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Control #: D4-100N-0043

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FACILITY STATUS CHANGE FORM

Date Submitted:	Area:	Control #:
Nov 20, 2012	100-N	D4-100N-0043
Originator:	**Facility ID:**	
David Warren	1605-NE East Observation Post	
Phone:	**Action Memorandum:**	
539-6040	100-N Ancillary 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 isolation was performed at the facility prior to beginning deactivation.

Decontamination and Decommissioning: If present, the following hazardous materials were removed prior to facility demolition: batteries, light bulbs, oils, grease, asbestos-containing material, mercury, refrigerant, and polychlorinated biphenyls. Hazardous material removal and waste disposition was performed in accordance with the *Removal Action Work Plan for 105-N/109-N Buildings Interim Safe Storage and Related Facilities*, DOE/RL-2005-43. No hazardous material was associated with the 1605-NE East Observation Post.

Demolition: Demolition of the 1605-NE East Observation Post was completed in August of 2010. Demolition debris was loaded out and transported to the Environmental Restoration Disposal Facility (ERDF) where it was disposed.

The 1605-NE East Observation Post was located on the 105-N Reactor roof. Accordingly, the 1605-NE footprint has been encompassed by the 105-N/109-N Reactor Interim Safe Storage (ISS) enclosure, which is classified as Waste Information Data System (WIDS) site 100-N-66.

Description of Deferral (as applicable):

N/A

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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:

The 1605-NE East Observation Post was, removed from the roof of the 105-N Building, demolished, and then disposed of at the ERDF. No anomaly was encountered during demolition. Subsequent to 1605-NE demolition, the 105-N/109-N ISS enclosure was constructed around the adjoined 105-N and 109-N Reactor buildings. No portions of the facility remain, however, the footprint of the 1605-NE facility currently exists within the completed 105-N/109-N ISS enclosure.

Neither a post-demolition Global Positioning System (GPS) civil survey nor a Global Positioning Environmental Radiological Surveyor (GPERS) survey was performed at the 1605-NE East Observation Post footprint. However, a GPS civil survey was performed to document the location of the 1605-NE facility prior to its demolition. The results of this civil survey are shown in Attachment 3.

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FACILITY STATUS CHANGE FORM

Identification of Documented Waste Site(s) or Nature of Potential Waste Site Discovery (as applicable):
As the 1605-NE East Observation Post was located on the 105-N Reactor roof, which is part of WIDS site 100-N-66, the 1605-NE facility footprint is located within the 100-N-66 boundary.

The Sampling Determination Form (Attachment 4) is part of a process implemented by the *Removal Action Work Plan for 100-N Area Ancillary Facilities*, DOE/RL-2002-70, Revision 3. In consultation with Ecology, it was determined that for consistency with respect to closeout of other facilities granted CERCLA authority under the 100-N Ancillary Facilities Action Memorandum, that this process would also be applied to the 1605-NE facility. The Sampling Determination Form for the 1605-NE East Observation Post (SDF-100N-026) represents a regulatory agreement between DOE and the Lead Regulator (Ecology), and indicates that the requirements of the Action Memorandum have been met with respect to demonstrating that cleanup criteria, MTCA Method B for Chemical Constituents and 15 mRem above Hanford Site background for Radiological Constituents, have been achieved for soils and structures remaining after facility removal. Further action will not be required by the D4 organization to demonstrate that cleanup criteria have been met for the 1605-NE facility.

Section 3: List of Attachments

1. Facility information (building history and characterization)
2. Project Photographs
3. Global Positioning System (GPS) civil survey information
4. Sampling Determination Form for the 1605-NE East Observation Post (SDF-100N-026)

DOE-RL — Date: 11/26/2012

Lead Regulator ☐ EPA ☒ Ecology — Date: 11/29/12

DISTRIBUTION:

EPA: Dennis Faulk, B1-46
Ecology: Rick Bond, H0-57
DOE: Rudy Guercia, A3-04
Document Control, H0-30
Administrative Record, H6-08

SIS Coordinator: Benjamin Cowin, H4-22
D4 EPL: David Warren, X9-08
Sample Design/Cleanup Verification: Megan Proctor, H4-22
FR Engineering: Rich Carlson, N3-30
FR EPL: Dan Saueressig, N3-30

Attachment 1: Facility Information (3 pages)

