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STS CONSULTANTS, LTD.

Work Plan for Investigation and Removal of Radiologically Impacted Soil

Lakeshore East LLC
One West Superior, Suite 200
Chicago, Illinois 60610

STS Project No. 1-32193-XA
June 24, 2002
Revised September 13, 2002
Revised September 30, 2002

STS CONSULTANTS

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Vernon Hills, Illinois 60061
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October 1, 2002

Mr. Fred Micke
Ms. Verneta Simon
U. S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd., SE-5J
Chicago, Illinois 60604

Re: Work Plan for Investigation and Removal of Radiologically Impacted Soil, Lakeshore East Site, Southwest Corner of Wacker Drive and Lake Shore Drive, 221 North Columbus Drive, Chicago, Illinois – STS Project No. 1-32193-XA

Dear Mr. Micke and Ms. Simon:

Enclosed please find the Work Plan for the above-referenced site. This Work Plan has been revised in response to your review and comments provided to STS in your letters dated September 4 and September 20, 2002. We have provided three copies for your use and distribution.

Please contact us with any questions you may have regarding the attached Work Plan.

Regards,

STS CONSULTANTS, LTD.

Steven C. Kornder, Ph.D.
Senior Project Geochemist

Richard G. Berggreen, C.P.G.
Principal Geologist

cc: David Carlins, Lakeshore East, LLC (3 copies)
Sean Bezark, Altheimer & Gray (1 copy)
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Mark Krippel, Kerr-McGee Chemical LLC (1 copy)
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Lakeshore East LLC
STS Project No. 1-32193-XA
June 24, 2002
Revised September 13, 2002
Revised September 30, 2002

WORK PLAN FOR INVESTIGATION AND REMOVAL OF RADIOLOGICALLY IMPACTED SOIL LAKESHORE EAST DEVELOPMENT

1.0 INTRODUCTION

This Work Plan was developed for investigation and removal of radiologically impacted soil from the Lakeshore East Development Site (Subject Site). The Subject Site consists of approximately 26 acres located at the southwest corner of Wacker Drive and Lake Shore Drive at 221 North Columbus Drive, Chicago, Illinois (Figure 1). The site is currently developed as Family Golf Centers at Chicago Metro, a golf course and driving range, with associated support buildings, facilities and parking lots. The Subject Site is being investigated as part of a proposed commercial and residential development.

The Work Plan describes the:

- Procedures for managing the removal of radiologically impacted soil above the 7.1 pCi/g cleanup threshold.
- Survey methods proposed for identifying radiologically impacted materials during the grading and excavation activities.
- Closure Report and Documentation of the work activities performed relating to the removal of radiologically impacted soil including health and safety procedures.

Following review and approval of this Work Plan by United States Environmental Protection Agency (USEPA), activities will begin with the removal of the radiologically impacted soils previously identified. Monitoring will be conducted concurrently with the excavation operations. The monitoring activities will be directed toward the identification of radiologically impacted materials within the excavation areas. Radiologically impacted material that is excavated will be transported to a disposal facility licensed to dispose of this material. After completion of the removal activities required by this Work Plan, a report will be prepared documenting the removal activities and indicating the location, if any, of impacted soil identified that will remain on-site. The USEPA will be requested to prepare a "Certification of Completion Letter" acknowledging the completion of the investigation and removal of impacted material. This "Certification of Completion Letter" is requested to acknowledge that conditions at the site are protective of human health and the environment and that no further remediation is necessary.

1.1 Background

Several properties north of the Chicago River in the Streeterville neighborhood of Chicago, Illinois have been found to exhibit evidence of radiological impacts from the former processing of thorium-bearing mineral sands by Lindsay Light and Chemical Company (Lindsay Light) during the 1910s, 20s and 30s. The radiological impacts consist of elevated concentrations of thorium, uranium and their radioactive decay products.

Due to their experience with the Lindsay Light sites the USEPA requested access and conducted a reconnaissance survey of a portion of the Subject Site. That survey identified at least two locations where the gamma radiation levels were anomalously high. Field analysis by USEPA using a portable multi-channel analyzer in areas exhibiting elevated gamma radiation identified uranium and thorium radionuclides consistent with the other Streeterville properties (USEPA correspondence, July 2, 2001).

STS was contracted to investigate the entire 26-acre property to evaluate whether additional locations exhibiting elevated radioactivity might be present, and to attempt to further investigate the USEPA survey results. STS conducted a walkover survey of the entire property on a 5-meter grid. The survey identified locations exhibiting elevated gamma radiation which were consistent with the USEPA findings. Borings, step-out borings, down-hole gamma surveys, and radiological analysis of soil samples were also conducted to document the apparent extent of the radiologically impacted material. The findings of the investigation were summarized in a report dated September 19, 2001, and in an addendum letter report dated October 2, 2001.

The identification of buried radioactive materials from surface surveys is constrained by the presence of soil cover of more that about two feet that can shield radioactive material from detection. The ground surface dating from about the year 1900 was researched to establish the ground surface elevation before the industrial use of the radioactive materials was begun in the site vicinity. The apparent historical site ground surface elevation was evaluated and described in STS's report dated January 2002. Additionally, a fill thickness map was subsequently developed by comparing the year 1900 site grade to the current site topography (STS, February 2002). The resulting fill thickness map identified those areas where the fill over the 1900 ground surface was in excess of 2 feet thick and therefore could potentially mask the presence of radioactive soil from detection by a surface survey. A total of 22 (fill thickness) borings were drilled and numbered 100 through 122 (Figure 2) and were surveyed by down-hole gamma logging for

evidence of radiologically impacted soil. The borings ranged from 4 to 10 feet deep and were intended to extend a minimum of 1 foot below the 1900 ground surface elevation.

STS's review of the historical records also identified the presence of several shipping slips on the Subject Site that were filled during a period which was concurrent with the Lindsay Light manufacturing operations. The location of these slips is shown on Figure 2. Borings within the slip areas were drilled on a 10-meter grid over the entire extent of the slips as of the year 1906 to explore the slips for evidence that radiological material may have been included in the fill. A total of 215 borings were drilled to examine the slip areas in January 2002. Borings in Slips C, D, and E are designated with a letter indicating the slip and a number indicating the boring number (i.e., C-1 reflects Slip C, boring 1). The boring layout is also shown on Figure 2. Additionally, a final set of borings, step-out borings, were positioned around those slip borings where evidence of elevated gamma radiation was noted in the down-hole logging of the initial 10 meter grid borings. These step-out borings were for the purpose of identifying the lateral extent of the radiologically impacted soil noted in the slip grid boring.

The results of the additional boring activities conducted in January 2002 are included the STS report of February 8, 2002. All of the fill thickness, slip and step-out borings were surveyed for elevated radioactivity by collecting down-hole gamma measurements. No additional locations exhibiting elevated radioactivity were identified in the borings in the thicker fill areas outside the slips. No elevated gamma readings were noted in the borings drilled in Slip C near the northwest corner of the site. One additional area was identified in Slip E and five additional areas were identified in Slip D.

In summary, based on the results of the investigations previously completed by STS, the radiologically impacted soil appears to be restricted to two localized areas. These areas are within or in close proximity to the former locations of Slips D and E. The volume of impacted soil identified using the data developed, and including several assumptions that would tend to overestimate the amount of impacted soil, resulted in an estimate of 1,136 cubic yards (CY) (STS, February 2002). However, subsequent excavation and grading activities may discover additional soil beyond that identified in the previous explorations. That material may also possibly require removal.

2.0 PROPOSED WORK ACTIVITIES

2.1 General Description

There are three phases of work that comprise the investigation and remediation of the Subject Site. The Initial Investigation and Delineation Phase (Phase I) has already been completed. The Investigation and Delineation Phase started with the survey and sampling work conducted by USEPA and/or STS and reported in the USEPA July 2, 2001 letter report and the STS September 2001, October 2001 and February 2002 reports. A summary of the Phase I results was provided in Section 1.1. The scope of work for Phases II and III comprises the work described in this Work Plan and summarized below.

The Radiologically Impacted Soil Removal Phase (Phase II) will consist of the removal of the radiologically impacted zones identified in the Initial Investigation and Delineation Phase. The Phase I results indicated that with one exception (boring number D-71) the impacted soil was confined to depths less than 10 feet. Therefore, the excavation and removal phase will remove impacted soil above the groundwater table, which is anticipated to be at a depth of 8 to 10 feet at the Subject Site. Removal of impacted material below groundwater, which would include material at depths greater than 10 feet, is not proposed since these deeper materials, if present, are shielded sufficiently by the overlying soil and/or groundwater to minimize the exposure hazard at the ground surface.

If radiologically-impacted material below groundwater will be left at the Site, a groundwater sample of the standing water within the excavation will be collected and analyzed for radiological impact. In addition, the location of impacted material that will remain at the Site will be referenced to surveyed coordinates based on traditional land surveying techniques to facilitate the accurate representation of the material in reports and on drawings.

It is acknowledged that if radiologically-impacted soil remains at the Site following completion of this work, Lakeshore East will work with USEPA regarding the required documentation relative to this residual impacted material. At present, in the absence of knowing whether material will be left, at what location, on private or public property, depth, quantity or activity, determination of the appropriate document is not feasible.

The Subject Site will be graded in preparation for construction activities. The Site-wide Grading and Monitoring (Phase III) will involve radiological surveys of those areas that are covered by greater than 18 inches of post 1900 fill soil as the areas are exposed during the site development grading process.

These post 1900 fill areas are shown on Figure 4. The Phase III activities will involve the grading of fill soils in thin lifts (18 inches maximum), which because of fill thickness, may have shielded the presence of radiologically impacted fill material during the initial surficial survey. Therefore, surficial surveys will be performed throughout the grading process in areas were post-1900s fill soil greater than 18 inches thick is present. Any soil above the cleanup threshold of 7.1 pCi/g total radium will be removed to clean limits, and the impacted location confirmed clean through confirmation surveys and verification sampling by USEPA. The determination that an impacted location has met the clean-up criteria will be made through analysis of soil samples to measure the soil concentration of contaminant radionuclides. A more detailed description of these activities is presented in the following sections.

