

Reflects consultation with EPA and Kentucky in accordance with the Site Management Plan that occurred on September 9, 2020, updates made and presented May 20, 2021, and includes incorporation of comments from those discussions. EPA and Kentucky concurred on these revisions May 24, 2021, and May 25, 2021, respectively.

C-727 90-Day Mixed Waste Accumulation Facility (C-727-90-Day-Area)

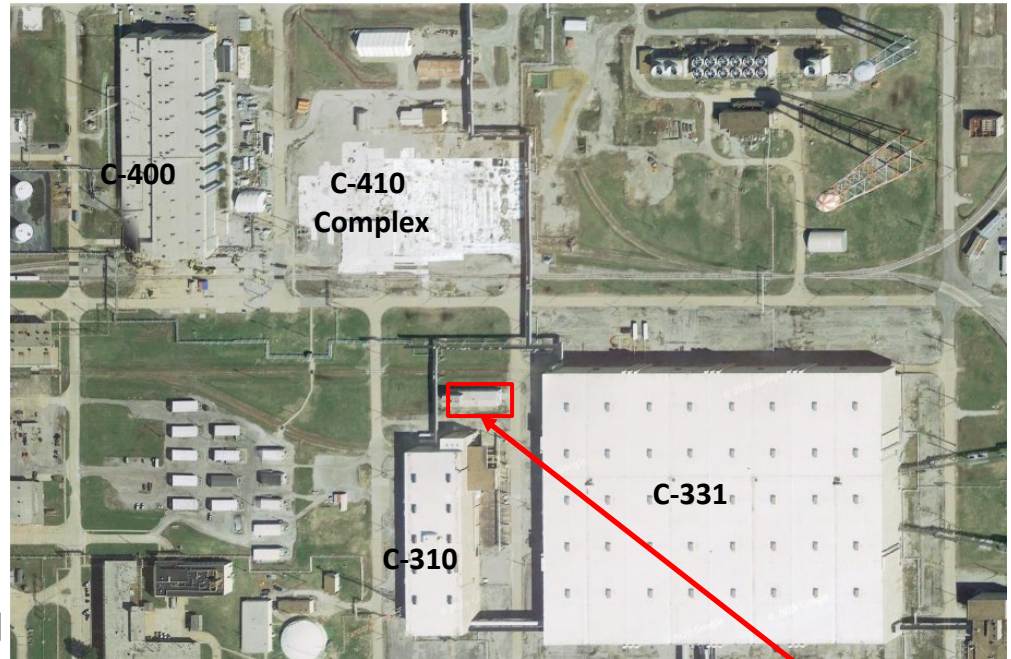


Facility Overview Briefing
Presented September 9, 2020
Updated May 20, 2021

C-727-90-Day Area

Purpose:

- C-727 was previously proposed for demolition in 2016 but deferred due to funding cuts.
- Candidate for future demolition contingent on funding priorities; slab/soils would remain for future CERCLA evaluation under Geographical Area (GA) 16.
- C-727 is one of facilities listed in Appendix 6 of the Site Management Plan (SMP) that require consultation with EPA and Kentucky. The FFA parties have agreed to continue collaboration in FY 2021 to discuss the timing and process for screening the remaining facilities in Appendix 6.
- This presentation is intended to serve as consultation providing basis for demolition and disposal of the aboveground structure outside of the FFA/CERCLA process.