D4 Project Facility Completion Form

Facility Information

Introduction

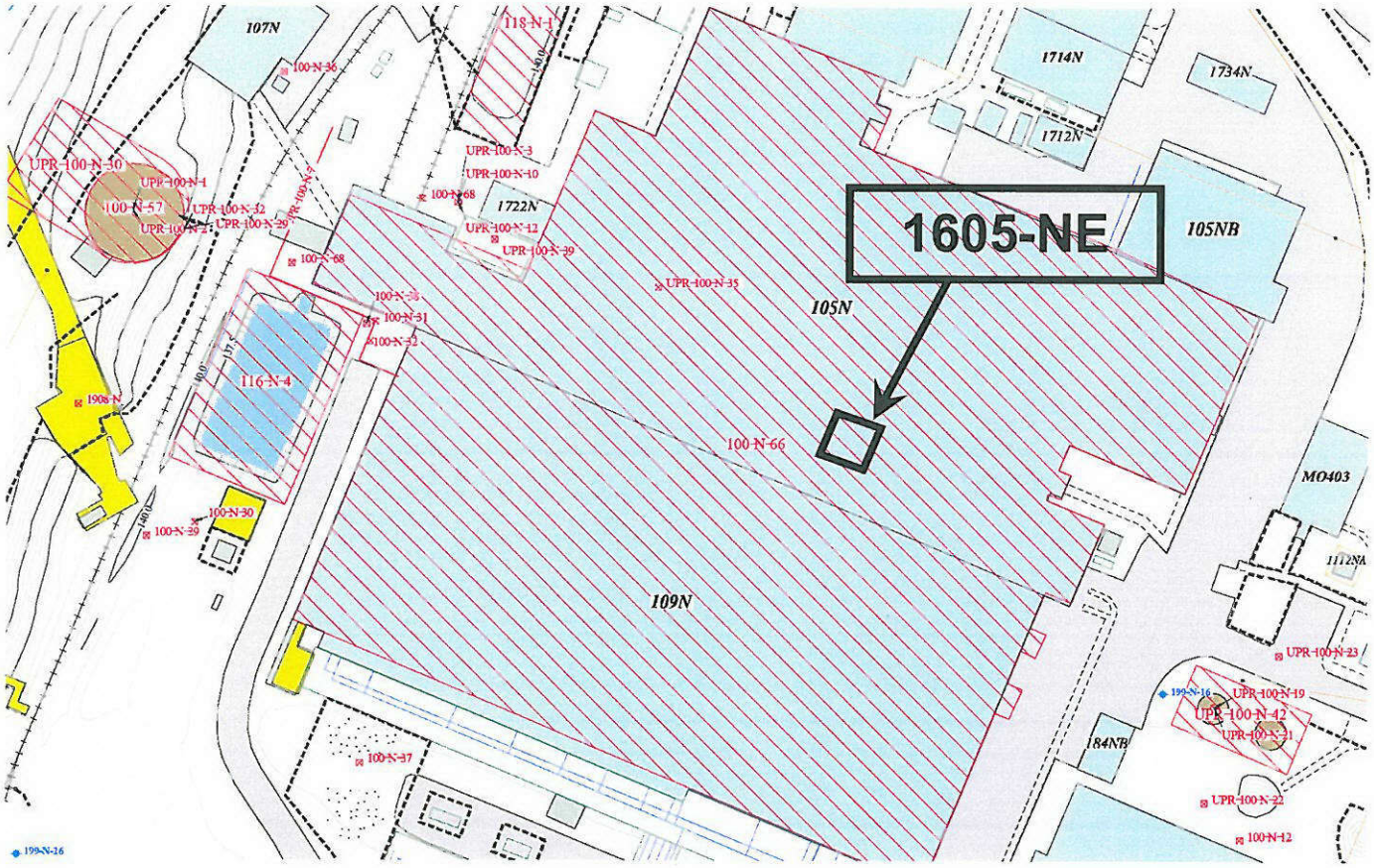
This document provides information regarding the history, characterization, and final status at the completion of deactivation, decontamination, decommissioning, and demolition (D4) activities of the 1605-NE East Observation Post formerly located at the 100-N Area.

Site Information

The 1605-NE East Observation Post was a steel frame and steel-sided structure, measuring approximately 64 square feet in area, that was positioned atop the 105-N Reactor roof. It was added to the 105-N Reactor roof in 1987 as part of the 100-N Reactor security upgrade. It provided a vantage point and source of protection for 100-N guard personnel.

