Acrobat 9.0

FACILITY STATUS CHANGE FORM
(for DOE/RL-2010-34 Facilities)

1220664

Date Submitted:	Area:	Control #:
Jun 6, 2013	100-B	D4-100B-001
Originator:	**Facility ID:**	
David Warren	151-B Switchgear Building	
Phone:	**Action Memorandum:**	
539-6040	General Hanford Site Decommissioning Activities	

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 removal actions require by action memo complete.

☐ Removal actions required by actions memo partially complete, remaining operations deferred.

Description of Completed Activities and Current Conditions:

Decontamination and Decommissioning: If present, the following hazardous materials were removed prior to facility demolition: batteries, light bulbs, oils, grease, Regulated Asbestos-Containing Material (RACM), mercury, refrigerant, and polychlorinated biphenyl (PCB) containing equipment. Hazardous material removal and waste disposition was performed in accordance with the *Removal Action Work Plan for River Corridor General Decommissioning Activities*, DOE/RL-2010-034.

Demolition: The 151-B building was demolished in place in the 100-B area in April of 2013, and the waste was loaded out and disposed of at the ERDF. Based on past uses of this facility and radiological scoping survey results (See Attachment 4), radiological contamination was not expected during demolition. Class II non-friable asbestos was the only contaminant of concern for demolition. Accordingly, portions of the demolition were performed under asbestos controls. The below grade structures of the facility to be left behind were visually inspected prior to demolition for staining as was the excavation area following demolition, this information is included in Attachment 3. The area was surveyed by GPS to delineate the extent of the excavations and identify below grade structures to remain in place.

Description of Deferral (as applicable):

Not Applicable

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 removal action. Waste site identification number <to be> assigned.

Cleanup and closeout to be addressed under Record of Decision.

Description of Current/As-Left Conditions:

The 151-B building was demolished in place at the 100-B area and the waste generated was loaded out and disposed of at the ERDF. The portions of the structure, including the basement, 3 feet below grade were left in place. No backfill has been performed as that scope of work is likely to be performed following demolition of the 152-B1 Switchyard or remediation of the 100-B-35 WIDS site. A GPS survey was performed at the site following D4 activities to delineate the extent of removal and identify below grade structures left in place. See Attachment 4 for GPS survey results. The previous building site is currently posted with a fall protection boundary for the open basement/excavation.

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

100-B-35 - 151-B Primary Electrical Substation Yard. The site consists of the the fenced gravel yard of the 152-B1 electrical switchyard. The WIDS designation is primarily due to the operation and maintenance of PCB containing electrical equipment. The site was impacted by D4 activities as the footprint of the site extends over the footprint of the

100-BC-1

30pgs

FACILITY STATUS CHANGE FORM
(for DOE/RL-2010-34 Facilities)

151-B building, which was removed to 3 feet below grade. The 100-B-35 site is currently scheduled to undergo confirmatory sampling in 2013.

Section 3: List of Attachments

1. Facility Information
2. Map and Photographs of the 151-B Facility
3. CCN 171321, Pre- and Post demolition Inspection of the 151-B Building
4. CCN 169649, DOE Approval of No PTE for the 151-B Facility
5. 151-B GPS Surveys
6. CCN 170115, EPA Approval of 151-D and 151-B Demolition approach

Rudy Guercia — 6/10/13

DOE-RL (Lead Agency) — Date

DISTRIBUTION:

DOE: Rudy Guercia, A3-04
Document Control, H0-30
Administrative Record, H6-08 (100-BC-1 OU)
SIS Coordinator: Benjamin Cowin, H4-22
D4 EPL: David Warren, X9-08
Sample Design/Cleanup Verification:Theresa Howell, H4-23
FR Engineering: Rich Carlson, N3-30
FR EPL: Dan Saueressig, N3-30

RECEIVED
JUN 10 2013
EDMC

Attachment 1: Facility Information

Introduction

This document provides information regarding the history, characterization, and final status at the completion of deactivation, decontamination, decommissioning, and demolition (D4) activities of the 151-B Switch House located in the 100-B Area.

Facility History

The 151-B Switch House was a one story reinforced concrete and concrete block building, with a sub-level cable pit equipped with a sump pump, located adjacent the 151-B Electrical Switch Yard. All underground electrical ducts in the substation yard terminated at the Switch House. The main floor was comprised of a switch room with a fan room, battery room, and restroom at one end. The cable pit floor slab varied in thickness from 12 inches to 18 inches, while the walls were 12 inches thick. Concrete block walls and concrete brick pilasters support the structural steel roof framing overlaid with concrete tile covered with a tar and gravel surface. Floors were reinforced concrete 12 inch thick over the cable pit and 6 inch thick over the backfill section and were supported by concrete wing walls. Switchgear was located on the main floor directly above the cable pit. In 1952, as part of the substation expansion to meet increased production, the Switch House received a 30 ft by 62 ft addition to house switchgear.

The 151-B Primary Substation served as the primary source of electrical power for all facilities in the 100BC Areas. It was first energized in August 1944, and received 230 kV power from the Midway Substation. From the three main transformers in the 151D Switch Yard, power was transmitted primarily via underground cables to thirteen secondary substations and nine distribution substations located throughout the 100BC Area. One 27.5 kVA transformer, located adjacent to the 151D Switch House, provided service for the building. Five oil circuit breakers were also in service to support the switch yard operations.

See Attachment 2 for a map and photographs of the 151-B facility.

Facility Characterization

The 151-B facility was never posted for radiological conditions. Based on historical research of past uses, radiological contamination was not expected and the radiological scoping surveys found no contamination. The 151-B facility was not listed on the Hanford Site Beryllium Controlled Facilities List. However, the facility was sampled prior to demolition and determined to be a beryllium-clean facility.

Table 1 summarizes the radiological control surveying and asbestos sampling that was performed at the 151-B facility. Table 2 summarizes the contaminants of concern for facility demolition and the Management Practices implemented to minimize the spread of those contaminants.

