................................................................. 13
    2.6.4 Mixed Waste ......................................................................... 13
    2.6.5 Radioactive Waste ................................................................. 13
    2.6.6 Ordinary Waste ...................................................................... 14
    2.6.7 Petroleum Hydrocarbon Waste ............................................... 14
    2.6.8 Polychlorinated Biphenyls ....................................................... 14
    2.6.9 Soil Stains .............................................................................. 14
  2.7 Biddable Units/Laydown Areas....................................................... 15
  2.8 Health and Safety .......................................................................... 15

3.0 HOUSEKEEPING CATEGORY CORRECTIVE ACTION DOCUMENTATION .... 16

4.0 RELATED DOCUMENTS .................................................................... 17

5.0 REFERENCES .................................................................................... 19
TABLE OF CONTENTS (continued)

APPENDICES

APPENDIX A - WASTE CATEGORIZATION LIST
APPENDIX B - SECTORED CLEAN-UP APPROACH LOGIC DIAGRAMS - TO DETERMINE IF A WASTE SITE IS APPLICABLE UNDER THIS WORK PLAN
APPENDIX C - EXAMPLE OF A HOUSEKEEPING CATEGORY CORRECTIVE ACTION DOCUMENTATION FORM
APPENDIX D - BN PROPOSED WORK AT RMAD, TEST CELL A, TEST CELL C, SUPER KUKLA, AND PLUTO FACILITIES LETTER

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COMMENT FORM

FIGURES

Figure 1 - Sectored Areas for the NTS .............................................. 8
Figure B-1 - General Procedure for the Sectored Clean-up Work Plan (SCWP) .......... B-1
Figure B-2 - Logic Diagram for Determination of Housekeeping Sites ................. B-2
Figure B-3 - Process for Removing Nonhazardous/Nonradioactive Debris .......... B-3
Figure B-4 - Process for Removing Hazardous/Radioactive/Mixed Waste .......... B-4

TABLES

Table 1 - Housekeeping Category-Related Plans ................................... 17
Table A-1 - Waste Categorization List ............................................. A-1
ACRONYMS AND ABBREVIATIONS

ACM  Asbestos-containing Material
AEA  Atomic Energy Act
CAS  Corrective Action Site
CAU  Corrective Action Unit
CFR  Code of Federal Regulations
CNTA Central Nevada Test Area
CWMA Controlled Waste Management Area
DoD  U.S. Department of Defense
DOE  U.S. Department of Energy
DOE/NV U.S. Department of Energy, Nevada Operations Office
ERD  Environmental Restoration Division
FFACO Federal Facility Agreement and Consent Order
ft³ cubic feet
gal gallons
JHA  Job Hazard Analysis
L  liter
m³ cubic meters
M&O  Maintenance & Operations
NDEP Nevada Division of Environmental Protection
NRS  Nevada Revised Statute
ACRONYMS AND ABBREVIATIONS (continued)

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tr>
<td>NTS</td>
<td>Nevada Test Site</td>
</tr>
<tr>
<td>OSHA</td>
<td>Occupational Safety and Health Act</td>
</tr>
<tr>
<td>PCB</td>
<td>Polychlorinated Biphenyl</td>
</tr>
<tr>
<td>POC</td>
<td>Performance Objective Certification</td>
</tr>
<tr>
<td>RCRA</td>
<td>Resource Conservation and Recovery Act</td>
</tr>
<tr>
<td>RCT</td>
<td>Radiological Control Technician</td>
</tr>
<tr>
<td>REECo</td>
<td>Reynolds Electrical &amp; Engineering Co., Inc.</td>
</tr>
<tr>
<td>SAA</td>
<td>Satellite Accumulation Area</td>
</tr>
<tr>
<td>SAFER</td>
<td>Streamlined Approach for Environmental Restoration</td>
</tr>
<tr>
<td>SCWP</td>
<td>Sectored Clean-up Work Plan</td>
</tr>
<tr>
<td>TSCA</td>
<td>Toxic Substances Control Act</td>
</tr>
<tr>
<td>TSDF</td>
<td>Treatment, Storage, and Disposal Facility</td>
</tr>
<tr>
<td>TTR</td>
<td>Tonopah Test Range</td>
</tr>
<tr>
<td>yd³</td>
<td>cubic yards</td>
</tr>
<tr>
<td>WM</td>
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EXECUTIVE SUMMARY

The Sectored Clean-up Work Plan (SCWP) replaces the Housekeeping Category Corrective Action Unit Work Plan and provides a strategy to be used for conducting housekeeping activities using a sectored clean-up approach. This work plan provides a process by which one or more existing housekeeping category Corrective Action Sites (CASs) from the Federal Facility Agreement and Consent Order and/or non-FFACO designated waste site(s) are grouped into a sector for simultaneous remediation and cleanup. This increases effectiveness and efficiencies in labor, materials, equipment, cost, and time. This plan is an effort by the U.S. Department of Energy to expedite work in a more organized and efficient approach.

The objectives of this plan are to:

- Group housekeeping FFACO CASs and non-FFACO housekeeping sites into sectors and remediate during the same field visit.
- Provide consistent documentation on FFACO CAS and non-FFACO clean-up activities.
- Perform similar activities under one approved document.
- RemEDIATE areas inside the Deactivation and Decommissioning facilities and compounds in a campaign-style remediation.
- Increase efficiencies and cost-effectiveness; accelerate cleanups; and reduce mobilization, demobilization, and remediation costs.

The SCWP process is as follows:

1) A site is identified as a non-FFACO housekeeping site covered by this Plan.

2) The wastes, debris, and/or materials included in the site are evaluated by a Preliminary Assessment Team according to the logic diagrams which are presented in this plan.

3) If a site is deemed a non-FFACO housekeeping site, it is grouped with FFACO CAS(s) and/or other non-FFACO sites in a designated geographical area to form a sector.

4) Clean-up activities will be performed and proper documentation will be completed and submitted using Housekeeping Category Corrective Action Documentation Forms.
1.0 INTRODUCTION

The purpose of this Sectored Clean-up Work Plan (SCWP) is to provide a strategy to be used by the U.S. Department of Energy, Nevada Operations Office (DOE/NV) to expedite clean-up and closure of housekeeping sites in a more organized and efficient manner. Work locations are at the Nevada Test Site (NTS), Tonopah Test Range (TTR), and the Central Nevada Test Area (CNTA). This plan applies to housekeeping category Corrective Action Sites (CASs) already listed in the Federal Facility Agreement and Consent Order (FFACO) Appendices (FFACO, 1996) and non-FFACO designated housekeeping waste sites that are applicable under this plan.

