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3005-0201290003

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Admin Record

ESC-018/99

January 25, 1999

99-TC/01-25

Mr. Richard B. Provencher, Director
Miamisburg Environmental Management Project
U.S. Department of Energy
P.O. Box 66
Miamisburg, OH 45343-0066

ATTENTION: Dewain Eckman

SUBJECT: Contract No. DE-AC24-97OH20044
BUILDING 43: DELIVERY OF FINAL ACTION MEMORANDUM

REFERENCE: Statement of Work Requirement C.7.1e -- Regulator Reports

Dear Mr. Provencher:

Attached is the Final Action Memorandum for Building 43. No comments were received during the public review of the Building 43 Action Memorandum. The release of this document has been authorized by Ron Church of MEMP.

Page 2 BUILDING 43: DELIVERY OF FINAL ACTION MEMORANDUM

Please advise if additional copies are required. If you require further information, please contact Dave Rakel at extension 4203.

Sincerely,



Linda R. Bauer, Ph.D.
Manager, Environmental Safeguards & Compliance

LRB/nmg

Enclosures as stated

cc: Tim Fischer, USEPA, (1) w/attachment
Dave Meredith, TechLaw, (1) w/attachment
Brian Nickel, OEPA, (1) w/attachment
Kathy Lee Fox, OEPA, (1) w/attachment
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Joe Barte, B&W, (1) w/attachment
Gary Coons, B&W, (1) w/attachment
Public Reading Room, (5) w/attachment
Administrative Record, (1) w/attachment
DCC, w/o attachment *nmj*

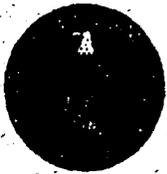
**ACTION MEMORANDUM
ENGINEERING EVALUATION/COST ANALYSIS**

**REMOVAL ACTION
BUILDING 43**

**MOUND PLANT
MIAMISBURG, OHIO**

JANUARY 1999

FINAL



Department of Energy



Babcock & Wilcox of Ohio

**ACTION MEMORANDUM
ENGINEERING EVALUATION/COST ANALYSIS**

**REMOVAL ACTION
BUILDING 43**

**MOUND PLANT
MIAMISBURG, OHIO**

January 1999

PREPARED BY:

**Babcock & Wilcox of Ohio, Inc.
P.O. Box 3030
Miamisburg, Ohio 45343-3000**

for the

U.S. DEPARTMENT OF ENERGY

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Appendix A Core Team Recommendation for Building 43 A-1

ACRONYMS

AEC	Atomic Energy Commission
AM	Action Memorandum
AM/EE/CA	Action Memorandum/Engineering Evaluation/Cost Analysis
ARARs	Applicable or Relevant and Appropriate Requirements
BGS	Below Ground Surface
BVA	Buried Valley Aquifer
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
D&D	Decontamination and Decommissioning
DOE	Department of Energy
EE/CA	Engineering Evaluation/Cost Analysis
EPA	Environmental Protection Agency
ER	Environmental Restoration
FFA	Federal Facilities Agreement
FSP	Field Sampling Plan
ID	Identification
LSA	Low Specific Activity
mrem	millirem
MSL	Mean Sea Level
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NTS	Nevada Test Site

ACRONYMS (cont.)

OAC	Ohio Administrative Code
OEPA	Ohio Environmental Protection Agency
OU	Operable Unit
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
pCi/g	picocuries per gram
PRS	Potential Release Site
RCRA	Resource Conservation and Recovery Act
RESRAD	Residual Radioactive Material Program
RI/FS	Remedial Investigation/Feasibility Study
RSE	Removal Site Evaluation
SARA	Superfund Amendments and Reauthorization Act
SW	Semi-Works
TRU	Transuranic
USEPA	United States Environmental Protection Agency

1. **PURPOSE**

The U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (USEPA) have agreed on an approach for decommissioning surplus DOE facilities consistent with the *Policy on Decommissioning of Department of Energy Facilities* under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) dated May 22, 1995. According to this approach, decommissioning activities will be conducted as CERCLA removal actions, unless the circumstances at the facility make it inappropriate (DOE 1995). The DOE is the designated lead agency and removal actions at the Mound Plant are implemented as federal-lead actions with DOE funds instead of the funds available to the USEPA under CERCLA (i.e., non-Superfund). DOE provides the On-Scene Coordinator (OSC). Non-Superfund, federal-lead removal actions are not subject to United States Environmental Protection Agency (USEPA) limitations on the OSC (\$50,000 authority) and are not subject to National Oil and Hazardous Substances Pollution Contingency Plan (NCP) limitations on removal actions (i.e., \$2,000,000 in cost and 12 months in duration).

