

**Bechtel**

## Interoffice Memorandum

Rec'd 2/98  
RHP

LTSM012574

To File File No. 128/7315

Subject Status of Bliss and Laughlin Steel Characterization and Remedial Action Planning Date July 26, 1995

From L.M. Artates *Juno*

or FUSRAP

Copies To E.T. Newberry At BNI Ext 6-3537  
P.R. Huber  
E. McNamee  
M. Bukhari  
D. Beard  
D. Davis  
C. Richardson  
M. R. Brown

The purpose of this memorandum is to document the status of the Bliss and Laughlin Steel characterization and remedial action planning at the point when further action was postponed until FY '97. Various comments and information have been included, as well as copies of documents that may have not previously been recorded, and references to important documents that have been processed through the project document control system.

**Status:**

Contamination is limited to floor and overhead surfaces in the area known as the Special Finishing Area, and one concrete-filled trench just west of the Special Finishing Area. The scope, manloaded schedule, and budget for Bliss and Laughlin Steel expedited remedial action were completed in the planning phase for FY '96, and moved forward in the lifecycle schedule to FY '97. Subcontract and Technical Specifications are in progress for the floor decontamination. The Safety Envelope is in the revision process for the RA. Site visit memos and other communications should be consulted for information regarding contacts with the site owner, Niagara Cold Drawn Corp.

**Characterization Results:**

Results from the Bliss and Laughlin Steel characterization indicate the following:

- Sections of three trusses and the lower sections of the ceiling above the Special Finishing area were surveyed. Two out of 45 locations were above 5000 dpm/100 sq. cm beta/gamma.
- The surface contamination of the floor in the Special Finishing Area is limited to approximately 19 meters by nine meters of floor. Direct beta/gamma readings are up to



ACTION REQ'D	( ) YES	(X) NO	DUE DATE	_____
RESPONSE TO GWS/OT NO.	_____			
<input type="checkbox"/> PPL	<input type="checkbox"/> Permit	<input type="checkbox"/> Milestones	<input type="checkbox"/> Gen	<input type="checkbox"/> CON
<input type="checkbox"/> GAA	<input type="checkbox"/> 2-98 Yr	<input type="checkbox"/> Yr End	_____	

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LBLS 21.00

July 26, 1995

Page 2

280,000 dpm/100cm<sup>2</sup>. Samples of material scraped out of rough floor areas are up to 23,570 pCi/g U-238, with no long-lived daughters present. The floor is concrete, with areas of patching, roughness, spalling, and cuts for machinery footings. Machinery is still in place and operating. Operations include covering steel surfaces with rustproofing oil and absorbing the excess oil with large amounts of clay absorbent.

- No soil samples from the subsurface showed evidence of contamination. One core sample taken through a concrete-filled trench showed elevated uranium levels. This material contained no long-lived daughters, and appears to be limited to debris deposited in the trench prior to sealing with concrete. The soil collected from below this material was not above criteria.
- The remainder of the building was surveyed as extensively as building conditions allowed, and showed no evidence of additional contaminated areas.
- A composite sample from the floor in the Special Finishing Area was analyzed for TCLP total, and showed no RCRA hazardous constituents.

**Notes:**

Tim Vitkus of ORISE was contacted as the IVC during the characterization planning stages in order to clarify the results of the designation survey and obtain verbal concurrence on the coverage of the planned characterization activities. Characterization results agree with the results shown in the Designation Survey Report. The only significant unknown is the extent of the contamination in the overheads. Site owner activities prevented sufficient access to overheads with scaffolding or manlifts.

CCN's

- 128031 - FCN-128-02 - Actual soil samples collected
- 128030 - FCN-128-03 - Description of concrete sampling
- 127098 - FCN-128-01 - Description of truss surveys/sampling
- 129946 - BLS-TECH MEMO - Bliss & Laughlin Steel Characterization Results
- 120248 - Bliss & Laughlin Steel Site Trip Report
- 124601 - From Artates to Dist. re: BLS - DQO Development for Characterization
- 130971 - Closed WI-95-073, Characterization WI
- 132034 - Closed SWI 128-S00.001
- 126433 - From Artates to Newberry, E re: BLS-Pre-char. site visit
- 121690 - Readiness Review Needs Evaluation
- 109197 - Phone Call Record: P. Huber to J. F. Walia re: Rad testing near the B&L Site
- 116886 - From Vitkus to Williams, A, re: BLS - Addl. data needs.
- 118027 - From Vitkus to Williams, A, re: BLS - Proposed rad/char survey plan
- 125760 - From Vitkus to Williams, A, re: BLS - - exterior radiological survey
- 118523 - Trans. of Justifications for NY REI's
- 125932 - QAA128A-01, QAA for Bliss & Laughlin Steel Characterization, Rev.0
- 126916 - From Richardson to Dist re: Closed QAP128A-01-00, BLS Characterization
- 125032 - WI-95-062 - Safety and Health Plan for BLS Expedited Remedial Action