Table 1: Summary of Radiological Surveying and Asbestos Sampling Performed at the 151-B Facility

Type	Quantity	Method Detection Limits	Results
Radiological Scoping Surveys	1 Survey	Beta-gamma: 1,000 removable/ 5,000 fixed [a] Alpha: 20 removable/ 500 fixed [a]	All results were less than the method detection limit. Scoping surveys are included in Attachment 4.
Asbestos – Thermal System Insulation and Miscellaneous Material	45 Samples	1% weight	17 samples contained asbestos concentrations greater than 1%. All other potentially-asbestos-containing materials sampled were below the Method Detection Limit.
[a] – dpm/100 cm^2			

Table 2: Contaminants of Concern for Facility Demolition

Contaminant of Concern	Management Practice
Non-friable Asbestos Containing Material (ACM)	Asbestos Containing Materials (ACM) were the only contaminant of concern for demolition of the 151-B Building. With the exception of 1 type of material associated with the roofing, all ACM was abated/removed from the facility prior to demolition. The ACM material on the roof was in the form of Class II/Category I materials (non-friable/non-regulated ACM) and was demolition was performed under asbestos controls as defined in the associated work package #100 12 02 28 011. See Attachment 6 for EPA approval of the Demolition approach. The below grade demolition was performed under general demolition controls with the utilization of dust suppression to control nuisance dust.

Attachment 2: Map and Photographs of the 151-B Facility

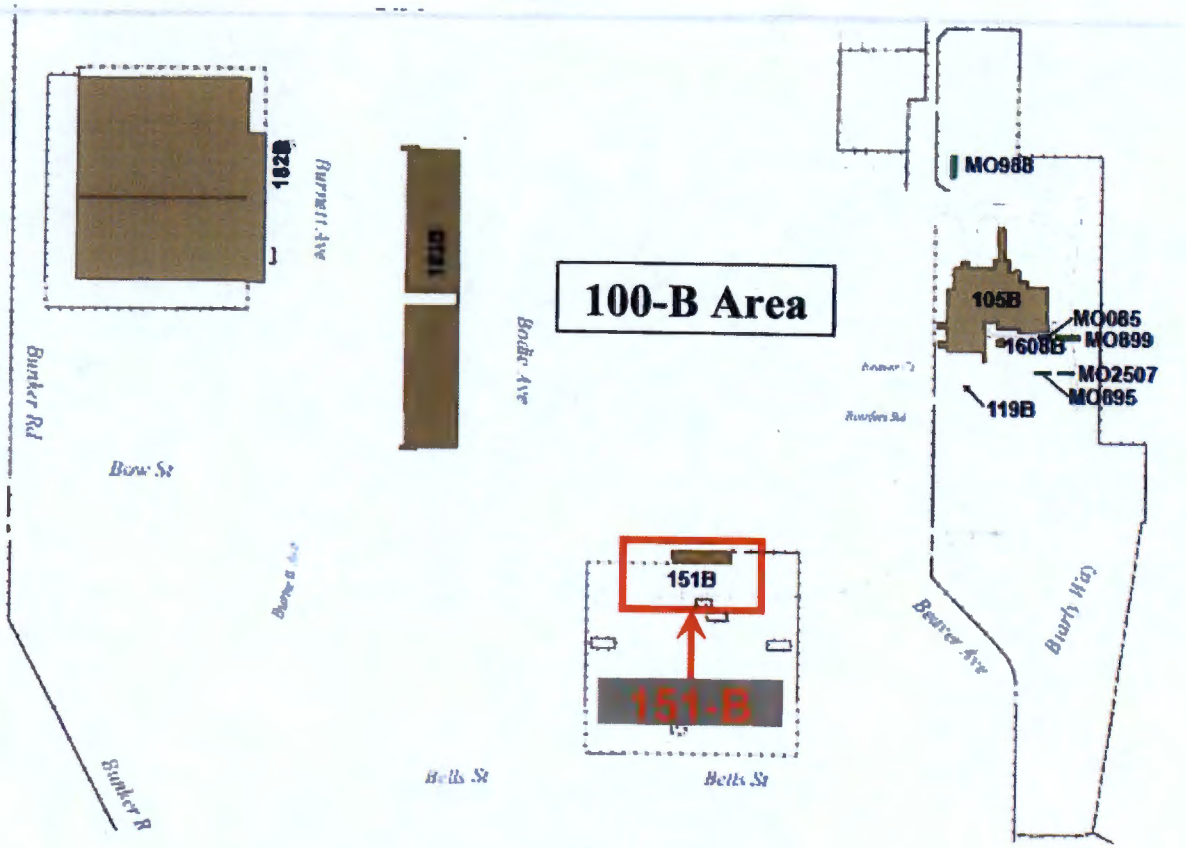


Photo of the 151-B Facility Before Demolition

Photo of the 151-B Facility Before Demolition

151-B Switch House Completion

Photo of 151-B Facility following demolition/excavation

171321

^WCH Document Control

From: Warren, David J
Sent: Tuesday, June 04, 2013 7:11 AM
To: ^WCH Document Control
Subject: FW: Pre- and post- demolition visual inspections of the 151-B Electrical Switchgear Building and excavation

Attachments: 151-B visual inspection.doc

Please CHRON the email below, and opened attachment, as pre- and post- demolition inspection of the 151-B Electrical Switchgear Building. Please advise
me of the CHRON number assigned. Contact me with any questions. Thanks.

Dave Warren
100-Area D4 EPL
539-6040

From: Warren, David J
Sent: Monday, June 03, 2013 4:08 PM
To: Douglas, L M (Michael); Allen, Mark E; Clary, Jeffrey D
Subject: Pre- and post- demolition visual inspections of the 151-B Electrical Switchgear Building and excavation

All,

At approximately 1200 hours on 4/17/13, the interior portions of the basement of the 151-B Electrical Switchgear Building to be left in place following demolition were visually inspected for signs of staining that would be indicative of chemical or petroleum contamination. The below grade structures of the facility to be left in place were observed to be free of any staining as is documented in the photos in the attached word file.

