3005-060502001O

CH2M HILL
Mound, Inc.
1 Mound Road
P.O. Box 3030
Miamisburg, OH
45343-3030

CH2MHILL

SMO-078-05
May 9, 2005

Ms. Margaret L. Marks, Director
Miamisburg Closure Project
U. S. Department of Energy
1075 Mound Road
Miamisburg, OH 45342

ATTENTION: Paul Lucas

SUBJECT: **Contract No. DE-AC24-03OH20152:** Deliverable #36 Building Data Package; Section C.2.1.1 Facility Demolition; Buildings 23 and 125 OSC Report, Final

Dear Ms. Marks:

Attached is the following Final document for your records:

- Buildings 23 and 125, OSC Report, Final

If you or members of your staff have any questions regarding the document, or if additional support is needed, please contact Dave Rakel at 937-865-4203.

Sincerely,

John Lehew
Site Manager

JL/ms
Enclosures

cc: T. Fischer, USEPA, (1) w/attachments
B. Nickel, OEPA, (1) w/attachments
R. Vandegrift, ODH, (1) w/attachments
M. Wojciechowski, Tetra Tech, (1) w/attachs.
F. Schmaltz, DOE/MCP, (1) w/attachments
L. Rawls, DOE/MCP, w/o attachments
R. Tormey, DOE/OH, (1) w/attachments
G. Desai, DOE/HQ, (1) w/attachments
F. Bullock, MMCIC, (2) w/attachments
Public Reading Room, (4) w/attachments
CERCLA Documents, (1) w/attachments
C. Watson, (1) w/attachments
Admin Records, (2) w/attachments
ER Records; (1) w/attachments
DCC (1) w/attachments
J. Lehew, w/o attachments
D. Rakel, w/o attachments
V. Darnell, w/o attachments
B. Wier, w/o attachments
MOAT Coordinator, w/o attachments
W. Webb, w/o attachments
M. McDougal, w/o attachments
File, w/o attachments