This SCWP replaces the Housekeeping Category Corrective Action Unit Work Plan (Department of Energy [DOE], 1996a). The housekeeping work plan was revisited because the current process has notable inefficiencies. These include: housekeeping CASs and non-FFACO designated waste sites are not addressed during the same field visits; solid and hazardous waste cleanups are not consistently documented with the Nevada Division of Environmental Protection (NDEP); and the existing definition of a housekeeping site has resulted in many ‘gray area’ sites.

This SCWP should be used with Appendix VI of the FFACO -- Corrective Action Strategy (FFACO, 1996).

1.1 Sectored Clean-up Work Plan Objectives

The objectives of this document are to provide methods to:

- Clearly define housekeeping site.
- Define whether a newly discovered waste site can be remediated using the SCWP process or if it should be a new FFACO CAS to be remediated under the Streamlined Approach For Environmental Restoration (SAFER) or Complex process.
- Remediate FFACO CASs and non-FFACO housekeeping sites during the same field visit under one approved document.
- Consistently document FFACO CAS and non-FFACO housekeeping cleanup activities in a simple manner.
- Remediate areas inside the Deactivation and Decommissioning facilities and compounds in a campaign-style remediation.
- Increase efficiencies and cost-effectiveness; accelerate clean-ups; and reduce mobilization, demobilization, and remediation costs.
• Obtain regulatory approval of designated sector closure with no further action required.

• Avoid duplication and provide continuity and traceability of waste removal and disposal actions on a site-specific basis.

1.2 Sectored Clean-up Work Plan Contents

General information on the housekeeping category, objectives, and definitions are found in Section 1.0 of this SCWP. Section 2.0 describes the housekeeping process for various waste types. Section 2.0 also contains discussion on how to recognize and categorize various waste types (i.e., housekeeping category wastes versus wastes that are remediated under the SAFER or Complex process). The sectored clean-up approach is discussed in Section 2.2. Documentation is described in Section 3.0. The relevant plans and related documents to be considered and/or used with this Work Plan are described in Section 4.0. References are found in Section 5.0.

1.3 Housekeeping Category Site Description

As specified in the Corrective Action Strategy (FFACO, 1996), the housekeeping corrective action process is used for waste sites that do not require further investigation prior to completing corrective actions. Housekeeping sites may only be closed through clean closure. At these sites, historical and field verification data allow the removal of source material and/or directly impacted soils and confirmatory sampling (if necessary), without additional field investigation. Documentation of the waste removal and any confirmatory sampling will be provided in a closure report.

Corrective actions using the housekeeping process can be done for any waste that is classified as a housekeeping category waste as stated in the logic diagram for determination of housekeeping category correction action sites presented as Appendix B-2. This includes any known waste that can be removed by hand, with a shovel, or with small, rubber-tired equipment, and is not impacting an area greater than 2.3 cubic meters (m³) (3 cubic yards [yd³]) of soil, and will not create a ground disturbance when removed as defined in Section 1.5. The housekeeping process can be used for low-level radioactive, hazardous, or mixed waste and asbestos waste.

It is not warranted to add new housekeeping waste items/sites to the FFACO as it is not in keeping with the intent of the Agreement and is not practical or efficient. Newly identified trash, litter, rubbish, and debris, located outside of a known CAS, not associated with visible soil staining of more than 2.3 m³ (3 yd³), will not be identified as a new CAS. Instead, they will be considered non-FFACO housekeeping sites and grouped into an appropriate sector.
1.4 Regulatory Drivers

The FFACO (1996), signed by the DOE, NDEP, and U.S. Department of Defense (DoD), is the primary regulatory driver for conducting corrective actions at the NTS and DOE/NV off-site locations. Additional drivers for these sites include federal regulations (i.e., Resource Conservation and Recovery Act [RCRA], Occupational Safety and Health Act [OSHA], Toxic Substances Control Act [TSCA], Comprehensive Environmental Response Compensation and Liability Act, etc.) as well as state policies and DOE Orders.

1.5 Definitions

The following definitions are used in this SCWP:

Asbestos-containing material (ACM) is any material that contains greater than 1 percent asbestos by weight (Title 29 Code of Federal Regulations [CFR] 1910.1001[b]) (CFR, 1998a). ACM as a waste is subject to special regulations for handling, transport, and disposal under the OSHA regulation, TSCA, and the National Emissions Standards for Hazardous Air Pollutants. Asbestos can be identified through process knowledge or by collecting a sample and analysis by microscopy. Only personnel licensed as asbestos inspectors by the state of Nevada may collect asbestos samples.

Assets for Services is a concept that identified assets (i.e., materials both recyclable and/or salvageable) that can be exchanged for remediation or decontamination services.

Auctionable wastes are materials that can be auctioned to a vendor in return for monetary compensation or services. Auctionable wastes may also be recyclable or salvageable waste.

Controlled Waste Management Area (CWMA) is an area in which the potential exists for contamination due to the presence of unencapsulated or unconfined radioactive material. It can also be an area that is exposed to emissions or other sources of radioactive particles capable of causing activation, i.e., neutrons and protons. CWMAs also include any other posted radiological area (Reynolds Electrical & Engineering Co., Inc. [REECo], 1995a).

Corrective Action Sites (CASs) are sites potentially requiring corrective action(s) and may include solid waste management units or individual disposal or release sites (FFACO, 1996). This term is used solely to identify action sites that are included or will be included in the FFACO Appendices.

Corrective Action Units (CAUs) consist of one or more CASs grouped geographically, by technical similarity, by agency responsibility, by funding, or other appropriate reasons for the purpose of determining corrective actions (FFACO, 1996).
Debris is solid material exceeding a 60-millimeter particle size that is intended for disposal and that is a manufactured object, plant, or animal matter, or natural geologic material.

A container is empty if: (1) all waste has been removed that can be removed using common practices and no more than 2.5 centimeters of residue remain on the bottom of the container or inner liner, or (2) no more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than, or equal to, 416.4 liters (L) (110 gallons [gal]) in size (0.3 percent by weight if greater than 416.4 L [110 gal]). A container that held a compressed gas is empty when the pressure in the container approaches atmospheric. The container or the inner liner removed from a container that held an acute hazardous waste is empty if the container or inner liner has been triple rinsed, or if the inner liner that prevented contact of the product with the container has been removed, and the rinsate is retained as a hazardous waste (Title 40 CFR Part 261, Identification and Listing of Hazardous Waste) (CFR, 1998b).