A map of the 1605-NE East Observation Post is included in Figure 1. Photographs are included in Attachment 2.

Figure 1. Location of the 1605-NE East Observation Post



Radiological and Industrial Hygiene Surveys

No radiological or industrial hygiene surveys were performed as the 1605-NE facility did not possess any radiological or industrial hygiene hazards. Additionally, no asbestos sampling was performed as no potential asbestos containing material was identified.

Civil Survey Information

A pre-demolition Global Positioning System (GPS) civil survey was performed at the 1605-NE East Observation Post. A copy of this GPS survey is provided in Attachment 3. No post-demolition GPS civil survey was performed at the 1605-NE footprint as the facility was situated atop the 105-N Reactor Building and no excavation was required to remove and demolish it.

Anomalies Discovered During Demolition

No anomaly was encountered during demolition or load out of the 1605-NE East Observation Post.

Final Building Status and Underlying Soil

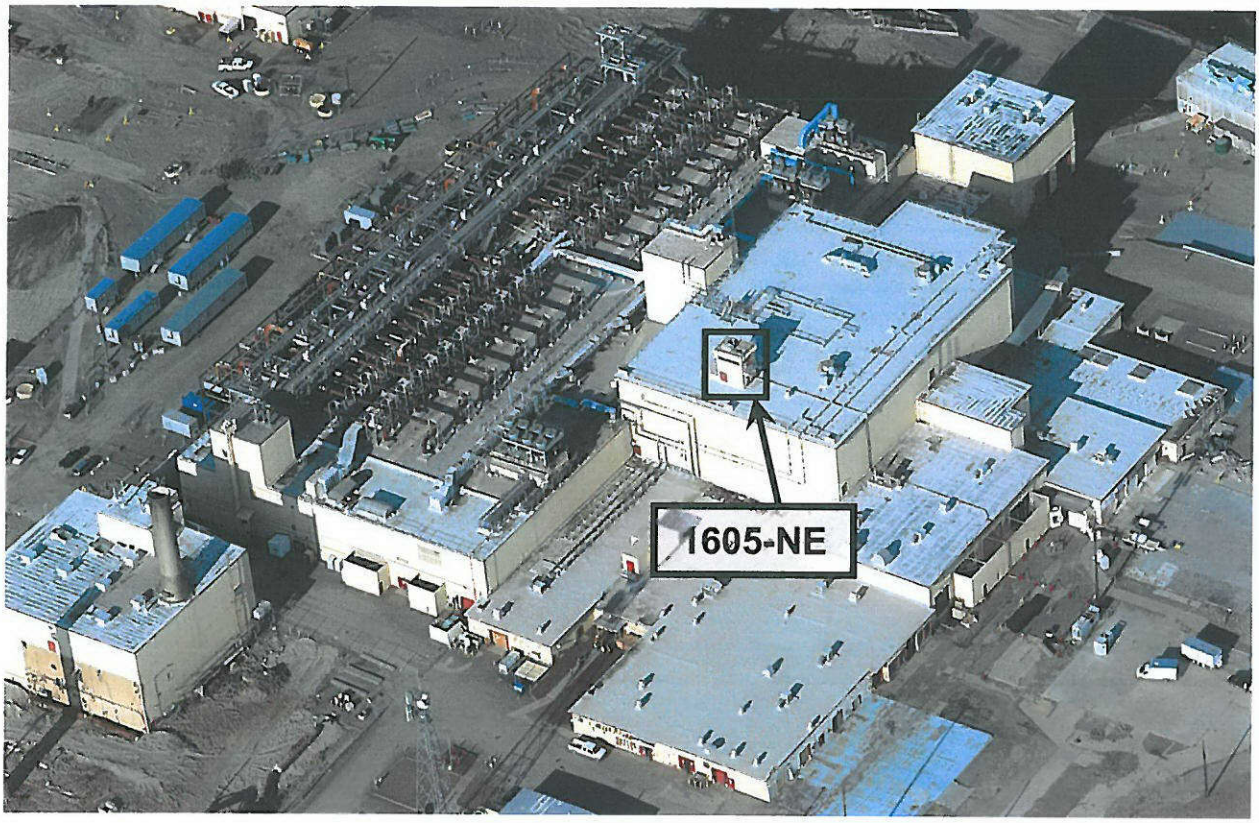
The 1605-NE East Observation Post was removed from the roof of the 105-N Reactor Building with a crane and demolished in August of 2010. Debris load out was completed in August of 2010. The debris was loaded into roll-off containers and shipped to the Environmental Restoration Disposal Facility (ERDF) for disposal.