2.2 Excavation of Radiologically Impacted Soil (Phase II)

It is anticipated that the removal activities will begin with the impacted areas identified in the southern portion of the property within the former Slip E (Figure 4). Removal activities will be completed in the southern area before moving to the northern area. That area will be finished before beginning the site grading phase. Excavation will proceed in two phases, radiologically impacted soil removal (Phase II) and the site-wide grading and monitoring phase (Phase III). Phase II will consist of the removal of the radiologically impacted soil identified through the site walk-over gamma survey and boring programs previously completed and summarized in the STS reports of September 2001 and February 8, 2002. Those soils will be removed to apparently clean limits of 7.1 pCi/g total radium or less. The excavations will be designated Exclusion Zones for purposes of health and safety requirements.

The excavation process will utilize an excavator with a maximum one CY bucket. This bucket size will facilitate loading the transport containers without spilling and/or spreading the contamination. Impacted soil will be loaded directly into transport boxes. Transport boxes will be lined, covered, and sealed, and the exteriors confirmed clean prior to leaving the Subject Site, in accordance with SOP-320 (Appendix B).

At locations where impacted soil is covered by clean soil, excavation will be limited to not more than 18 inches per lift followed by a survey for elevated gamma readings. This restriction is due to the shielding provided by soil, which could preclude detecting impacted soil beneath a soil cover of greater than 18 inches. Excavation will proceed to excavate the impacted soils at the Subject Site. The excavations will proceed to clean limits and will be confirmed by surveys conducted during the excavation process. Once the confirmation survey has confirmed the absence of radiologically impacted soil (SOP-210), the excavation will be subject to verification survey and sampling by USEPA, in accordance with Section 3.2.3 of this Work Plan (SOP-223 and SOP-214 of Appendix B).

If floor slabs are encountered within the post-1900 fill materials, the slab will be broken and removed and the soil beneath the slab screened for verification and closure by USEPA. Concrete slabs, footings or walls encountered during the excavation will be cleaned of adhering contamination, if any, and after release by USEPA as non-radiologically impacted, will either be removed from the site or stockpiled on-site for subsequent management in connection with site development work.

2.3 Site Grading and Monitoring (Phase III)

The Subject Site will be graded in preparation for construction activities. Phase III will involve the surveying for radioactivity of post 1900s fill soil that, because of fill thickness, may have shielded the presence of a radiologically impacted soil during the Phase I surficial survey. Surficial surveys will be performed as grading proceeds in the areas where the post 1900 fill is in excess of 18 inches thick in accordance with Section 5.7 of SOP-210 (Appendix B). These post 1900 fill areas are shown on Figure 4. All impacted soil will be removed to clean limits. Grading will be limited to lifts of 18 inches or less between surveys.

Former building foundations or buildings with basements built after 1900 have not been identified at the Subject Site. However, if discovered during the grading process, the potential presence of radiologically impacted fill materials below the floor slab or basement floor and any fill materials within the basement will be investigated. For the materials within the basement structure the radiological survey methods will be similar to those used for the excavation process (i.e., investigation in maximum 18 inch lifts through the full thickness of the basement fill). For soil below the floor, the method of investigation will consist of the complete removal of the floor and a subsequent surficial survey. The discovery and subsequent investigation of such structures will be included within the closure report for the Subject Site.

2.4 Construction Monitoring

Radiation monitoring will continue during site development and construction as part of the following activities:

- Utility installation; and
- Foundation excavations in certain areas of the site.

2.4.1 Utilities

The installation or excavation of utilities will occur during the grading and subsequent construction phases. Utility excavations will be screened for the presence of radiologically impacted materials when the utility activities are proposed for areas containing post-1900 fill materials which have not been previously surveyed. These areas will be limited to the shipping slip areas shown on Figure 1.

These surveys will be conducted following the methodology for excavation of apparently clean soil in Sections 2.2 and 2.3. Excavation will be limited to not more than 18 inches. All impacted soils will be removed to clean limits or to the depth of groundwater, which is anticipated to occur at a depth of about 10 feet. Areas containing impacted soil above the 7.1 pCi/g cleanup threshold will remain designated as Exclusion Zones until the area is verified clean by USEPA. Work within any utility installation area designated as an Exclusion Zone will require appropriate personal protective equipment (PPE) and personal air monitoring. Personnel entering Exclusion Zones must be 40-hour health and safety trained. All equipment and personnel that enter an Exclusion Zone will be frisked clean upon leaving the area.

2.4.2 Foundations

Drilled or excavated foundations may be installed in post-1900s fill materials, and will be screened for radioactivity during the grading and subsequent construction phases. Spoil from drilled foundations will be screened for the presence of radiologically impacted materials when the drilling activity is proposed for an area containing post-1900 fill material, such as in the slip areas. Radiological surveying will be limited to these fill materials. Natural soil excavation and drilled spoil will not be surveyed for radioactivity. Spoil materials exhibiting a radiological impact above the 7.1 pCi/g cleanup threshold will be managed for disposal according to Section 3.3. The closure report will provide the location, if any, of impacted material identified during these drilling activities that will remain on-site.

Foundation excavations will be screened for the presence of radiologically impacted materials if the excavation activities are proposed for areas containing post-1900 fill materials. These surveys will be conducted following the methodology for excavation of apparently clean soil in Sections 2.2 and 2.3. Excavations will be limited to not more than 18 inches between surveys. (Note that the 18 inch limit will not apply to any caisson or other drilled foundation elements due to the construction methods for such features.) Impacted soils will be removed to clean limits or to depth of groundwater (i.e., about 10 feet). Areas containing material above the 7.1 pCi/g cleanup threshold will remain designated as Exclusion Zones until the areas are verified clean by USEPA. Work within an area designated as an Exclusion

Zone will require appropriate personal protective equipment (PPE) and personal air monitoring. Personnel entering Exclusion Zones will be 40-hour health and safety trained and all equipment/personnel will be frisked clean on leaving the area.

3.0 METHODS

3.1 Cleanup Threshold

The USEPA has set the cleanup level as 5 picocuries per gram (pCi/g) total radium (Ra-226 and Ra-228) above the background. A level of 2.1 pCi/g total radium is currently considered background for the area by the USEPA. Thus, radiologically impacted material is defined by the USEPA for the Streeterville area as exceeding a threshold of 7.1 (pCi/g) total radium.

Field measurements will be taken of gamma radiation levels using a Ludlum 2221 rater-scaler and a 2 x 2 NaI detector. The equipment will be calibrated to determine the gamma count in counts per minute (cpm) that is equivalent to 7.1 pCi/g. Equipment calibration will be performed using the thorium calibration blocks at the Kerr-McGee West Chicago Rare Earth Facility.

Field measurements of gamma counts will include the following:

- Surveys of excavation as clean overburden is removed;
- Surveys of excavation as radiologically impacted soil is removed;
- Surveys of excavations to document all impacted soil has been removed;
- Surveys of Phase III grading as 18-inch lifts are removed;
- Surveys of utility or foundation excavations; and
- Surveys of deep foundation excavations or drilling spoil.

3.2 Surveys, Sampling, and Analysis

3.2.1 Confirmation Surveys

Confirmation screening surveys will be conducted during the excavation of fill materials previously identified as radiologically impacted in the STS reports of September 19 and October 2, 2001 and February 8, 2002. Excavated locations will be screened in accordance with SOP-210 (Appendix B). Since evidence of radiologically-impacted soil in excess of the 7.1 pCi/g cleanup threshold has been identified, these areas will be designated as Exclusion Zones. As described in the Health and Safety Plan (HASP) and discussed briefly in Section 4.0, the Exclusion Zones will require appropriate personal protective equipment (PPE) and personal air monitoring to enter. All equipment and personnel that enter an Exclusion Zone will need to be frisked clean upon leaving the Exclusion Zone. Personnel entering Exclusion Zones must be 40-hour health and safety trained. The surveys will be conducted using a Ludlum 2221 rater-scaler and a 2 x 2 NaI gamma detector.

The areas of potentially impacted soil that have not been documented as clean will be surveyed in place. Excavation will proceed in lifts not to exceed 18 inches in thickness. If an increase in gamma radiation is noted on the order of twice background values, excavation will proceed in thinner lifts to minimize the potential for mixing clean and radiologically-impacted soil. Excavation will proceed through the potentially impacted fill material using an excavator with a maximum bucket of one CY. This bucket size will facilitate loading the transport containers without spilling and spreading the radiologically impacted soil contamination. The subsample locations will be obtained by dividing the 100 m^2 area (10-meter x 10-meter) into four equal quadrants of 5-meters x 5-meters. Four of the subsamples will be collected from the center of the 5-meter x 5-meter quadrants. The fifth subsample will be obtained from the center of the 10-meter x 10-meter sample area. Sample collection will be in accordance with SOP-214.

Once the confirmation screening indicates the absence of radiologically impacted material above the cleanup threshold, samples will be collected over a maximum 100 m^2 area for confirmation analysis at a laboratory. Five subsamples will be composited to develop the sample for each 100 m^2 area. Analysis will be either by NUTRANL or gamma spectroscopy. After confirmation analysis shows the area to be clean, the area will be subject to verification surveys and sampling by USEPA, in accordance with Section 3.2.3 of this Work Plan. The excavations will not be backfilled until a signed radiological verification closure form is received from USEPA.

Soil screening during the course of the excavation activities is also intended to minimize the incorporation of clean material in that which is designated for disposal. Soil indicative of levels below 7.1 pCi/g total radium by the confirmation screening process prior to excavation will be staged for potential use as backfill. As previously indicated, excavation will proceed using an excavator with a maximum 1 CY bucket. This bucket size will also allow the excavated soil to be screened a second time before being placed on the backfill pile. This potentially non-impacted soil will also be subject to verification surveys and sampling by USEPA, if requested, in accordance with SOP-214 (Appendix B) and Section 3.2.3 of this Work Plan.

Imported fill soil will be tested to confirm it meets the criteria specified in Specification 02200, Section 2.E. Material will be tested for radioactivity (less than 3.7 pCi/g), engineering classification per ASTM D2487, and Standard Proctor per ASTM D698. One series of tests will be performed for each 10,000 cubic yards from a single borrow source. One series of tests will be provided for each borrow source at a minimum.

Prior to the initiation of Phase II or Phase III activities, gamma count rate background levels shall be established for each applicable survey instrument. Six locations shall be chosen in non-radiologically impacted areas of the Site. A one-minute integrated count shall be obtained at the surface of each location, for each survey instrument (Ludlum 2221 with 2" x 2" NaI probe). The measurements collected from each location shall be averaged to establish instrument specific background gamma count rates.