Ground disturbances include any activity which disrupts or damages plant or animal habitats or cultural resources. Ground disturbances also consist of removal of more than 2.3 m³ (81 cubic feet [ft³] or 3.0 yd³) of soil containing waste where plant and/or animal habitats or cultural resources are not disturbed (DOE, 1996a).


Hazardous waste is a solid waste that meets the criteria for a hazardous waste defined in Title 40 CFR Part 261.3 and Nevada Revised Statutes (NRS) 459.430 (State of Nevada, 1991). Only hazardous waste that clearly has not entered the environment or spills of a known hazardous waste with a volume of less than 2.3 m³ (81 ft³ or 3 yd³) (DOE, 1996a) can be cleaned up under the housekeeping process. This type of waste will be determined and evaluated by a Preliminary Assessment Team.

Housekeeping sites are waste sites that require removal of certain wastes and/or removal of limited quantities of impacted soil and qualify as a housekeeping site as determined in Figure B-2, Logic Diagram for Determination of Housekeeping Category Corrective Action Sites. Housekeeping sites include FFACO CAS housekeeping sites and non-FFACO housekeeping sites.

Listed wastes are those wastes cited in Title 40 CFR Part 261 and NRS 459.430.

Mixed waste is a waste that contains both radioactive and hazardous components regulated by the Atomic Energy Act (AEA) and RCRA. Only mixed waste that clearly has not entered the
environment or spills of a known mixed waste with a volume of less than 2.3 m³ (81 ft³ or 3 yd³) (DOE, 1996a) can be cleaned up under the housekeeping process.

**Non-FFACO housekeeping sites** are sites not included in the FFACO that are categorized as housekeeping in accordance with this SCWP and may be remediated following this Plan.

**Ordinary waste** is any discarded, nonradioactive material that is identified as garbage, sewage, rubbish, refuse, sludge, or is excluded by Title 40 CFR Part 261. Ordinary waste includes industrial, commercial, and solid household-type wastes, and excludes hazardous, radioactive, polychlorinated biphenyl (PCB), asbestos, or mixed wastes.

**Petroleum hydrocarbon waste** is a waste that consists of petroleum hydrocarbons or media containing petroleum hydrocarbons. Process knowledge or sampling must be used to determine which regulations are applicable to hydrocarbon waste (such as stained soil).

**Polychlorinated biphenyls (PCBs)** are halogenated organic compounds defined in accordance with Title 40 CFR 761.3 (CFR, 1998c). Waste containing PCBs is regulated for handling, transport, storage, and disposal under TSCA and under RCRA Title 40 CFR 268.2 (CFR, 1998d). Capacitors, fluorescent light ballasts, and transformers are examples of equipment that may contain PCBs.

**Radioactive waste** is a solid, liquid, or gaseous material that contains radionuclides regulated under the AEA, as amended, and which is of negligible economic value considering the cost of recovery (DOE Order 5820.2A, Radioactive Waste Management [DOE, 1995a]). Only radioactive waste that clearly has not entered the environment or spills of a known radioactive waste with a volume of less than 2.3 m³ (81 ft³ or 3 yd³) (DOE, 1996a) can be cleaned up under the housekeeping process.

**Recyclable and salvageable wastes** are able to be returned to a workable condition so that the material is adaptable to a new use or reuse. Hazardous waste can be recycled if it meets the RCRA definitions. Ordinary waste may be salvaged. Wood materials, excluding paper, are not permitted to leave the NTS.

**Sanitary landfill** is a landfill for disposal of refuse, garbage, rubbish, and industrial solid waste in compacted layers covered with soil to a depth sufficient to exclude rats, flies, and other disease vectors.

**Solid waste** is any discarded material that is not excluded by Title 40 CFR 261.4(a) or that is not excluded by variance granted under Title 40 CFR 260.30 and 260.31 (40 CFR 261.1) (CFR, 1998b).
A *Sector* is a group of FFACO housekeeping CAS(s) and/or non-FFACO housekeeping site(s) that are grouped by geographic proximity. Sectors are further explained in Section 2.1.
2.0 HOUSEKEEPING CATEGORY STRATEGY

Housekeeping category waste removal, waste disposition, and confirmatory sampling will be performed following this SCWP and related documents as discussed in Section 4.0. Documentation of the waste removal and verification sampling will be through a closure report. If a housekeeping CAS or non-FFACO housekeeping site is more complex than anticipated, such as finding a non-housekeeping waste type, the CAS will be recommended for inclusion into a different CAU and the non-FFACO site will be recommended for inclusion in the FFACO.

2.1 Sectors

A sector is a group of FFACO housekeeping CAS(s) and/or non-FFACO housekeeping site(s) that are grouped by geographic proximity. The NTS has been divided into sector boundaries as presented in Figure 1. Each of these sectors are given a letter designation A through G. It is important to note that these lettered sectors do not correspond to the numbered areas used at the NTS, although groups of the numbered NTS areas makeup the lettered sector. For example, NTS areas 25, 26, and 27 combine to form the sector A. All sites at the CNTA will be grouped into a single sector. Sites at the TTR will likewise be grouped into one sector.

2.2 Sectored Clean-up Approach

The sectored clean-up approach includes the following steps:

1) A sector is identified as including FFACO CAS housekeeping site(s) and/or possible non-FFACO housekeeping site(s) covered by this SCWP.

2) If an existing housekeeping CAU contains CASs that are located in more than one sector, the CASs will be regrouped from the existing CAU into the appropriate sectors.

3) Wastes, debris, and/or materials included in each potential non-FFACO housekeeping site are evaluated by a Preliminary Assessment Team according to the logic diagrams which are presented in this Work Plan. Non-FFACO housekeeping sites will be documented by the Preliminary Assessment Team and reported by DOE in the Quarterly FFACO Reports provided to NDEP.

4) If a site is found to be a non-FFACO housekeeping site, the site will be grouped with other non-FFACO housekeeping sites and/or with one or more FFACO housekeeping CASs in a sector as denoted in Figure 1.
LEGEND

- 25 NTS Area
- A Sectored Area

Approximate Scale

0 10 Miles
0 16 Kilometers

Figure 1
Sectored Areas for the NTS
Figure 1
Sected Areas for the NTS
5) FFACO CASs within a sector will be promoted from Appendix II of the FFACO to Appendix III and a closure report deadline established.

6) Clean-up activities will be performed at all housekeeping sites in a sector under a single work package. Clean-up activities will be reported by DOE to the NDEP in the Bi-weekly and Quarterly FFACO Reports.

7) One Housekeeping Category Corrective Action Documentation Form will be completed for each FFACO CAS or non-FFACO housekeeping site in a sector. These forms will be assembled and submitted as one closure report for the entire sector.