The 1605-NE East Observation Post was located on the 105-N Reactor roof. Accordingly, the 1605-NE footprint has been encompassed by the 105-N/109-N Reactor Interim Safe Storage (ISS) enclosure, for which the footprint is classified as Waste Information Data System (WIDS) site 100-N-66. No soils are present within, or adjacent to, the 1605-NE footprint. No post-demolition GPERS survey was performed at the 1605-NE East Observation Post because of its location and its clean radiological history. No anomaly was encountered during demolition or load out of the 1605-NE East Observation Post. Photographs are included in Attachment 2.

Table 1. Contaminants of Concern for Facility Demolition

Contaminant of Concern	Management Practice/Determination of No Impact to the Soil
N/A	No contaminant of concern existed for demolition of the 1605-NE East Observation Post. The facility was not contaminated and did not contain hazardous material during its operational lifetime. No anomaly was encountered during demolition or load out.

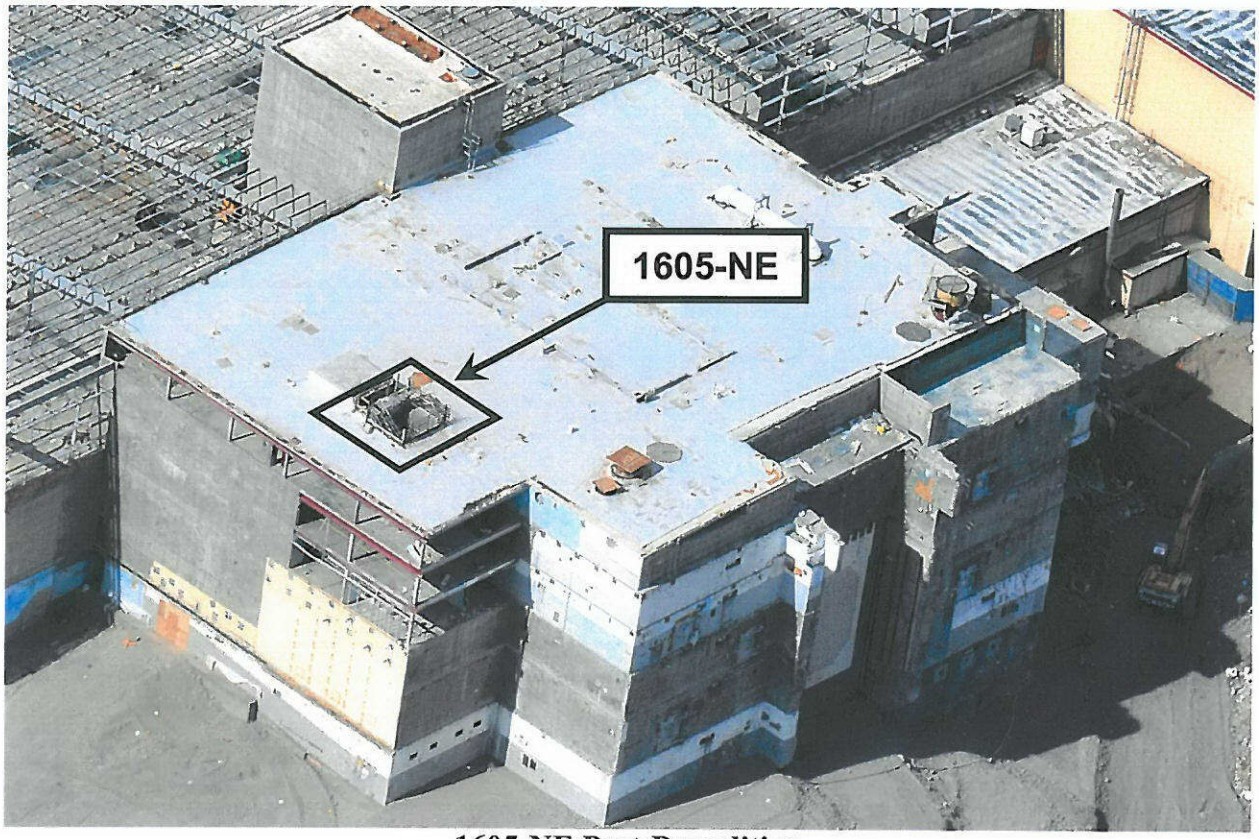
Attachment 2: Photographs (2 pages)