At approximately 1000 hours on 5/15/13 the soils of the excavation for removal of the 151-B Electrical Switchgear Building were visually inspected for signs of staining or anomalous items. The above grade portions of the structure have been demolished and loaded out. The portions of the structures greater than 3 feet below grade have been left in place. The excavation and surrounding area(s) were observed to be free of any stained soils or anomalies that would be indicative of chemical or petroleum contamination. Please see the attached word file for photographs that were taken during the inspection(s). I'll CHRON this e-mail and attachment for future use as reference for closure documentation. Feel free to contact me if you have any questions. Thanks.

David Warren
100-Area D4 Environmental Project Lead
WCH
539-6040

151-B visual
spection.doc (1.

151-B Visual Inspection Photographs

151-B Basement looking West

151-B Basement looking East

151-B Basement looking West

151-B Basement looking East

151-B Basement looking East

151-B Basement looking West

151-B Basement looking West

151-B Demolition Excavation Looking East

151-B Demolition Excavation Looking West

151-B Demolition Excavation Looking Southwest

Attachment 4: CCN 169469, DOE Approval of No PTE for the 151-B Facility

169649

^WCH Document Control

From: Warren, David J
Sent: Thursday, January 31, 2013 8:12 AM
To: ^WCH Document Control
Subject: FW: No PTE for 151B Electrical Substation at the 100-B Area
Attachments: No PTE 151-B.doc

Please CHRON the e-mail below and attachment as: DOE approval of No Potential to Emit for Demolition of the 151-B Building. Please advise me of the CCN number assigned. Thanks.

Dave Warren
100-Area EPL
539-6040

From: Guercia, Rudolph F (Rudy) [mailto:rudolph.guercia@rl.doe.gov]
Sent: Thursday, January 31, 2013 7:37 AM
To: Warren, David J
Subject: No PTE for 151B Electrical Substation at the 100-B Area

After reviewing the data provided on the subject facility, RL concurs with the analysis that the subject facility does not have a radiological inventory to justify calculation of a PTE. RL believes that this facility has no potential to emit either from activities related to operation, demolition, or removal of the slab.

Please chron this email and attachment and place in the project files.

R. F. Guercia, Field Engineering
U.S. Dept. of Energy, Richland Operations Office
PH: (509) 376-5494
Fax: (509) 373-0726

From: Warren, David J [mailto:djwarren@wch-rcc.com]
Sent: Wednesday, January 30, 2013 10:09 AM
To: Guercia, Rudolph F (Rudy)
Subject: No PTE for 151-B Electrical Substation at the 100-B Area

Rudy,
Section 9.0 of the ***Action Memorandum for General Hanford Site Decommissioning Activities***, DOE/RL-2010-22, Rev. 0, establishes the U.S. Department of Energy (DOE) as lead agency for the proposed removal action. This removal action includes scope managed under ***the Removal Action Work Plan for River Corridor General Decommissioning Activities***, DOE/RL-2010-34, Rev. 1.

WCH is currently preparing to demolish the 151-B Electrical Substation at the 100-B Area. This work falls within the scope documented in DOE/RL-2010-34, Rev. 1. The facility was not used for the storage of radioactive materials nor was it ever posted for radiological contamination. Accordingly, a facility history and radiological surveys are attached that establish current conditions based on completed scoping surveys. DOE's concurrence is requested on the determination that an emissions estimate is not required prior to performing removal actions on these facilities. This request to DOE, as lead agency, is consistent with the methodology established in Section 4.3.2 of the current ***Removal Action Work Plan for River***

Corridor General Decommissioning Activities, (DOE/RL-2010-34, Rev. 1).

Please call if you have any questions.
Thanks,

David Warren
100-Area D4 Environmental Project Lead
WCH
539-6040

<<No PTE 151-B.doc>>

151-B Electrical Substation

Facility Description:

The 151-B Primary Substation included a wooden fenced, gravel surfaced area as well as a reinforced concrete and concrete block switch house along the north side of the fence. Concrete pads of various sizes protrude from the crushed gravel bed throughout the yard, supporting a variety of electrical equipment, including transformers, circuit breakers, and power line towers and stands. The fenced area originally measured 430 ft by 303 ft and contained wooden frame bus structures, two main 15,000 KVA transformers, three oil circuit breakers, and terminal structures. The area was served by rail spur and contained several underground ducts, which connected the switch house with the oil circuit breakers, transformers, and terminal structures.

The 151-B Switch House is a one story building, with a sub-level cable pit equipped with a sump pump. All duct lines in the fenced area terminated at the Switch House. The main floor was comprised of a switch room, with a fan room, and a battery room. The cable pit was a completely enclosed reinforced concrete pit with floor slab that extended below grade.

Facility Location:

The 151-B Building and associated switchyard are located approximately 1150 ft southwest of the 105-B Reactor building, in the 100-B area of the Hanford Site.

Facility History:

The 151-B Substation served as the primary source of electrical power for all facilities in the 100BC Area. It was first energized in June 1944, and received 230 kV power from the Midway Substation. From the three main transformers in the 151-B Switch Yard, power was transmitted primarily via underground cables to thirteen secondary substations and nine distribution substations located throughout the 100BC Area. One 27.5 KVA transformer, located adjacent the 151-B Switch House, provided service for the building. Five oil circuit breakers were also in service to support the switch yard operations.

In 1952, the substation was expanded to support the new 105-C Reactor facilities, including the construction of an addition to the Switch House as well as additional equipment in the Switch Yard. Polychlorinated biphenyl (PCB)-containing oil was transferred, as needed, from a rail tanker on the railroad spur through above ground and underground piping to transformers and oil circuit breakers in the yard.

Currently the facility is inactive and electrical service to the facility has been disconnected.

Radiological Contaminants of Concern:

Historically, there are no processes that indicate any type of contamination to be associated with the 151-B Switchyard. Scoping survey RSR-100N-12-2538, completed of the 151-B Switch House in December of 2012, found no contamination.