3005-060S020010

BUILDINGS 23 AND 125 REMOVAL ACTION

PRS 160 is closed via this OSC Report

OSC REPORT

May 2005

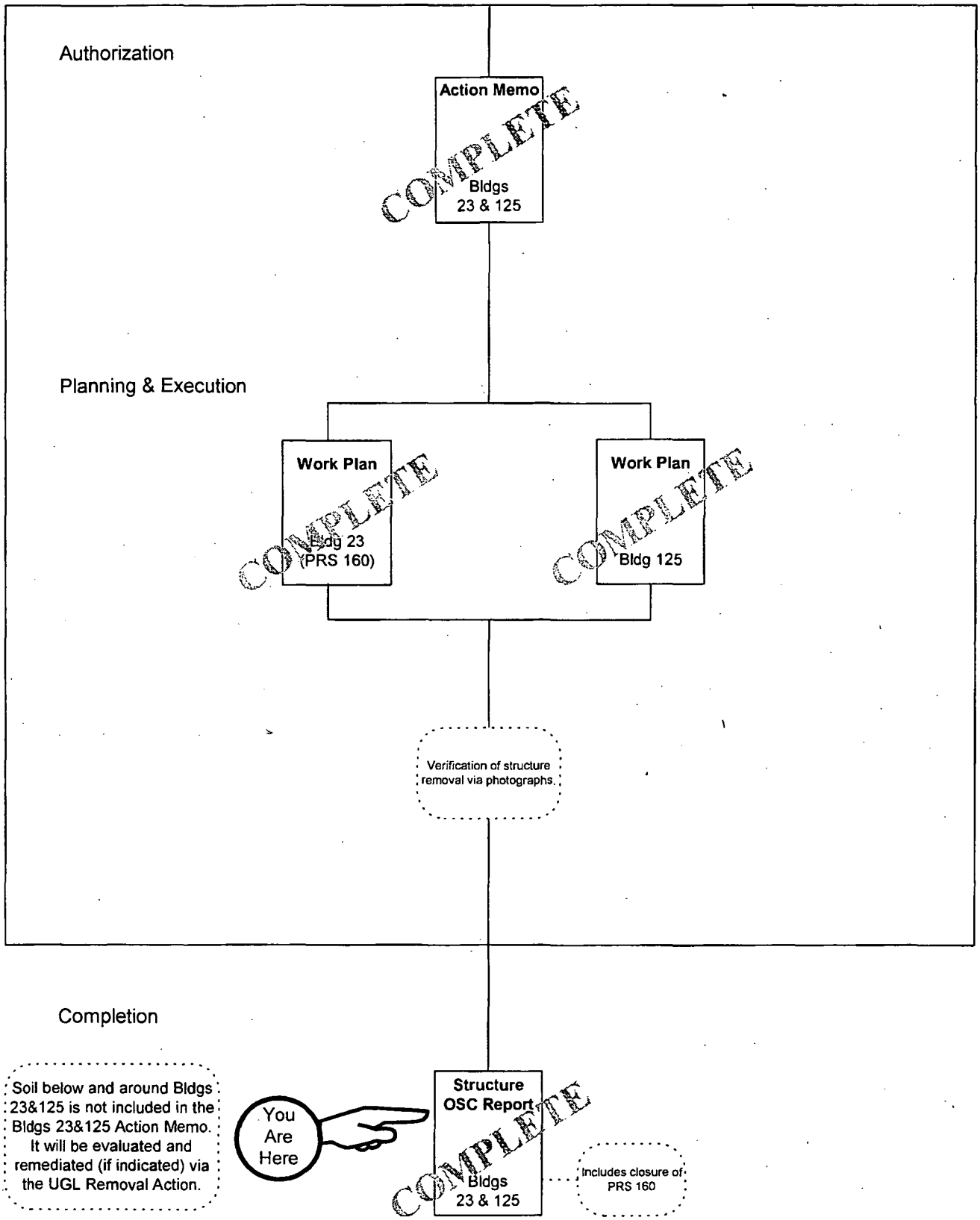
Final

Department of Energy
Miamisburg Closure Project

CH2MHILL

Buildings 23 and 125 (ATS), and PRS 160

Buildings 23 and 125 (ATS), and PRS 160



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Acronyms

AM	Action Memorandum
ATS	alpha treatment system (also known as Building 125)
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
D&D	decontamination and decommissioning
DAC	derived air concentration
DOE	Department of Energy
EE/CA	Engineering Evaluation/Cost Analysis
ER	Environmental Restoration
MCP	Miamisburg Closure Project
MMCIC	Miamisburg Mound Community Improvement Corporation
OEPA	Ohio Environmental Protection Agency
OSC	On-Scene Coordinator
PRP	Potentially Responsible Party
PRS	Potential Release Site
RA	Removal Action
UGL	Underground Line
USEPA	United States Environmental Protection Agency

RECOMMENDATION

The Buildings 23 and 125 Removal Action was performed based on historical processes and levels of contamination present in the buildings. The removal action resulted in the demolition of Buildings 23 and 125 and disposal of approximately 474 cubic yards of material. The demolition debris (including 2 cubic yards of asbestos) that was radiologically contaminated (approximately 194 cubic yards) was sent to Envirocare or NTS; and the demolition debris meeting surface release criteria (approximately 280 cubic yards) was sent to Stoney Hollow Landfill. PRS 160, Mixed Waste Storage Area (Building 23) was removed. Evaluation of the Buildings 23 and 125 footprint soil is addressed in the UGL Removal Action, and will be closed via the UGL OSC Report.

After a thorough review of the Buildings 23 and 125 OSC Report, the Core Team agrees that the Removal Action of Buildings 23 and 125 and PRS 160 is complete, and that all previously existing environmental issues associated with Buildings 23 and 125 and PRS 160, have been resolved.

Paul Lucas 5/3/05

Paul Lucas, OSC
U.S. Department of Energy
Miamisburg, Ohio

USEPA signature on next page.*

Timothy J. Fischer, Remedial Project Manager
USEPA
Chicago, Illinois

B. K. Nickel 5/3/05

Brian K. Nickel, Project Manager
OEPA
Dayton, Ohio

* Binning took place during a Core Team conference call; DOE and OEPA were in Ohio, and USEPA was in Chicago.

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DOE signature on previous page*

Paul Lucas, OSC
U.S. Department of Energy
Miamisburg, Ohio

Timothy J. Fischer 5/3/05

Timothy J. Fischer, Remedial Project Manager
USEPA
Chicago, Illinois

OEPA signature on previous page*

Brian K. Nickel, Project Manager
OEPA
Dayton, Ohio

*See note previous page

1.0 SUMMARY OF EVENTS

This section describes the site background and events leading up to the removal action, parties involved in supporting the removal action, chronological narrative of the removal action, and resources committed to complete the project.

1.1 Site Conditions and Background

The Action Memorandum (AM), Buildings 23 and 125 Removal Action, September 2003, Final authorized removal of Buildings 23 and 125, and PRS 160. This Structure On-Scene Coordinator (OSC) Report documents only the removal of Buildings 23 and 125 and PRS 160. Evaluation of the Buildings 23 and 125 footprint soil is addressed in the UGL Action Memo (Final, September 2003), and will be closed via the UGL OSC Report.

The levels of radiological contamination present in Buildings 23 and 125 warranted a Removal Action (RA) under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) and subsequent demolition of Buildings 23 and 125.

Building 23 Background

Built in 1965, Building 23 was a single-story, 3,444 square-foot (approximate dimensions of 117 feet by 30 feet) reinforced concrete block structure with a built-up membrane roof. Originally called the Waste Material Staging Center, the two-room building was used for packaging of radioactive waste into drums and staging of the drums prior to their shipment offsite. In 1989, a third room was formed by the construction of a block wall, creating a separate drum scanning facility. In 1994, the building underwent additional modifications to support its new capabilities as the Resource Conservation Recovery Act (RCRA) Mixed Waste Storage Facility. Mixed wastes are hazardous wastes that are also radioactively contaminated. Building modifications included re-engineering of the containment, epoxy-sealant floor coatings, and installation of trenches and dikes. The building's floors were slightly sloped to the floor drain system, and the floor drains were connected to the floor sump (~320 gallon capacity), located along the south side of the building.

A Removal Action was recommended for this building based on its history of storing hazardous and radioactively contaminated materials. This AM includes decontamination and demolition of the building superstructure, slab, and foundation/footers.

Building 125 Background

Building 125 was the alpha treatment system (ATS) facility used for treating low-level alpha-contaminated (primarily plutonium-238) wastewater. Liquid wastes from the site were previously piped, and transported, to Building 125 for processing and packaging for offsite disposal. The purpose of ATS was to reduce the number of drums with alpha

contaminated sludge that were shipped offsite by concentrating the liquids prior to shipment.

Constructed in 1998, Building 125 was a single-story, two-room facility consisting of a steel beam frame covered by metal panels with all concrete floors (sealed and epoxy-painted). The building contained a multimedia filter and bag filter, a clariflocculator unit, alpha influent and effluent tanks, a sump pit, a filter press, and a drum packaging area. The nominal building dimensions were 40 feet by 50 feet, with approximately 2,000 square feet of floor space.
Appendix D provides photographs of the buildings before, during, and after demolition.

Associated Potential Release Sites.