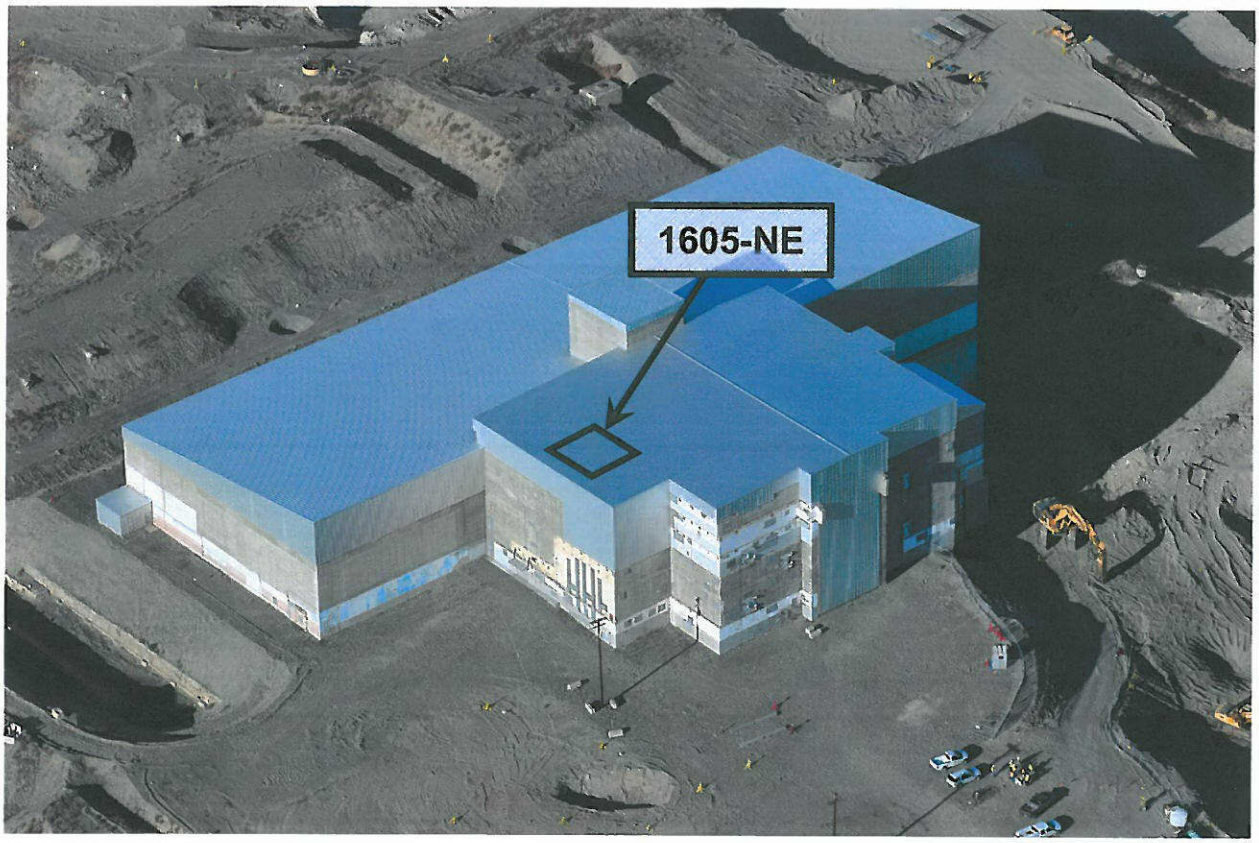
1605-NE Pre-Demolition

1605-NE Pre-Demolition

1605-NE East Observation Post Completion

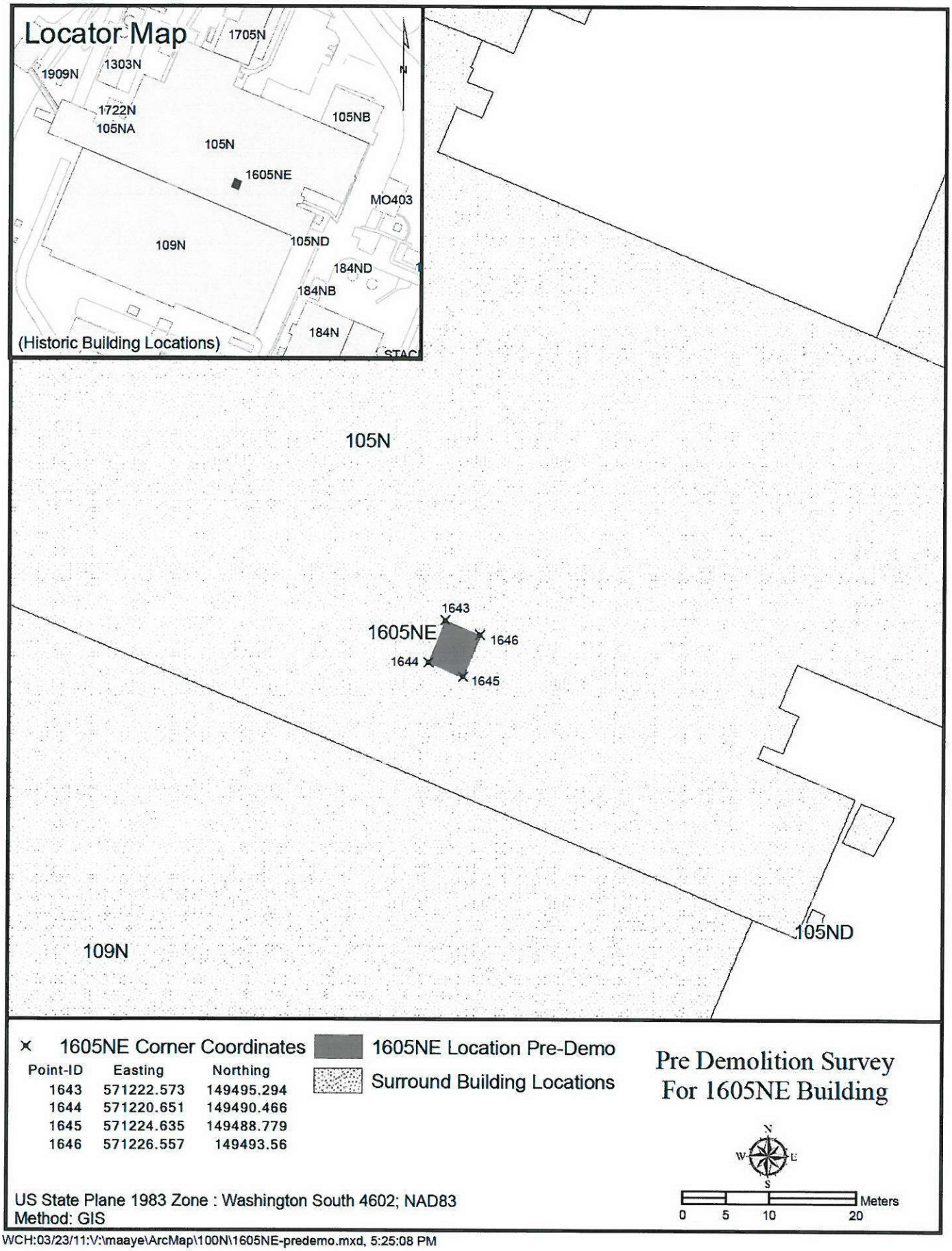


1605-NE Post-Demolition



1605-NE Post-Demolition (ISS Enclosure)

Attachment 3: GPS Civil Survey (1 page)



WCH:03/23/11:V:\maaye\ArcMap\100N\1605NE-predemo.mxd, 5:25:08 PM

Attachment 4: Sampling Determination Form for the 1605-NE East Observation Post (SDF-100N-026)
(4 pages)

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100-N ANCILLARY FACILITIES REMOVAL ACTION SAMPLING DETERMINATION FORM

Determination Number
SDF-100N-026

A. INSTRUCTIONS

This form must be completed to: 1) document existing data in order to determine if current data is suitable to prove completion of 100-N Ancillary Facilities, or 2) document that site-specific sampling and analyses are needed to provide completion for 100-N Ancillary Facilities.