Chemical Contaminants of Concern:

The 151-B Switch House contains minor amounts of contaminants of concern associated with lighting and air conditioning service (e.g., lead, mercury, PCBs, and CFCs), as well as multiple types of Asbestos Containing Materials. There are no accepted WIDS sites identified for the 151-B Electrical Substation.

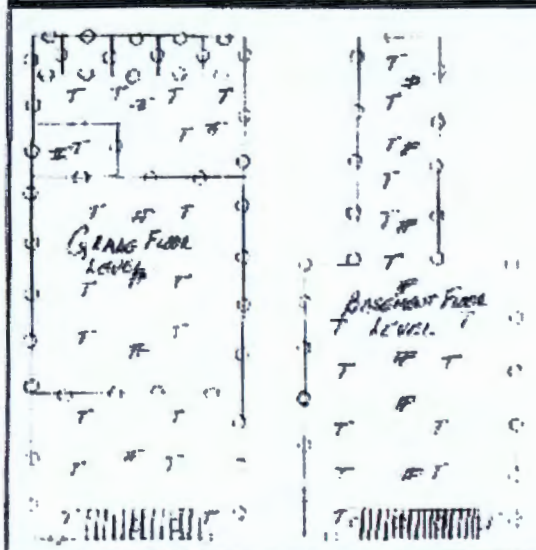
RADIOLOGICAL SURVEY RECORD

Page 1 of 2

Type of Survey		Survey #
☐ Routine	☒ Work Progress	RSR – 100N-12-151B
RWP # / Rev #	Date	Time	Location
N/A	10/05/12	1600	100N / 151B

Description: Characterization Survey of 151-B

References: (eg. SRTA, NSER, LASER, ISP, Work Package)
TA 07-SL-02 - Rev 3



A. Floor of Basement & Grade Level has Direct Access to Terranean Surface >30
B. Walls (18" thk), Cable Trays, Conduit Parts, Stairs, Misc. Appurtenances against the Entire Perimeter >30
C. No Surveys Performed Above 8' due to Accessibility.
D. Note: Is currently Not Certified on Grade Level Access Surveyed on Some Floor Slabs
E. No Contaminated Found

COPY

CA	CA	FRA	ATA	AS	FRA	TA	HHA	HHA	
O		M							

Instruments

Model	ID #	Cal Due Date	Model	ID #	Cal Due Date
2241/43-89	[illegible]	09/04/2013	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A

RADIOLOGICAL SURVEY RECORD

Page: 2 of 4

Survey # RSR (Rev.) 12-2538

Contamination Measurement Information[1]

Circled value indicates Removable β contamination greater than β

No.	Description of Item or Location	Removable (dpm/100 cm²)				Total (dpm/100 cm²)			
ALL	SALIANS, DUCTS, FANS.	< 20	7	< 1K	10	< 500	7	< 5K	10
N/A									N/A

COPY

[1] Unless stated otherwise in the "Remarks" section, exempted β-γ (i.e., C-14, Fe-55, Ni-59, Ni-63, Sr-90, Tc-99, I-129) and Lu-125 contamination levels are > 10 times the β-γ contamination levels shown above.

Corrected Dose Rate Calculations

Location	Contact Readings		30 cm Readings	
N/A				

Attachment 5: 151-B GPS Surveys

0646159

GPS Pre Demo Survey Report for the 151-B Building

Project : 151_B

Job 1259

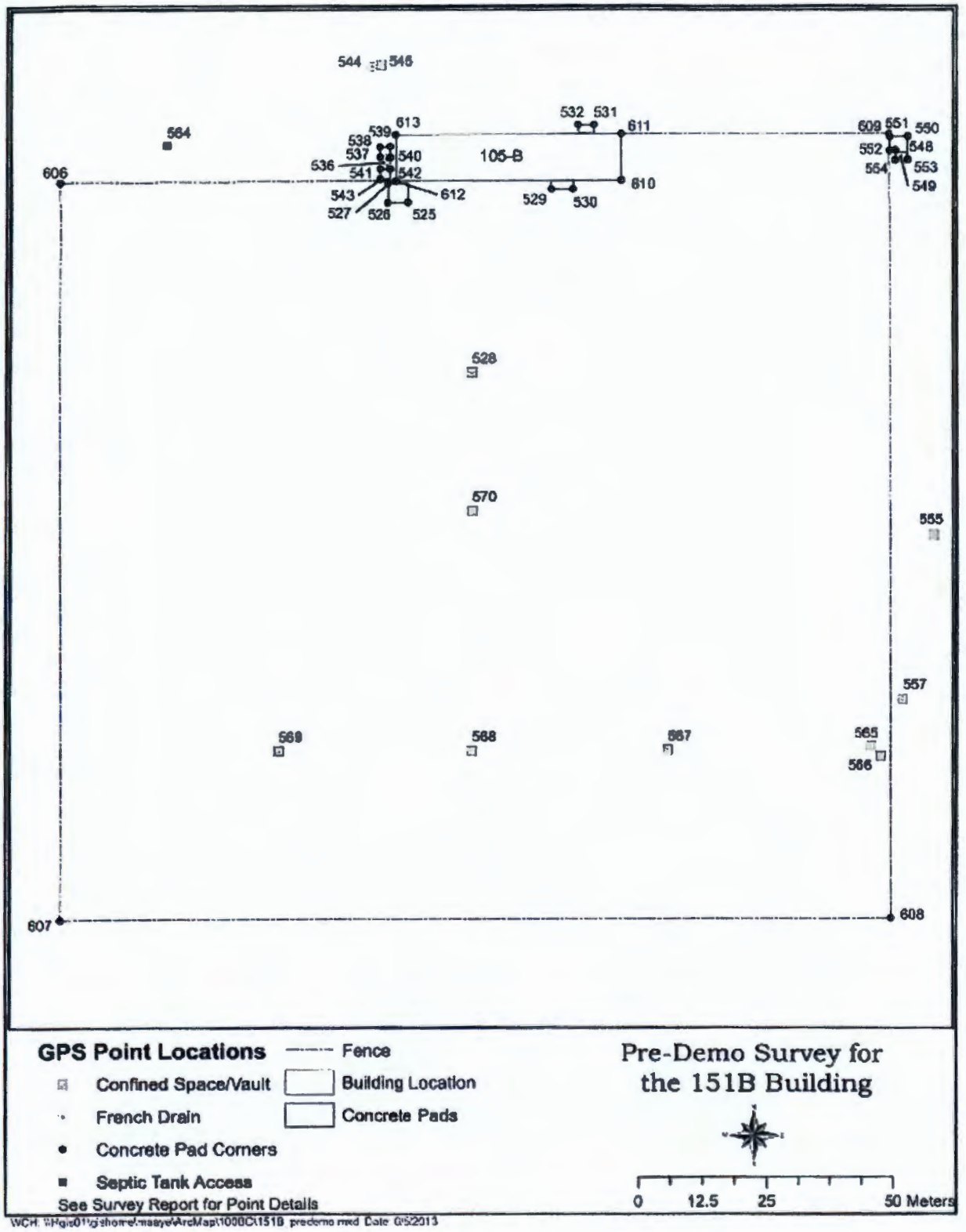
User name	rmaye	**Date & Time**	6:00:25 PM 6/5/2013
Coordinate System	US State Plane 1983	**Zone**	Washington South 4602
Project Datum	(WGS 84)		
Vertical Datum	NAVD88	**Geoid Model**	Not selected
Coordinate Units	Meters		
Distance Units	Meters		
Height Units	Meters		