The SCWP manages waste that falls into one of the following categories:

- Wastes from a FFACO housekeeping CAS where no further investigation is required to perform or document corrective actions (Figure B-1).
- Solid or ordinary waste (all non-hazardous and non-radioactive waste that can be removed without a ground disturbance).
- Petroleum hydrocarbon, hazardous, radioactive, or mixed waste that clearly has not entered the environment.
- Asbestos-containing waste if removed by properly trained personnel.
- PCB waste in a container with a capacity less than 3.8 L (1 gal).
- Spills of a known petroleum hydrocarbon, hazardous, radioactive, or mixed waste with an impacted soil volume of less than 2.3 m³ (3 yd³).

Any waste that will create a ground disturbance as defined in Section 1.5 in order to be removed cannot be cleaned-up under the housekeeping process.

2.3 Grouping Corrective Action Sites

Corrective Action Sites will be grouped into sectors based on their geographical location. If an existing housekeeping CAU contains CASs that are located in more than one sector, the CASs will be regrouped from the existing CAU into the appropriate sector.

If at any time, a FFACO CAS housekeeping category site is determined to not meet the requirements of a housekeeping site, the CAS will be labeled a non-housekeeping site and moved to a non-housekeeping CAU in the FFACO. Moving a CAS to a different CAU will be done by
DOE at the subsequent FFACO quarterly meeting. The CAS will then be remediated under the SAFER or Complex process.

2.4 Newly Discovered Sites

When a potentially new housekeeping site is discovered, it must be evaluated by a Preliminary Assessment Team to determine that the housekeeping process is the most appropriate way to manage the waste. Figures B-1 and B-2 are logic diagrams illustrating the housekeeping corrective action process confirmation strategy.

During preliminary assessment of a potential non-FFACO housekeeping site, the following activities will be completed:

- Field screening for radioactive contamination and other hazards as required under the Health and Safety Plan for the Nevada Environmental Management Project (DOE, 1999c).
- Evaluation of the type of materials/debris present.
- Obtainment of site coordinates using as-builts or by conducting a survey and placement of a site marker.
- Completion of applicable documentation needed to decide how to group the site as determined jointly by DoD, DOE, and NDEP.

Existing CAS housekeeping sites may have gone through this process as part of preliminary assessment completed before the CAS was added to Appendix II of the FFACO. If comparable data cannot be found for a CAS, a Preliminary Assessment Team must visit the site and gather the data.

If an existing CAS meets the definition of a housekeeping site, or a non-FFACO site is determined to be a housekeeping category site, then it will be evaluated by DOE and grouped into a sector according to this plan. Newly discovered sites will not be listed in the FFACO. Newly identified non-FFACO housekeeping sites will be documented by the Preliminary Assessment Team and DOE will report these sites to the NDEP in the Quarterly FFACO Report. Corrective action may be performed any time after the site is categorized as a housekeeping site by the Preliminary Assessment Team.

If at any time, a non-FFACO site is determined to not meet the requirements of a housekeeping site, it will be added to the FFACO. Adding a site will be done by DOE at the subsequent FFACO quarterly meeting. The CAS will then be remediated under the SAFER or Complex process.
2.5 Prioritization

Clean-up activities will be conducted on a priority basis. Each sector has been prioritized based on baseline planning, the hazard, location, type of waste, concurrent activities, available funding, efficiencies, and value, following the preliminary assessment. Sectors at the NTS have been prioritized and will be addressed in alphabetical order based on the sector designation (Figure 1). If there is an immediate health and safety concern, the waste will be addressed immediately.

2.6 Waste Management, Minimization, and Disposal

A Radiological Control Technician (RCT) will be present, as needed, based on site-specific conditions. At each applicable CAS or non-FFACO site, the waste will be surveyed and cleared by the RCT who will issue a radiation clearance certification (i.e., green tag) prior to removal. The survey will include field screening and/or collecting swipe samples to determine if contamination is present and removable. Screening data collected from non-radiological areas will be evaluated against the requirements of the NV/YMP Radiological Control Manual (DOE, 1999a). In CWMAs, the Performance Objective Certification (POC) guidance (REECo, 1995b) will be used to evaluate site-screening results, and any waste containing isotopes not addressed in, or exceeding the NTS POC screening levels, will be managed as radioactive waste following the requirements of the Nevada Test Site Waste Acceptance Criteria, Certification, and Transfer Requirements (DOE, 1996b).

Corrective actions requiring dust control, disturbance of a protected habitat, or ground disturbance as defined in Section 1.5 are not eligible for remediation under the housekeeping category or this SCWP. In order to determine if waste removal operations may cause a ground disturbance, the following should be completed prior to corrective action:

- Inspection of sites located in desert tortoise areas for tortoise habitat and for other endangered species following DOE Order NV O 450.x1, Protection of Cultural Resources and Endangered Species (DOE, 1999b), and the opinion of a biologist.

- Evaluation of the need for a Cultural Resource Survey following DOE Order NV O 450.x1, Protection of Cultural Resources and Endangered Species (DOE, 1999b).


During corrective action operations, waste minimization practices will be followed. Readily removable waste will be segregated by waste type and transported to the proper disposal/collection site based on the waste categorization and evaluation. In addition, the following will also be done:
• A Housekeeping Category Corrective Action Documentation Form (see Section 3.0 and Appendix C) will be completed for each housekeeping site.

• Before and after photographs of each site will be taken.

• Waste disposal documentation, as appropriate (e.g., Bills of Lading, manifests), will be completed.

• Verification that corrective actions are complete for all sites following this Work Plan.

• A closure report (see Section 3.0) with all necessary documentation will be submitted to NDEP.

A discussion of specific waste categories and the disposal practices for each are presented in the following sections. Possible categories for waste can be found in Appendix A. A logic diagram for waste category determination is found in Figure B-2.

2.6.1 ACM

Friable and non friable asbestos may be removed by properly trained personnel under this SCWP. However, asbestos containing drilling mud must be evaluated under the SAFER or Complex process. A radiological clearance certification (i.e., green tag) will be issued for waste ACM, as needed, based on site-specific conditions. ACM will be accounted for in a daily log or field notes and tracked to its destination with appropriate documentation, as required.

2.6.2 Actionable, Recyclable, and/or Salvageable Waste

Waste, debris, and materials will be evaluated to determine if they are recyclable, salvageable, or actionable, including those materials that may be reused, stockpiled, or sold. The Management and Operations (M&O) Property Department will identify these items prior to their final disposition. Housekeeping salvage work at the Reactor Maintenance and Disassembly Building, Test Cell A, Test Cell C, Super Kukla, and Pluto Facilities were outlined in a letter from DOE to NDEP (Appendix D). Future salvage activities at the Sectors will involve the removal of similar materials and removal activities will be conducted as outlined in the letter (Appendix D).

