

Control #: D4-300-104

FACILITY STATUS CHANGE FORM

Date Submitted: December 10, 2015	Area: 300 Area	Control #: D4-300-104
Originator: Clay McCurley	Facility ID: MO-391	
Phone: (509) 440-4478	Action Memorandum: #3 for the 300 Area Facilities	

This form documents agreement among the parties listed below on the status of the facility D&D operations and the disposition of underlying soil in accordance with the applicable regulatory decision documents.

Section 1: Facility Status

- All D4 operations required by action memo complete.
- D4 operations required by action memo partially complete, remaining operations deferred.

Description of Completed Activities and Current Conditions:

Deactivation: Utility isolations were performed on the facility prior to beginning removal actions.

Decontamination and Decommissioning: Hazardous materials were removed which included oils (door actuators), grease, refrigerant and compressors, and lights/lamps.

Demolition: Mobile office MO-391 was towed to ERDF on 5/14/2015 and disposed in the ERDF cell on 6/3/2015.

Description of Deferral (as applicable):

N/A

Section 2: Underlying Soil Status

- No waste site(s) present. No additional actions anticipated.
- Documented waste site(s) present. Cleanup and closeout to be addressed under Record of Decision.
- Potential waste site discovered during D4 operations. Waste site identification number <to be> assigned. Cleanup and closeout to be addressed under Record of Decision.

Description of Current/As-Left Conditions:

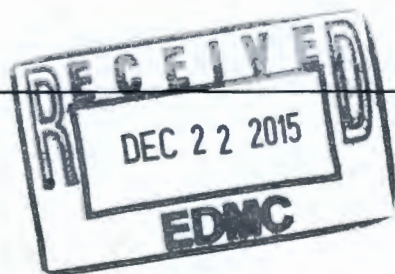
No excavation or backfill was associated with removal of MO-391.

Identification of Documented Waste Site(s) or Nature of Potential Waste Site Discovery (as applicable):

None

Section 3: List of Attachments

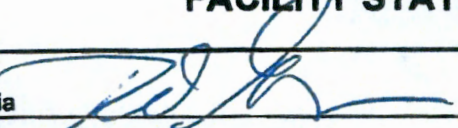

1. Facility Information (building history, characterization and identification of documented waste sites).
2. Project photographs.
3. BFA-MO391-2010-10-28
4. IHEA-MO391-14-001
5. CCN 181386
6. RSR-FF2-15-0944
7. MO-391 Air Samples



300-FF-2

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FACILITY STATUS CHANGE FORM

Rudy Guercia		12/10/15
DOE-RL		Date
Ben Simes		12/17/15
Lead Regulator	<input checked="" type="checkbox"/> EPA <input type="checkbox"/> Ecology	Date

DISTRIBUTION:

EPA: Ben Simes
Ecology: Stephanie Schleif, H0-57
DOE: Rudy Guercia, A3-04
Document Control, H4-11
Administrative Record, H8-08 (300-FF-2 OU)

SIS Coordinator: Ben Cowin, H4-22
D4 EPL: Clay McCurley, N2-02
Sample Design/Cleanup Verification: Theresa Howell, H4-23
FR Engineering: Eric Ison, N2-02
FR EPL: Clay McCurley, N2-02

Attachment 1: Facility Information

Building History

The MO-391 trailer was a single-wide transportable mobile office constructed of sheet metal with wood walls and roof on a steel frame. It encompassed approximately 256 square feet. From 2005 to 2012 it provided office and laboratory space in the 300 Area southeast of the 324 building, east of the 309 building, and north of the 3709A building. Finally, it was used as a field support storage trailer in the parking lot southwest of the 325 building until May 14, 2015 when it was transported to the ERDF. It was disposed in the ERDF cell on June 3, 2015.

Building Characterization:

Table 1 summarizes the industrial hygiene and radiological control samples collected in MO-391 trailer.

Table 1: Summary of Characterization Surveys at MO-391.