Survey Project Name: Pre Demo 151B
Date: 5/23/2013
Equipment: 5800
Survey Purpose: Map the pre demo locations to 151-B and 135B
Requested By: Mark Allen
Location: 100HC
Charge Code:
Field Surveyor: Margo Aye
Survey Software Used: Trimble Survey Controller, and Geomatics Office V.11
Survey Equipment Used: 5800
Control Monuments Used: 100B-3
Survey Method: RTK
Horizontal Precision: .020m
Vertical Precision: .050m
Fieldwork Start Date: 2/13/13
Fieldwork Completion Date: 2/13/13
Notes: This report is only for the 151-B Building

GPS Name	Northing	Easting	Elevation	Feature Code	Time/Date
520	144320.476m	565089.321m	145.325m	corn-offset	12:16:38 13 Feb 2013
521	144318.823m	565095.538m	145.313m	corn-offset	12:17:14 13 Feb 2013
522	144309.566m	565091.069m	145.380m	corn-offset	12:13:58 13 Feb 2013
523	144308.486m	565089.370m	145.364m	corn-offset	12:14:43 13 Feb 2013
524	144304.876m	565045.280m	145.366m	corn offset	12:15:36 13 Feb 2013
525	144305.252m	565047.647m	145.493m	tower-pad	12:16:15 13 Feb 2013
526	144305.165m	565043.702m	145.550m	tower-pad	12:16:35 13 Feb 2013
527	144309.071m	565043.656m	145.584m	tower pad	12:17:07 13 Feb 2013
528	144271.655m	565060.218m	145.275m	conf-space-access	12:18:40 13 Feb 2013
529	144307.026m	565075.723m	145.549m	conc pad corner	12:20:28 13 Feb 2013
530	144307.838m	565079.969m	145.549m	conc-pad-corner	12:21:04 13 Feb 2013
531	144320.551m	565083.965m	145.368m	conc-pad-corner	12:21:58 13 Feb 2013
532	144320.552m	565080.947m	145.351m	conc pad corner	12:22:17 13 Feb 2013
533	144319.300m	565045.200m	145.131m	bldg-corn-offset	12:23:17 13 Feb 2013
534	144318.587m	565044.132m	145.105m	bldg corn-offset	12:24:31 13 Feb 2013
535	144309.456m	565041.575m	145.426m	bldg-corn-offset	12:25:09 13 Feb 2013
536	144313.712m	565043.457m	145.441m	FD	12:26:09 13 Feb 2013
537	144314.152m	565042.015m	145.384m	conc pad	12:26:23 13 Feb 2013
538	144316.245m	565041.984m	145.363m	conc-pad	12:26:46 13 Feb 2013
539	144315.276m	565044.108m	145.312m	conc-pad	12:27:14 13 Feb 2013
540	144314.114m	565044.136m	145.388m	conc-pad	12:27:34 13 Feb 2013
541	144311.901m	565042.054m	145.387m	conc-pad	12:28:05 13 Feb 2013
542	144311.876m	565044.126m	145.483m	conc pad	12:28:26 13 Feb 2013
543	144309.810m	565042.016m	145.425m	conc-pad	12:28:44 13 Feb 2013
544	144332.132m	565040.250m	144.986m	FD	12:29:19 13 Feb 2013
545	144332.502m	565041.427m	144.965m	CS	12:29:48 13 Feb 2013
546	144319.431m	565142.149m	145.206m	fence-corner-offset	12:35:42 13 Feb 2013
547	144318.018m	565143.331m	145.185m	fence corner offset	12:36:34 13 Feb 2013