Recyclable and/or salvageable wastes that are not wood products (except paper) and not radioactively contaminated can be removed from the site provided that a ground disturbance will not be created. Materials which have been identified as either recyclable, salvageable, or actionable will be transported to the proper collection point (e.g., intact, lead acid batteries to one of the collection points established by the M&O) or biddable unit/laydown area. A mobile waste container (e.g., a drum which is moved from site to site until full) may be used to stockpile
recyclable or scrap materials from multiple sites. The material will be accounted for in a daily log or field notes and a radiological clearance certification will be issued for these materials, as needed, based on site-specific conditions. These wastes will be tracked to their destination with a Bill of Lading or equivalent documentation, as required, and an inventory list will be completed for each site. An example of an inventory list is included in Appendix D.

2.6.3 Hazardous Waste

Hazardous waste that has clearly not entered the environment or impacted more than 2.3 m³ (3 yd³) of soil (Figure C-3) may be removed and disposed of as a housekeeping category waste, after the waste has been evaluated by the field team. Hazardous wastes will be managed in a Satellite Accumulation Area (SAA) or 90-day accumulation area and meet RCRA requirements (Title 40 CFR 262.34) (CFR, 1998e). The waste will be disposed of in a licensed Treatment, Storage, and Disposal Facility (TSDF). A radiological clearance certification (i.e., green tag) will be issued for these materials, as needed, based on site-specific conditions. Hazardous debris will be accounted for in a daily log or field notes and tracked to their destination with a RCRA manifest.

2.6.4 Mixed Waste

Mixed waste that has clearly not entered the environment or impacted more than 2.3 m³ (3 yd³) of soil may be removed and disposed of as a housekeeping category waste after the waste has been evaluated by the field team. An RCT must be present when handling the waste. Other radiological and hazardous controls may include a Radiological Work Permit, Job Hazard Analysis (JHA), or other planning documents. Mixed waste will be managed in a SAA or 90-day accumulation area prior to disposal in a licensed TSDF. Mixed waste will be handled in accordance with the Mutual Consent Agreement or future permitted facility requirements. Mixed waste will be accounted for in a daily log or field notes and tracked to its destination with appropriate documentation.

2.6.5 Radioactive Waste

Radioactive waste that has clearly not entered the environment or impacted more than 2.3 m³ (3 yd³) of soil may be removed and disposed of as a housekeeping category waste after the waste has been evaluated by the field team. An RCT must be present when handling the waste. Other radiological controls may include a Radiological Work Permit, JHA, or other planning documents. The waste will be accounted for in a daily log or field notes and tracked to its destination with appropriate documentation.
2.6.6 Ordinary Waste

Ordinary waste will be transported to an approved landfill. At the NTS, this may be either the Area 9 U-10c Class III Landfill or to the Area 23 Class II Landfill (household waste, sludge, and industrial solid wastes only). A radiological clearance certification (i.e., green tag) will be issued for the ordinary waste, as needed, based on site-specific conditions. The material will be accounted for in a daily log or field notes and tracked to its destination with appropriate documentation, as required.

2.6.7 Petroleum Hydrocarbon Waste

Process knowledge or sampling must be used to determine how petroleum hydrocarbon waste, such as stained soil, is regulated and disposed. Items containing certain petroleum hydrocarbons (such as diesel fuel, motor oil, or lubrication oil) may not be classified as hazardous waste but must be disposed of in a special section of a Solid Waste Disposal Site or at the NTS Area 6 Hydrocarbon Landfill or recycled. Petroleum hydrocarbon releases with a volume of greater than 2.3 m$^3$ (3.0 yd$^3$) of impacted soil are not housekeeping category sites, and therefore, cannot be remediated using this SCWP. A radiological clearance certification (i.e., green tag) will be issued for these wastes, as needed, based on site-specific conditions. The waste will be accounted for in a daily log or field notes and tracked to its destination with a RCRA manifest or other documentation, as required.

2.6.8 Polychlorinated Biphenyls

All unlabeled electrical equipment that typically contain PCBs will be assumed to contain regulated quantities of PCBs until sampling and analysis has demonstrated otherwise. PCBs in a container with a capacity of less than 3.8 L (1 gal) may be considered a housekeeping category waste; however, uncontained, spilled, or burned PCBs are not housekeeping waste. Ballasts containing PCBs, if not accumulated, can be disposed of at a landfill. However, PCB ballasts which have been accumulated must be characterized and are not housekeeping waste. A radiological clearance certification (i.e., green tag) will be issued for these materials, as needed, based on site-specific conditions. PCBs will be accounted for in a daily log or field notes and tracked to their destination with a RCRA manifest.

2.6.9 Soil Stains

Soil stains of known materials or stains that have been characterized before prioritization may be remediated under the housekeeping category provided the volume of soil is less than 2.3 m$^3$ (3 yd$^3$). A radiological clearance certification (i.e., green tag) will be issued for the excavated

14
soil, as needed, based on site-specific conditions. The excavated soil will be accounted for in a daily log or field notes and tracked to its destination with a manifest, Bill of Lading, or other appropriate shipping documentation.

Verification sampling is required to verify removal of impacted soil. At housekeeping sites, one verification sample will be collected for each distinct stained area as long as the total excavated soil volume is not greater than 2.3 m$^3$ (3 yd$^3$). Soil stains requiring more than one sample for each distinct stained area cannot be remediated using this SCWP.

2.7 Biddable Units/Laydown Areas

During the site evaluation process, materials that are determined to have a significant monetary, recyclable, salvageable, auctionable, or serviceable value will be stockpiled into biddable units or placed/consolidated in designated laydown areas. These areas may be located on-site, in the compound (fenced area surrounding a specific building), or off-site at another location designated for staging or stockpiling these materials. These materials will be screened for radiological constituents (as needed, based on site-specific conditions), evaluated, secured, and inventoried.

2.8 Health and Safety

Field activities will be conducted under a generic Health and Safety Plan which covers routine field activities. Work will be done under an approved JHA and/or Radiological Work Permit for non-routine site-specific field activities. An As Low As Reasonably Achievable review will be conducted if needed.
3.0 HOUSEKEEPING CATEGORY CORRECTIVE ACTION DOCUMENTATION

Corrective actions at housekeeping sites will be recorded in a bound project log/field book or an equivalent log each day that corrective action-related activities take place. Field notes will document time, date, weather, field conditions, personnel, equipment, arrangements, corrective actions, and deviations, and will be signed and dated at the end of each day.

