October 13, 2011

John Eschenberg
Manager for Environmental Management
DOE-Oak Ridge Office
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. Eschenberg:

Recommendation 207: Recommendation to Automate the Stewardship Verification Process for the Remediation Effectiveness Report

At our October 12, 2011, meeting the Oak Ridge Site Specific Advisory Board approved the enclosed recommendation to automate the stewardship verification process for the annual Remediation Effectiveness Report.

The board recommends exploring ways to automate the stewardship tracking process and establish a web-based solution for managing long-term stewardship information for the Oak Ridge Reservation

Please see the enclosed recommendation for complete details.

We look forward to receiving your response to this recommendation by January 12, 2012.

Sincerely,

Maggie Owen
Chair, Oak Ridge Site Specific Advisory Board
mo/rsg

Enclosure

cc/enc:
Dave Adler, DOE-ORO
Cate Alexander, DOE-HQ
Fred Butterfield, DOE-HQ
Susan Cange, DOE-ORO
Connie Jones, EPA Region 4
Local Oversight Committee
Myron Iwanski, Anderson County Mayor

Melissa Nielson, DOE-HQ
Melyssa Noe, DOE-ORO
John Owsley, TDEC
Mark Watson, Oak Ridge City Manager
Ron Woody, Roane County Executive
File 140.1

Oak Ridge Site Specific Advisory Board
Recommendation 207:
Recommendation to Automate the Stewardship Verification Process
for the Remediation Effectiveness Report

Background

Each year the Department of Energy's Oak Ridge Water Resources Restoration Program (WRRP) prepares the Remediation Effectiveness Report (RER) for the Oak Ridge Reservation (ORR). The RER is a document required by the Oak Ridge Federal Facility Agreement to assess the progress of remedial actions toward goals stated in CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) decision documents and compares pre- and post-remedial conditions at cleaned up sites.

The RER reports on compliance with long-term stewardship requirements for areas remediated under CERCLA where contaminants or hazardous materials remain in place. It also reports on any actions taken during the reporting year and makes recommendations for future actions.

Every five years, the WRRP prepares a Five-year Review, which is required by CERCLA. The Five-year Review determines if a remedy is still appropriate under current conditions.

Discussion

At the June 21, 2011 meeting of the Stewardship Committee of the Oak Ridge Site Specific Advisory Board, representatives of WRRP explained the steps involved in documenting the stewardship requirements for remediated areas with residual contamination. The process is a time-consuming, labor intensive endeavor that requires input from multiple companies and organizations.

Currently about 180 check sheets must be completed by facility managers across the ORR and compiled for the annual RER. As more sites on the reservation are remediated and incorporate stewardship requirements, the amount of documentation will increase significantly.

Recommendation

Because of the amount of documentation required to track CERCLA-required stewardship activities, Oak Ridge Site Specific Advisory Board recommends that the Department of Energy Oak Ridge Office WRRP explore ways to automate the stewardship tracking process.

It is recommended that the Department of Energy pursue an established solution for managing long-term stewardship information at the ORR. Without such a system the process could become overwhelming using current methods.

Such a system could compile long-term stewardship information for controlled areas on the ORR such as contaminant and physical hazards remaining, regulatory drivers, land use designations and restrictions, and required controls such as land use controls and engineering controls.

Ideally the system would be used for data entry during site inspections by facility managers and automatic inspection schedule reminders would be sent to the inspectors at the required frequencies.

Having these processes automated provides a more streamlined system for annual verification for the RER as well as verification for the Five-Year Review. A system like this would also allow for data summary reports to be generated and could be linked to the DOE geographic information system web site providing anyone (i.e., the public) online access to details of the long term stewardship components on the ORR.