In order to establish background gamma dose rates, a measurement shall be obtained at one meter above the surface of each of the six background locations. A Ludlum Model 3 with attached 1" x 1" NaI probe will be used to record the uR/hr reading at each location. The measurements shall be averaged to establish a background gamma dose rate for the Site.

3.2.2 Surficial Walk-over Surveys

Surficial survey methods were used in Phase I of this project to initially identify the presence of radiologically impacted materials. This same technique will be used during Site-wide Grading and Monitoring (Phase III) to survey for the presence of contamination. Additionally, those areas currently covered by pavement and/or buildings that precluded the survey of exposed soil, will be subject to walkover surveys. If necessary, paving stones, asphalt, concrete and the associated subgrade will be removed prior to conducting the surficial survey. A grid with a 5-meter spacing will be marked by stakes and flagging at the edges of the project area or by paint on the ground surface on the interior of the site. The areas between the grid points will be scanned so as to cover 100 percent of the intra-grid areas.

The surveys will be conducted using a Ludlum 2221 rater-scaler and a 2 x 2 NaI gamma detector. The detector will be unshielded to provide for a broader screening area in assessing the surface survey. Values will be recorded in counts per minute (cpm). The maximum value will be recorded for each grid cell and all anomalously high areas (2 times background) will have the approximate limits designated on the survey data sheets. The locations will be marked in paint on the ground surface. Field screening data sheets will include recording the instrument serial number, calibration date, operator, and site grid coordinates surveyed. A copy of a field data sheet is attached (see Appendix A).

Locations with elevated gamma counts (twice background) will be marked to identify the limits of the elevated readings. Those areas which exceed the USEPA cleanup level, gamma counts indicative of material exceeding 7.1 pCi/g total radium, will be designated as Exclusion Zones. Work activities within the Exclusion Zones will be conducted in accordance with the procedures outlined in the HASP and briefly summarized in Section 4.0.

Additional documentation of contaminant levels may be performed through the collection of samples for laboratory analysis using high resolution gamma spectroscopy analyses. Gamma spectroscopy samples will be collected in 500 ml Marinelli beakers and submitted to a subcontract laboratory for analysis. These samples may be collected to: a) document where removal is necessary; b) indicate areas where removal has been successful; c) document areas that are below the USEPA threshold level as indicated by the NaI detector; or d) to confirm the levels of radiological contamination that will remain on-site outside the designated excavation areas.

3.2.3 Verification Sampling

As previously indicated, soil exhibiting contamination above the clean-up threshold of 7.1 pCi/g total radium (Ra-226 + Ra-228) will be removed, placed in transport boxes and shipped to a disposal facility licensed to receive this material. Excavated locations will be screened in accordance with SOP-210 (Appendix B). To demonstrate to the USEPA that the floors and sides of soil excavations meet cleanup criteria specified by USEPA, a verification/field sampling program must be implemented following the excavation of the radiologically-impacted materials. The verification survey sampling program will be conducted in general accordance with SOP-223 and SOP-214 (Appendix B).

The excavations will not be backfilled until a signed radiological verification closure form is received from USEPA. Initial field demonstration that the location has been excavated to clean limits will be made with a shielded 2 x 2 NaI detector. Pre-verification samples will then be collected and analyzed using NUTRANL software and gamma spectroscopy analyses. It is anticipated that the NUTRANL software and gamma spectroscopy analyses will be conducted at an off-site (fixed) laboratory. This fixed facility will be at a temporary laboratory established in the vicinity of the Lakeshore East site and will be supervised by Mr. Glenn Huber of Stan A. Huber Consultants, Inc. of New Lenox, Illinois. Samples may also be sent for high resolution gamma spec analysis to a subcontract laboratory operated by RSSI in Morton Grove, Illinois. The laboratory data package will include chain-of-custody copies, sample receipt and tracking forms, preparation and analysis logbooks, raw data forms, tabulated data summaries, calibration records, and standards, QC sample results, and any corrective action reports (refer to SOP-364 in Appendix B). Gamma spec analysis will be conducted using a Library Energy Tolerance of 1.2 keV and a Gamma Fraction Limit of 71%.

The option to use a temporary field laboratory for generating the gamma spectroscopy verification data could be utilized if rapid turn-around of results becomes critical to the project. Field lab verification results

would be provided in two forms. The initial NUTRANL data set will consist of one set per sample and will include the radionuclide concentrations and error limits for uranium 238, thorium 232, radium 226, and potassium 40; the sample number; date and time sampled; laboratory number (sequential); identify the analyst; and analytic method (NUTRANL). The second field lab data form will be a consolidated spreadsheet with all analysis in sequence by laboratory number. This table will include the sample number, data and time sampled, radionuclide concentrations and error limits for the four NUTRANL analytes, and a line totaling the thorium and radium concentrations. The field laboratory will also maintain a copy of the chain-of-custody for those samples received and analyzed.

3.3 Materials Management

Activities to manage removed material include all actions taken from the time the material is excavated until it reaches its final destination. Materials that are removed from the property may be replaced in their original locations, placed in another location on the property, salvaged, or sent to a local landfill if the materials meet the radiological clean-up criteria of 7.1 pCi/g total radium. Materials that do not meet the radiological cleanup criteria will be sent to an approved disposal facility.

At present, it is anticipated the radiologically-impacted material will be sent to EnviroCare of Utah, located in Clive, Utah. Shipping and placarding will be in accordance with all Department of Transportation regulations for shipping radiologically-impacted material. Permitting for disposal at EnviroCare will be arranged before any impacted material is loaded for shipment.

Trash and debris that is not radiologically-impacted and is designated to be removed from the site will typically be placed into clean roll-off containers provided and collected by licensed trash removal and disposal companies. Radiologically-impacted materials will be transported between the Subject Site and the approved disposal facility according to DOT regulations. Procedures which will be used with respect to radiologically-impacted materials to minimize the potential for and effects of spills and accidents during transport of such radiologically-impacted materials include but are not limited to the following:

- Drivers will have the proper licenses, training, and certifications for transporting potentially radioactive materials.
- Trucks transporting low-level radioactive materials in excess of 7.1 pCi/g total radium will have sealed or lined containment. Covers for the roll-off containers will be placed over the load prior to exiting the contaminated area. Covers will be fastened down tightly to prevent materials from being blown out of the containers. This will minimize the escape of materials should an accident occur. Empty containers returning to the site will also have covers. Trucks will carry all

necessary papers and placarding. Containers will be inspected prior to loading to determine suitability.

- Contaminated vehicles and equipment will be decontaminated first using broom cleaning to remove all adhering surface dirt. As needed, pressurized water spray will be used for further decontamination. Water generated during decontamination will be contained and evaporated, used for dust control on contaminated soils designated for disposal, or possibly sent for disposal at an approved disposal facility.

- Prior to transporting excavated soils or other materials, all transport equipment will be frisked. Frisking will include tires and fenders and the sides and back of the bed. Frisking the cabs of trucks will not be necessary unless loading has been over the front of the truck.

- Travel between the property and the rail terminal will be only on specified routes selected to minimize the potential for and the effects of any accidents.

Two types of material will be distinguished in the excavation process: radiologically-impacted soil exceeding the clean-up threshold of 7.1 pCi/g total radium, and excavated soil suitable for backfill that is not radiologically impacted in excess of 7.1 pCi/g total radium. There also may be materials that will be specified by the owner as unsuitable for backfill, based on engineering properties, non-radiological impacts, or other specifications. For this Work Plan, a distinction is proposed for radiologically-impacted materials and non-radiologically impacted materials. Disposal of non-radiologically impacted materials at an off-site location will comply with all applicable laws and regulations.

Soil that, based on visual or olfactory observations, is suspected to be grossly impacted by non-radiological contamination will be temporarily staged on-site to allow for proper sampling and characterization for disposal. These soils will be placed on liners and will be covered to minimize potential for erosion and spread of the material.

Radiologically-impacted soil excavated in Phase II will be loaded directly into containers (either "Baker Boxes" or "Supersacks"). In Phase III, the anticipated quantities of material exceeding the radiological cleanup standard of 7.1 pCi/g total radium at individual locations may not fill a "Baker Box". If that is case, soil exceeding the radiological cleanup level will be temporarily stored in "Supersacks" until enough has accumulated to warrant delivery of a "Baker Box". Where locations are encountered during Phase III where significant quantities of radiological material require removal, direct loading of containers will be resumed.

3.4 Data Management and Report

Data management for the site consists of site safety and training records, health physics data (i.e., air monitoring and personnel monitoring data), soil radioactivity field and laboratory data, shipping and transport records, and civil construction and excavation data (i.e., land surveys, excavation volume estimates, etc.). A vicinity or local laboratory will be used to analyze soil samples as excavation and removal proceeds, and for pre-verification sampling that the radiological clean-up criteria have been met. Analytical records will be kept at the site and at the STS office in Vernon Hills, Illinois. Air monitoring analyses will be maintained at both the site and the STS office, and will be transmitted with the monthly project progress reports to USEPA.

Monthly progress reports will be submitted to USEPA beginning 30 days after USEPA's review and approval of this Work Plan, and will be submitted monthly by the 15th of each month until termination of the UAO as applicable to this site, unless otherwise directed by the USEPA On-Scene Coordinator (OSC). These monthly reports will describe all significant developments during the preceding period, including the work performed, and any problems encountered, analytical data received during the reporting period, and developments anticipated during the next reporting period, including a schedule of work to be performed, anticipated problems, and planned resolutions.

3.5 Exclusion Zone Access and Security

Access by unauthorized personnel to the Exclusion Zone excavation areas will be controlled during operational and non-operational hours because of hazards created by open excavations, moving contractors' equipment, and traffic. Only authorized personnel will be permitted within the fenced area. Exclusion Zone access will be directed by the Project Coordinator, Field Team Leader or their designated representative (see HASP). The excavation work area will be fenced with a temporary chain-link fence unless the access is restricted by fencing at the site perimeter. In the case of a perimeter fence, access to the excavation areas will be restricted through the use of temporary fencing (i.e., plastic barrier fencing). This fencing will include appropriate signage to provide security during non-operational hours. Access gates/points will be closed when not in use.

During operational hours, the project management consultant, its contractors and subcontractors, and their representatives will have access to the excavation area to implement the excavation activities. The party responsible for radiological soil transport and their contractors and subcontractors will have access to implement health physics and transportation activities. Information on restrictions to the excavation

areas, and various signs and barricades, will be disseminated during the project kick-off meeting held at the beginning of the project.