This Action Memorandum/Engineering Evaluation/Cost Analysis (AM/EE/CA) has been completed to document the evaluation of site conditions, to propose the removal action described herein and to allow public input.

2. SITE CONDITIONS AND BACKGROUND

2.1 SITE DESCRIPTION

This section describes the physical site location, site characteristics, release of contaminants into the environment and the site's National Priorities List (NPL) status.

2.1.1 Physical Location

The Mound Plant is a 306-acre site on the southern border of the city of Miamisburg in Montgomery County, Ohio. The site is approximately 10 miles south-southwest of Dayton and 45 miles north of Cincinnati. The specific location of the proposed removal action is Building 43. This location is identified in Figure 2.1.

2.1.2 Site Characteristics

Building 43 was constructed in 1970 in an area known as the lower valley to replace and enlarge the explosive processing facility maintained by Building 1. Building 1 is located adjacent to, and to the east of Building 43. This need became obsolete; Building 43 then served as a laboratory for the development of energetic thermite materials and detonators.

Building 43 is a one-story, 1516 square-foot, reinforced concrete structure. The roof is of built-up membrane (asphalt). Figure 2.2 is a photograph of Building 43.

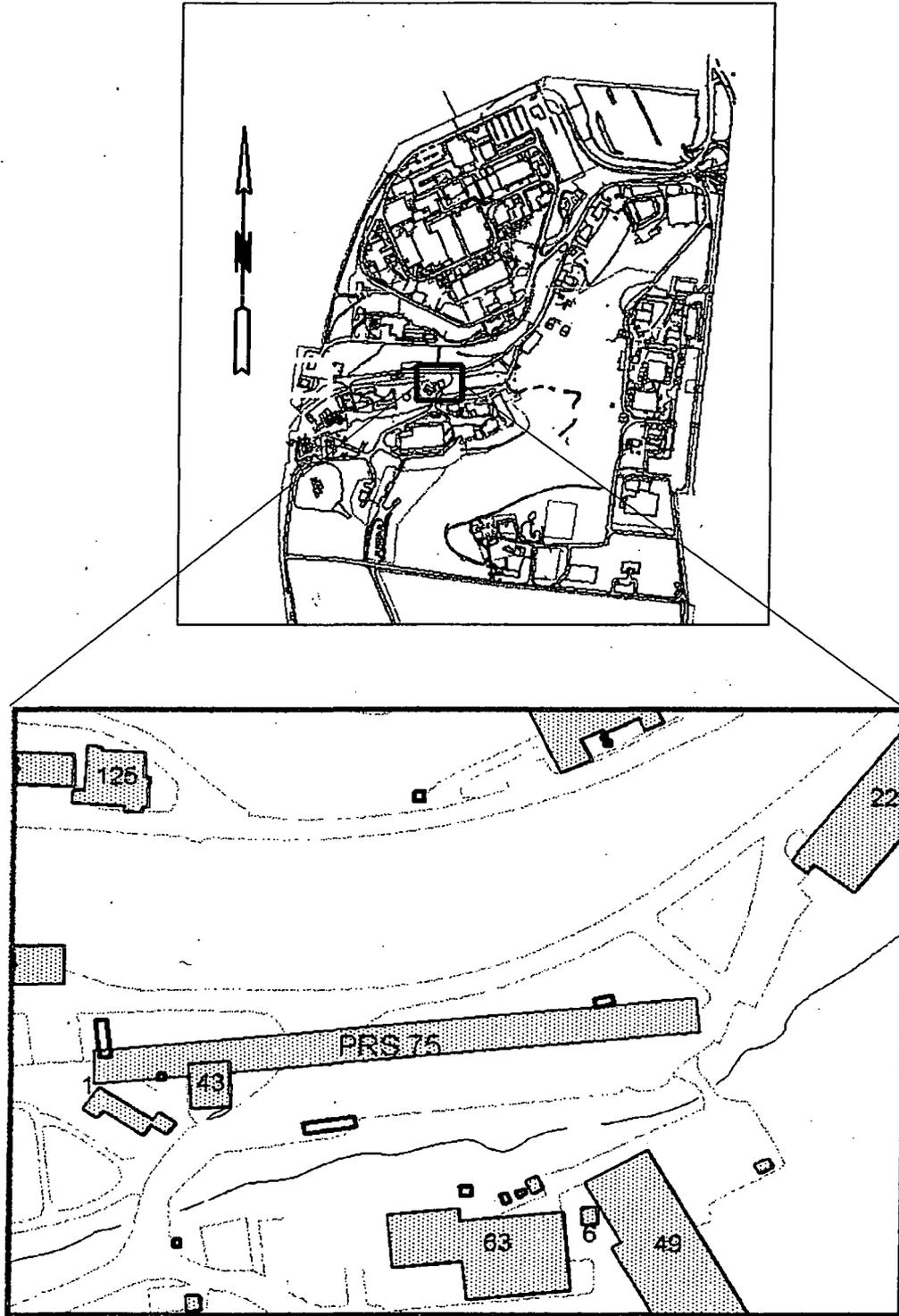


Figure 2.1 Location of Building 43



The doors in the photo are in the southeast
corner of the building

Figure 2.2 Photograph of Building 43

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2.1.3 Release or Threatened Release into the Environment

The potential release of chemical contamination (asbestos, thermite dust, oil) prompted this removal action. On November 19, 1997, representatives of DOE/MEMP, USEPA, and OEPA recommended a Response Action for Building 43 (Appendix A).

2.1.4 National Priorities List Status

The USEPA placed the Mound Plant in Miamisburg, Ohio on the NPL by publication in the Federal Register on November 21, 1989.

2.2 OTHER ACTIONS TO DATE

The Mound Plant initiated a CERCLA program in 1989, now guided by the agreement between the DOE, Ohio Environmental Protection Agency (OEPA), and USEPA. A Federal Facilities Agreement (FFA) under CERCLA Section 120 was executed between DOE and US EPA Region V on October 12, 1990. It was revised on July 15, 1993 (EPA Administrative Docket No. OH 890-008984) to include OEPA as a signatory. The general purposes of this agreement are to:

