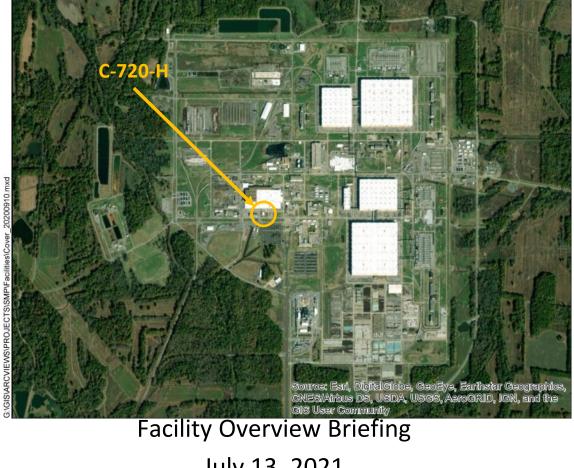
# **C-720-H Warehouse**



#### July 13, 2021

Reflects consultation with EPA and Kentucky in accordance with the Site Management Plan that occurred on June 28, 2021.

#### Purpose

- The C-720-H Warehouse is a candidate for future demolition and disposal, contingent upon funding priorities.
- Listed in Appendix 6 of the Site Management Plan (SMP); requires consultation with EPA and Kentucky for CERCLA screening prior to demolition.

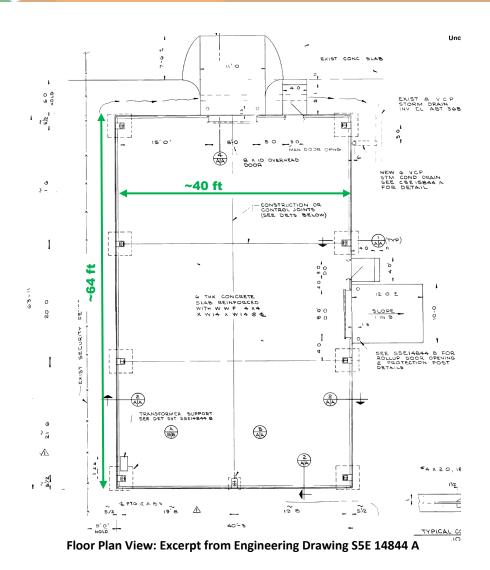


- This presentation is intended to serve as consultation, providing the basis for demolition and disposal of the aboveground structure outside of the FFA/CERCLA process.
- The remaining slab/soils will be subject to future CERCLA evaluation under Geographical Area (GA) 14.



#### **Construction History**

- C-720-H is located within the Paducah Site security fence, south of the C-720 Machine Shop and Stores Building.
- Constructed in 1978.
- Construction consists of a prefabricated metal building on a poured-concrete slab (6-inch thick).
- The facility is approximately 2,560 ft<sup>2</sup>.
  Measuring ~ 40 ft x ~ 64 ft.



# **Operational History**

- C-720-H has operated as a warehouse addition from its construction in 1978 to present.
- USEC leased the facility in the early 1990s and continued to use C-720-H as a warehouse addition for Plant Stores.
- C-720-H transitioned from USEC to DOE in 2014 and continues to be used as a warehouse.



Northeast Corner



North End of Building



East Side of Building

C-720-H Warehouse Photos: 3/2021

## **Operational History**

- C-720-H currently contains a variety of material being warehoused for Plant Stores (primarily overstocked items).
- ➢ No chemicals are stored in C-720-H.



Warehoused Supplies

#### **Current Status**

- C-720-H is being used as a warehouse addition for Plant Stores.
- Walkdown inspection conducted in March 2021 and employee interviews confirmed no unusual conditions.
  - □ No floor sumps or floor drains present.
  - No generator staging area (GSA) or satellite accumulation area (SAA).
  - □ No known chemical spills.
  - Not used for radiological storage; facility does not contain any radiological postings.
  - No visible evidence of environmental issues (e.g., no visible floor staining inside or immediately surrounding the facility outside).