All visitors desiring access to the excavation area will be required to register with the Project Coordinator or his designee. The Project Coordinator or his designee will provide necessary orientation and training, provide radiation monitors as appropriate, and escort the visitors. The visitors will be required to observe all health and safety requirements and follow all instructions given by the Field Team Leader.

Regulatory and governmental officials who visit the excavation areas regularly will be requested to notify the Project Coordinator or the Field Team Leader. They will be required to comply with all Health and Safety rules.

During non-operational hours, barricades, beacons, radiation warning signs, and temporary fencing, as appropriate, will be placed to prevent unauthorized entry into an Exclusion Zone. Exclusion Zones will be surrounded with magenta and yellow rope and stakes or fence posts until determination that it meets the USEPA cleanup threshold. Signs will be placed on the excavation area perimeter fencing identifying the area as a construction area and prohibiting unauthorized entry. The warning signs will be installed at maximum 100 foot intervals on the perimeter fence.

3.6 Decontamination

All discarded materials, waste materials, and other field equipment and supplies shall be handled in such a way to prevent the potential spread of contamination during excavation and restoration activities. Discarded items that have contacted contaminated materials will be containerized and stored for disposal at the approved disposal facility. Non-contaminated items to be discarded will be collected for disposal as general refuse waste. Personnel and sampling equipment decontamination are described in the Decontamination Procedure included as SOP-347 of Appendix B.

4.0 HEALTH AND SAFETY PLAN SUMMARY

A project specific HASP is provided under separate cover. Site surveys, excavation and remediation activities will be conducted in accordance with the site HASP. Additionally, reference is made to the following documents included within Appendices B and C:

- Dust Control Plan
- SOP-210 – Gamma Radiological Surveys
- SOP-217 – Excavation Procedure
- SOP-223 – Verification Survey Procedure
- Construction Health and Safety

The HASP addresses required training, personnel protection equipment, general work precautions, and medical monitoring among other issues. In general, as contamination is detected, either by the initial surface survey or in the course of monitoring the excavations, the areas will be designated with a magenta and yellow rope and stakes or fence posts. These areas will be designated Exclusion Zones, and will require appropriate personal protective equipment (PPE) and personal air monitoring to enter. All equipment and personnel that enter an Exclusion Zone will need to be frisked clean upon leaving the Exclusion Zone. Personnel entering Exclusion Zones must be 40-hour health and safety trained.

All accidents or injury "near misses" will be documented and communicated to the Project Coordinator and Field Team Leader in a timely manner. Project safety briefings will be held on a weekly basis, and project tailgate meeting will be held on a daily basis as a regular part of project communication between the Field Team Leader and project contractors and subcontractors.

4.1 Key Personnel

While health and safety will be the concern of every person on the job, the radiation survey and soil excavation management team will be responsible for the implementation of the HASP. These persons are the Project Coordinator, Health and Safety Officer and the Field Team Leader. Figure 3 presents the project management work organization chart. The responsibilities for these positions are detailed in the HASP. Radiation laboratory subcontract services will be provided through Radiation Safety Services, Inc. (RSSI).

4.2 Potential Hazards

Potential hazards that could be encountered during the removal activities include contaminated materials and the hazards associated with construction work. Contaminants of concern include the entire decay series for U-238 and Th-232. Radiological and air monitoring as described in this Work Plan will be performed during excavation to define the presence of radiological contaminants.

The mechanisms for exposure to the radiologically-impacted soil material are direct exposure, inhalation, ingestion and eye/skin contact. The primary mechanism of exposure is direct exposure to external gamma radiation. All workers will be instructed in appropriate measures to protect against exposure to the above materials, and PPE will be worn until monitoring shows such is not necessary.

Physical hazards which might be encountered at this site include but are not limited to the following:

- Construction equipment (front-end loaders, back-hoes, trucks, compactors, bulldozers);
- Power tools (saws, drills, jack hammers, compactors);
- Heat and cold stress;
- Overhead power lines;
- Excavations;
- Confined space;
- Noise;
- Demolition of structures;
- Slip, trip and fall conditions, especially during wet or freezing periods; and
- Buried utilities.

For this project, "utilities" include natural gas, water, sewer, communication, cable television lines, and electrical power distribution systems. Prior to the physical site survey, city and utility company records concerning location and construction of utilities on and in the general vicinity will be reviewed and consolidated on a single Utility Plan Drawing. The appropriate utility companies or their designees will be asked to verify the location by originating a request through the Chicago Utility Alert Network (DIGGER) phone number: 312-744-7000, and through application to the Chicago Board of Underground.

The locations of the identified utilities will be "ground-truthed" by observing the locations of power and phone poles, above-ground transformers (where electrical distribution lines are below ground), manholes, water meters, natural gas meters, phone boxes, surface indications such as utility vaults, catch basins, and surface depressions which can occur over utility trenches, and the locations marked by the utility companies or their representatives. Procedures for working in the vicinity of utilities and repair to

damaged utilities will be discussed with the excavation contractor crews. All work on and in the vicinity of utilities will be in accordance with City and utility company specifications.

Additional details on these and other safety provisions are addressed in the HASP.

4.3 Training and Communications

Site and project specific radiation and health and safety training will be provided for all on-site personnel prior to work on the Subject Site. All personnel required to work in the Exclusion Zone or Contamination Reduction Zone shall complete training conforming to the requirements of 29 CFR 1910.120(e) including 40 hours of initial hazardous waste site worker training. Where appropriate, they shall have 8 hours of annual refresher training, and 8 hours supervisors training. Field personnel shall complete radiation safety training in compliance with 32 IAC 400. This training shall include, at a minimum, 4 hours of training pertaining to radiation safety and awareness. Training will be conducted by a qualified safety specialist and/or a qualified senior health physics technician, at a minimum. The project training program is included in HASP. As noted in the HASP, Federal safety requirements take precedence over state requirements.

All site personnel will be trained and briefed on radiation basics, anticipated hazards, equipment to be worn, safety practices to be followed, contamination prevention practices, emergency procedures, radiation basics and communications. Procedures for leaving a contaminated area shall be planned and implemented prior to going on-site. Work areas and decontamination procedures will be established based on expected site conditions, and updated as necessary during construction. Other guidelines such as heat and cold stress, excavation safety and confined space are included within the HASP.

In addition to this formal health and safety training, "tailgate" safety meetings will be held weekly, or more frequently, dependent on safety issues arising during the project. These meetings may be led by the worker's foremen and every employee must sign in before beginning work for the week. The subject covered and persons present will be recorded for each meeting and kept as part of the project records. Health and safety incidents and monitoring results will be discussed in the tailgate safety meetings, when appropriate.

Visitors to the site will be briefed on the requirements of the HASP before being allowed within the work area, and will be accompanied by a foreman or supervisor whenever possible.

4.4 Personnel Protective Equipment

Based on information from previous investigations of site conditions, radiologically impacted soil removal will be necessary. All personnel operating in Exclusion Zones will be required to have personal air monitors (PAMs). Disposable coveralls, steel-toed work shoes, boot covers, hard hat, safety glasses and gloves will also be required in all Exclusion Zones. Prior to exiting any Exclusion Zones, personnel will go through decontamination, disposal of all appropriate PPE, and frisking procedures as described in the HASP.

4.5 Air Quality Monitoring

The principal objectives of the air monitoring activities are to:

- Ensure worker and general population safety and provide radiological control information;
- Evaluate work procedures and site control measures. In addition to identifying the need for corrective action, air monitoring also documents the effectiveness of such control actions; and
- Measure releases of airborne radioactivity (should any occur) and ensure that people living and working in the surrounding area are not exposed to radiation above acceptable limits.

A primary requirement of dust control is "no visible dust" during activities associated with contaminant removal. The excavation, remediation and soil handling areas where impacted soil is present will be required to have no visible dust. Fugitive dust generation is caused by a range of activities including excavation, loading, dumping, transporting and scraping using heavy equipment such as bulldozers, front-end loaders, trucks and graders. Air monitoring will be conducted for the purpose of documenting and, if detected, initiating measures to control airborne contamination. Air monitoring will be conducted at both site and personnel levels. During the excavation and handling of radiologically-impacted materials, the procedures to be followed to control dust will include traffic speed control and use of covered stockpiles. Where possible, excavated contaminated materials will be loaded into the transport containers the same day they are excavated. Any radiologically-impacted material stored on-site will be either in containers or in Supersacks if there is not sufficient material to mobilize a container. Stockpiled clean materials, including excavated and imported borrow material, will be piled to minimize dust generation. Additionally, the covering of vehicles transporting borrow material will be required. If these initial efforts appear to be inadequate to control dust, water will be applied during the course of excavation and restoration activities as directed by the Field Team Leader to prevent, mitigate or reduce dust

resulting from excavation activities. The Dust Control Plan (Appendix C) provides additional detail on the control measures that may be implemented at the site.

4.5.1 Personnel Exposure Monitoring

All personnel operating in Exclusion Zones will be required to have personal air monitors (PAMs). Procedures for personal air monitoring are discussed in the HASP and SOP-212 (Appendix B). Lapel samplers worn for personal air monitoring will be utilized for airborne radioactivity monitoring. Air filters will be analyzed on a daily basis and additional evaluation of samples will be performed when determined necessary based on elevated results. Procedural changes or control measures, such as wetting of soils, will be employed prior to the prescription of respiratory protective equipment.

4.5.2 Perimeter Monitoring

Site perimeter monitoring will be conducted with high volume air samplers at the four sides of the site (north, south, east, and west). This monitoring will be at the property boundary or no more than 200 feet from the limits of the areas anticipated to be excavated. This air monitoring is for the purpose of documenting, and if detected, initiating measures to control off-site airborne contamination. Air monitoring will be conducted in accordance with the Air Monitoring Procedure, SOP-212 in Appendix B. Air filters will be evaluated on a daily basis for gross alpha activity. Comparisons will be made to 10 CFR 20, Appendix B, Table I and II to ensure that adequate radiological controls are in place for workers and the general public. Unless Illinois regulations are more stringent, 10 CFR Part 20, Standards for Protection Against Radiation shall be complied with. In such cases where Illinois regulations are more stringent, 32 IAC Section 340 shall be utilized.