Upon completion of corrective actions at a CAS or non-FFACO housekeeping site, a Housekeeping Category Corrective Action Documentation Form (Appendix C) will be completed for the site. This Form will include before and after photographs of the site, description and removal status of the wastes, and waste disposal information. The Housekeeping Forms will be used along with waste disposal documentation such as Bills of Lading, manifests (both on- and off-site), and other disposal records to track corrective actions performed at the site and waste removed from the site. The Housekeeping Forms for each housekeeping site in a sector will be compiled and presented as a closure report for the sector. All documentation, including sampling results, will be maintained following DOE and DoD records retention procedures.
4.0 RELATED DOCUMENTS

Corrective actions at housekeeping category sites will be conducted under existing umbrella documents for quality assurance, health and safety, waste management, and sampling. Examples of these documents are found in Table 1. Other pertinent documents may include Work Plans; contractor-specific operating procedures; site-specific health and safety plans; and field instructions, as applicable. A JHA will also be prepared for routine activities at these sites.

TABLE 1 HOUSEKEEPING CATEGORY-RELATED PLANS

<table>
<thead>
<tr>
<th>TOPIC</th>
<th>APPLICABLE PLANS</th>
<th>APPLICABLE LOCATION(S)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality Assurance</td>
<td>• Resource Conservation and Recovery Act Industrial Sites Quality Assurance Project Plan, Nevada Test Site, Nevada, Rev. 0 (DOE, 1994)</td>
<td>NTS, TTR, Off-sites</td>
</tr>
<tr>
<td>Health &amp; Safety</td>
<td>• Nevada Test Site Radiation Protection Program (DOE, 1995b)</td>
<td>NTS, TTR, Off-sites</td>
</tr>
<tr>
<td></td>
<td>• Nevada Test Site Performance Objective for Certification of Nonradioactive Hazardous Waste (REECo, 1995a)</td>
<td>NTS</td>
</tr>
<tr>
<td></td>
<td>• Operating Plan for U10C Solid Waste Disposal Site (Class II), Operation and Maintenance Plan for the Nevada Test Site Class I Landfills in Areas 9 and 23, and Operation and Maintenance Plan for the Nevada Test Site (NTS) Area 6 Class III Disposal Site for the Disposal of Hydrocarbon-Burdened Soil, Septic Sludge, and Debris (BN, 1996; REECo, 1993; REECo, 1995b)</td>
<td>NTS</td>
</tr>
<tr>
<td>Confirmation Sampling</td>
<td>• CAS-specific Sampling and Analysis Plans (developed as needed)</td>
<td>NTS, TTR, Off-sites</td>
</tr>
</tbody>
</table>
5.0 REFERENCES

BN (see Bechtel Nevada)


CFR (see Code of Federal Regulations)


DOE (see U.S. Department of Energy)

FFACO (see Federal Facility Agreement and Consent Order)


IT (see IT Corporation)

5.0 REFERENCES (continued)

REECo (see Reynolds Electrical & Engineering Co., Inc.)


U.S. Department of Energy, Nevada Operations Office, 1999b, Protection of Cultural Resources and Endangered Species, DOE Order NV O 450.x1, Las Vegas, NV.