PRS 160 is closed out via this Buildings 23 and 125 OSC Report. PRSs in proximity of Buildings 23 and 125 are listed in Table 1, and their locations shown on Figure 2. PRSs 154, 240, and 405 are binned as Removal Actions and will be remediated via the Contingent Removal Action for Contaminated Soil (Final; June 2002) in conjunction with their respective Public Fact Sheets, and closed out via the UGL OSC Report.

Removal Action.

The authorization of the Removal Action for Buildings 23 and 125 was made by the Core Team on July 9, 2003 via the Buildings 23 and 125 AM. This document was made available for public review and comment on July 16,2003.

Since DOE is the sole responsible party for cleanup of contamination in Buildings 23 and 125, no Potentially Responsible Parties (PRPs) were sought to clean up the site. Monsanto Research Corporation, EG&G Mound Applied Technologies, and BWXT of Ohio, Inc. were the operating contractors at the site from 1948 to 30 September 1988, from 1 October 1988 until 30 September 1997, and from 1 October 1997 until 31 December 2002 respectively. CH2M Hill Mound, Inc. became the site contractor for the Miamisburg Closure Project (MCP) effective January 1, 2003.

1.2 Organization of the Removal Action

Table 2 (Appendix B) lists the parties supporting the removal action and their responsibilities.

1.3 Objectives

Documentation Objective. The objective of this Buildings 23 and 125 Structure OSC Report is to describe the removal action fieldwork, report the air monitoring results, and document successful completion of the project. Demolition debris quantities and disposition locations are presented in Table 3. The cost breakdown of the RA is presented in Table 4.

During demolition activities, Radiological Control performed air monitoring to confirm a safe work environment and document that no radiological contamination was released from the demolition site. Air monitoring results from the building demolition are provided in Appendix E. The highest recorded air monitoring result was 0.1446 DAC. All results were below the 0.3 DAC Mound posting criteria.

Removal Action Objectives: The objectives of the removal action included:

- Project Planning,
- Public Notification,
- Establish Work Zones,
- Safe Shutdown
- Characterization
- Decontamination,
- Demolition,
- Verification,
- Site Restoration, and
- Documentation of Completion.

Per the Action Memorandum, Decontamination activities included:

1. Isolate utilities; drain all systems of liquid.
2. Remove contaminated equipment.
3. Remove equipment designated for reuse.
4. Decontaminate building interiors and exteriors based on the radiological characterization data.
5. If ACM requiring remediation prior to building demolition is identified, asbestos abatement contractor will remove and dispose of all ACM regulated by EPA under NESHAP.

Per the Action Memorandum, Demolition activities included:

1. Demolish building superstructures.
2. Demolish building slabs and footers/foundations to three feet below grade.
3. Remove inactive drain lines and underground piping, down to 3 feet below grade.
4. Remove and dispose of debris.

The verification of structures removal is provided in the photographs included in Appendix D. Final grading and seeding will be performed after completion of the UGL soil activities and will be documented in the UGL OSC report.

1.4 Chronological Narrative of the Removal Action

The following is a chronological narrative of events surrounding the Building 23 and 125 Removal Action.

Timeframe	Activity
September 2003	Action Memorandum issued
October 2003	Buildings 23 and 125 turned over for demolition
January 2004	Building 125 Demolition
May 2004	Building 23 (PRS 160) Demolition
February 2005	OSC report generated

2.0 EFFECTIVENESS OF THE REMOVAL ACTION

The Buildings 23 and 125 structures have been demolished and the debris removed and properly disposed of per the EPA-approved Work Package (Work Packages 01930-4-d and 01940-4-d). Photographs taken before, during, and after demolition are included in Appendix D.

2.1 Actions Taken by Site Contractor

CH2M Hill Mound, Inc. personnel planned and provided removal action oversight of building decontamination, asbestos abatement (Building 23 only), building dismantlement and demolition, and onsite transportation and staging of debris. The project met the removal action objectives as outlined in the AM (Final, dated September 2003). CH2M Hill Mound, Inc. personnel prepared the OSC Report, which shows that the Removal Action objectives related to the building structure were achieved.

In accordance with the Action Memorandum/EE/CA, Buildings 23 and 125 Removal Action, September 2003, Final, the following actions were taken: Project Planning, Public Notification, Establish Work Zones, Decontamination, and Demolition. This Structure OSC Report provides the Documentation of Completion for this removal action. Documentation of soil verification, and site restoration will be provided in the UGL OSC Report.

<u>Building Dismantlement and Demolition</u>

Photographs of Buildings 23 and 125 before, during, and after demolition are provided in Appendix D. Prior to demolition, approximately 2 cubic yards of asbestos was abated from Building 23, and disposed of as radioactive waste. To prevent the generation of airborne radioactive contamination during structure demolition activities, engineering controls were employed. These controls included (but were not limited to) fixing contamination using liquid fixatives and/or foam, acid etching fixed contamination locations to remove the contamination, and using water misting to prevent fugitive dust emissions.

Liquid and foam fixatives were used inside contaminated pipes and ductwork to prevent the contamination from becoming airborne during demolition. The resulting debris was disposed of as low-level waste. Acid etching was done as part of the isotopic analysis of certain contaminated areas of concrete. The resulting samples were analyzed by gamma and/or alpha spectroscopy as appropriate. The sample was then disposed of through the appropriate waste stream. Water misting was performed to knock down fugitive dust.

Air Monitoring for Worker Safety

During demolition activities, the Mound Radiological Control organization performed air monitoring to confirm a safe work environment, in accordance with 10 CFR 835. Air monitoring results measured during building demolition are provided in Appendix E. The monitors were repositioned up and downwind from the demolition activities in response to changes in wind direction.