5.0 CLOSURE DOCUMENTATION

An objective of the Work Plan is to document the identification, handling, and disposal of radiologically impacted soil encountered during construction activities at the Lakeshore East Site. The following types of data will be generated during the project:

- Surface gamma survey records
- Soil sampling records
- Soil sample field laboratory data
- Fixed laboratory soil analyses data (USEPA contract and STS subcontract laboratories)
- Air quality sampling records
- Air quality analytical data

The results of the Work Plan investigation and the removal work will be presented in a final closure report. The closure report will provide a summary of the locations of impacted material identified during the project, areas remediated, and identify any known areas where impacted soil remains on-site, if any. The report will include field data, laboratory results, documentation of the volume of material removed and its disposal location. The report will present the information as the basis for and will request issuance by USEPA of a "Certification of Completion Letter" for the Lakeshore East Site. The final closure report will be submitted within 60 days of completion of the on-site investigation and removal work.

6.0 REFERENCES

STS (February 8, 2002) Lakeshore East Additional Radiation Survey Investigation, Chicago Illinois, STS Project No, 1-32193-ZH.

STS (October 2, 2001) Addendum to Report: Results of Expanded Gamma Radiation Survey, 26-Acre Site, Chicago, Illinois—STS Project No. 1-32193-XH.

STS (September 19, 2001) Radiation Survey, 26-Acre Site, Southwest Corner of Wacker Drive and Lake Shore Drive, Chicago Illinois, STS Project No, 1-32193-XH.

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Figures

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LEGEND OF SYMBOLS

- Structural Steel Column On Concrete Base
- MLP Metal Light Pole
- Woven Wire Fence
- C.C.D. City of Chicago Elevation Datum
- MH Manhole
- CB Catch Basin
- City Electric Handhole
- Inlet
- Light Pole
- Fire Hydrant
- Street Light Control Box
- Elevated Gamma Radiation Areas (STS, September 19 and October 2, 2001; February 8, 2002)

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SITE PLAN
PREVIOUS DETECTIONS A
LAKESHORE EAS
CHICAGO, ILLINOI

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NUMBER
32193-ZH

STS PROJECT FILE
GG132193-ZH_FIG.1.dwg

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SHEET NUMBER
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Property For Connection
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LEGEND OF SYMBOLS

- Structural Steel Column On Concrete Base
- Metal Light Pole
- Woven Wire Fence
- C.C.D. City of Chicago Elevation Datum
- Manhole
- Catch Basin
- City Electric Handhole
- Inlet
- Light Pole
- Fire Hydrant
- Street Light Control Box
- Elevated Gamma Radiation Areas
- Soil Boring
- Impacted Soil Boring

NOTE:
Elevations shown hereon are with respect to Chicago City Datum.

SITE PLAN
SOIL BORING LOCATION
LAKESHORE EAS
CHICAGO, ILLINO

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NUMBER
32193-ZH

STS PROJECT FILE
GG132193-ZH_FIG.3&4.dwg

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1"=100'

SHEET NUMBER
2

PROJECT MANAGEMENT ORGANIZATION CHART

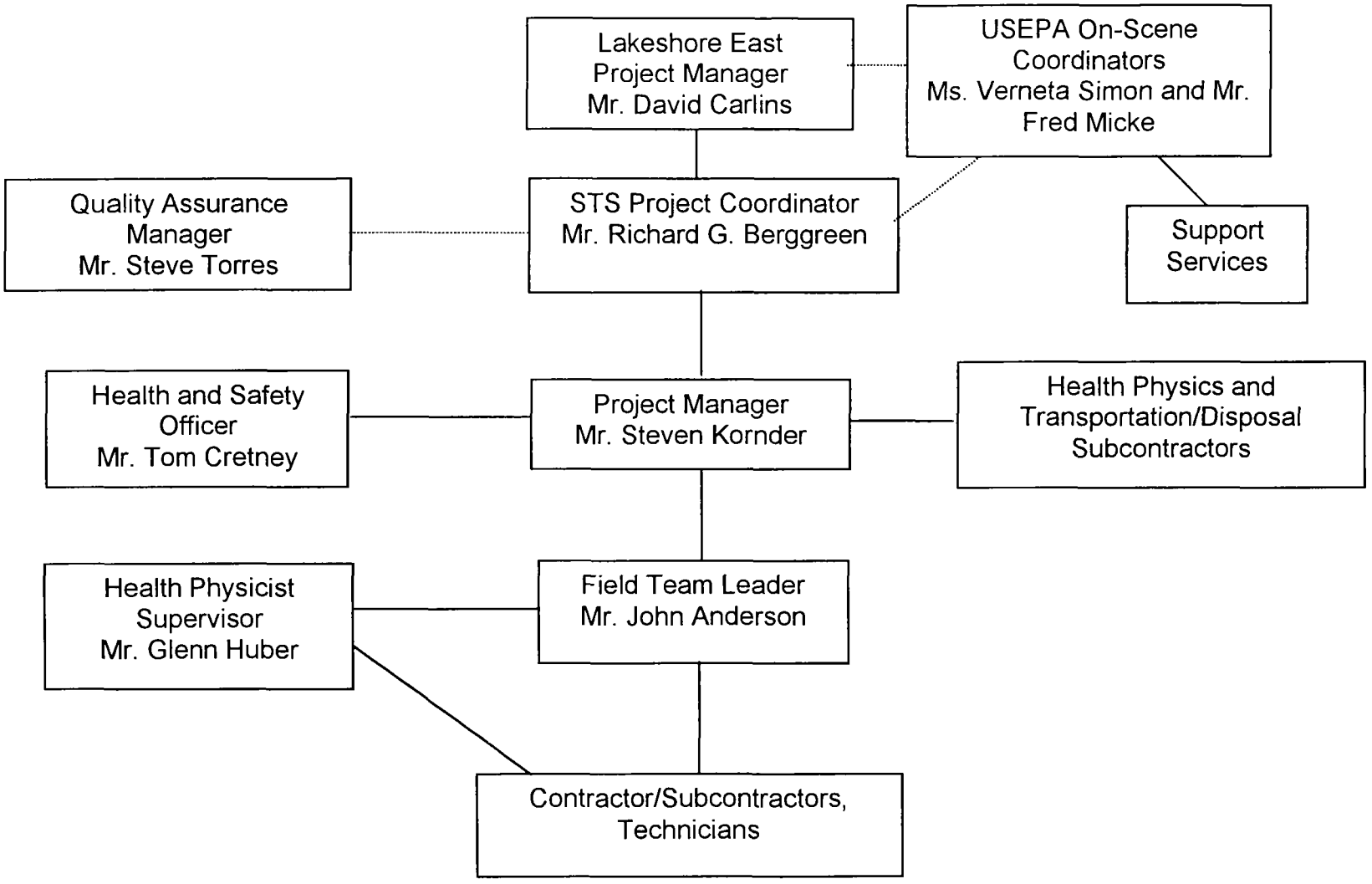

Figure 3

ISOPACH MAP SHOWING FILL
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CHICAGO, ILLINOIS

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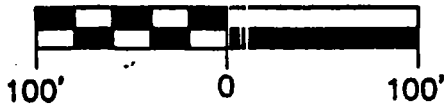

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NUMBER
32193-ZH

STS PROJECT FILE
GG132193-ZH_FIG.2.dwg

SCALE
1"=100'

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4

Appendix A

Field Gamma Survey Forms

RADIATION SURVEY FORM - GENERAL

Project # _____ Project Name _____ Sheet _____ of _____

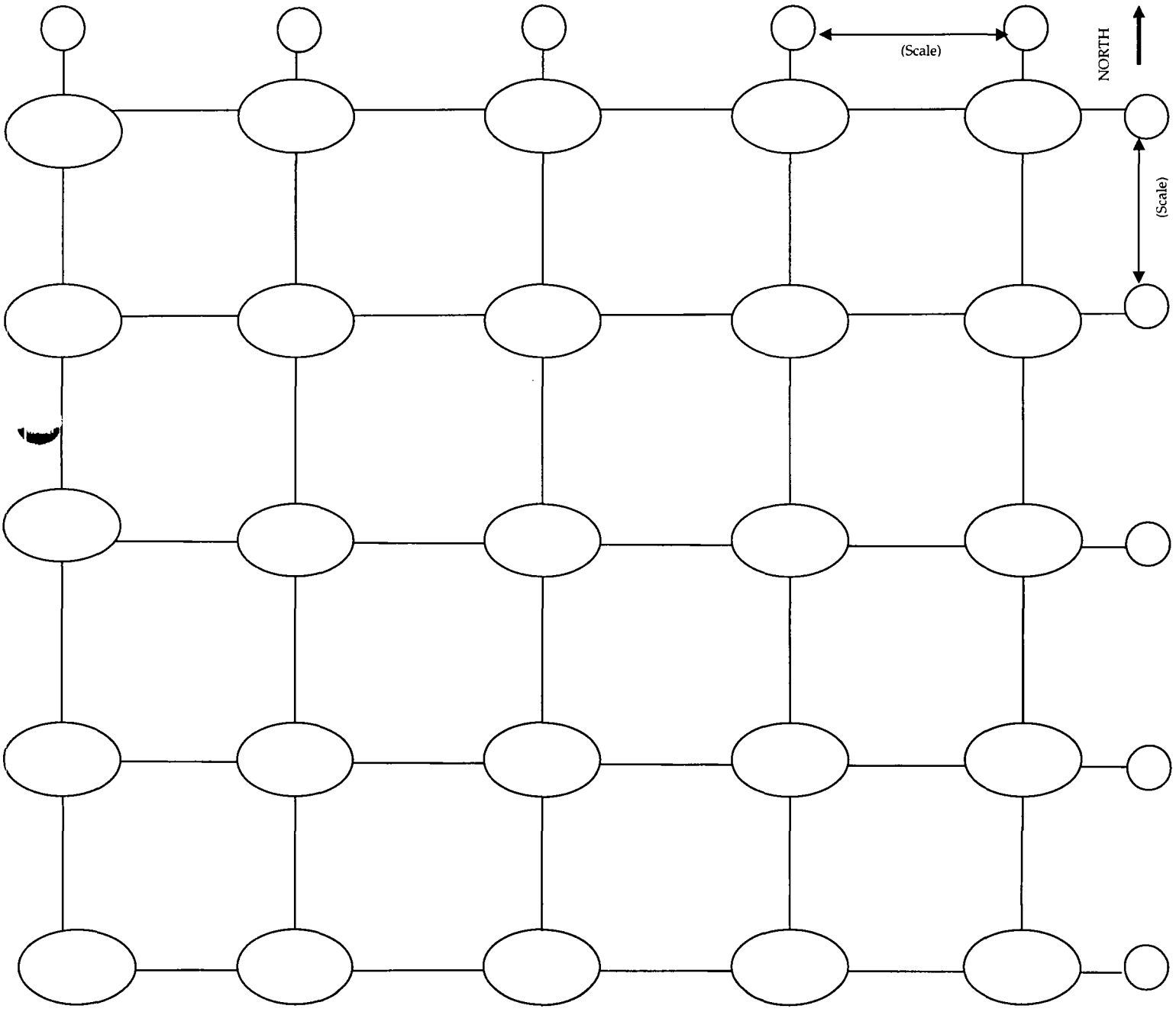
STS Consultants, Ltd.