- Ensure that the environmental impacts associated with past and present activities at the site are thoroughly investigated and appropriate remedial action taken as necessary to protect the public health, welfare, and the environment.
- Establish a procedural framework and schedule for developing, implementing, maintaining, and monitoring appropriate response actions at the site in accordance with CERCLA, Superfund Amendments and Reauthorization Act (SARA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Superfund guidance and policy, and Resource Conservation and Recovery Act (RCRA) guidance and policy.
- Facilitate cooperation, exchange of information, and participation of the parties in such actions.

On November 19, 1997, the Core Team consisting of representatives of DOE/MEMP, USEPA, and OEPA recommended a RESPONSE ACTION for Building 43. This recommendation (Appendix A) was available for public review and comment from January 15 to February 15, 1998.

2.2.1 Previous Removal Actions

No previous removal actions have been performed at Building 43.

2.2.2 Current Actions

Asbestos piping insulation and fluorescent light ballasts containing PCBs will be removed before demolition starts. These materials will be disposed according to the appropriate regulations.

All materials and equipment have been removed from Building 43 except for the following items: doors, plumbing fixtures, ceiling and floor tile, rigid fiberglass insulation panels, air conditioning and heating units and their associated duct work.

Building 43 has potable water, telephone, Molan (Mound Local Area Network), central steam and chilled water, and sanitary sewer. Building 43 has electricity and fire sprinkler systems. All these services will be terminated and isolated outside the buildings before demolition.

2.3 STATE AND LOCAL AUTHORITIES' ROLES

2.3.1 State and Local Action to Date

In 1989, as a result of Mound Plant's placement onto the NPL, DOE and USEPA entered into a Federal Facilities Agreement (FFA) which specified the manner in which the Mound CERCLA-based Environmental Restoration (ER) program was to be implemented. In 1993, the FFA was amended to include the OEPA. Under the ER program, DOE remains the lead agency.

2.3.2 Potential for Continued State and Local Response

OEPA will continue its oversight role until all the terms of the FFA have been completed.

3. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

3.1 THREATS TO PUBLIC HEALTH OR WELFARE

The potential release of chemical contaminants (asbestos, thermite dust, oil) may create a potential threat to the public health or welfare.