The derived air concentration (DAC) factor is a calculated value for occupationally exposed radiological workers based on continuous, non-shielded exposure. For the purpose of the Buildings 23 and 125 demolitions, the DAC was calculated based on the isotopic mix of 100% plutonium-238. The highest recorded result was 0.1446 DAC. All results were well below the 0.3 DAC, which is a Mound Administrative Control level based on 10 CFR 835. Therefore, the air monitoring results indicate that demolition activities did not pose any risk to human health and the environment.

2.2 Actions Taken by Local, State, and Federal Agencies

The Department of Energy (DOE)/MCP, the United States Environmental Protection Agency (USEPA), and Ohio EPA (OEPA) had oversight responsibility for the removal action. The DOE/MCP was the lead agency for the RA and provided the funding and oversight for the RA. The USEPA and OEPA had oversight responsibility for the RA and review of the AM and OSC Reports to ensure that the objectives are/were met.

2.3 Actions Taken by Subcontractors

Subcontractors involved in the project included the following:

- Bierline Inc., 2000 Bay City Road, Midland, MI 48642. Assisted with demolition.
- BNFL, British Nuclear Fuels, Inc. 1235 Jefferson Davis Highway, Arlington Va., 22202 performed dismantlement and demolition.

3.0 DIFFICULTIES ENCOUNTERED

3.1 Items that Affect the Removal Action

No difficulties were encountered that affected the removal action.

3.2 Issues of Intergovernmental Coordination

All DOE/USEPA/OEPA interactions were good. The agencies were updated informally on a regular basis, and formally at monthly Core Team meetings. The Mound 2000 Process worked well.

4.0 RECOMMENDATIONS

4.1 Means to Prevent a Recurrence

The building debris was removed and properly disposed of per the EPA-approved work plan; therefore, the spread of contamination is prevented. The scope of work for this Removal Action (removal of the Buildings 23 and 125 superstructures, slabs, and foundations to three feet below grade) is complete. Evaluation of the Buildings 23 and 125 footprint soil is addressed in the UGL Action Memo (Final, September 2003), and will be closed via the UGL OSC Report. Once both removal actions are complete, the area will be seeded and will be transferred from federal to private ownership. All State and Federal disposal rules will apply.