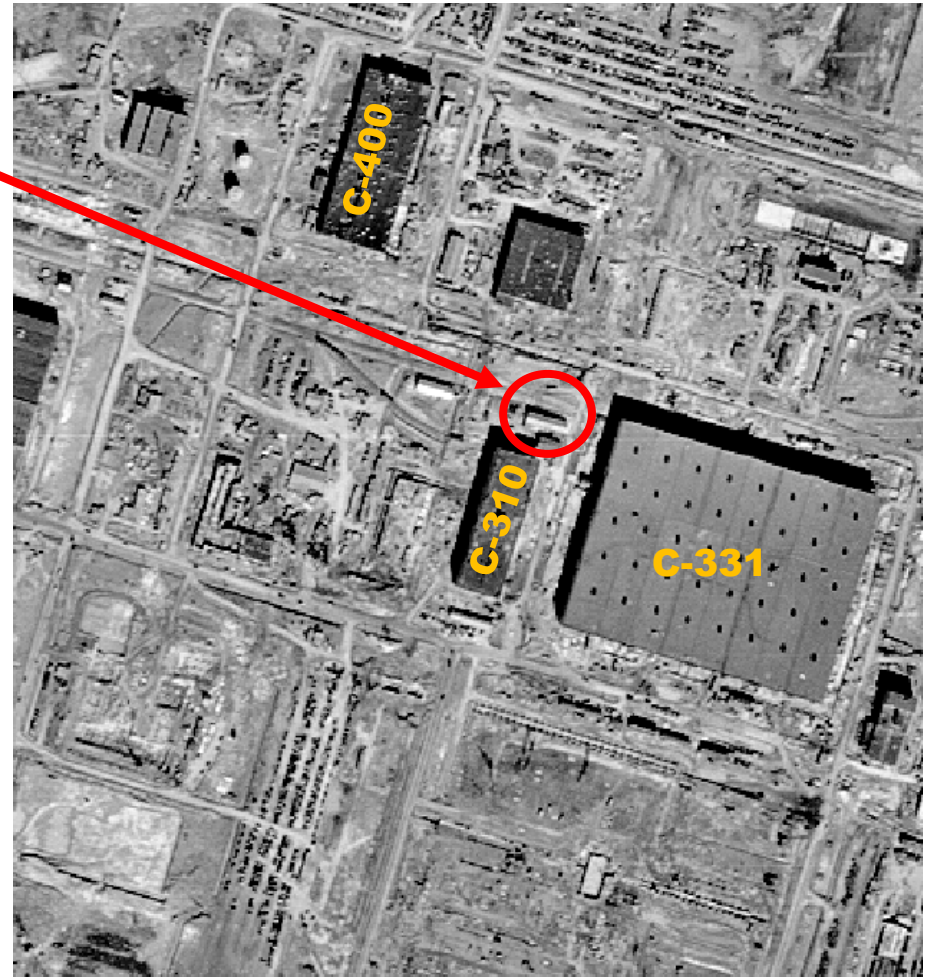


C-727 Facility Photo: June, 2020

C-727-90-Day Area

Construction History:

- Aerial photo confirms construction in the early 1950s during initial plant construction.
- Consist of a prefabricated steel building constructed on a 6-inch concrete slab.
- Located within the PGDP security fence north of C-310 and west of C-331.