Type	Date	Documented In	Results Summary	See Attachment
Beryllium	October 28, 2010	BFA-MO391-2010-10-28	Be Clean Facility	3
Industrial Hygiene	June 26, 2014	IHEA-MO391-14-001	No hazards identified	4
Industrial Hygiene	December 3, 2015	CCN 181386	Letter from manufacturer verifying that no asbestos was used in construction of mobile office	5
Radiological Scoping Survey	April 30, 2015	RSR-FF2-15-0944	No detectable contamination	6
Asbestos Air Sampling	September 13, 2012 through October 29, 2014	MO-391 Air Samples	All results were below the OSHA limit	7

Identification of Document Waste Sites:

No waste sites are associated with this mobile office.

Anomalies Discovered During Demolition:

No anomalies were discovered following removal of MO-391.

Attachment 2: Project Photographs

Photo 1: MO-391 as it appeared southeast of Building 324 in 2006.



Photo 2: MO-391 as it appeared east of Building 309 in 2009.



Attachment 3: BFA-MO391-2010-10-28

(3 pages)

BFA Number: BFA- M0391- 2010-10-28

BERYLLIUM FACILITY ASSESSMENT (BFA)

Note: The attached BFA is being captured as-is and is assigned the BFA number depicted above. It may or may not be signed by the assessor(s).

Beryllium Facility Assessment Form

(Attach additional pages and/or documentation if needed)

Date: Assessor(s):

Facility Information

Building: Building Description:

Building Administrator: Date Built: Square Footage:

Project/Organization: Contractor:

Rad Contaminated Facility: YES NO

Current Status: Active Inactive

Occupancy: Full Time Occasionally Unoccupied # Employees Based in Facility:

Facility Usage:

Assessment Information

Individual(s) Contacted:

Documented Usage of Be Materials in Facility: YES NO Possible Maintenance of Be Items in Facility: YES NO

Possible Handling/Storage of Be Items: YES NO Facility Historical Usage: Known Partial and/or Incomplete Knowledge

Comments:

Use of building prior to moving to 300 Area is not indicated in the above documents.

Characterization Information (to be completed by industrial hygienist)

Previous Characterization Data: YES NO

References:

Recommended Status: Be Clean Facility Be Controlled Facility Status to be Determined

Recommendations for Potential Beryllium Controlled Areas in Facility:

Recommendation for Characterization Sampling: YES NO

Comments:

IH Sampling data from 2008-2010 indicate all seven wipe samples below Be trigger level; currently listed as Be clean; BFA of 2/10/2010 indicate continued sampling

Signature Validation

Assessor(s): _____ Date: _____

IH Manager: _____ Date: _____

Wipe samples

Supp Number	Sampling Date	Sample Number	Sample Location	Be Results
111208-300-ROUTI-RDM	12-Nov-08	J17LF2	MO-391	<0.005
021809-300-ROUTI-RDM	18-Feb-09	J184R8	MO-391	<0.0001
031609-300-ROUTI-DMB	16-Mar-09	J185L8	MO-391- LUNCH AREA - TOP OF BASEBOARD HEATER UNDER LUNCH TABLE	0.0140
042009-300-ROUTI-SML	20-Apr-09	J18DK8	MO-391 Lunch Table	<0.001
121609-300-ROUTI-GKM	16-Dec-09	J18WL6	MO-391 ASB.Count table	<0.005
052710-300-ROUT-RDE	27-May-10	J1B0N8	MO-391 (Asb Count Traller) RM B Tabletop	<0.005

Attachment 4: IHEA-MO391-14-001

(6 pages)

INDUSTRIAL HYGIENE EXPOSURE ASSESSMENT

Print Form

IHEA- MO391-14-001 Rev. ⁹⁻²³⁻¹⁴ 20

Date Completed:
06/26/14

Location (Area/Building/Room/Waste Site):
300 Area/Building MO-391

Coordinates Washington State Plane
(E) 593892.9
(N) 115656.3

Exposure Assessment Author(s):
Kenneth P. Overby

Other Associated Documents:
Facility Summary Report



Work Scope, Activities and Tasks:

For MO-391 this IHEA pertains to activities that will be performed by WCH personnel.

This Mobile Office may be sampled/characterized, and subsequently demobilized off-site, demolished, or moved elsewhere on the Hanford site. It was not used in a BCA, adjacent to a BCA, or for storage of beryllium tools, or for beryllium-contaminated tools.