APPENDIX A

WASTE CATEGORIZATION LIST
**TABLE A-1**
WASTE CATEGORIZATION LIST

<table>
<thead>
<tr>
<th>WASTE TYPE</th>
<th>POSSIBLE WASTE CATEGORY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abandoned chemicals</td>
<td>Housekeeping if containerized (not in soil)</td>
</tr>
<tr>
<td>Aerosol cans</td>
<td>Housekeeping if empty or if not empty but contents are identifiable by process knowledge</td>
</tr>
<tr>
<td>Air filters</td>
<td>Ordinary/Sanitary waste</td>
</tr>
<tr>
<td>Aluminum cans</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Arsenic</td>
<td>Hazardous</td>
</tr>
<tr>
<td>Asbestos (non-friable)</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Bare wood, wooden structures</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Batteries - lead acid (intact)</td>
<td>Recyclable</td>
</tr>
<tr>
<td>Batteries - lead acid (crushed)</td>
<td>Hazardous</td>
</tr>
<tr>
<td>Batteries, other - intact</td>
<td>Recyclable, hazardous if alkaline, mercury, or nickel-cadmium</td>
</tr>
<tr>
<td>Black rubber casing</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Bottles</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Buckets or Cans (empty)</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Buckets or Cans (not empty)</td>
<td>Hazardous or salvageable; not housekeeping unless contents are known</td>
</tr>
<tr>
<td>Cable and wire</td>
<td>Salvageable if in good condition; otherwise ordinary</td>
</tr>
<tr>
<td>Cadmium</td>
<td>Hazardous</td>
</tr>
<tr>
<td>Capacitors</td>
<td>May contain polychlorinated biphenyls (PCBs)</td>
</tr>
<tr>
<td>Chromium</td>
<td>Hazardous</td>
</tr>
<tr>
<td>Circuit and electrical boxes</td>
<td>Salvageable or recyclable (if in good condition)</td>
</tr>
<tr>
<td>Concrete blocks, cinder blocks</td>
<td>Salvageable if not broken; ordinary waste</td>
</tr>
<tr>
<td>Construction debris (untreated lumber, rebar, or concrete)</td>
<td>Industrial solid waste</td>
</tr>
<tr>
<td>WASTE TYPE</td>
<td>POSSIBLE WASTE CATEGORY</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>Drill pipe</td>
<td>Salvageable if in good condition</td>
</tr>
<tr>
<td>Drilling mud</td>
<td>Pre-1975 contained asbestos, barium, chromium, if asbestos in drilling mud then not housekeeping</td>
</tr>
<tr>
<td>Drums or barrels (empty)</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Drums or barrels (not empty)</td>
<td>Hazardous or salvageable</td>
</tr>
<tr>
<td>Epoxy tar sites</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Eye hook tie downs</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Fencing</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Fluorescent light bulbs, intact</td>
<td>May be hazardous</td>
</tr>
<tr>
<td>Food containers, food wrappers</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Gas cylinders (compressed) - empty</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Gas cylinders (compressed) - not empty</td>
<td>Hazardous or salvageable</td>
</tr>
<tr>
<td>Gas cylinders (uncompressed)</td>
<td>Can be reused if in good condition</td>
</tr>
<tr>
<td>Gasoline cans</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Glass</td>
<td>Ordinary Waste, recyclable</td>
</tr>
<tr>
<td>Heavy equipment</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Hoists, pulleys</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Hoses</td>
<td>Salvageable if new and/or in good shape</td>
</tr>
<tr>
<td>Industrial solid waste</td>
<td>Salvageable or ordinary waste</td>
</tr>
<tr>
<td>Joint compound</td>
<td>May be hazardous</td>
</tr>
<tr>
<td>Lead</td>
<td>Recyclable, hazardous, or mixed</td>
</tr>
<tr>
<td>Linoleum</td>
<td>Asbestos potential</td>
</tr>
<tr>
<td>Lumber, dimensioned</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Mastic</td>
<td>May contain asbestos</td>
</tr>
<tr>
<td>Metal (scrap)</td>
<td>Ordinary Waste, recyclable</td>
</tr>
<tr>
<td>WASTE TYPE</td>
<td>POSSIBLE WASTE CATEGORY</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-------------------------------------------------------------</td>
</tr>
<tr>
<td>Metals (steel, iron, aluminum, copper)</td>
<td>Scrap or ordinary waste, recyclable</td>
</tr>
<tr>
<td>Nuts, bolts, nails</td>
<td>Salvageable or ordinary, recyclable</td>
</tr>
<tr>
<td>Office trash</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Paint cans</td>
<td>Probably not hazardous if latex</td>
</tr>
<tr>
<td>Painted or treated wooden boards</td>
<td>May be hazardous</td>
</tr>
<tr>
<td>Pesticide cans</td>
<td>Hazardous even if empty</td>
</tr>
<tr>
<td>Petroleum spill sites (&lt;3 yd³)</td>
<td>Hydrocarbon waste</td>
</tr>
<tr>
<td>Photographic equipment</td>
<td>Salvageable or recyclable</td>
</tr>
<tr>
<td>Photographic chemicals</td>
<td>May be hazardous</td>
</tr>
<tr>
<td>Pipes and unions</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Piping or connectors with insulating wrap</td>
<td>Asbestos potential</td>
</tr>
<tr>
<td>Piping with sealant on the threads</td>
<td>Sealant is often lead based</td>
</tr>
<tr>
<td>Plastic, molded</td>
<td>Ordinary if not new or reusable</td>
</tr>
<tr>
<td>Radioactive Waste, Low Level</td>
<td>Possibly non-impacting radioactive waste</td>
</tr>
<tr>
<td>Rebar</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Recyclable Materials</td>
<td>Cabling, steel, drill pipe, empty gasoline cans, empty gas cylinders, nuts and bolts</td>
</tr>
<tr>
<td>Sand bags</td>
<td>Salvageable or ordinary waste</td>
</tr>
<tr>
<td>Signs (in good condition)</td>
<td>Salvageable if metal or plastic</td>
</tr>
<tr>
<td>Silver</td>
<td>Photographic related; not housekeeping</td>
</tr>
<tr>
<td>Spill sites of known materials (&lt;3 yd³)</td>
<td>Hazardous or ordinary</td>
</tr>
<tr>
<td>Soil that contains lead shot</td>
<td>Not housekeeping; requires treatment</td>
</tr>
<tr>
<td>Sparkletts bottles</td>
<td>Returned for deposit</td>
</tr>
<tr>
<td>Spray insulation</td>
<td>Ordinary waste, salvageable</td>
</tr>
<tr>
<td>Stained soil</td>
<td>Housekeeping, if less than 3 yd³</td>
</tr>
<tr>
<td>WASTE TYPE</td>
<td>POSSIBLE WASTE CATEGORY</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>-------------------------------------------------------------</td>
</tr>
<tr>
<td>Sulfa-set</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Tar</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Tin cans</td>
<td>Ordinary waste, recyclable</td>
</tr>
<tr>
<td>Tires</td>
<td>Salvageable or recyclable</td>
</tr>
<tr>
<td>Transformers/PCBs</td>
<td>PCB waste</td>
</tr>
<tr>
<td>Transite pipe</td>
<td>Non-metal, non-plastic pipe; asbestos potential</td>
</tr>
<tr>
<td>Trash cans, metal</td>
<td>Salvageable if in good condition</td>
</tr>
<tr>
<td>Treated or painted pallets or posts</td>
<td>May be hazardous</td>
</tr>
<tr>
<td>Unexploded ordnance</td>
<td>Not housekeeping</td>
</tr>
<tr>
<td>Tiles and shingles - roofing, flooring, and ceiling</td>
<td>Asbestos potential</td>
</tr>
<tr>
<td>Wallboard</td>
<td>Paint and asbestos potential</td>
</tr>
<tr>
<td>White plastic sheeting</td>
<td>May be salvageable if new or non-weathered; otherwise ordinary waste</td>
</tr>
<tr>
<td>Wood - bare</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Wood - cable spools, pallets</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Wood - dimensioned lumber</td>
<td>Salvageable</td>
</tr>
<tr>
<td>Wood - painted or treated</td>
<td>May be hazardous</td>
</tr>
<tr>
<td>Wood railroad ties (untreated)</td>
<td>Ordinary waste</td>
</tr>
<tr>
<td>Wood railroad ties (treated; creosote)</td>
<td>Hazardous</td>
</tr>
</tbody>
</table>
APPENDIX B

SECTORED CLEAN-UP APPROACH LOGIC DIAGRAMS - TO DETERMINE IF A WASTE SITE IS APPLICABLE UNDER THIS WORK PLAN
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Figure B-1
General Procedure for Sectored Clean-up Work Plan (SCWP)
Figure B-2
Logic Diagram for Determination of Housekeeping Sites
Disposal of debris as appropriate, may include but is not limited to, recycling, landfill, or sewage lagoon disposal.

Document debris removal per Sectored Clean-up Work Plan requirements.

Submit Closure Report to NDEP when all housekeeping sites in sector addressed.