3.2 THREATS TO THE ENVIRONMENT

The potential release of hazardous chemicals (asbestos, thermite dust, oil) may create a potential threat to the environment.

3.2.1 Removal Site Evaluation

The Removal Site Evaluation (RSE) requirements, as outlined under EPA's NCP regulations in 40 CFR 300.415, are presented throughout this AM/EE/CA. The source and nature of the potential release are described in the Building Data Package for Building 43. On the basis of this information, the Core Team recommended a **RESPONSE ACTION** for this building. An evaluation by public health agencies has not been performed for this area, and, therefore, is not included in this AM/EE/CA. The determination of the need for a removal action is outlined in this section, in Table 3.1.

The NCP identifies eight factors that must be considered in determining the appropriateness of a removal action [40 CFR 300.415(b)(2)]. These criteria are evaluated in Table 3.1.

Table 3.1 Evaluation of Removal Action Appropriateness Criteria [40 CFR 300.415(b)(2)]

Criteria	Evaluation
(i) "...potential exposure to nearby human populations, animals, or the food chain..."	There is potential exposure of termite contamination when present institutional controls are relaxed.
(ii) "Actual or potential contamination of drinking water supplies..."	There is the potential that termite or oil has leaked through the floor of Building 43. The contaminants could migrate to the ground water that is the source for the plant's drinking water.
(iii) "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;"	None
(iv) "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;"	None
(v) "Weather conditions that may cause hazardous substances to migrate or be released;"	None
(vi) "Threat of fire or explosion;"	None
(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release;" and	There are no other appropriate federal or state mechanisms to respond. The Federal Facilities Agreement (FFA) established a combined state and federal mechanism to respond under CERCLA. DOE is the designated lead agency at Mound under CERCLA.
(viii) "Other situations or factors that may pose threats to public health or welfare or the environment."	PRS 75 has been designated Removal Action. PRS 75 consists of Thorium contaminated soil. The footprint of Building 43 overlaps the boundary to PRS 75. Building 43 blocks access to some of the contaminated soil of PRS 75.

4. ENDANGERMENT DETERMINATION

As Building 43 is currently configured and access controlled, there is no known actual release of pollutants and contaminants from Building 43 that would pose an endangerment to public health or welfare or to the environment. To eliminate the possibility of endangerment as the site transfers from DOE ownership and control, DOE has determined that removal of the building is appropriate.

5. PROPOSED ACTION AND ESTIMATED COSTS

5.1 PROPOSED ACTION

The proposed action is to dismantle, demolish, and remove Building 43. This is to be accomplished in a safe manner to avoid future maintenance cost and eliminate potential negative impacts to personnel and the environment. A Work Plan outlining these procedures will be developed. The Mound site is designated for future industrial land use after remediation activities are complete. The boundary of this project includes the entire footprint of Building 43, but not the soil beneath Building 43. The soil beneath Building 43 will be addressed by the PRS 75 Removal Action. Since the proposed action is within the plant boundaries, it is not expected to have a disproportionate impact on minority or low-income populations.

5.1.1 Proposed Action Description

- **Site Preparation**

This step includes among other activities: placement of project trailer, removal of any trees or shrubs that interfere with work activities, review demolition activities with commercial tenant in Building 63 (Star City), review demolition activities and safety issues with work force and Mound Fire Department, obtain appropriate site permits, establish control of access and egress to construction site, locate and clearly mark underground utilities, and establish temporary water supply for dust control.

- **Building Preparation**

This step includes among other activities: disconnecting telephone and computer network service to the buildings, terminating potable and fire protection water, disconnecting and cutting electrical feeds to the buildings and isolating them outside the buildings.

- **Building Demolition**

This step includes among other activities: establishing a staging area and relocating heavy duty equipment at the project site, establishing a staging area for waste, making provisions for appropriate monitoring equipment, making provisions for water misters. Progression of building demolition will be determined in the field. Heavy-duty equipment using shear, grapple, and ram fixtures will be used. Demolition of Building 43 is expected to produce construction debris, scrap metal for recycling, glycol, light ballasts, asbestos, and rags and water contaminated with energetic materials. These items will be dispositioned at licensed, commercial

recycling/disposal facilities. Concrete debris will be taken to the Mound Spoils Area. Any soil attached to the debris will be screened for potential contaminants prior to placement in the Mound Spoils Area.