Demobilization may include the shut down, disconnect, and removal of Electrical Distribution Equipment (EDE) and other utilities. Hazardous materials removal can include draining or removing oil from door actuators, removing fluorescent/sodium vapor light bulbs, all light bulbs, ballasts, batteries, fire extinguishers, smoke detectors, mercury thermostats, switches, fuses, circuit boards, removing refrigerant (freon) from air conditioner units, component/obstruction removal, and packaging of waste into approved waste containers.

Demobilization may also include moving interior walls (white boards, cork boards, mechanically fastened posters, mail boxes, and drop boxes), isolating and removing electrical power and network from track walls, removing office track walls, removing wall tracks (which involves removing ceiling tiles), removing main electrical power to trailer at disconnect, removing roof cap at trailer section marriage line, unbolting trailer section at roof marriage line and floor marriage line, elevating trailer section with bottle jack and tray to accommodate installation tires on trailer sections, installing tires, separating trailer sections slightly using bottle jacks and trays, and lowering trailer sections to grade, and installing tongues.

Preventative maintenance on EDE/electrical service boxes and panels is also covered under this IHEA. Scheduled preventative maintenance will require that beryllium sampling be performed in that Electrical Distribution Equipment on the day that the maintenance is performed, whenever possible IF the WCH PIH has determined that sampling is required.

Should anomalous materials be discovered during the course of activities, work shall be conducted under the applicable work procedures detailed for anomalies.

This IHEA was completed in order to cover the routine activities that occur inside this mobile office, intrusive activities in or on the listed facility (during Interim Controls), demobilization and/or demolition and sampling/characterization of this trailer, and the sampling/characterization of EDE during preventative maintenance.

Similar Exposure Groups (SEGs) Identified:
IH Techs

Other Information:
None

INDUSTRIAL HYGIENE EXPOSURE ASSESSMENT

Individuals and/or Databases Contacted:
 Brett Klnetobe, SIS, IHOP, SWIHD

Previous Process or Activities:
 MO-391 has been used as a lab. MO-391 has been used in support of D4 activities. It is a single transportable structure and is located southeast of the 309 Building. The floor space covers 256 square feet and is divided into 3 room. The date of construction was 1987.

Documents and References:
 None

Other Information:
 None

Site Walk-Down Description:
 MO-391 is located near MO-168 and is used as an asbestos counting station.

Date Completed: 2-24-2014	Personnel in Attendance: Ken Overby
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Other Information:
 The unit has a suspended ceiling. Additional sampling will be needed above the ceiling.

Known Exposure Sources/Types:

Airborne:
None

Surface:
None

Other:
None

Suspected Exposure Sources/Types:

Airborne:
None

Surface:
None

Other:
None

INDUSTRIAL HYGIENE EXPOSURE ASSESSMENT

Print Form

Exposure Significant Tasks:	Dermal: None
	Airborne: None
Conditions with the Potential to Increase the Risk of Exposure: None	
Special Conditions/Hazards: None	
Other Factors Affecting Exposure Potential (e.g. ventilation, trenches, PPE): None	
<p>Beryllium Status of Sites (e.g., buildings, structures, conex boxes, outdoor areas): This Mobile Office is beryllium clean as it has been sampled on accordance with Rev. 2A requirements.</p> <p>Beryllium is not an expected contaminant in any of the structures or EDE that are part of this unit.</p> <p>This facility and EDE to be demolished or demobilized has been evaluated and is not:</p> <p>a) Attached to a Beryllium Controlled Facility (BCF); b) Adjacent to a BCF; c) Affected by potential Beryllium sources (i.e., no nearby potential Beryllium sources); d) Affected by Beryllium cross-contamination; e) Potentially internally contaminated with Beryllium; and f) Containing Beryllium items or equipment.</p> <p>In addition, none of the activities below ever occurred in this Mobile Office:</p> <ul style="list-style-type: none"> a. Machine Shops b. Metal Manufacturing Activities c. Materials Research and Development d. Fuel Assemblies Experiments e. Electrical Component Fabrication f. Laboratory Operations g. Tool Cribs h. Machinery/Equipment Storage of Potentially Beryllium-contaminated Items i. Tool Maintenance Activities j. Beryllium Controlled Areas (BCA)/Beryllium Regulated Areas (BRA) k. Bridge Cranes m. Elevator Control Systems and n. Storage of other items that may have contained beryllium or metals alloyed with beryllium including glove boxes and laboratory hoods that may have been used to process beryllium-containing materials. 	
Other Information: None	
<p>HPN Criteria - Enter a value of 1-4 for each criteria</p>	