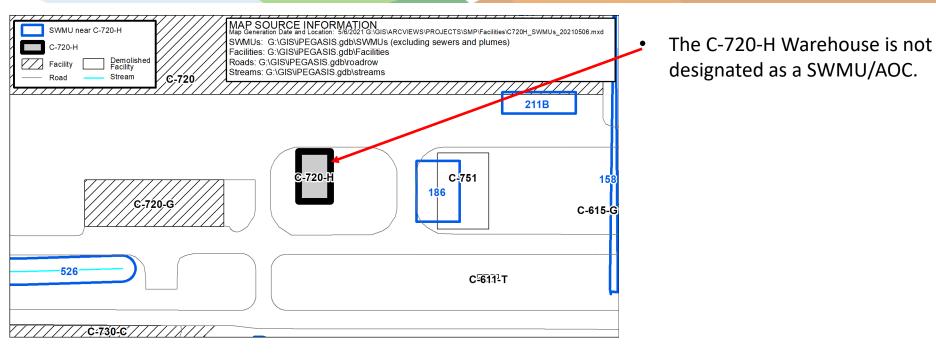
Steam and Condensate Piping in Northwest Corner of C-720-H



Ceiling View Showing Heaters/ Lighting



#### **Environmental Impacts** (Solid Waste Management Units)



SWMU No.	Facility Name	Current Status	NFA Approval By
158	Chilled-Water System Leak Site	Soils OU Remedial	
186	C-751 Fuel Facility	NFA	KDWM 10/20/19935
211B	C-720 TCE Spill Site Southeast	GWOU/	
		Soils and Slabs OU	
526	Internal Plant Drainage Ditch	Surface Water OU	

# **Environmental Impacts**

- No information to indicate a release or threatened release of a hazardous substance that would require an evaluation for a potential response action to protect future public health or welfare or the environment.
  - C-720-H has operated as a warehouse addition for Plant Stores from 1978 to present.
  - Though constructed in 1978, building materials used for construction could contain lead-based paints and asbestos-containing materials, both of which can be effectively verified during a predemolition inspection and properly managed using standard demolition and waste management practices.
  - No history or records of chemical use or spills that would pose an environmental release threat.

# **Conclusion and Recommendations**

- Walkdown inspection of the facility, employee interviews, and other reviewed historical information did not identify any unusual conditions that would pose a potential threat of environmental release during future demolition of the aboveground structure.
  - Deactivation will include removal of any accessible loose items being stored (to the extent practicable) prior to demolition.
  - □ Any floor drains will be delineated, documented, and isolated prior to demolition.
- Pending ceasing of operation, deactivation, and availability of funding, proceeding with demolition and disposal of the C-720-H facility (aboveground structure) outside of the FFA/CERCLA process, contingent upon the fact that no additional changes have occurred that would affect the CERCLA determination of the facility prior to demolition, is recommended.
- All applicable laws, regulations, and DOE procedures/protocols will be followed to ensure the demolition and disposal of the aboveground structure occurs in a safe, compliant manner, including conducting any additional radiological characterization through confirmation radiological surveys (as necessary) to support demolition and waste disposition.

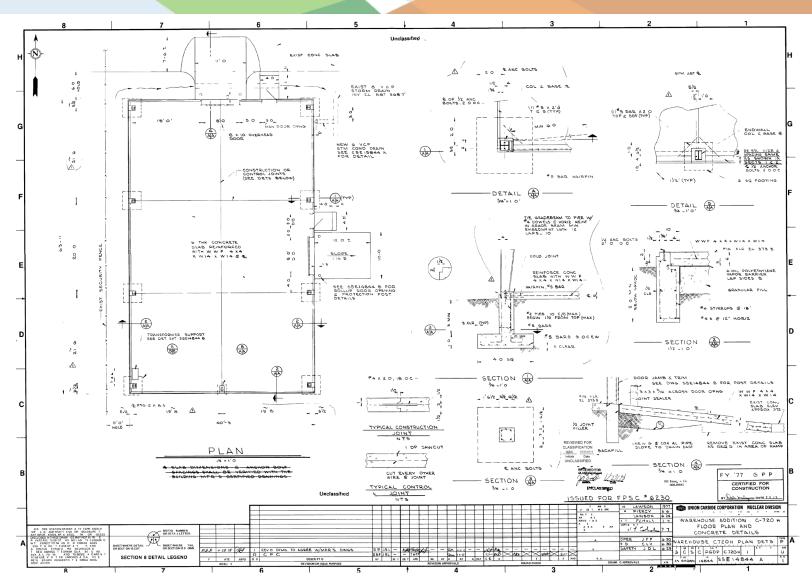
# **Conclusion and Recommendations**

- As part of the demolition of the aboveground structure, the appropriate best management practices (BMPs) will be evaluated and implemented (as needed) to prevent/minimize the pooling and/or migration of storm water that may come into contact with any contamination that may exist on the pad/subsurface structure(s). For example, the following BMPs will be implemented as necessary:
  - □ Radiological surveying will occur following demolition.
  - Decontamination and/or application of fixatives/barriers will be applied to contaminated surfaces above regulatory posting limits.
  - □ Isolation measures and other types of barriers to minimize and/or control runoff/pooling of contaminated storm water [e.g., seal inlets to drains/sumps/subsurface structure(s)].
- Removal of the C-720-H facility will be documented in the appropriate annual SMP revision.
- ➤ The future evaluation conducted for GA 14 will further evaluate the potential threat of release associated with the slab/soils from the C-720-H facility.