B. GENERAL INFORMATION

Building Name: East Observation Post, Guard Tower Building Number: 1605-NE

WIDS Sites Associated or Adjacent:
100-N-66 (Accepted)

Other:
The 1605-NE facility was a steel-sided enclosure positioned atop the 105-N Reactor roof (CCN 157853 pg. 1, IHC-2005-0032 pg. 1, and WCH-473 pg. 9). It provided a vantage and source of protection for 100-N guard personnel (WCH-473 pg. 1). The 1605-NE facility was demolished in 2010 and demolition debris were disposed at the Environmental Restoration Disposal Facility (ERDF) (CCN 157853 pg. 2 & WCH-473 pgs. 1 & 9).

Given the previous location of the 1605-NE on top of the 105-N Reactor roof, the facility footprint is encompassed by the Interim Safe Storage (ISS) enclosure. Accordingly, its footprint is essentially part of the 100-N-66 WIDS site.

C. INFORMATION SOURCES

Available information (list document number for each if applicable):

Historical Site Assessment: N/A Site Walkdown: N/A

IH Characterization Report: N/A Radiological Survey: N/A

IHC/FHC Document: Initial Hazard Categorization (IHC) Documentation Form for D4 of Buildings 105NB, 1722N and 1605NE: IHC-2005-0032

WIDS/SIS: RCC Stewardship Information System (SIS) Facility Summary Report for 1605-NE

PDSR: Post-Demolition Summary Report for the 1605-NE East Observation Post: CCN 157853

Facility Inspection: N/A

Waste Characterization Checklist: N/A Summary Report: N/A

Other:
- 100 Area D4 Project Building Completion Report, Rev. 0: WCH-473
- Removal Action Work Plan for 105-N/109-N Buildings Interim Safe Storage and Related Facilities, Rev. 1: DOE/RL-2005-43
- Photograph of the 1605-NE Facility Pre-Demolition, Time-Stamped: SIS Facility Summary Report for 1605-NE pg. 3 (2/9/2006)
- Photographs of the 1605-NE Facility Pre-Demolition, No Time Stamp: SIS Facility Summary Report for 1605-NE pg. 2, CCN 157853 pg. 4, and WCH-473 pg. 10
- Photographs of the 1605-NE Facility Post-Demolition, No Time Stamp: SIS Facility Summary Report for 1605-NE pg. 4 & CCN 157853 pg. 5

D. HAZARDOUS SUBSTANCES

Check all that apply:

☒ None ☐ Asbestos containing material ☐ Lead ☐ PCBs/PCB Articles ☐ Oils/Greases

☐ Chemicals List:

☐ Radiological Contamination ☐ Mercury/Mercury Devices

☐ Other:

References/Comments:
No reviewed document confirmed the presence of any hazardous substance at the 1605-NE facility.

Liquids: ☐ Yes ☒ No

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100-N ANCILLARY FACILITIES REMOVAL ACTION SAMPLING DETERMINATION FORM

Determination Number SDF-100N-026

If yes, describe source and nature of liquids:
The 1605-NE facility was used exclusively as a vantage and source of protection for 100-N guard personnel (WCH-473 pg. 1). No reviewed document indicated that liquids had been present at the facility.

Were the hazardous substances removed from the facility prior to demolition? ☐ Yes ☐ No

As verified by what documentation:
This question is not applicable as no reviewed document confirmed the presence of any hazardous substance at the 1605-NE facility.

Was there potential for hazardous substances to be introduced into the soils during facility operations or demolition? ☐ Yes ☐ No ☒ N/A

References/Comments:
The 1605-NE facility was located atop the 105-N Reactor roof, approximately 75 feet above grade (CCN 157853 pg. 1, IHC-2005-0032 pg. 1, and WCH-473 pg. 9). A minimum approximate distance of 100 feet separated the 1605-NE facility from the edge of the 105-N Reactor roof, as demonstrated by a pre-demolition survey (CCN 157853 Attachment 1).

List any hazardous materials left in the building for demolition:
N/A

Does review of historical records and process knowledge indicate a potential for radiological or chemical contamination to be present in the facility?
Chemical:
One reviewed document indicated that asbestos-containing material was believed to have been present in the 1605-NE facility (DOE/RL-2005-43 pg. 1-17). However, no reviewed document confirmed the presence of any hazardous substance either in or on the 1605-NE facility.