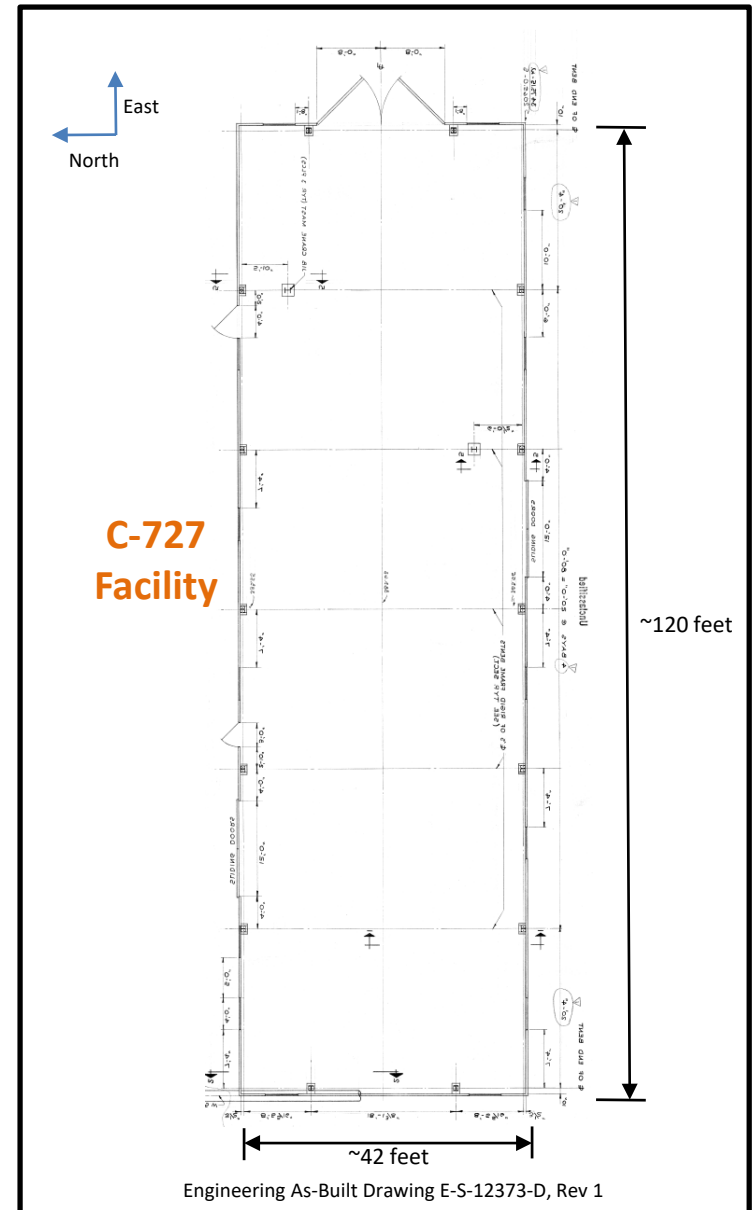


Modified from Aerial Photo: February 1, 1952 (1-65)

C-727-90-Day Area

Operational History:

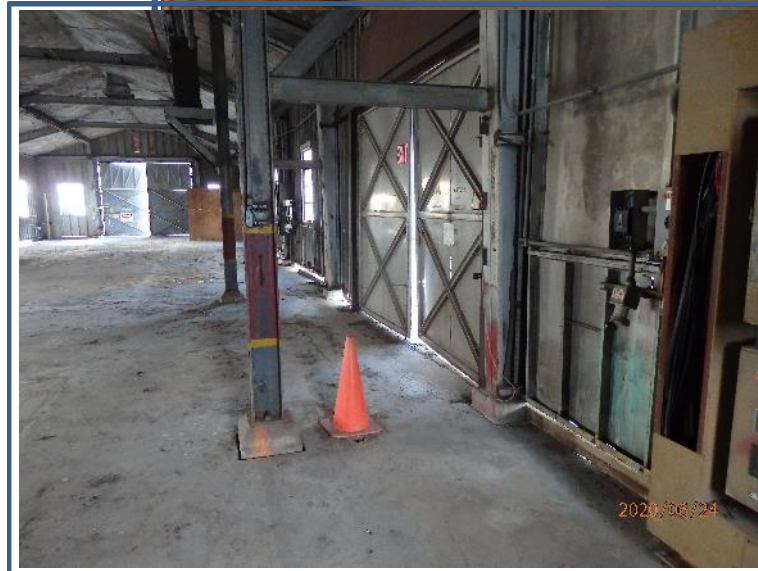
- C-727 was originally used as a heat treating facility, maintenance pipe fabricating shop, and storage of asbestos waste and asbestos abatement equipment:
 - Measuring ~120 ft. x ~42 ft.
- USEC leased the facility in the early 1990s and converted the facility to a < 90 day RCRA storage facility which operated until 2014.
- The USEC waste was managed in accordance with 40 CFR § 262.34 and in 2014 underwent a RCRA clean closure by USEC.



C-727- 90-Day Area

Current Status:

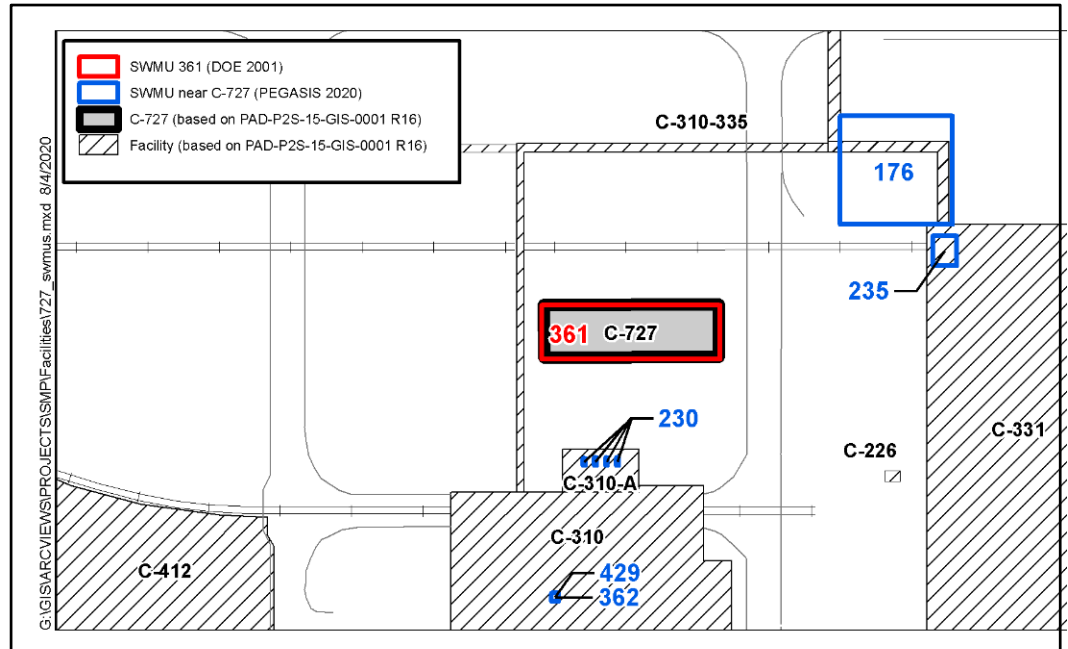
- Transitioned back from USEC to DOE in 2014 as a non-RCRA storage facility.
- Following transition to DOE, C-727 underwent deactivation to prepare it for demolition.
- Contents of the building have been removed and it is not in use.
- Listed in Appendix 6 of the SMP pending further CERCLA determination.