APPENDIX A

FIGURES

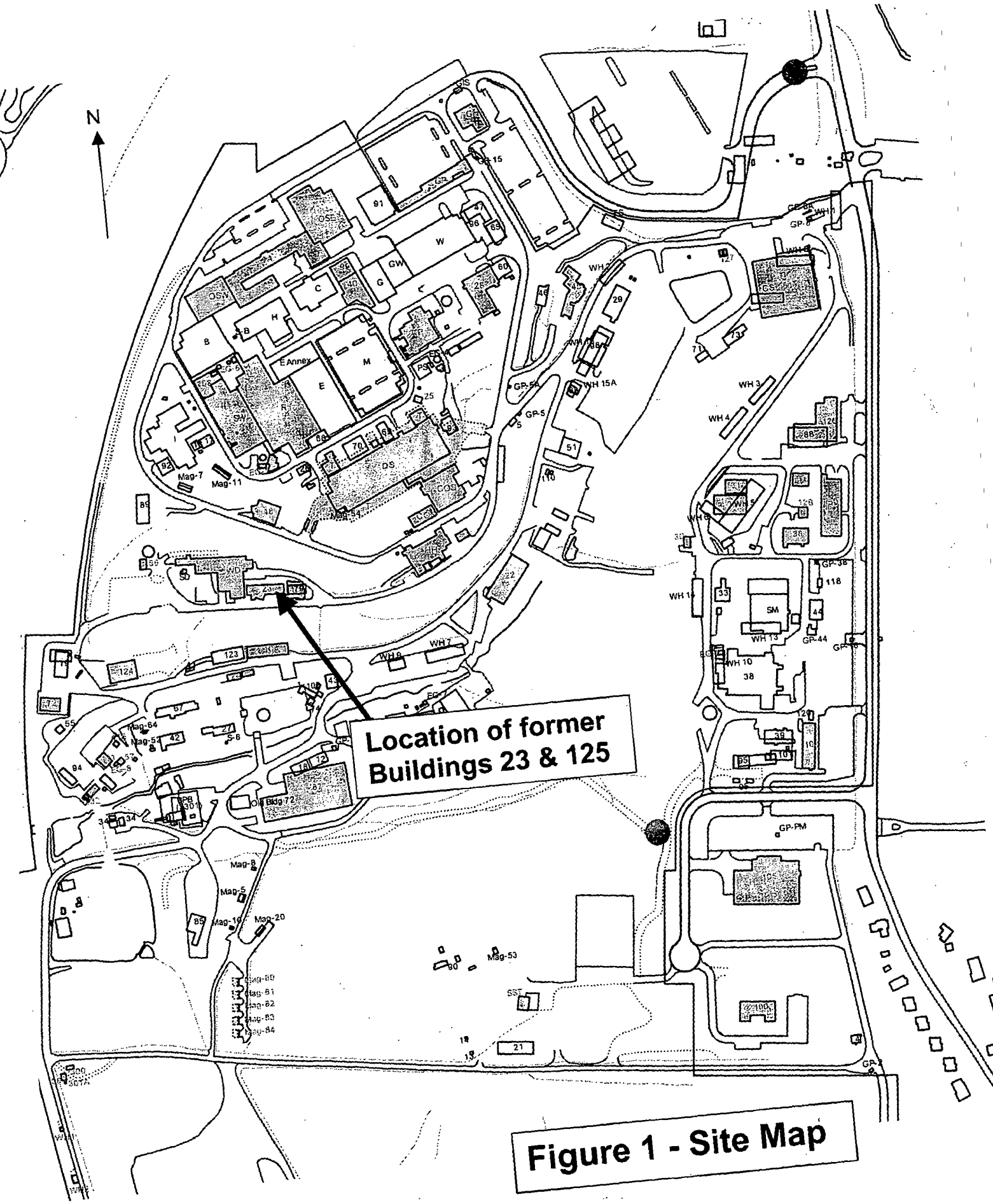
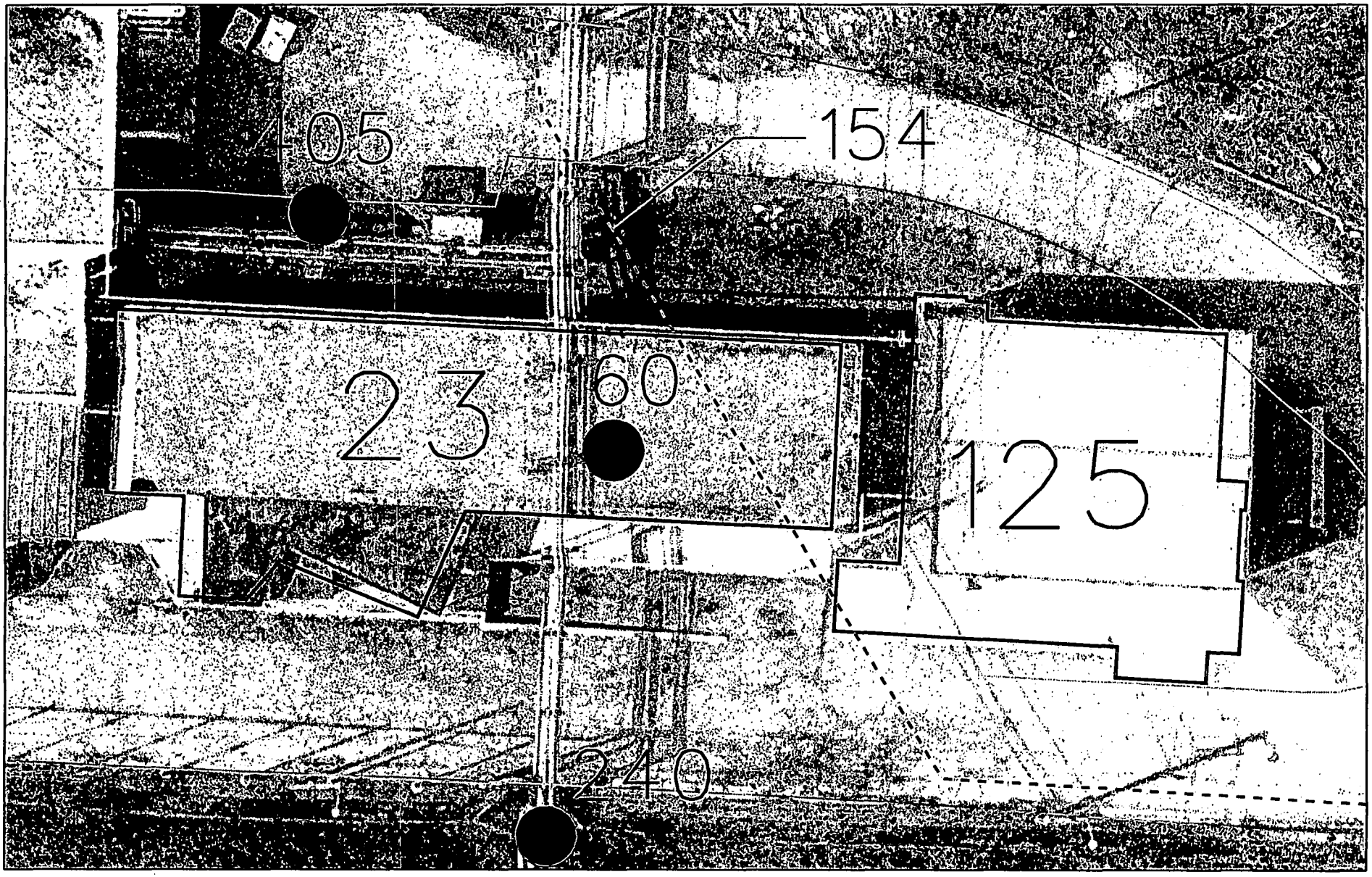


Figure 1 - Site Map



PRS Point
PRS Area
PRS Line

20 10 0 20 40FT
GRAPHIC SCALE

MOUND
Environmental Restoration Geographic Information System

SHEET	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27
ISSUE																					
SHEET	1	2	3	4	5	6															
ISSUE																					

PART CLASSIFICATION

Figure 2:
Building 23 & 125
and Vicinity

DRAWING CLASSIFICATION: UNCLASSIFIED
SIZE
DRAWING NUMBER: vicinity.dgn
JOB NUMBER
DGN TYPE: STE
PRNG: ER-GIS
CADEC
SCALE
SHEET 1 OF 1
STATUS: MD-REL-03/25/03
ORIGIN: MSTATION / J

ISS	DATE	REVISION	BY	CHKR	ENG	LPMEC	APVD	M
	10/11/04		SSF					

APPENDIX B

TABLES

Table 1: PRSs in Proximity to Buildings 23 and 125

PRS	CERCLA or Bldg. Related	Binning Status	Comments
154	CERCLA	Removal Action (RA)	Area 23, thorium contaminated soil.
160	Building	RA	Mixed waste storage area (Building 23), closed by this OSC.
240	CERCLA	RA	Site survey project potential hot spot location S0472
405	CERCLA	RA	(North of Building 23) Oil and PCB potential in soil.