Date _____ Technician _____

Inst. Model _____ Serial No. _____

Inst. Calibrated (Y/N)? _____ Lift Elevation_____

Write grid designations in circles. Indicate excavated area with heavy line. Record counts at intersections in CPM. Indicate areas with audible alarms by shading the area.



STS Consultants, Ltd.

RADIATION SURVEY FORM – GRADING

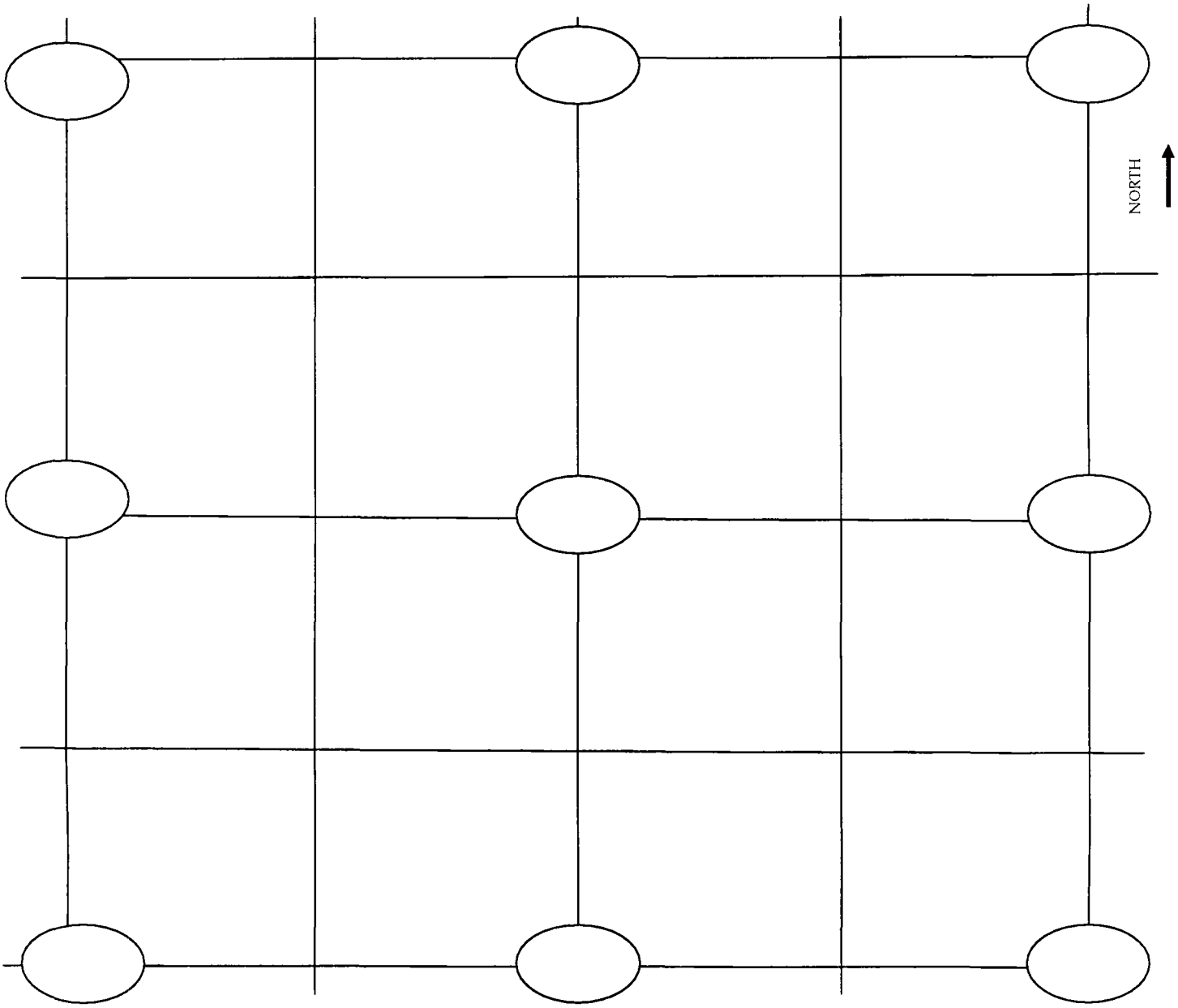
Project # _____ Project Name _____ Sheet _____ of _____

Date _____ Technician _____

Inst. Model _____ Serial No. _____

Inst. Calibrated (Y/N)? _____ Lift Elevation

Write the area coordinates in the large circles. Indicate boundaries of grading/excavation with a heavy line. Survey areas in accordance with Section 5.7 of SOP-210. Within each grid record the maximum cpm. If detected, shade areas of elevated gamma readings (> twice background) and record max cpm.



APPENDIX B

Standard Operating Procedures

SOP-210	Gamma Radiological Surveys
SOP-212	Air Monitoring Procedure
SOP-214	Soil Sampling Procedure
SOP-215	Field Logbook Procedure
SOP-217	Excavation Procedure
SOP-223	Verification Survey
SOP-320	Radioactive Material Shipments
SOP-345	Survey for Surface Contamination and Release of Equipment for Unrestricted Use
SOP-347	Decontamination
SOP-364	Sample Preparation Procedure for Gamma Spectral Analysis
SOP-366	Operation of the ACCUSPEC Gamma Counter
SOP-372	Operation of the Ludlum Model 2000 Alpha System

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Gamma Radiological Surveys

Document: SOP-210

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

GAMMA RADIOLOGICAL SURVEYS

1.0 PURPOSE

This procedure provides protocols for pre-verification or verification gamma radiological surveys.

2.0 SCOPE

Radiological surveys will be performed at the designated Site as part of the pre-excavation, excavation, pre-verification, and/or verification surveying programs.

3.0 REFERENCES

None.

4.0 EQUIPMENT AND MATERIALS

The following equipment may be used as part of the survey programs. Other equipment may be substituted if necessary because of availability of the items listed or the conditions encountered at the site.

- Trimble Pathfinder Pro XL 4.1 GPS (optional).
- 2-inch by 2-inch NaI (Tl) gamma detector.
- Ludlum Model 2221 portable scaler ratemeter analyzer.

5.0 INSTRUCTIONS FOR RADIOLOGICAL SURVEY

5.1 Establishment of Background Gamma Count Rate

5.1.1 The gamma count rate background levels shall be established for each applicable survey instrument. Six randomly selected locations shall be chosen in non-radiologically impacted areas of the Site. A one-minute integrated count shall be obtained at the surface of each location for each survey instrument (Ludlum 2221 with 2" X 2" NaI probe). The measurements collected from each location shall be averaged to establish an instrument specific background gamma count rate.

5.2 Land Survey Procedure

5.2.1 Two perpendicular baselines will be established.

5.2.2 A grid along the baseline will be established using cloth or steel tape and a compass, if necessary. Stakes, survey flags, or paint will be placed as needed to delineate grid or traverse lines. The grids will be spaced about five meters apart.

5.2.3 The baseline, permanent structures, areas of remediation, and other areas of interest will be illustrated in the field logbook.

5.3 Gamma Survey Procedure

5.3.1 The Ludlum ratemeter is set for 2-second time-weighted average count rate.

5.3.2 Hold the survey meter probe parallel to the ground surface at a height of approximately two to six inches.

5.3.3 Walk along grid lines at a maximum speed of about 0.5 meters per second (1 mile per hour).

5.3.4 Continue surveying until all survey grids have been traversed.

5.4 Radiological Survey of On-Site Materials

5.4.1 Material that is excavated and placed in the clean stockpile will be surveyed two times. The first survey will be performed prior to excavation activities.

5.4.2 The second survey will be performed during the excavation of the non-contaminated soil.

The soils will be surveyed before they are placed in the stockpile. Based on the gamma scan, the material will either be designated as contaminated material and immediately loaded for transportation and disposal or tentatively designated as clean and stockpiled for subsequent soil sampling per SOP-214.

5.5. Daily Surveys

5.5.1 Routine daily surveys shall be performed for each day of operations at the site.

5.5.2 The routine surveys will monitor areas in the immediate vicinity of excavations and along soil movement paths to ensure that radiation levels are not affected by activities.

5.5.3 Routine surveys shall be documented by preparing a drawing of the survey results in the field logbook, indicating either the location and value of individual measurements, or contours of the measured gamma field.

5.5.4 Surveys of excavation areas will be made at the request of the Field Team Leader to assess the progress of the removal. These surveys will not be documented, but will be used by the Field Team Leader to manage the excavation.

5.6 Pre-Verification or Verification Survey

5.6.1 Upon completion of excavation activities, either a pre-verification survey shall be performed to ensure that the excavation is ready for a final verification survey by USEPA or a verification survey shall be performed to ensure that the excavation is ready for backfill based on USEPA approval.

5.6.2 The survey is conducted at the same time as the excavation work phase. The survey method is performed as specified in Sections 5.2 and 5.3. Upon completion of the survey and excavation phase, a Notification of Successful Pre-Verification or Verification is sent to the USEPA requesting a final verification survey or approval to backfill.

5.7 Site Grading Survey

5.7.1 Surveys will likely be conducted at the same time as the grading activities and will be performed as specified in Section 5.3 of this SOP.

5.7.2 The corners or boundaries of the area to be surveyed will be tied into a site-wide coordinate/survey network. Stakes, survey flags, or paint will be placed along the boundaries of the survey area using a cloth/steel tape or wheel at approximately 100 foot intervals to subdivide the area into 100 ft X 100 ft areas.

5.7.3 Each 100 X 100 ft areas will be traversed using a line spacing of approximately 10 feet. Readings greater than twice background will be painted and flagged for further investigation.