- **Verification**

Since the proposed action is the dismantlement and disposal of Building 43, no environmental sampling is required to verify the completion of the removal action. The On-Scene Coordinator Report will document the completion of the removal action with photographs of the former location of Building 43.

- **Site Restoration**

Equipment, materials, waste containers, and boundaries will be removed. The site will be backfilled and compacted to original contours and elevation. The area will be seeded as needed.

5.1.1.1 Rationale, Technical Feasibility, and Effectiveness

The removal action chosen is necessary for the removal of known contamination and to ensure that migration of the contamination does not occur.

5.1.1.2 Monitoring

Health and safety monitoring will be performed throughout the removal action according to standard Mound procedures.

5.1.1.3 Uncertainties

The major uncertainty is the presence of contaminants (thermites, oil, and/or Thorium) beneath the footprint of Building 43. Characterization sampling of the Building 43 footprint will be performed according to the procedures identified in the Work Plan for the Removal of Building 43. Results will be documented in the Building 43 On-Scene Coordinator report. Any necessary soil removal or remediation will be done as part of the PRS 75 Removal Action. The minor uncertainties include location of utilities in the area of the project.

5.1.1.4 Institutional Controls

DOE will remain in control of the Building 43 project site during the Removal Action.

5.1.1.5 Post-Removal Site Control

Initially, post removal site control will be provided by DOE/Mound. The Mound Plant is to be sold to Miamisburg Mound Community Improvement Corporation (MMCIC). The institutional and site controls needed at the time of title transfer in order to ensure future protection of human health and the environment will be included in the Record of Decision.

5.1.1.6 Cross-Media Relationships and Potential Adverse Impacts

The potential cross-media impact associated with the removal action is the potential for unintended release of contaminated materials into the atmosphere. Careful monitoring and control by misting will be implemented during the removal action.

No potential adverse impacts of the removal action have been identified.

5.1.2 Contribution to Future Remedial Actions

To facilitate further assessments and removal actions in or near the site of this removal action, the On-Scene Coordinator Report will document the removal action with photographs, drawings, and other information collected during field work.

The information obtained, as a result of this removal, will be used in determining the availability of the Mound site for final disposition and will be subject to review in the subsequent risk evaluation.

5.1.3 Description of Alternative Technologies

Alternative technologies frequently evaluated for CERCLA remediation include institutional controls, containment, collection, treatment, and disposal. Based on the prevailing conditions, the following alternatives (in addition to the proposed alternative of dismantlement) were developed.

1. No Action
2. Institutional Controls
3. Decontamination

The performance capabilities of each alternative with respect to the specific criteria are discussed below.

5.1.3.1 No Action

The "No Action" approach was eliminated. The Core Team determined that a Response Action is warranted for Building 43.

5.1.3.2 Institutional Controls

Existing Mound Plant institutional controls effectively minimize the potential for contact of the subject contamination with the general public. However, institutional controls for events such as renovation, removal, or demolition will be difficult to implement, when industrial use of adjacent areas is permitted. Thus, institutional controls were eliminated from further consideration. Response Action is warranted for Building 43.

5.1.3.3 Decontamination

The environmental concern identified in the Core Team recommendation (chemical contamination in the building) could be addressed by decontamination of the building interior (i.e., treatment, collection and disposal). However Building 43 would be in the way of addressing the thorium contaminated soil of PRS 75. Thus, decontamination was eliminated from further consideration.

5.1.4 Engineering Evaluation/Cost Analysis (EE/CA)

This document serves as the action memo and the EE/CA.

5.1.5 Applicable, or Relevant and Appropriate Requirements (ARARs)

Mound ARARs for the ER Program have been identified (DOE 1998). CERCLA regulations require that removal actions comply with ARARs.

The following have been identified as applicable, or relevant and appropriate to this removal action:

- 49 CFR 172, 173: DOT hazardous material transportation and employee training requirements.

5.1.5.1 Air Quality

- 40 CFR Part 61 Subpart H: National Emissions Standards for Emissions of Radionuclides other than Radon from Department of Energy Facilities.