INDUSTRIAL HYGIENE EXPOSURE ASSESSMENT



Contaminant	A	B	C	D	E	F	HPN Total	IH Samp Req'd?
	Frequency	Duration	Eng/Env	Agent/Route	Quantity/Concentration	Health Effects		
N/A								

HPN Total = 1.5A + 1.5B + C + D + E + 3F

If HPN Total <20 Sampling not required.

≥20 <28 Sampling is PIH discretion. PIH peer review required.

≥28 Sampling is required. PIH Peer Review and Project IH Manager approval required.

Other Information:

None

Describe Basis for Sampling Requirements: (Then complete the IHSP associated with the work)

Wipe samples will be taken to determine beryllium status. Two samples are required per 200 square feet of surface. This unit occupies 256 square feet of floor space. Therefore, a minimum of 4 wipe samples will be taken.

Characterization Sampling:	Bulk samples: None
	Wipe samples: Routine beryllium sampling and surveillance shall be performed as described in DOE-0342 and SH-100-2.3, <i>Industrial Hygiene Sampling for Beryllium</i> . Recommended locations for future beryllium characterization Sampling Plan: 2 samples from horizontal surfaces 1 sample on the floor 1 inside the HVAC system The samples will be taken randomly.
	Other: None
Air Sampling:	Personal: None
	Area: None
Direct Reading and/or Real-time Monitoring:	Instrument: None
	Frequency: None
Other Information: None	

INDUSTRIAL HYGIENE EXPOSURE ASSESSMENT**Engineering Controls:**

None

Work Practice Controls:

None

Administrative Controls:

None

Personal Protective Equipment:

Nitrile gloves shall be worn during wipe sampling and changed for each wipe sample taken.

Basis for Controls:

SH-1, Safety and Health Procedure No.

- SH-1-4.9 Rev. 7, "WCH Implementation of Hanford Site Chronic Beryllium Disease Prevention Program"

Other Information:

None

Training Necessary for Completion of Work:

TPD-788, "Beryllium Worker"

TPD-000, "General Employee"

Medical Surveillance Required:

None

INDUSTRIAL HYGIENE EXPOSURE ASSESSMENT

Print Form

Negative Exposure Assessment

Will a Negative Exposure Assessment be used? Yes No

If NO is checked, additional monitoring and/or sampling is required.

If YES is checked, complete the following:

1. List the Contaminants and/or Hazards for which the Negative Exposure Assessment will apply:

2. ALL of the following conditions must apply for each Contaminant or Hazard listed above.

**Verification
PIH Initials**

Is the sampling data statistically significant and representative of the work being conducted?

Does sampling data demonstrate a high degree of certainty (95% confidence limit) that employee exposure during the current operations will not exceed PEL, TLV, or DOE limits?

Does sampling data obtained during work operations closely resemble the current operation, the state of contamination, control methods, work practices, and environmental conditions?

Will the work remain consistent, with no anticipated change in work practices, engineering controls, etc.?

Are any new employees expected to have equivalent training and experience as those of employees performing current work?

PIH Peer Review and Project IH Manager approval required.

Signatures

Project Industrial Hygienist Print/Sign/Date: Kenneth P. Overby *K. P. Overby* 7/1/14

If HPN ≥20 or a Negative Exposure Assessment is used a Peer Review is required

Peer Review Print/Sign/Date: Daniel Wood *Daniel Wood* 7/1/2014

If HPN ≥28 or a Negative Exposure Assessment is used Project IH Manager approval is required

Project Industrial Hygiene Manager Print/Sign/Date: N/A

Attachment 5: CCN 181386

(2 pages)

Klinetobe, Brett A

181386

From: Kelly Daniels <kelly@northwestbuilding.com>
Sent: Thursday, December 03, 2015 9:41 AM
To: Klinetobe, Brett A
Cc: chad@northwestbuilding.com
Subject: RE: Northwest building systems (Redsal)
Attachments: Asbestos Letter.pdf