548	144314.211m	565144.660m	145.436m	CS	12:36:57 13 Feb 2013
549	144313.606m	565145.894m	145.389m	conc-pad	12:37:09 13 Feb 2013
550	144318.272m	565145.890m	145.371m	conc-pad	12:37:43 13 Feb 2013
551	144318.207m	565142.344m	145.412m	conc-pad	12:38:10 13 Feb 2013
552	144315.482m	565142.311m	145.415m	conc-pad	12:38:31 13 Feb 2013
553	144315.507m	565143.427m	145.430m	conc-pad	12:38:47 13 Feb 2013
554	144313.532m	565143.460m	145.454m	conc-pad	12:40:24 13 Feb 2013
555	144239.341m	565150.966m	147.393m	CS	12:42:06 13 Feb 2013
556	144236.605m	565147.435m	146.722m	cut-vert-12inpipe	12:43:15 13 Feb
2013					
557	144206.920m	565144.918m	145.835m	CS	12:45:10 13 Feb 2013
558	144163.074m	565145.401m	146.354m	fence-corn offst	12:46:54 13 Feb
2013					
559	144159.743m	565142.559m	146.924m	fence-corn-offst	12:47:37 13 Feb
2013					
560	144161.261m	564979.861m	145.682m	fence-corn-offst	12:51:12 13 Feb
2013					
561	144162.674m	564977.237m	145.592m	fence-corn-offst	12:51:47 13 Feb
2013					
562	144309.144m	564978.270m	144.921m	fence-corn-offst	12:54:32 13 Feb
2013					
563	144310.211m	564979.544m	144.977m	fence-corn-offst	12:54:48 13 Feb
2013					
564	144316.525m	564999.395m	145.033m	septic-tank-access	12:56:04 13 Feb
2013					
565	144197.500m	565138.588m	145.344m	CS-MH	13:00:02 13 Feb 2013
566	144195.554m	565140.474m	145.331m	CS-MH	13:00:17 13 Feb 2013
567	144196.756m	565098.592m	145.355m	CS-vault	13:01:14 13 Feb 2013
568	144196.649m	565060.208m	145.319m	CS-MH	13:02:29 13 Feb 2013
569	144196.481m	565021.787m	145.369m	CS-vault	13:03:37 13 Feb 2013
570	144244.113m	565060.307m	145.251m	CS-vault	13:05:33 13 Feb 2013
A10	144309.152m	565047.647m	?		
A3	144309.786m	565044.086m	?		
A5	144309.476m	565075.721m	?		
A7	144309.417m	565079.963m	?		
A8	144318.952m	565080.947m	?		
A9	144318.951m	565083.965m	?		

Back to top



WCH: \\Hqis01\gishome\-masye\ArcMap\1000C\151B predemo.mxd Date: 6/5/2013

151-B Switch House Completion

0646158

GPS Post Demo Survey Report for the 151-B Building

Project : 151B_postdemo

Job 1258

User name	maaye	**Date & Time**	5:48:10 PM 6/5/2013
Coordinate System	US State Plane 1983	**Zone**	Washington South 4602
Project Datum	(WGS 84)		
Vertical Datum	NAVD88	**Geoid Model**	Not selected
Coordinate Units	Meters		
Distance Units	Meters		
Height Units	Meters		

Survey Project Name:	151B Post Demo
Date:	6/5/2013
Equipment:	5800
Survey Purpose:	Map the topographic area of excavation
Requested By:	Mark Allen, Dave Warren
Location:	100HC
Charge Code:	
Field Surveyor:	Margo Aye
Survey Software Used:	Trimble Survey Controller, and Geomatics Office V.11
Survey Equipment Used:	5800
Control Monuments Used:	HSWB-038
Survey Method:	RTK
Horizontal Precision:	.022m
Vertical Precision:	.058m
Fieldwork Start Date:	6/4/13
Fieldwork Completion Date:	6/4/13
Notes:	

GPS Name	Northing	Easting	Elevation	Feature Code	Time/Date
1	144320.846m	565089.817m	145.171m	top	12:46:24 4 Jun 2013
2	144322.300m	565087.244m	145.192m	top	12:46:48 4 Jun 2013
3	144323.254m	565083.806m	145.059m	top	12:47:02 4 Jun 2013
4	144323.911m	565080.041m	145.067m	top	12:47:22 4 Jun 2013
5	144324.830m	565074.976m	145.023m	top	12:47:43 4 Jun 2013
6	144323.809m	565070.860m	145.107m	top	12:48:03 4 Jun 2013
7	144324.726m	565066.080m	145.173m	top	12:48:20 4 Jun 2013
8	144323.918m	565061.765m	145.123m	top	12:48:34 4 Jun 2013
9	144322.395m	565064.760m	145.122m	top	12:48:56 4 Jun 2013
10	144323.870m	565058.034m	145.105m	top	12:49:45 4 Jun 2013
11	144323.497m	565046.828m	144.844m	top	12:50:50 4 Jun 2013
12	144321.867m	565041.389m	144.545m	top	12:51:12 4 Jun 2013
13	144326.201m	565048.787m	144.727m	top	12:51:33 4 Jun 2013
14	144310.875m	565048.237m	144.996m	top	12:51:51 4 Jun 2013
15	144306.616m	565039.941m	145.201m	top	12:52:10 4 Jun 2013
16	144304.596m	565044.962m	145.036m	top	12:52:29 4 Jun 2013
17	144303.245m	565049.246m	145.256m	top	12:52:46 4 Jun 2013
18	144302.113m	565056.092m	145.334m	top	12:53:08 4 Jun 2013
19	144302.296m	565060.517m	145.344m	top	12:53:22 4 Jun 2013
20	144301.947m	565065.378m	145.302m	top	12:53:35 4 Jun 2013
21	144301.656m	565072.129m	145.220m	top	12:53:53 4 Jun 2013
22	144302.266m	565079.039m	145.291m	top	12:54:08 4 Jun 2013
23	144303.117m	565088.861m	145.282m	top	12:54:30 4 Jun 2013
24	144307.693m	565092.351m	145.279m	top	12:54:51 4 Jun 2013
25	144311.295m	565094.226m	145.320m	top	12:55:25 4 Jun 2013
26	144316.317m	565094.242m	145.297m	top	12:55:40 4 Jun 2013
27	144319.562m	565091.834m	145.119m	top	12:55:59 4 Jun 2013
28	144317.051m	565089.842m	144.506m	edge	12:56:20 4 Jun 2013
29	144318.475m	565086.423m	144.086m	edge	12:56:45 4 Jun 2013
30	144317.895m	565083.306m	143.676m	edge	12:57:00 4 Jun 2013
31	144317.360m	565079.634m	143.481m	edge	12:57:19 4 Jun 2013
32	144315.792m	565075.002m	143.419m	edge	12:57:40 4 Jun 2013
33	144315.090m	565071.152m	143.866m	edge	12:57:57 4 Jun 2013
34	144315.205m	565068.364m	143.834m	edge	12:58:15 4 Jun 2013