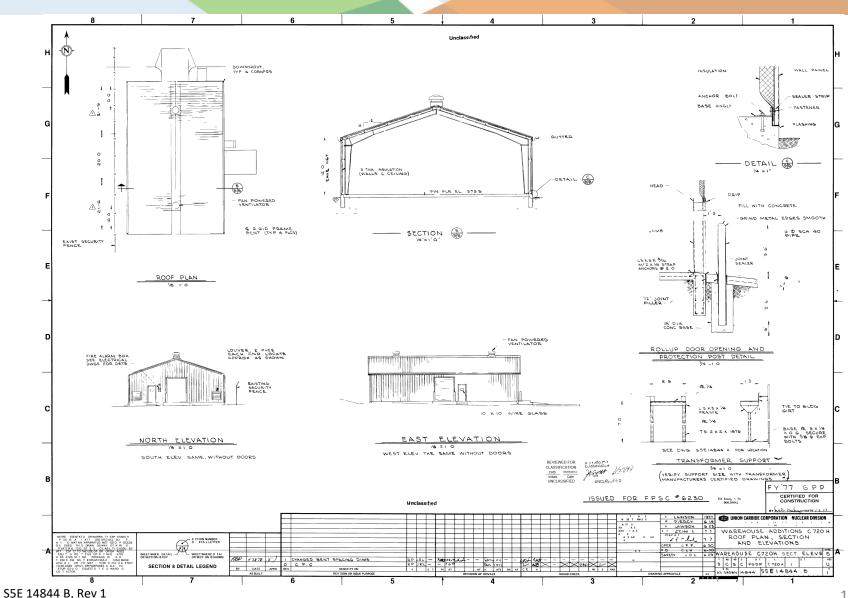
#### C-720-H Warehouse

#### **BACKUP INFORMATION**

## **C-720-H Engineering Drawings**



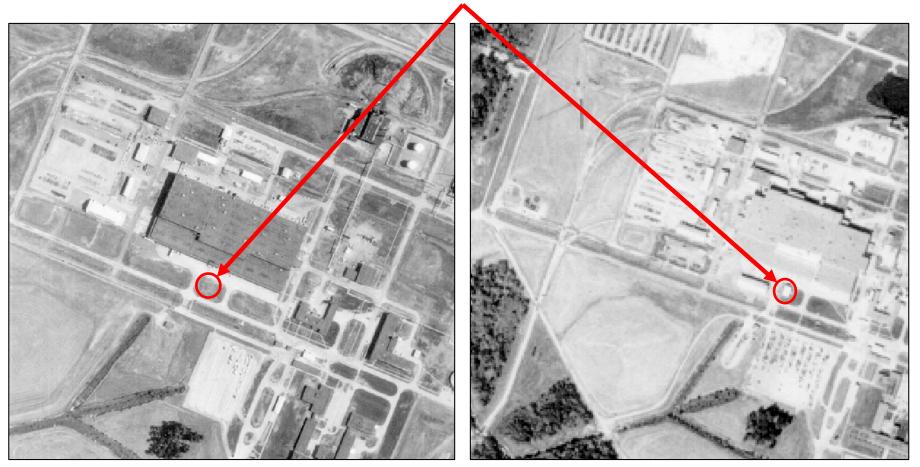
### **C-720-H Engineering Drawings**



13

#### C-720-H Aerial Photograph





Modified from Aerial Photo: September 1981 (81PGD100)

Modified from Aerial Photo: July 1971 (71PGD053)

# C-720-H Sources

- Engineering Drawings:
  - Provided in presentation
- Databases:
  - USEC's BPS
  - Issues Management System
  - Regulatory Compliance Archive Spill Log (pre-2018)
  - PCB Database (1989 2021)
  - Active GSAs and SAAs Master List
  - Employee Communication:
    - Facility Manager (25 years plant expertise)
    - Compliance Subject Matter Expert (45 years plant expertise)
- Documents:
  - Paducah Gaseous Diffusion Plant Sitewide Strategy Facility Background Information, FPDP-RPT-0021, May 2016
  - Report for Environmental Audit Supporting Transition of the Gaseous Diffusion Plants to the United States Enrichment Corporation, DOE/OR/1087&V5, June 1993
  - Fluor Federal Services, Inc., Paducah Deactivation Project Comprehensive Environmental Compliance Due Diligence Review, CP5-ES-0101
  - Paducah Asbestos Survey Executive Summary (Lee Wan Report), October 1990