Radiological:
No reviewed document provided radiological survey information for the 1605-NE facility (CCN 157853 pgs. 1 & 2). The 1605-NE facility was not posted as a radiologically controlled area at the time of initial hazard categorization (IHC-2005-0032 pg. 1).

Comments:
N/A

E. FIELD OBSERVATIONS

Visual Inspection

Were any stained soils/anomalies discovered during or after demolition of the facility? ☐ Yes ☒ No

References/Comments:
As detailed in parts B and D of this form, the 1605-NE facility was not adjacent to any soil. No anomalies were found at the 1605-NE facility (CCN 157853 pg. 2).

Were samples taken of the stained soils/anomalies? ☐ Yes ☐ No ☒ N/A

References/Comments:

Do results of the samples indicate that chemical contamination exists? ☐ Yes ☐ No ☒ N/A

References/Comments:

Is the area potentially a discovery site? ☐ Yes ☒ No

References/Comments:

Radiological Surveys

Did radiological surveys (GPERS or equivalent) identify contamination? ☐ Yes ☒ No

References/Comments:
No reviewed document provided radiological survey information for the 1605-NE facility (CCN 157853 pgs. 1 & 2).

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100-N ANCILLARY FACILITIES REMOVAL ACTION SAMPLING DETERMINATION FORM

Determination Number SDF-100N-026

Were samples taken of the radiologically contaminated soils? ☐ Yes ☐ No ☒ N/A

References/Comments:

Is the area potentially a discovery site? ☐ Yes ☒ No

References/Comments:

Were the contaminated materials removed? ☐ Yes ☐ No ☒ N/A

References/Comments:
No reviewed document indicated the potential for presence of radiologically contaminated material at the 1605-NE facility.

F. WIDS SITES

Were there any WIDS sites affected by D4 activities? ☐ Yes ☒ No

If yes, list the WIDS sites:
100-N-66 encompasses the area underneath the 1605-NE facility footprint. The 1605-NE was a completely above grade facility that was attached to the roof of the 105-N Reactor Building. Its' removal did not affect the 100-N-66 waste site. The portion of the reactor building that was underneath the 1605-NE still remains under the roof of what is now the Interim Safe Storage (ISS) Enclosure of the 105-N Reactor Building.

Were the WIDS site(s) completely removed? ☐ Yes ☐ No

References/Comments:
N/A

Will the Ancillary Facility Footprint be deferred to FR to be closed out with a co-located Waste SIte? ☐ Yes ☐ No

References/Comments:
N/A

G. COPCs FOR SOILS AND STRUCTURES REMAINING AFTER DEMOLITION

What are the potential contaminants of concern for the remaining below-grade soil?

☒ None ☐ SVOC ☐ VOC ☐ Metals ☐ TPH ☐ Rad ☐ PCBs

☐ Other (Specify): _____

Comments:
No reviewed document confirmed the presence of any hazardous substance at the 1605-NE facility.

Summary of in-process soil sampling requirements:
N/A

Constituents detected / concentrations / rationale
N/A

Sample Collection Summary
No reviewed document provided sample information for the 1605-NE facility.

H. NOTES / ADDITIONAL INFORMATION

☐ Check here if additional information / data / maps / sketches are attached to this form.

If checked, list the attachment(s):
N/A

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100-N ANCILLARY FACILITIES REMOVAL ACTION SAMPLING DETERMINATION FORM

Determination Number
SDF-100N-026

I. SAMPLING

Are soil samples required to demonstrate that remaining structure or below-grade soils meet cleanup standards? ☐ Yes ☒ No

Based on the above information it was determined that sampling: ☐ will ☒ will not be required in order to demonstrate that cleanup criteria have been met.

The individual below acknowledges that the review of this facility has been completed. He or she also commits to provide to the Department of Energy (DOE) and the Washington State Department of Ecology (Ecology) any available information that could alter the sampling decision established in this form.

Information Reviewer Signature	Printed Name	Date
David Warren	David Warren	8 6 12

The regulatory representative below agrees with the decision outlined in section I of this form for the indicated facility and supports implementation of that decision based on the information currently available.

DOE Signature	Printed Name R F Garcia	Date 8/6/2012
Ecology Signature	Printed Name Rick Bond Rick Bond	Date 8/8/2012