

**Standardized Federal Facility Agreement and Consent Order
(FFACO) Outline
Corrective Action Decision Document/Closure Report
(CADD/CR)
Revision 2
June 13, 2012**

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Executive Summary

1.0 Introduction

Identify the Corrective Action SiteCAS number(s), their location(s), and Corrective Action Unit (CAU) number. Provide a concise statement relating the corrective action being proposed to the provisions of the FFACO.

1.1 Purpose

Provide a concise updated description of the CAU, reference previous documentation and state the purpose of this document, namely to justify why no corrective action is necessary; how and why use restrictions will be applied; and the technical rationale for implemented closure activities.

1.2 Scope

Discuss the scope and substance of activities used to identify, evaluate, and recommend why no corrective action is necessary; how and why any required use restrictions will be applied; and basis for implemented closure activities.

1.3 CADD/CR Contents

Summarize the contents of the CADD/CR. Reference applicable programmatic plans and other documents as appropriate to support the CADD/CR. Include the Data Quality Objectives (DQOs) and summarize the results of the assessment in Section 2.2.2.

2.0 Corrective Action Investigation Summary

Concisely discuss the subject matter described by the following subject headings. Provide only enough information on the site conditions and/or completed closure activities to facilitate an understanding that no further corrective action is required. Refer the reader to an appendix for detailed discussion of the results including any changes/modifications to the approved Corrective Action Investigation Plan (CAIP).

2.1 Investigation Activities

Provide a concise description of the investigation activities conducted at the site. Refer to and discuss the validity of the conceptual model developed in the CAIP.

2.2 Results

2.2.1 Provide summary analytical data, plume concentration isopleth maps or graphics that summarize the investigation results and affirm that based on these results the CAU has been adequately characterized.

2.2.2 An assessment as to whether or not the results from the CAIP meet the DQOs must be included. The conceptual site model must be reconciled with the actual findings.

2.3 Justification for No Further Action

Justify why no further corrective action is to be performed at this site (e.g., investigation activities determine that contaminants are below Preliminary Action Levels [PALs] stated in the approved CAIP and/or industrial Preliminary Remediation Goals, or are determined not to present a risk to human health or the environment based on a site-specific risk assessment. If appropriate, provide a summary of any closure and verification activities that were performed). Provide details on use restrictions (figures with coordinates, Use Restriction Forms, etc.) Based on the current U.S. Department of Energy *Nevada Test Site (NTS) Resource Management Plan (RMP)* for those sites on the Nevada National Security Site (NNSS) (formerly known as the Nevada Test Site).

3.0 Recommendation

State that no further corrective action is required. Request the Nevada Division of Environmental Protection (NDEP) issue a Notice of Completion for this CAU and the CAU be moved from Appendix III to Appendix IV of the FFACO.

4.0 References

Provide references for the sources of information used during the preparation of the CADD/CR.

Appendices

Corrective Action Investigation Results

Discuss the investigation and present the results. Minimize restating site history, etc.; refer to CAIP, as appropriate. Concisely discuss the field program, focusing on changes or deviations from the planned operation. Present and discuss the results, quality assurance parameters and data validation results, as appropriate. Present data in tables, lab data reports, boring logs, site cross-sections with plume data, or other graphic representations of the results, as appropriate.

DQOs as developed in the CAIP

Data Assessment

Assess how well the results from the CAIP meet the DQOs using the primary data quality indicators (DQIs) of precision, accuracy, representativeness, comparability, and completeness. Other DQIs used to support the discussion of the analytical data can be sensitivity, recovery, memory effects, limit(s) of quantitation, repeatability, and reproducibility. The assessment must include a reconciliation of the data with the

conceptual site model and the model revised as appropriate.

Risk Assessment (if applicable)

Risk Assessment findings and supporting documentation.

Closure Activity Summary (if applicable)

Provide concise details on the completed closure activities and include the required verification activities and supporting documentation. Multiple variations of Closure Activities and required supporting documentation can be applicable under the CADD/CR. Examples of the type of Closure Activities that would be appropriate include, but are not limited to:

- Limited contaminated soil excavation (hot spot removal) supported by post excavation verification sampling and analysis documentation and documentation (manifest) of proper disposal of the material.
- Removal of underground storage tank contents and/or underground tanks for closure where characterization has determined that concentrations in surrounding soil is less than the PAL supported by documentation (manifest) of the proper disposal of the material.
- Use restriction is the only corrective action based on the characterization results. This activity will be supported by details on the use restrictions: figures with coordinates, Use Restriction Forms, etc., based on the current RMP.
- Closure of septic tanks associated with leachfields determined through the characterization that concentrations are below the PAL and/or released without restriction based on a risk assessment (A through K analysis).
- Closure of hydrocarbon impacted soils in place and released without restrictions based on a risk assessment (A through K analysis).
Closure activities similar to Housekeeping type cleanups at CAUs where characterization has determined that concentrations in surrounding soil is less than the PAL supported by documentation (manifest) of the proper disposal of the material.
- Removal of underground piping and/or pipeline contents for closure where characterization has determined that concentrations in surrounding soil is less than the PAL supported by documentation (manifest) of the proper disposal of the material.

All Final Documents must include an Appendix with the NDEP Comment Response Sheets

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