5.7.4 The maximum gamma count and/or readings over twice background will be recorded on a 50 ft X 50 ft grid on the radiation survey form for site grading (Appendix A). Permanent structures and other issues of interest also will be included on the radiation survey form.

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Air Monitoring Procedure

Document: SOP-212

Revision Number: 1

Date: September 30, 2002 Replaces: June 13, 2002

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Air Monitoring Procedure

Document: SOP-212

Revision Number: 1

Date: September 30, 2002 Replaces: June 13, 2002

AIR MONITORING PROCEDURE

1.0 INTRODUCTION

The Air Monitoring Procedure provides for measuring the concentration of radioactive airborne dust that could be generated and emitted into the atmosphere as a result of the excavation, moving, and loading activities planned at the Site. The objectives of data collection for air monitoring activities are as follows:

- Collect airborne radioactivity data for the purpose of determining the exposure of workers participating in Site activities to airborne particulates
- Collect airborne radioactivity data to measure releases of airborne radioactivity to the environment and ensure that people living and working in the surrounding areas of the Site are not exposed to radiation above acceptable limits
- Collect airborne radioactivity data to evaluate work procedures and Site control measures for the purpose of keeping exposures to both workers and the general public as low as reasonably achievable (ALARA).

2.0 REGULATORY REQUIREMENTS AND ADMINISTRATIVE LIMITS

As specified in 10 CFR Part 20 (unless more restrictive in 32 IAC 340) the licensee must demonstrate compliance with the dose limits for individual members of the public. The Site Air Monitoring Plan is based on being able to demonstrate that the average concentrations of radioactive materials in gaseous and liquid effluents at the boundary of the unrestricted area do not exceed the limits specified in Table 2 of Appendix B to 10 CFR 20. The radionuclides in the thorium and uranium series that could potentially be encountered during Site activities are listed in Table 1 of the Air Monitoring Plan. Th-232 has the most restrictive concentrations for both the Derived Air Concentration (DAC) and Air Effluent Limits.

Th-232	Class W	DAC=$5x10^{-13}$µCi/ml	Air Effluent=$4x10^{-15}$µCi/ml

Both worker exposure to airborne particulates and effluent release limits will be based on Th-232.

3.0 AIR MONITORING EQUIPMENT AND MATERIALS

- Staplex Model TFIA High Volume Air Samplers (or equivalent)
- Gilan Model BDXII Low Volume Personal Air Sampler (or equivalent)
- Staplex Model TFA810 "Ashless" Filter Papers – 95% collection efficiency of 1-micron particles. Effective efficiency of 70% (penetration absorption 30%)
- Zefon Model 739 MCE Filter Cartridges – 37mm x 0.8um membrane filters
- Ludlum Model 2200 Scaler w/ Model 43-10 alpha scintillation detector
- Radiological Air Sample Data Form – Area Monitors, Form SOP 212-10
- Radiological Air Sample Data Form – Personal Air Monitors, Form SOP 212-11

4.0 SITE AIR MONITORING PROCEDURE

4.1 Background Air Quality

One downwind, high volume air sample shall be collected for a minimum of forty hours (five 10-hour days) prior to the commencement of excavation activities. This sample shall be analyzed the day after collection and then again after four days to allow for the decay of short lived radon and thoron daughters. The count, after four days decay, will serve as the official measurement of the background airborne alpha concentration. Future results during Site operations should be compared to this value to see if further engineering controls or procedural changes are warranted.

4.2 Perimeter Air Monitoring – High Volume Samplers

Four air monitoring locations shall be used during all excavation activities. These monitoring units will be at the property boundary or no more than 200 feet from the limits of the areas anticipated to be excavated. Samples shall be collected during all operations where potentially contaminated soils are being excavated, moved, or loaded. One monitor shall be placed on each perimeter of the site (North, South, East, and West) and collect samples at a height between one and two meters above the ground. Monitors will be located so as to provide unobstructed air flow from the source to the monitors. Flow rate through air samplers shall remain between 20 and 60 cubic feet per minute. Air sample filters shall be collected and replaced daily and submitted to the laboratory for analysis. Samples analyzed from the perimeter high volume monitors shall be used to determine the amount of airborne radionuclides leaving the Site.

4.3 Personal Air Monitoring – Lapel Samplers (Low Volume)

All workers participating in Site activities that involve the excavation, movement, or loading of potentially contaminated soils within a radiological exclusion zone shall wear a Personal Air Monitor (PAM) to evaluate the air quality in the worker's breathing zone. The Health and Safety Coordinator may require that additional personnel wear PAMs if there is a potential for that worker to encounter airborne particulates during Site operations. Samples shall be collected the entire time a worker is inside the exclusion zone and the cumulative time recorded. Flow rate through air samples shall remain between 2 and 4 liters per minute. Air sample filters shall be collected and replaced daily and submitted to the laboratory for analysis. Samples analyzed from the PAMs shall be used to determine potential contributions to worker's dose from airborne radionuclides.

5.0 AIR SAMPLE ANALYSIS

The Th-232 decay series contains seven alpha-emitting nuclides: Th-232, Th-228, Ra-224, Rn-220, Po-216, Bi-212 and Po-212. Of these, the first three nuclides can be assumed to be in complete equilibrium. The noble gas Rn-220 (thoron) may be ejected from the original matrix by recoil from the alpha particle decay of Ra-224. The fraction of Rn-220 that is removed via emanation is dependent on several variables, and is assumed to range from 10% to 40%. The emanating fraction is assumed to be transported away from the original matrix. If 40% of the Rn-220 escapes, the activity of the Rn-220 and its three alpha-emitting progeny nuclides will be at 60% of the Rh-232 activity. These four alpha-emitting nuclides produce a total of 3.35 alpha emissions per Rn-220 decay. Since the Rn-220 activity is 60% of the Th-232 activity, these four nuclides only emit the equivalent of two alpha particles per Th-232 decay. These two alphas when combined with the three alpha particles from the nuclides in full equilibrium with the parent, result in the total emission of the five alpha particles. Thus, the Th-232 contribution will be one-fifth or 20% of the total alpha activity.

For the reasons stated above, gross alpha concentrations shall be divided by a factor of five to determine the air concentration of Th-232, which is the most limiting of the applicable air effluent concentration limits (4×10^{-15} μCi/ml).

5.1 High Volume Sample Analysis

A 1.75 inch diameter cutout shall be obtained from each 8"x10" high volume sample collected. All data pertaining to the sample shall be included on the *Radiological Air Sample Data Form – Area Monitors* worksheet. This worksheet contains the calculations required to determine total sample volume and sample concentration.

Each sample shall be analyzed the day after collection for gross alpha concentration. The minimum counting time is 30 minutes for Th-Alpha. The "day after" count will serve as a comparison to identify high gross counts from the previous day. It is expected that naturally occurring radon and thorium daughters

will interfere with analysis, so the sample must be reanalyzed in four days. Thoron (Rn-220), if present in significant amounts, will require up to four days to allow for the decay of its Pb-212 daughter (10.6 hour half life). The count, after four days decay, will serve to be the official measurement of Th-Alpha.

Th-232 is the most restrictive of the applicable radionuclides that may be present during Site operations. *The Th-232 contribution will account for 20% of the total alpha activity, so each gross alpha count must* be divided by five to determine Th-232 concentration.

Multiple concentration measurements improve both precision and detection capability. Although air samples shall be counted the following day (and again four days later), effluent releases shall be reported on a weekly basis using the following calculation:

Equation A.9 NUREG 1400

$$C_{avg} = \frac{\Sigma T_{s,i} C_i}{\Sigma T_s}$$

where C = effluent concentration in μCi/ml
T_s= duration of sample collection

Sample concentration shall be determined using the following calculation:

Equation 6.9 *NUREG 1400*

$$C = \frac{R_n}{E\ F\ K\ T_s\ cf\ (5)}$$

Where:

R_n = net count rate; $R_n = R_g - R_b = \frac{N_g}{T_g} - \frac{N_b}{T_b}$

E = fractional filter efficiency
F = air flow rate through the air sampler, cm^3/min
Cubic feet per hour x 28.316 liters/cfh x 1000 ml/ liter
K = Counting efficiency in cpm/ μCi
T_s = duration of sample collection
Cf = collection vs. analyzed ratio: conversion factor = 0.035

** note: cf is not part of original NUREG calculation. It has been added to account for the fact that we are only analyzing 3.5% of total sample

5 = Samples are analyzed for gross alpha activity. Gross alpha concentration is to be divided by five to determine Th-232 concentration

5.2 Personal Air Monitor Sample Analysis

Personal Air Monitor (PAM) samples shall be analyzed in the same manner as the high volume perimeters samples. The only exceptions are that samples may be collected over the course of one week and that calculations are performed on a different worksheet – *Radiological Air Sample Data Form – PAM's, Form SOP 212-11.*

The action level for airborne radioactivity shall be 30% of the Derived Air Concentration (DAC) for Th-232 (DAC=5×10^{-13} μCi/ml). When PAM analysis indicates that concentrations have reached 1.5×10^{-13} μCi/ml, Level C protection may be considered. It is not anticipated that airborne concentrations will reach this level. Engineering controls, such as wetting of soils, and procedural changes shall be implemented to keep airborne concentrations ALARA.

At the conclusion of the project, data obtained from PAM's shall be used to determine a dose from airborne radionuclides for each monitored worker.

6.0 INVESTIGATIONS AND CORRECTIVE ACTIONS

The Health and Safety Coordinator will perform investigations and responses consisting of one or more of the following actions in the event that Action Levels are exceeded:

- Verification of laboratory data and calculations.
- Analyze and review probable causes.
- Evaluate need for reanalysis or additional analysis on original sample.
- Evaluate need for resampling.
- Evaluate need for sampling of other pathways.
- Evaluate need for notifications to regulators
- Dose assessments/bioassays.