July 26, 1995

Page 3

- 130254 - Activity Safety Envelope for Site Characterization and Remediation at the Former Bliss and Laughlin Steel Company, Rev. 0; February 8, 1995  
129381 - Project Document Review of SC-525 CHEMICAL DECON OF FLOOR SLABS  
130693 - From Huber to Kirk re: Deletion from FY'95 scope  
130907 - From Kirk to Schaus (of Niagara Cold Drawn), re: BLS - Delaying removal action

Drawings

- 128F002.DGN - 11x17 of BLS Building w/detail showing characterization results  
128F004.DGN - 8.5x11 of Trusses 18, 19, 20 showing survey results  
128F003.DGN - 11x17 of Special Finishing Area showing characterization results  
128-SK000-C01 Rev. A

# Bechtel

Interoffice Memorandum

132584

To Paul Huber  
Subject Bliss & Laughlin  
Facility Visit

File No.  
Date August 30, 1994  
From Jack Mattson  
Of CISS/Colonie, NY  
At 518-482-0237

1. Conduct a characterization exercise sufficient to determine the extent of the contamination requiring remediation.
  - Retrieve core samples sufficient to determine if "U" is under concrete patches and filled in trenches and below metal covered floor recesses
  - production floor surface contamination,
  - loading dock area,
  - any exit areas near current identified contaminated areas.
2. Develop remediation plan based on results of the characterization.
3. Develop integrated schedule based on owners production schedule.
4. Establish area for a small office, shower facility, craft break room, and staging and waste processing.
5. Restrictions:
  - Overhead bridge crane must remain usable (lower structure approx. 16' from floor surface).
  - Bays are approx. 100' wide by 500' long.
  - Characterization may take place with no problem once the real estate instrument is in place.
  - The remediation process may not begin until July, FY'95 time frame.
  - Current manufacturing is scheduled 3 shifts per day, 6 days per week.
  - Can not shut the owner's production process down for the duration of the remedial process.
  - Equipment must be relocated by owner.
  - Must have the capabilities to clear decontaminated areas with a third party verifier paralleling the decontamination activities.
  - Develop closure paperwork.



*A Memo From the Desk of Laura Artates*

05/09/95

Eric,

The following paragraph explains the use of 'elevated' areas between 2000 and 5000 dpm/100cm<sup>2</sup> in the figures for the Bliss & Laughlin Characterization Technical Memorandum.

The Data Quality Objectives development process as published by EPA dictates that acceptable decision error be taken into consideration when setting decision levels for remedial action. False negative decision error (designating a location as not contaminated when in reality it is) can result in more severe consequences than a false positive decision error, since it can result in negative public perceptions and additional costs incurred for remobilization to remediate areas that were not included in remediation scope. In order to limit the false negative decision error, the decision level for characterization was shifted downward 20% (the expected standard deviation for survey results). According to the Data Quality Objectives, 4000 dpm/100 cm<sup>2</sup> is the decision level for designating a location as requiring remediation for fixed contamination, although these locations are not marked as contaminated in the figures. In order to facilitate remedial design, which will consist of either non-destructive chemical remediation or surface abrasion, the criteria for 'elevated' locations was added in the results, effectively reducing the probability of a false negative decision error again. This was considered to be an appropriately conservative approach for remedial design, since it reduced the probability of a false negative decision error as far as possible without significantly affecting the cost of remediation.

Sincerely,

Laura Artates



## Bliss Laughlin Steel Samples

Page 1 of 1

Waste Stream	SUB	D#	W.O.	Analyses	Collected	Sample ID	Purpose	Description
	9503L131	20506	926	TCLP Total	10-Mar-95	BLS013	Char	Composite of scraped-up floor material
	E15389	20558	9503036	Iso-U, Gamma spec list 1	3-Mar-95	BLS019	QC	Rinse Blank
	E15446	20647	9503035	Iso-U, Gamma spec list 1	5-Mar-95	BLS001-005, 007-009, 011, 014-018	Char	Rad char samples, floor, subfloor, overheads.

## Bliss and Laughlin Steel Surveys and Logs

Page 1 of 1

Location	SUB	D#	Survey Type	Purpose	Date	Survey/Log
ET logbook		20372	log	char	2/25-3/8	128-e-007
Floors (Lev. I, II, & III and hotspots) upper truss and ceiling readings, Background meas., Columns	E15369	20525	DS & TC	Char	2/26 - 3/5	128DT001 through 128DT008.
Floors - Lev II & III scans	E15370	20526	Floor Monitor	Char	2/26/95 3/5/95	
Trenches, Pipe, Water shutoff valve access scans	E15497	20702	WGS (Lg. Area)	Char	3/5/95	
Eberline technicians logs	E15496	20724	log	H&S	2/25-3/5	
Chem sample logbook	E15498	20725	log	char	3/5/95	128-t-004
Rad sample logbook	E15499	20726	log	char	2/25-3/5	128-t-001
truck loading area, special finishing area, pillar E-8	E15513	20767	air sampling radon daughters	H&S	2/25	
Truss 18, 19, 20, Bottom Horizontals Survey (and scan)	E15514	20768	DS&TC	Char	2/25/95	128DT004