- Ohio Administrative Code (OAC) 3745-15-07(A): Air Pollution Nuisances Prohibited.
- OAC 3745-17-02 (A,B,C): Particulate Ambient Air Quality Standards
- OAC 3745-17-05: Particulate Non-Degradation Policy
- OAC 3745-17-08: (A1), (A2), (B), (D): Emission Restrictions for Fugitive Dust

5.1.5.2 To Be Considered

- EPA/230/02-89/042: Methods for Evaluating the Attainment of Cleanup Standards.

5.1.5.3 Worker Safety

- 29 CFR Part 1910: Occupational Safety and Health Act (OSHA) - General Industry Standards
- 29 CFR Part 1926: Occupational Safety and Health Act (OSHA) - Safety and Health Standards
- 29 CFR Part 1904: Occupational Safety and Health Act (OSHA) - Record Keeping, Reporting, and Related Regulations

5.1.6 Other Standards and Requirements

Other standards or requirements related to the actual implementation of the response action may be identified subsequently during the design phase and will be incorporated into the Work Plan for Building 43 demolition.

5.1.7 Project Schedule

The schedule established for planning and implementing the removal action is shown in Figure 5.1.

5.2 ESTIMATED COSTS

The cost estimate to perform the removal action is shown in Table 5.1. Costs include the construction activities, all engineering and construction management, waste disposal, and site restoration.

TABLE 5.1 REMOVAL ACTION COST ESTIMATE

ESTIMATE TOTALS	
Work Plan	36,500
Site Prep & Work Zones	34,500
Demolition of buildings	86,500
Characterize foundation & soil	165,000
Remediation foundation/soil/verify	19,500
OSC report	1,500
TOTAL (1998 dollars)	343,500

6. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the proposed action is not taken and nothing else is done to the building, there is the potential for the contaminants (asbestos, thermite, or oil) to migrate from the building into the air and onto the soil.

7. OUTSTANDING POLICY ISSUES

There are currently no outstanding policy issues affecting performance of this removal action.

8. ENFORCEMENT

The core team consisting of DOE, USEPA, and OEPA has agreed on the need to perform the removal. The work described in this document does not create a waiver of any rights under the Federal Facility Agreement, nor is it intended to create a waiver of any rights under the Federal Facility Agreement. The DOE is the sole party responsible for implementing this clean-up. Therefore, DOE is undertaking the role of lead agency, per the CERCLA and NCP, for the performance of this removal action. The funding for this removal action will be through DOE budget authorization and no Superfund monies will be required.

10. REFERENCES

DOE 1995 Policy on Decommissioning Department of Energy Facilities Under CERCLA, U.S. Department of Energy, U.S. Environmental Protection Agency, May, 1995.

USEPA 1990. Superfund Removal Procedures Action Memorandum Guidance. Office of Emergency and Remedial Response. U.S. Environmental Protection Agency. December 1990.

DOE 1998 Building Data Package, Building 43, dated 6/18/98.

DOE 1998 List of Ohio Administrative Code and Ohio Revised Code ARARs, Letter from Nickel to Kleinrath, August 19, 1998.

APPENDIX A

January 19, 1999
Mound Plant
Contract #DE-AC24-97OH20044

Building 43 Removal Action
AM/EE/CA
Final

MOUND PLANT RECOMMENDATION

Building 43

Background:

Building 43 is a one-story, 1516 square-foot, reinforced concrete structure with a built-up membrane (asphalt) roof.

Building 43 was constructed in 1970 in an area known as the lower valley to replace and enlarge the explosive processing facility maintained by Building 1. Building 1 is located adjacent to, and to the east of Building 43. Building 43 acted as a laboratory for the development of energetic thermite materials and devices. There were no other structures, roads or improvements that would impact the environmental conditions of the building.

Recommendation:

Piping insulation containing friable asbestos is present in a damaged state. Residual thermite dust is present in the ventilation system. Oil was visible on the floor in Room 4.

It has been determined that these conditions are not protective of human health and the environment. Therefore, a RESPONSE ACTION is recommended.

Concurrence:

DOE/MEMP:	<u><i>Sam Cheng</i></u> Sam Cheng, D&D Team Leader	11-19-97 (date)
USEPA:	<u><i>Timothy J. Fischel</i></u> Timothy J. Fischel, Remediation Project Manager	11/19/97 (date)
OEPA:	<u><i>Brian K. Nickel</i></u> Brian K. Nickel, Project Manager	11/19/97 (date)

11/19/97
1:29 pm

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Information