PRSs 154, 240, and 405 will be remediated via the Contingent Removal Action for Contaminated Soil (Final; June 2002) in conjunction with their respective Public Fact Sheets, and closed out via the UGL OSC Report. PRS 160 was removed via this Buildings 23 and 125 Removal Action, and is closed out via this OSC Report.

Table 2: Organization of the Removal Action

Agency or Party Involved	Contact	Description of Participation
US EPA (SR-6J) 77 W. Jackson Chicago, IL 60604 312-886-7058	Timothy J. Fischer USEPA Remedial Project Manager	Federal agency responsible for MCP oversight.
Ohio EPA 410 E. Fifth Street Dayton, OH 45402-2911 937-285-6468	Brian K. Nickel OEPA Remedial Project Manager	State agency responsible for MCP oversight.
DOE/ MCP 1075 Mound Road Miamisburg, OH 45342 937-847-8350, ext. 304	Paul Lucas DOE/MCP Project Manager	DOE is responsible for project oversight and success.
CH2M Hill Mound, Inc. BOSS Project P.O. Box 3030 1 Mound Road Miamisburg, OH 45343-3030 937-608-8007	Chris Watson	Provided the DOE/ MCP Project Manager with technical assistance, administrative support, sampling, decontamination, photo and site documentation, site safety, and report preparation.
CH2M Hill Mound, Inc. General Superintendent and Equipment Manager P.O. Box 3030 1 Mound Road Miamisburg, OH 45343-3030 937-865-4278	Max Edington	Provided the equipment necessary for the demolition.

Table 3a: Building 23 Materials and Disposition

Debris	Quantity	Method	Location
Construction Debris	80 cubic yards	Landfill	Stoney Hollow of Ohio
Radioactive Waste (including 2 cubic yards of asbestos)	64 cubic yards	Landfill	Envirocare of Utah/ Nevada Test Site of Nevada

Table 3b: Building 125 Materials and Disposition

Debris	Quantity	Method	Location
Construction Debris	200 cubic yards	Landfill	Stoney Hollow
Radioactive Waste	130 cubic yards	Landfill	Envirocare/ Nevada Test Site

Table 4: Estimated Removal Costs

Activity	Cost
Planning	$166,000
Facility Preparation	$740,000
Rad Support	$179,000
Demolition	$6,200,000
Total	**$7,285,000**

Note: Estimated costs include Building WD.

APPENDIX C

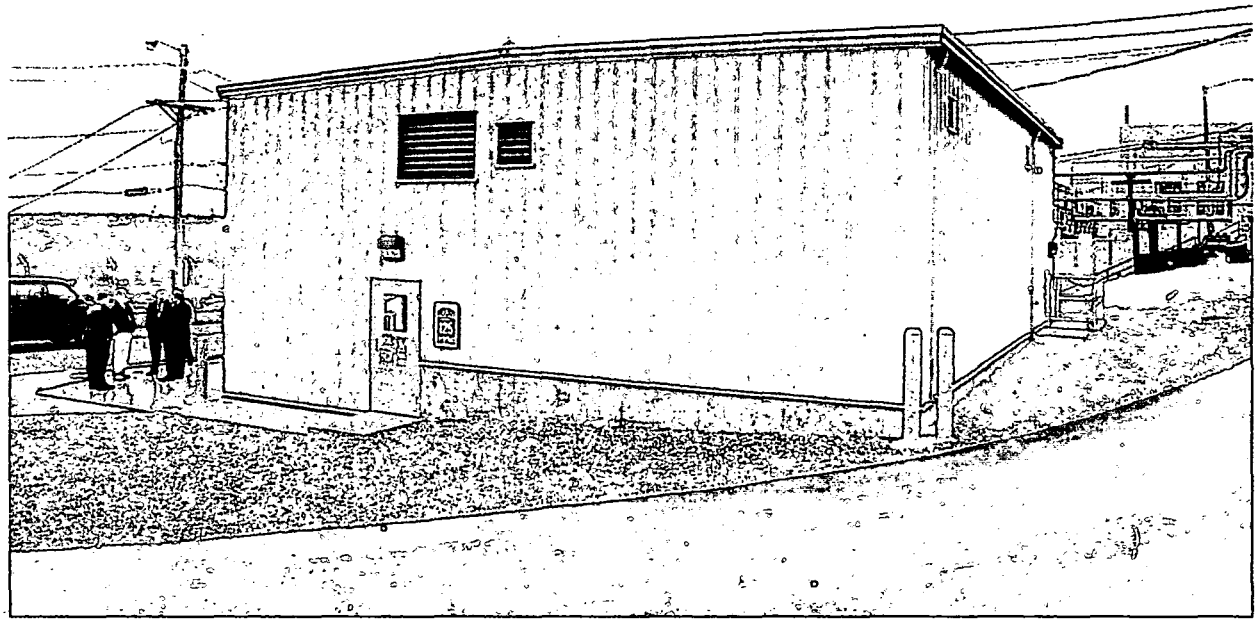
GENERAL MEDIA INFORMATION

There were no internal or external media information releases.