C-727- 90-Day Area

Environmental Impacts – Solid Waste Management Units

SWMU No.	Facility Name
176	C-331 RCW Leak Northwest Side
230	C-310-01
235	C-331-01
361	C-727-90 Day Area
362	G-310-04
429	S-310-04



- The C-727-90-Day Area was designated as SWMU 361 based on USEC converting its use to a RCRA <90 storage area.

C-727- 90-Day Area

Environmental Impacts:

- While not confirmed as present, building materials used for construction in the 1950s could contain lead-based paints and asbestos materials, both of which can be effectively contained and properly managed using standard demolition and waste management practices.

- During early years of operation, C-727 initially operated as a:
 - Heat treating and pipe fabricating facility that included the dipping/processing of freon condensers in a lead-lined pit which was emptied and filled.
 - Stored asbestos waste and asbestos equipment which since has been removed.

- The facility was leased by USEC and converted to a <90 day RCRA storage facility in the early 1990s which ceased operation in 2014.

C-727- 90-Day Area

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:
 - CERCLA Site Evaluation (i.e., SWMU Assessment Report) completed and issued in 2001; Kentucky granted no further action under the RCRA/HSWA Permits and Site Management Plan in 2007.
 - < 90 day storage area for containerized waste with secondary containment; managed in accordance with applicable RCRA regulations; no reported spills; subject to internal and regulator inspections; and, underwent a RCRA-clean closure [40 CFR 264.34(A)(1)(iv)]; which was verified by KDWM in October of 2014.
 - In preparation for demolition, results from radiological surveys of the interior building surfaces indicate nearly all radionuclides present are fixed with only about 1% being removable.

C-727- 90-Day Area

Conclusions and Recommendations:

- An FRNP inspection conducted in June 2020 verified the contents of the building have been removed, sumps/pits filled, and no conditions remain that would impact the safe and effective demolition of the aboveground structure.
 - ❑ Deactivation will include removal of any accessible loose items being stored (to the extent practicable) prior to demolition.
 - ❑ Floor drains (if present) will be delineated, documented, and isolated prior to demolition
- Pending availability of funding, DOE/FRNP proposes to proceed in the near-term with demolition and disposal of the C-727 (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.
- 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 survey (as necessary) to support demolition and waste disposition.

C-727- 90-Day Area

Conclusions 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 and/or barriers 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)].
- Document the removal of the C-727 in the appropriate annual SMP revision.
- The future evaluation conducted for GA 16 will further evaluate the threat of release associated with the concrete pad/soils from C-727.



C-727- 90-Day Area

SWMU Summary

C-727- 90-Day Area

SWMU No.	Facility Name	Current Status	NFA Approval By
176	C-331 RCW Leak Northwest Side	Soils & Slabs OU	--
230	C-310-01	NFA	KDWM 4/24/2009
235	C-331-01	NFA	KDWM 4/24/2009
361	C-727-90 Day Area	NFA	KDWM 8/28/2007
362	G-310-04	NFA	KDWM 8/28/2007
429	S-310-04	NFA	KDWM 8/28/2007