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**REMOVAL ACTION MEMORANDUM - CARPET REPLACEMENT,
ADMINISTRATION BUILDING, 2ND FLOOR CORRIDOR**

12/28/94

DOE-0333-95

DOE-FN FERMCO

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ACT MEMORAND



Department of Energy
Fernald Environmental Management Project
P. O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 648-3155

DEC 2 1994

DOE-0333-95

Mr. Don Ofte, President
Fernald Environmental Restoration
Management Corporation
P.O. Box 538704
Cincinnati, Ohio 45253-8704

Dear Mr. Ofte:

**CONTRACT DE-AC05-92OR21972, REMOVAL ACTION MEMORANDUM - CARPET REPLACEMENT,
ADMINISTRATION BUILDING, 2ND FLOOR CORRIDOR**

The enclosed Removal Site Evaluation (RSE) for the Carpet Replacement, Administration Building, 2nd Floor Corridor Project has been reviewed by my office. The RSE was prepared for this project under the authority of the Department of Energy, Fernald Area Office (DOE-FN) as a lead agency in accordance with Subpart B of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This RSE identifies sources and the nature of releases or threat of releases that may result from this project and evaluates the magnitude of the threat to human health and the environment. Based upon a review of this RSE and an evaluation of the factors to be considered under the NCP (300.415), DOE-FN has determined that this project does not cause initiation of a removal action.

Carpeting and asbestos floor tile associated with this project should be managed in accordance with the control measures noted within the RSE document and per the guidelines specified in the Fernald Environmental Management Project (FEMP) Site Policy and Procedures, and Removal Action Numbers 17 and 26.

At the completion of this project, Fernald Environmental Restoration Management Corporation (FERMCO) should submit a final report describing the changed site conditions, detailing the volume of waste generated, the number and type of containers used, the locations of disposition material (including containers), and the results of any verification sampling. Furthermore, this final report should be submitted to the Administrative Record for the Remedial Investigation/Feasibility Study.

If you or your staff have any questions, please contact Anand Shah at (513) 648-3146.

Sincerely,



J. R. Craig
Acting Director

FN:Shah

Enclosure: As Stated

cc w/enc:

~~AR Coordinators, FERMCO~~

cc w/o enc:

S. Houser, FERMCO/52-1
J. F. James, FERMCO/64

REMOVAL SITE EVALUATION

CARPET REPLACEMENT
ADMINISTRATION BUILDING
SECOND FLOOR CORRIDOR

FERNALD SITE OFFICE

U. S. DEPARTMENT OF ENERGY

OCTOBER 1994

JERRY F. JANES

1.0 INTRODUCTION

The purpose of this "Carpet Replacement, Administration Building, Second floor Corridor" is to remove the existing carpeting, cove base, and asbestos floor tile and install new carpeting and cove base.

The existing carpeting has been coming loose from the floor and is wrinkling badly. This creates a safety situation with the potential for a tripping accident and possible injury. DOE has requested that FERMCO take action to correct this problem.

The waste estimated to be generated for the project includes the following materials and quantities:

1. Existing carpeting & backing - 127 cubic feet/4.7 cubic yards
2. Existing asbestos floor tile - 27 cubic feet/1.0 cubic yards
3. existing vinyl cove base - 6 cubic feet/.3 cubic yards

This removal Site Evaluation (RSE) has been completed by the Department of Energy (DOE) under authorities delegated by Executive Order 12580 under section 104 of CERCLA and is consistent with Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This RSE addresses the existing conditions of the "Carpet Replacement, Administration Building, Second Floor Corridor." This RSE has been completed to support the decision as to whether the project conditions warrant a removal action. Controls implemented to support this activity are also presented in the RSE to demonstrate that the proposed construction will not cause deterioration of the existing site conditions.

2.0 SOURCE TERM

The existing floor tile used in the Administration Building contains asbestos. It could pose a hazard if damaged or improperly removed, allowing it to become friable and release asbestos fibers that are harmful if inhaled.

There are no other hazards present in conjunction with this project.

Consistent with 40 CFR 300.410 (a) the RSE includes a removal preliminary assessment which is based upon readily available information as described in 40 CFR 300.410 (c). A RCRA Determination was approved 9/29/94 for the "Carpet Replacement, Administration Building, Second Floor Corridor and will be revised to reflect the changes to the scope of work.

3.0 EVALUATION OF THE MAGNITUDE OF THE POTENTIAL THREAT

Any asbestos that is removed shall be handled in accordance with site procedures for asbestos to prevent the release of fibers. The removal shall be planned and supervised by AHERA certified supervisor and certified asbestos workers.

3.0 EVALUATION OF THE MAGNITUDE OF THE POTENTIAL THREAT (cont.)

The waste shall be wrapped in plastic or bagged and labeled as "Asbestos". These controls will prevent the release of and mitigate the threat from asbestos at this project site.

The management of the waste from this project will be controlled by Site Standard Procedure SSOP-0044 "Management of soil, debris, and waste from a Project". All waste generated from this project will be monitored for radioactivity prior to final disposition. The following controls, among others, will be implemented during the removal of the existing materials of the Carpet Replacement, Administration Building, Second Floor Corridor" project:

- * The project will be completed in accordance with the approved Health & Safety Requirements Matrix.
- * Physical barriers will be positioned around the work area to prevent unauthorized access.
- * Protective clothing and respiratory protection will be provided for the workers as required and specified on the RWP.
- * Plastic tarpaulins, bags, and appropriate containers, will be readily available to contain radiologically contaminated materials, as required.
- * The asbestos floor tile will be removed using the heat machine process which will not require general containment of the area. This process will allow the asbestos tile to be removed without damage and release of asbestos fibers. Asbestos removal shall be managed as per "Asbestos Abatement Removal Action Number 26" guidelines and procedures.

4.0 ASSESSMENT OF THE NEED FOR REMOVAL ACTION

Consistent with 40 CFR 300.410 of the NCP, the DOE shall determine the appropriateness of a removal action. Eight (8) factors to be considered in this determination are listed in 40 CFR 300.415 (b) (2). Based on the data presented above, the following of the eight (8) criteria listed in the NCP applies to this project:

40 CFR 300.415 (b) (2) (i)

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

As discussed previously, the administrative measures taken in the field during this activity are expected to mitigate or prevent the threat of a release to the environment. Therefore, while the above criteria can be applied to the "Carpet Replacement, Administration Building, Second Floor Corridor" project, the level of threat is negligible and a removal action is not required.

5.0 APPROPRIATENESS OF A RESPONSE

Based on the evaluation of all of the above factors, it has been determined that a removal action will not be necessary and that this project should be continued as a maintenance activity in support of the CERCLA remediation process and waste management. Furthermore, the controls planned in conjunction with this activity are adequate to mitigate any hazards at this site and to prevent deterioration of existing site conditions.