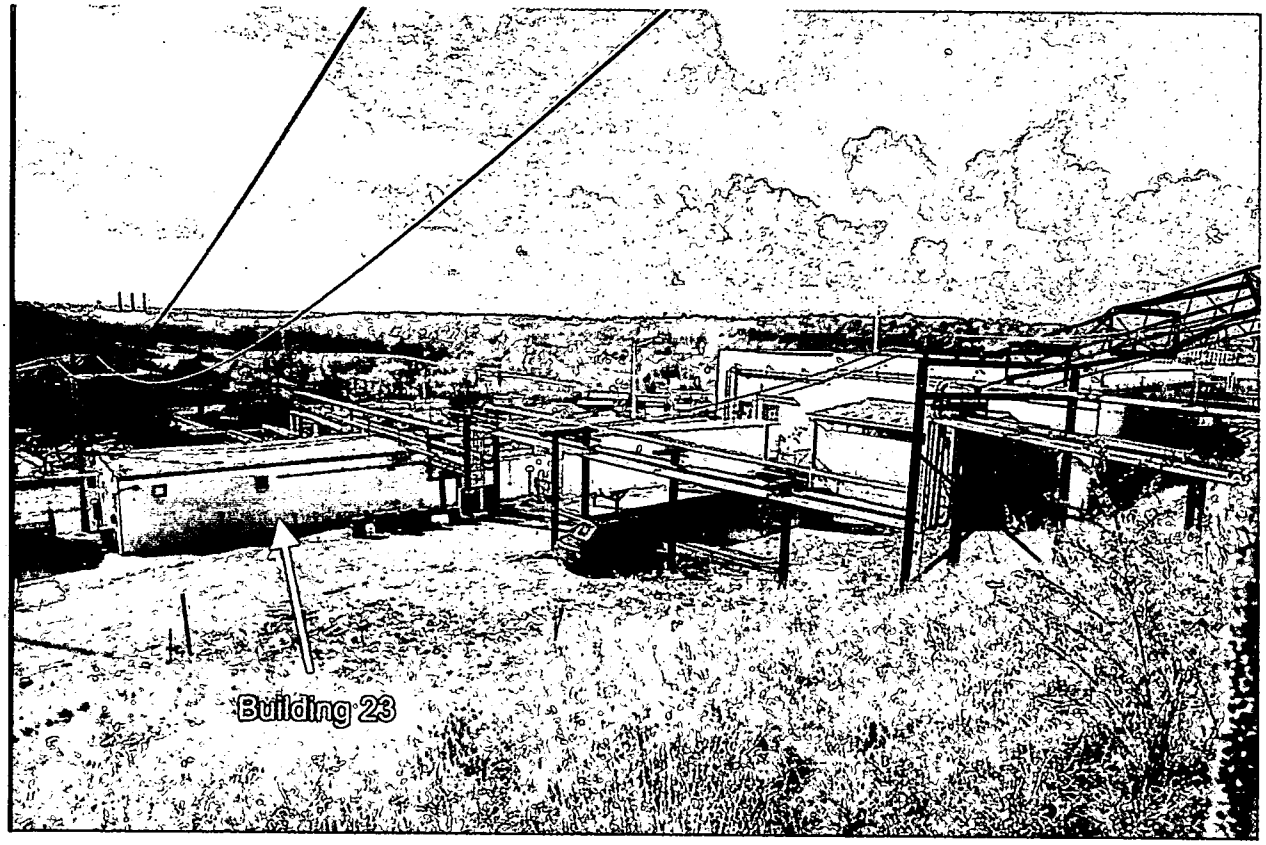
APPENDIX D

PHOTOGRAPH DOCUMENTATION

Photograph 1: Building 125 Prior to Demolition



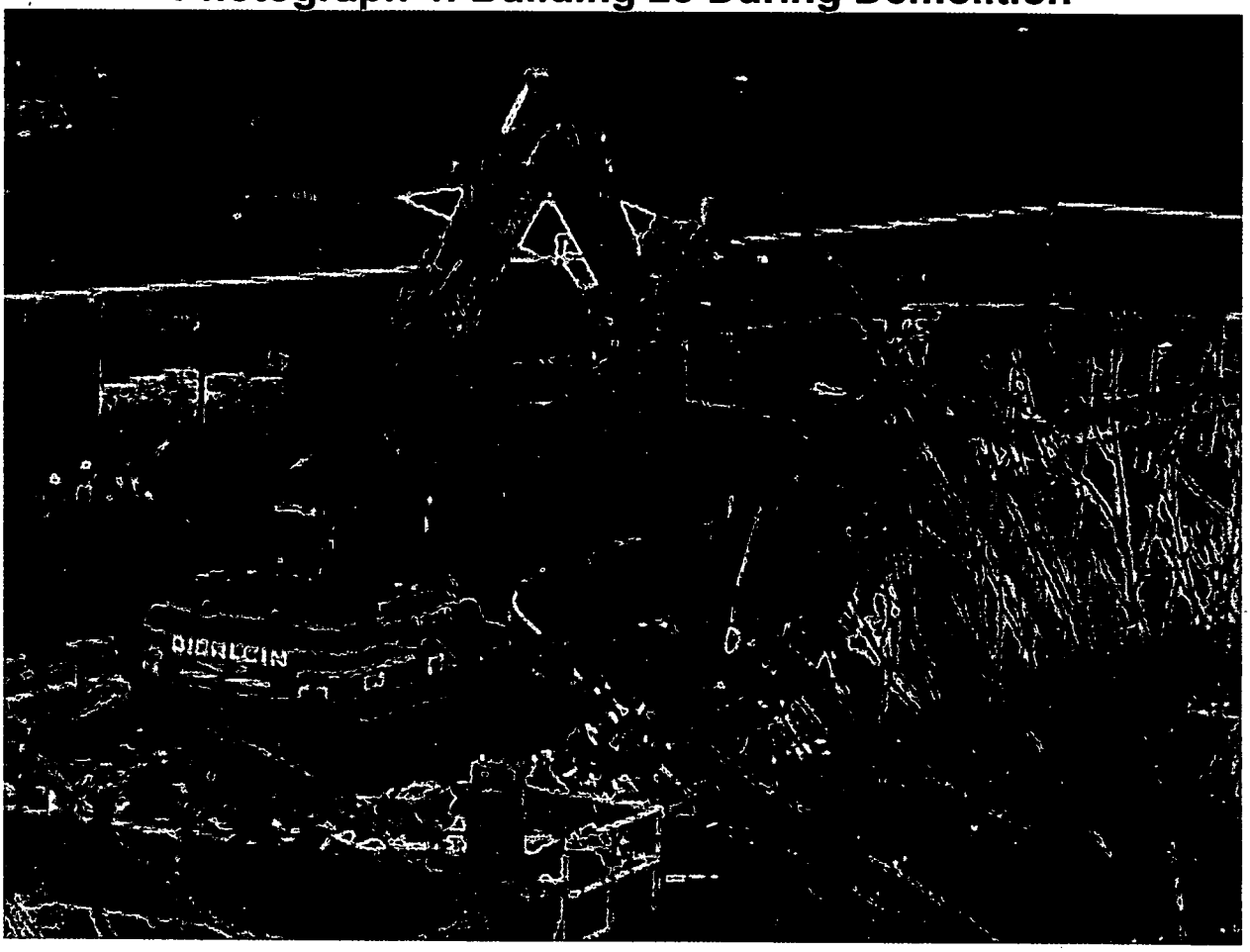
Photograph 2: Building 23 Prior to Demolition