Figure B-3
Process for Removing Nonhazardous/Nonradioactive Debris
Figure B-4
Process for Removing Hazardous/Radioactive/Mixed Waste
APPENDIX C

EXAMPLE OF A
HOUSEKEEPING CATEGORY CORRECTIVE ACTION
DOCUMENTATION FORM
SECTORED HOUSEKEEPING SITE CLOSURE VERIFICATION FORM

Closure Verification Date: 
CAS Number (if applicable): 
CAU Number (if applicable): 
Sector Designation: 
Housekeeping Site General Location: 
Elevation: 
Latitude: Northing: 
Longitude: Easting: 

Coordinate/Elevation Data Obtained from: 
Site Access Route: 

<table>
<thead>
<tr>
<th>Waste Item(s) Originally at Site</th>
<th>Apparent Waste Type*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Ordinary, Scrap Metal, Asbestos, PCB, Salvageable, Hazardous, Radioactive, Mixed, Unknown, Other

Current Site Description/Observations: 

<table>
<thead>
<tr>
<th>Housekeeping Site As Identified</th>
<th>Current Housekeeping Site Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

No Further Action Required at Housekeeping Site

Corrective Action Coordinator/Designee (Signature) Date
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APPENDIX D

BN PROPOSED WORK AT RMAD, TEST CELL A, TEST CELL C, SUPER KUKLA, AND PLUTO FACILITIES LETTER
NOV 23 1999

Paul J. Liebendorfer, P. E., Chief
Department of Conservation and Natural Resources
Division of Environmental Protection
333 W. Nye Lane, Room 138
Carson City, NV 89706-0851

BECHTEL NEVADA (BN) PROPOSED WORK ACTIVITIES AT REACTOR MAINTENANCE & DISASSEMBLY BUILDING (RMAD), TEST CELL A, TEST CELL C, SUPER KUKLA, AND PLUTO FACILITIES

BN is planning to do equipment and materials salvage at the above facilities all of which are Corrective Action Units (CAUs) in the Federal Facility Agreement and Consent Order (FFACO). An example of the types of equipment and materials to be salvaged include: various bridge cranes and load handling equipment; heating systems; cooling systems; electrical distribution systems including wiring and conduit; compressed air supply systems including piping; nitrogen supply systems including piping; lighting systems including fixtures; potable water distribution systems including piping; interior doors and windows including desks, chairs, filing cabinets, and storage lockers; plumbing fixtures such as sinks, toilets, showers, and drinking fountains; and railroad tracks.

While conducting these salvage operations cleanup, work will also be done on the interior and exterior of the facilities. Trash and debris from inside the facilities and within the facility compounds will be removed. In addition, vegetation will be removed from areas around the outside of the facilities. Temporary lighting will be installed in the facilities during the salvage operations as electrical power to the facilities has been disconnected. To access salvageable equipment, drop ceilings will be removed. Construction debris is expected to be generated as part of the salvage operations.

Part of the salvage operation will include removing hazardous conditions from each site. Hanta virus decontamination will be performed using trained workers throughout the facilities to minimize risk to workers. Asbestos Containing Materials (ACM) has been identified in the roofing insulating material over the former MX missile high bay, part of building 3110C, at RMAD. This material is not part of the building structure and will be removed by a qualified subcontractor. Asbestos material is also expected to be found in limited quantities in piping insulation elbows on some piping systems. This material will be removed by state certified asbestos workers in accordance with BN Company Directive CD-044.012, Asbestos Management. Nonfriable asbestos containing materials such as floor tiles, floor tile mastic, cementitious asbestos-containing materials that have become damaged will be considered friable and handled as friable ACM. Flourescent lamps will also be removed. These and other hazardous materials such as lead bricks will be collected, and properly disposed or recycled.
All salvaged materials and equipment will be inventoried. Inventory records will be maintained and made available to the Nevada Division of Environmental Protection (NDEP) upon request.

Waste generated as part of the salvage operations will be managed in accordance with BN Company Directive CD-0442.010, Waste Management and Permitting. All wastes generated will be inventoried prior to proper disposal. Waste inventories and disposal records will also be maintained and made available to NDEP upon request.

Work at these facilities will be performed by a dedicated field crew. Debris and trash removal will occur the week of November 22, 1999, at Test Cell C. Salvage work will occur the week of November 29, 1999, at RMAD and will continue throughout the rest of the fiscal year. Removal of asbestos containing roof insulation from the RMAD Building 311 building will start after subcontract bid evaluation and award. The FFACO Bi-Weekly Schedule will provide details of the work schedule.

If you have any questions regarding this issue, please contact Clayton W. Barrow, of my staff, at (702) 295-7960.

ERD: CWB

cc:
M. D. McKinnon, NDEP, Las Vegas, NV
J. J. Johnson, NDEP, Carson City, NV
D. A. Bedsun, DTRA, Mercury, NV
L. F. Roos, IT, Las Vegas, NV
K. A. Hoar, ESHD, DOE/NV, Las Vegas, NV
P. L. Hall, EM, DOE/NV, Las Vegas, NV
J. L. Appenzeller-Wing, ERD, DOE/NV, Las Vegas, NV
<table>
<thead>
<tr>
<th>ITEM (S)</th>
<th>DESCRIPTION</th>
<th>LOCATION</th>
<th>DISPOSITION</th>
<th>PHOTO #</th>
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<table>
<thead>
<tr>
<th>Comment Number/ Location</th>
<th>Type</th>
<th>Comment</th>
<th>Comment Response</th>
<th>Accept</th>
</tr>
</thead>
<tbody>
<tr>
<td>1  Page ix, 1st para, 1st sent</td>
<td></td>
<td>The acronym “SCWP” should follow “The Sectored Clean-up Work Plan”.</td>
<td>Done</td>
<td>yes</td>
</tr>
<tr>
<td>2  Page ix, 1st sent after bullets</td>
<td></td>
<td>replace “followed” with follows.</td>
<td>Done</td>
<td>yes</td>
</tr>
<tr>
<td>3  Page 1, 1st para, 2nd line</td>
<td></td>
<td>Insert “remediation of” between “Expedite” and “Housekeeping”</td>
<td>Done except replaced “remediation” with “clean-up and closure of”</td>
<td>yes</td>
</tr>
<tr>
<td>4  Page 7, Para 2.1.5, 2nd line</td>
<td></td>
<td>Replace “my” with “may”</td>
<td>done</td>
<td>yes</td>
</tr>
<tr>
<td>5  Page 8, 5th bullet</td>
<td></td>
<td>The correct version from liters to gallons is 3.785</td>
<td>Changed conversions throughout document. Left 1 gallon as max.</td>
<td>Yes</td>
</tr>
<tr>
<td>6  Page 12, mixed waste</td>
<td></td>
<td>This section should indicate that mixed wastes will be managed in accordance with the Mutual Consent Agreement.</td>
<td>Added phrase saying such</td>
<td>yes</td>
</tr>
<tr>
<td>7  Page #13 Polychlorinated biphenyls.</td>
<td></td>
<td>See comment #5.</td>
<td>See resolution #5.</td>
<td>yes</td>
</tr>
<tr>
<td>8  Page B-2, Figure B-2</td>
<td></td>
<td>The first decision point does not have the “yes” and “no” directions indicated.</td>
<td>Added.</td>
<td>Yes</td>
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