35	144313.596m	565067.933m	143.493m	edge	12:58:28 4 Jun 2013
36	144313.452m	565065.075m	143.758m	toe	12:58:59 4 Jun 2013
37	144313.099m	565060.563m	143.991m	toe	12:59:15 4 Jun 2013
38	144313.656m	565054.957m	143.764m	toe	12:59:36 4 Jun 2013
39	144313.568m	565050.493m	143.841m	toe	12:59:54 4 Jun 2013
40	144312.044m	565049.944m	143.830m	toe	13:00:15 4 Jun 2013
41	144311.229m	565054.061m	143.737m	toe	13:00:30 4 Jun 2013
42	144311.600m	565058.710m	143.782m	toe	13:00:47 4 Jun 2013
43	144311.423m	565064.225m	143.797m	toe	13:01:09 4 Jun 2013
44	144311.322m	565067.888m	143.736m	toe	13:01:33 4 Jun 2013
45	144310.808m	565070.121m	143.916m	edge	13:02:02 4 Jun 2013
46	144310.809m	565073.555m	144.038m	edge	13:02:18 4 Jun 2013
47	144310.210m	565077.687m	143.992m	edge	13:02:34 4 Jun 2013
48	144310.759m	565081.301m	143.803m	edge	13:02:49 4 Jun 2013
49	144311.062m	565083.759m	143.681m	edge	13:03:05 4 Jun 2013
50	144310.303m	565085.095m	144.050m	edge	13:03:18 4 Jun 2013
51	144312.001m	565086.999m	143.603m	edge	13:03:35 4 Jun 2013
52	144313.324m	565088.642m	143.851m	edge	13:03:50 4 Jun 2013
53	144314.342m	565089.705m	144.198m	edge	13:04:30 4 Jun 2013
54	144313.299m	565077.305m	141.945m	toe	13:06:11 4 Jun 2013
55	144313.351m	565080.468m	141.950m	toe	13:06:36 4 Jun 2013
56	144313.818m	565082.736m	141.967m	toe	13:06:59 4 Jun 2013
57	144313.572m	565084.905m	141.992m	toe	13:07:20 4 Jun 2013
58	144314.599m	565086.026m	141.996m	toe	13:07:36 4 Jun 2013
59	144315.310m	565083.919m	142.019m	toe	13:07:48 4 Jun 2013
60	144315.247m	565081.077m	141.976m	toe	13:08:04 4 Jun 2013
61	144314.723m	565077.958m	141.940m	toe	13:08:19 4 Jun 2013
62	144313.678m	565075.640m	141.906m	toe	13:08:34 4 Jun 2013

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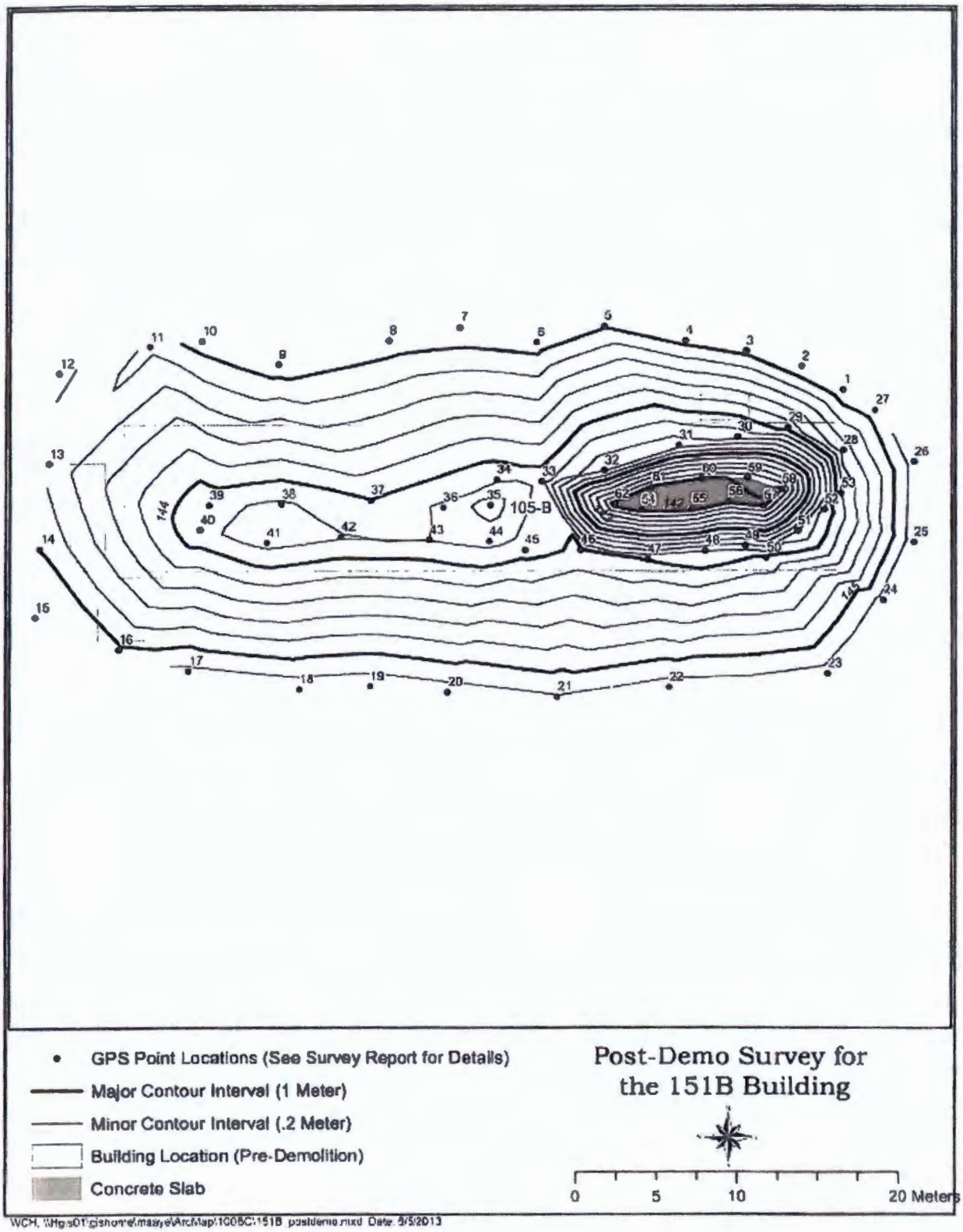