D2/5

Photograph 3: Building 125 Slab during Demolition

Photograph 4: Building 23 During Demolition



D4/5

Photograph 5:Building 23 and 125 Area After Demolition

APPENDIX E

RADIOLOGICAL AIR MONITORING RESULTS

RwpNo	SampleId	StartTime	RSDSNo	Building	Room	Area	Purpose	TotalDac
1376	24374	12/29/2003	1797	ATS	125	RBA	Early Warning	0.0798
1376	24375	12/29/2003	1797	ATS	125	RBA	Posting Verification	0.0651
1376	24329	12/30/2003	1806	ATS	125	HEPA Exhaust	Posting Verification	0.0055
1376	24328	12/30/2003	1806	ATS	125	RBA Boundary	Posting Verification	0.0891
1376	24332	12/30/2003	1806	ATS	125	G/A	Early Warning	0.1153
1376	24331	12/30/2003	1806	ATS	125		Early Warning	**0.1446**
1371	24358	12/31/2003	1824	ATS	125	G/A	Early Warning	0.0841
1371	24355	12/31/2003	1824	ATS	125	RBA	Boundary Verification	0.1420
1371	24356	12/31/2003	1824	ATS	125	G/A	Boundary Verification	0.1119
1547	24400	1/5/2004	0013	ATS	125		Early Warning	0.0225
1547	24401	1/5/2004	0013	ATS	125	RBA	Boundary Verification	0.0212
1564	24563	1/13/2004	0090	23	OS		Boundary Verification	0.0162
1564	24562	1/13/2004	0090	23	BLDG	DEMO	Boundary Verification	0.0036
1564	24629	1/14/2004	0106	23	DEMO	OUTSIDE	Posting Verification	0.0000
1564	24631	1/14/2004	0106	23	DEMO	OUTSIDE	Boundary Verification	0.0057
1564	24636	1/15/2004	0116	23	OUTSIDE	NORTH	Posting Verification	0.0000
1564	24697	1/19/2004	0139	ATS	125	Slab	Boundary Verification	0.0059
1564	24698	1/19/2004	0139	ATS	125	Slab	Material Conf. C & V	0.0103
1564	24671	1/21/2004	0175	ATS	125		Posting Verification	0.0000
1564	24672	1/21/2004	0175	ATS	125	Slab	Routine (Daily)	0.0000
1564	24681	1/22/2004	0182	ATS	125	Slab	Posting Verification	0.0000
1564	24682	1/22/2004	0182	ATS	125	Slab	Routine (Daily)	0.0000
1564	24753	1/27/2004	0205	ATS	125	Slab	Posting Verification	0.0043
1564	24754	1/27/2004	0205	ATS	125	Slab	Routine (Daily)	0.0000
1564	24802	1/28/2004	0221	ATS	Slab		Posting Verification	0.0000
1564	24803	1/28/2004	0221	ATS	Slab		Routine (Daily)	0.0000
1564	24796	1/29/2004	0234	ATS/23	Slab		Job Coverage	0.0000
1564	24797	1/29/2004	0234	ATS/23	Slab		Job Coverage	0.0000
1564	24912	2/2/2004	0245	23/ATS	Slab	Upwind	Job Coverage	0.0000
1564	24911	2/2/2004	0245	23/ATS	Slab	Downwind	Job Coverage	0.0000
1564	24847	2/3/2004	0255	ATS/23	Slab		Job Coverage	0.0063
1564	24848	2/3/2004	0255	ATS/23	Slab	Upwind	Job Coverage	0.0000
1564	24914	2/4/2004	0264	ATS/23	Slab	Upwind	Job Coverage	0.0090
1564	24915	2/4/2004	0264	ATS/23	Slab	Downwind	Job Coverage	0.0000
1564	24916	2/4/2004	0264	ATS/23	Slab		Job Coverage	0.0001
1564	24865	2/5/2004	0276	23	Slab	Upwind	Job Coverage	0.0000
1564	24866	2/5/2004	0276	23	Slab	Downwind	Job Coverage	0.0066

1564	24867	2/5/2004	0276	23	slab	na	Job Coverage	0.0155
1564	25015	2/9/2004	0315	23	Slab	Downwind	Job Coverage	0.0000
1564	25016	2/9/2004	0315	23	Slab	Upwind	Boundary Verification	0.0000
1564	24999	2/10/2004	0328	23	slab	na	Job Coverage	0.0041
1564	25000	2/10/2004	0328	23	slab	na	Job Coverage	0.0000

Max	0.1446
Average	0.023
Standard Deviation	0.042
Confidence Interval	0.013
n	42

E2/2