Brett, attached is the asbestos letter you requested.
Thanks

Kelly Daniels
Planning & Design Manager
NWBS
405 E Boeing Ln.
Boise, Id. 83716
P: (208) 344-3527 Ext. 2

From: Klinetobe, Brett A [<mailto:brett.klinetobe@wch-rcc.com>]
Sent: Thursday, December 03, 2015 10:18 AM
To: Chad Harp
Cc: Krull, Connie J
Subject: Northwest building systems (Redsal)

Chad,
Per our phone conversation, I have a 1987 8'x32' northwest building systems trailer. What I need is any information about the building materials that were used when manufactured, specifically asbestos. If no asbestos building materials were used in its manufacture, please send me an e-mail (company letter head) stating, "no asbestos materials were used in the building process of this trailer".

You have been a great help.

Thanks
Brett Klinetobe
WCH LLC



Northwest Building Systems
405 E. Boeing Lane
Boise, Idaho 83716-5245
Fax: (208) 345-0420
Ph: (208) 344-3527

December 3, 2015

Re: 1987 / 8'x32' Office

Attn: Brett Klinetobe

No asbestos material was used in the building material products or building construction by N.W.B.S. for the office facility.

Kelly Daniels

Kelly Daniels / Planning & Design Manager

Attachment 6: RSR-FF2-15-0944

(3 pages)

RADIOLOGICAL SURVEY RECORD Survey # Page 1 of 3
 RSR- FFZ-15-0944

Type of Survey: Work Progress Routine

RWP # / Rev. #: N/A Date Survey Complete: 04/30/2015

Location/Description:
300 Area Trailer

References: (e.g., SRTA, ASER, LASER, RSP, Work Package)
TA-04-SR-07/23

RCT Name/Signature/Date
Judith Hasser / Judith Hasser - 04/30/15

RadCon Supervisor Name/Signature/Date:
William D. Gowey / W.D. Gowey 4/30/15

RCT signature indicates portable instruments checked IAW RC-300-2.1

Comments: Items survey prior to exit off site.
MO-0169, MO 0391, MO 167

Insert picture(s) and/or drawing(s) of the item surveyed, indicating the areas that were surveyed.

① = 5 smears
 #₁ = 8 directs in area North →

MO169

NOTE: Not drawn to scale
 Surveyor inside only.

CA	Contamination Area	SOP	Step Off Pad
		○	Technical Smear
HCA	High Contamination Area	⊞	Direct
RBA	Radical Buffer Area	⊞	Large Area Wipe
		T	Transferable
ARA	Alpha Radioactivity Area		General Area Does Rater - Unconnected Meter Reading (µR/hr)
SCA	Soil Contamination Area		All radiation readings are γ dose rates in units of mR/hr unless otherwise indicated
RMA	Radioactive Materials Area		Contact 30 cm
RA	Radiation Area	N	Neutrons (nFlux/hr)
HRA	High Radiation Area	Δ	Micro Rats (µR/hr)
VRA	Very High Radiation Area	[AS]	Air Sample Location
RCA	Radioactively Controlled Area	URMA	Underground Radioactive Material Area

RADIOLOGICAL SURVEY RECORD Survey # Page 2 of 3
 RSR- FFZ-15-0944

Insert picture(s) and/or drawing(s) of the item surveyed, indicating the areas that were surveyed.

Area Surveyed

TABLE inside M0391 down posted from RBA. TABLE located on the South end in back room.

CA	Contamination Area	SOP	Step Off Pad
HCA	High Contamination Area	○	Technical Smear
RBA	Radicalogical Buffer Area	#	Direct
ARA	Airborne Radioactivity Area	M	Large Area Wipe
SCA	Soil Contamination Area	T	Transferable
RMA	Radioactive Materials Area		General Area Dose Rates = Unconnected Meter Reading (mR/hr)
RA	Radiation Area		All radiation readings are γ dose rates in units of mR/hr unless otherwise indicated
HRA	High Radiation Area	Contact	30 cm
VRA	Very High Radiation Area	N	Neutrons (mR/hr)
RCA	Radioactively Controlled Area	Δ	Micro Film (mR/hr)
		[AS]	Air Sample Location
		URMA	Underground Radioactive Material Area

③ = 2 smears in each location of symbol
 #3 = 2 directs in each location of symbol

Vent

Control panel for electrical

Trailer M0167 in trailer village in 300 Area. Survey performed inside only.