WCH, \\Hgis01\gishome\mazye\ArcMap\1005C\151B postdemo.mxd Date: 9/5/2013

Attachment 6: CCN 170115, EPA Approval of 151-D and 151-B Demolition approach

170115

^WCH Document Control

From: Warren, David J
Sent: Tuesday, March 05, 2013 1:46 PM
To: ^WCH Document Control
Subject: FW: Building Demolitions under River Corridor General Facilities Decommissioning CERCLA work plan

Please CHRON this email as it represents a regulatory agreement. Title: EPA approval of 151-D and 151-B demolition approach. Please advise me of the CHRON number assigned. Thanks.

Dave Warren
539-6040

From: Guzzetti, Christopher [mailto:Guzzetti.Christopher@epa.gov]
Sent: Tuesday, March 05, 2013 8:42 AM
To: Warren, David J
Subject: FW: Building Demolitions under River Corridor General Facilities Decommissioning CERCLA work plan

David,

Looks like you are good to go.

From: Pavitt, John
Sent: Thursday, February 28, 2013 3:00 PM
To: Guzzetti, Christopher
Subject: RE: Building Demolitions under River Corridor General Facilities Decommissioning CERCLA work plan

Hello Chris.

The asbestos NESHAP allows building owners and operators (contractors) to leave certain materials in place during demolition. (40 CFR 61.145(c)(1)) The two materials identified by Mr. Warren (asphalt roofing products and caulking) are examples of what can be left in place.

Asphalt roofing products meet the definition of Category I nonfriable asbestos material and EPA expects these materials as a group to stay nonfriable during demolition. Caulking meets the definition of Category II nonfriable asbestos (this group includes all other nonfriable materials which are not specifically named in the Category I group). Based on my experience, and also described in EPA's Guide to Demolition Practices, we do not expect caulk to become friable during a demolition.

Thank you,

John Pavitt
EPA R10, Alaska Operations Office
(907) 271-3688

From: Guzzetti, Christopher

Sent: Thursday, February 28, 2013 12:46 PM
To: Pavitt, John
Subject: FW: Building Demolitions under River Corridor General Facilities Decommissioning CERCLA work plan

John,

I would like you to take a look at this. It's a little different than what we've seen before so I thought I'd ask for your input. Remember, we revised all the workplans to include the language that was passed around about following NESHAPS.

Thanks,
Chris

From: Warren, David J [mailto:djwarren@wch-rcc.com]
Sent: Tuesday, February 26, 2013 3:02 PM
To: Guzzetti, Christopher
Subject: Building Demolitions under River Corridor General Facilities Decommissioning CERCLA work plan

Chris,

Greetings. I'm looking for some clarification, guidance really, regarding demolition of facilities that fall under the scope of the Removal Action Work Plan for River Corridor General Decommissioning Activities (DOE/RL-2010-34 Rev. 1). Specifically, my interest is with respect to demolition of facilities with Asbestos NESHAP Category 1 non-friable Asbestos Containing Materials (ACM) in place. As I'm sure you're aware, the RAWP was recently revised (now rev. 1) and the text regarding removal and management of asbestos materials was recently modified.

WCH has 2 facilities in the 100-Areas, 151-D and 151-B, that fall under the scope of this CERCLA work plan. A comprehensive asbestos inspection has been performed by an AHERA accredited inspector and the findings are documented in the respective Asbestos Inspection Summary reports for each facility, these are available for your review if you would like to see them. WCH is currently in the process of removing all Regulated Asbestos Containing Materials (RACM) from these facilities, which includes friable ACM (thermal systems insulation [TSI]), as well as Category 2 materials (e.g. Cement Asbestos Boards and cable trays [transite]) that have a high probability of becoming friable (thus RACM) during demolition. Both facilities contain small quantities of Category 1 non-friable materials associated with roofing products. The material on the 151-D facility is approximately 5 sq. ft. of black asphaltic mastic material on a roof air vent. The materials on the 151-B facility are non-friable caulking material between the concrete roof panels and asphaltic/composite sheeting around the base of a roof air intake. The fact the materials are on the rooftops of each of the facilities complicates safe access for abatement. Additionally, the caulking material between the roof panels of the 151-B is physically impossible to access. WCH believes that these materials can be left in place for demolition as this practice is allowed under the asbestos NESHAP and shearing is described as an acceptable method that will generally not render non-friable materials friable. WCH proposes to:

1. Surgically remove with an excavator the portion of the 151-D roof vent with the ACM intact (Cat 1 non-friable ACM), manage that material as asbestos waste accordingly, have an asbestos competent person visually inspect the roof to verify that the ACM materials were completely removed, and then proceed to demo the rest of the facility as non-asbestos.

2. Demolish the 151-B facility with the small quantities of caulking between the roof panels and asphaltic/composite sheeting (Cat 1 non-friable ACM) left in place with the determination that the demolition methods (shearing) will not render the material friable. The quantity of asbestos material to be left for demolition is likely below the threshold quantity of 48 sq. ft. for the asbestos NESHAP.

I apologize for the length of this e-mail. Again, just looking for guidance or agreement from EPA that what WCH

proposes is an acceptable practice, and also that it fulfills the intent of the excerpts from the RAWP listed above. Thanks for your time. Feel free to call or e-mail with any questions.

Dave Warren
100-Area EPL
WCH
539-6040