CA	Contamination Area	SOP	Step Off Pad
HCA	High Contamination Area	○	Technical Smear
RBA	Radicalogical Buffer Area	#	Direct
ARA	Airborne Radioactivity Area	M	Large Area Wipe
SCA	Soil Contamination Area	T	Transferable
RMA	Radioactive Materials Area		General Area Dose Rates = Unconnected Meter Reading (mR/hr)
RA	Radiation Area		All radiation readings are γ dose rates in units of mR/hr unless otherwise indicated
HRA	High Radiation Area	Contact	30 cm
VRA	Very High Radiation Area	N	Neutrons (mR/hr)
RCA	Radioactively Controlled Area	Δ	Micro Film (mR/hr)
		[AS]	Air Sample Location
		URMA	Underground Radioactive Material Area

Survey # Page 3 of 3
 RSR- FE2-15-0944

Instruments

Model	ID#	Efficiency %		Cal Due Date
		α	β-γ	
2224-3/43-93	SC4A-0075/DIAP-0202	14.3	10	04/06/16 04/06/16
2360/43-93	SC4B-0042/DIAP-0145	14.5	10	04/02/16 04/02/16

Contamination Measurement Information¹

Circled values indicate removable β contamination in mrad/hr β

No.	Description of Item or Location	Removable (dpm/100 cm ²)				Total (dpm/100 cm ²)			
		α Bkgd (cpm)	α Activity	β-γ Bkgd (cpm)	β-γ Activity	α Bkgd (cpm)	α Activity	β-γ Bkgd (cpm)	β-γ Activity
1.	Molded Smears Wall/Floors/Hand direct - floor	2	<20	150	<1k	2	<500	150	<5k
2.	Table in MO391: 4 Smears 4 direct	2	<20	160	<1k	2	<500	160	<5k
3.	Molded Smears Wall, Floors 1 direct - Vent, Control panel	2	<20	155	<1k	2	<500	155	<5k

¹Unless stated otherwise in the "References" section, exempted β-γ (i.e., C-14, Fe-55, Ni-59, Ni-63, Se-78, Tc-99, Pd-107, Eu-155) contamination levels are ≤10 times the β-γ contamination levels shown above.

Corrected Dose Rate Calculations

Show all work. CF = 1 unless noted.

Location	Contact Readings		30 cm Readings	
	β (mrad/hr) (WO-WC) X CF = DR	γ (mR/hr) WC X CF = DR	β (mrad/hr) (WO-WC) X CF = DR	γ (mR/hr) WC X CF = DR
N/A	N/A	N/A	N/A	N/A

Attachment 7: MO-391 Air Samples

(1 page)

NOTE:

The data provided on the next page presents the results of air samples collected by industrial hygiene personnel to demonstrate there were no background fibers in the Fiber Counting Facility, which was MO-391 at the time the samples were collected. The samples only show airborne fibers on the days of the sampling. The methodology used was NIOSH Method 7400 for phase contrast microscopy.

MO-391 Air Samples						
Survey ID	Survey Date	Agent	Range	Air Conc	Air Conc UOM	OSHA LIMIT
12-40595	9/13/2012	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
12-41139	11/5/2012	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
12-41139	11/5/2012	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
12-41139	11/5/2012	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
13-40385	3/6/2013	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
13-40385	3/6/2013	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
13-40620	4/4/2013	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
13-40620	4/4/2013	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
13-41151	5/30/2013	airborne fiber	<	0.002	Fibers/cm3	0.1 f/cc
13-41151	5/30/2013	airborne fiber	<	0.003	Fibers/cm3	0.1 f/cc
14-40094	1/14/2014	airborne fiber	<	0.003	Fibers/cm3	0.1 f/cc
14-43921	10/29/2014	airborne fiber	<	0.001	Fibers/cm3	0.1 f/cc