7.0 ATTACHMENTS

- Table 1 *Derived Air Concentrations (DACs) and Effluent Air Concentrations of Selected Radionuclides in the Uranium and Thorium Series*
- Minimum Detectable Concentration Calculation – Area Monitors
- Minimum Detectable Concentration Calculation – PAM's
- Radiological Air Sample Data Form – Area Monitors, Form SOP 212-10
- Radiological Air Sample Data Form – PAM's, Form SOP 212-11

TABLE 1

Derived Air Concentrations (DACs) and Effluent Air Concentrations of Selected Radionuclides in the Uranium and Thorium Series

Radionuclide	Class	10 CFR 20 DAC (μCi/ml)	Air Effluent (μCi/ml)
^{238}U	D	$6x10^{-10}$	$30x10^{-12}$
	w	$3x10^{-10}$	$1x10^{-12}$
	Y	$2x10^{-11}$	$6x10^{-14}$
^{234}Th	w	$8x10^{-8}$	$3x10^{-10}$
	Y	$6x10^{-8}$	$2x10^{-10}$
^{234}U	D	$5x10^{-10}$	$3x10^{-12}$
	w	$3x10^{-10}$	$1x10^{-12}$
	Y	$2x10^{-11}$	$5x10^{-14}$
^{230}Th	w	$3x10^{-12}$	$2x10^{-14}$
	Y	$6x10^{-12}$	$3x10^{-14}$
^{226}Ra	w	3x10-10	$9x10^{-13}$
$_{222}Rn$	With Daughters Removed	$4x10^{-6}$	$1x10^{-8}$
	With Daughters Present	$3x10^{-8}$	$1x10^{-10}$
		or 0.33 of working level	
^{214}Pb	D	$3x10^{-7}$	$1x10^{-9}$
^{214}Bi	D	$3x10^{-7}$	$1x10^{-9}$
	w	$4x10^{-7}$	$1x10^{-9}$
^{210}Pb	D	$1x10^{-10}$	---
^{232}Th	w	$5x10^{-13}$	$4x10^{-15}$
	Y	$1x10^{-12}$	$6x10^{-15}$
^{228}Ra	w	$5x10^{-10}$	$2x10^{-12}$
^{228}Th	w	$4x10^{-12}$	$3x10^{-14}$
	Y	$7x10^{-12}$	$2x10^{-14}$
^{220}Rn	With Daughters Removed	$7x10^{-6}$	$2x10^{-8}$
	With Daughters Present	$9x10^{-9}$	$3x10^{-11}$
		or 1.0 working level	
^{212}Pb	D	$2x10^{-8}$	$5x10^{-11}$
^{212}Bi	D	$1x10^{-7}$	$3x10^{-10}$
	w	$1x10^{-7}$	$4x10^{-10}$
^{228}Ac	D	$4x10^{-9}$	$2x10^{-11}$
	w	$2x10^{-8}$	$8x10^{-11}$
	Y	$2x10^{-8}$	$6x10^{-11}$
^{234m}Pa	w	$3x10^{-6}$	$1X10^{-8}$
	Y	$3x10^{-6}$	$9x10^{-9}$
^{235}U	D	$6x10^{-10}$	$3x10^{-12}$
	w	$3x10^{-10}$	$1x10^{-12}$
	Y	$2x10^{-11}$	$6x10^{-14}$
^{231}Pa	w	$6x10^{-13}$	$6x10^{-15}$
	Y	$2x10^{-12}$	$8x10^{-15}$
^{227}Ac	D	$2x10^{-13}$	$1x10^{-15}$
	w	$7x10^{-13}$	$4x10^{-15}$
	Y	$2x10^{-12}$	$6x10^{-15}$
^{227}Th	Y	$1x10^{-10}$	$5x10^{-13}$
	w	$1x10^{-10}$	$5x10^{-13}$

FORM SOP 212-10

RADIOLOGICAL AIR SAMPLE DATA FORM – AREA MONITORS

Equation:

Volume (V) = (Pump ml/min.) (Total Sample Time) (count/sample conversion)
Multiply Cubic Feet by 28.316 to Obtain Liters
Ml/min = (L/min.) (1000 ml/L)

SAMPLE COLLECTION

Sample #	Per. By	Date	Sample Start Time	Sample End Time	Total Sample Time	Cubic Ft/min. (CFM)	Count vs. Sampled Conv.	Total Sample Volume (ml)

Equation: Actual Activity = Activity (A) - Background (B)

$$\text{Activity (A)} = \frac{\text{(Net CPM) (1/Eff.)}}{\text{(V) (2.2 E + 6 dpm/uCi) (filter retention factor) (5)}}$$

Sample #	Cal. By	Date	Gross Counts	Net CPM	Detector Efficiency (EFF)	Sample Volume Analyzed (ml)	Sample Concentration (A)µCi/ml	Background Activity (B)µCi/ml	Actual Concentration µCi/ml
4 day recount									

Filter retention factor/absorption correction = 0.7 for Staplex 8x10 ashless paper filter
= 1.0 for 37mm PAM membrane filters

Note: Activity is divided 5 due to the Thorium daughters that are counted with an open window (gross alpha)

Conversion factor for volume analyzed vs. volume sampled for 1.75" diameter cut-out = 0.035

30 minute background count for _____ is _____ cpm
date

30 minute background count for _____ is _____ cpm
date

FORM SOP-212-11

RADIOLOGICAL AIR SAMPLE DATA FORM – PAM'S

Equation:

Volume (V) = (Pump liters/min.) (Total Sample Time in minutes) (1000 ml/liter)

Sample Collection

Person Wearing Monitor	Pump #	Sample #	Date	Sample Start Time	Sample End Time	Total Sample Time	Cubic liters/min. LPM	Total Sample Volume (ml)

Equation: Actual Activity = Activity (A) - Background (B)

$$\text{Activity (A)} = \frac{\text{(Net CPM) (1/Eff.)}}{\text{(V) (2.2 E + 6 dpm/uCi) (filter retention factor) (5)}}$$

Sample Analysis

Sample #	Cal. By	Date	Gross Counts	Net CPM	Detector Efficiency (EFF)	Sample Volume Analyzed (ml)	Sample Concentration (A)µCi/ml	Background Activity (B)µCi/ml	Actual Concentration µCi/ml

Filter retention factor/absorption correction = 0.7 for Staplex 8x10 ashless paper filter
= 1.0 for 37mm PAM membrane filters

Note: Activity is divided 5 due to the Thorium daughters that are counted with an open window (gross alpha)

30 minute background count for _____ is _____ cpm
date

30 minute background count for _____ is _____ cpm
date

MINIMUM DETECTABLE CONCENTRATION CALCULATION – PAMS

Sensidyne Personal Air Monitor Samples analyzed on Ludlum 43-10 Alpha Counter

$$MDC = \frac{2.71}{n\,E\,F\,K\,T_g\,T_g} \qquad 3.29\,\frac{\sqrt{Rb}\left[\frac{1}{Tb}+\frac{1}{Tb}\right]}{n^{1/2}\,E\,F\,K\,T_s}$$

n = number of sampling intervals
E = fractional filter efficiency
F = airlow rate through the sampler in cm^3/min
K = counting efficiency in cpm/μCi
T_s = duration of sample collection in min
T_g = gross counting time
T_b = background counting time
R_n = net count rate in cpm
R_b = background count rate in cpm
C = concentration of radioactive material in the air in μCi/cm^3

N = 5 days of sampling minimum per week
E = 1.0 37mm 0.8 μm MCE Filters
F = 2.5×10^3 cm^3/min (or ml/min)
2.5 liters per minute x 1000 ml/l = 2500 ml/min
K = 699300
0.315 count/disintegration x 2.22 x 106 dis/μCi = 699300 cpm/μCi
T_s = 480 min
Based on a minimum of 8 hours per day
T_g = 30 min
T_b = 600 min

Rb = 0.58 cpm, based on 3000 min background count on 9/16 – 9/20/02

$$MDC = \frac{2.71}{(5)\,(1.0)\,(2500)\,(699300)\,(480)\,(30)} + 3.29\,\frac{\sqrt{(0.58)}\left[\frac{1}{(600)}+\right]\frac{1}{(30)}}{(2.24)\,(1.0)\,(2500)\,(699300)\,(480)\,(30)}$$

= 2.98×10^{-14} μCi/ml (gross alpha weekly MDC)
= 5.96×10^{-15} μCi/ml (gross alpha ÷ 5, for Th-232)

MINIMUM DETECTABLE CONCENTRATION CALCULATION

Sensidyne TFIA High Volume Air Samples analyzed on Ludlum 43-10 Alpha Counter

$$MDC = \frac{2.71}{n\,E\,F\,K\,T_g\,T_g} \qquad \frac{3.29\,\sqrt{Rb}\left[\frac{1}{Tb}+\frac{1}{Tb}\right]}{n^{1/2}\,E\,F\,K\,T_s\,cf}$$

NUREG 1400 Air Sampling in the Workplace Appendix A (eq A.17)

n = number of sampling intervals
E = fractional filter efficiency
F = airlow rate through the sampler in cm^3/min
K = counting efficiency in cpm/μCi
T_s = duration of sample collection in min
T_g = gross counting time
T_b = background counting time
R_n = net count rate in cpm
R_b = background count rate in cpm
Cf = count vs. sample conversion
(this is not part of NUREG 1400, however, analysis volume must be taken into account)

n = 5 days of sampling minimum per week
E = 0.7 (referred to as filter retention factor on air sampling form)
F = 1.13×10^6 cm^3/min (or ml/min)
40 ft^3/min x 28.316 liters/ft^3 x 1000 ml/l = 1.13×10^6 ml/min
K = 699300
0.315 count/disintegration x 2.22 x 106 dis/μCi = 699300 cpm/μCi
T_s = 480 min
Based on a minimum of 8 hours per day
T_g = 30 min
T_b = 600 min
Cf = 0.035
8" x 10" original filter size = 80 $inches^2$
0.3 inch border is covered by sampler plate and not sampled = 10.8 $inches^2$
filter cutout = πr^2 = $(0.875")^2$ (3.14) = 2.41 $inches^2$
actual sample area = 80 $inches^2$ – 10.8 $inches^2$ = 69.2 $inches^2$
sample analyzed vs. sample collected ration = 2.41/69.2 = 0.035
r_b = 0.58 cpm, based on 3000 min background count on 9/16 – 9/20/02

$$MDC = \frac{2.71}{(5)\,(0.7)\,(1.13E6)\,(699300)\,(0.035)\,(480)\,(30)} + \frac{3.29\,\sqrt{(0.58)}\left[\frac{1}{(600)}+\right]\frac{1}{(30)}}{(2.24)\,(0.7)\,(1.13E6)\,(699300)\,(0.035)(480)\,(30)}$$

= 2.69×10^{-15} μCi/ml (gross alpha weekly MDC)
= 5.39×10^{-16} μCi/ml (gross alpha ÷ 5, for Th-232)

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Soil Sampling Procedure

Document: SOP-214

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

SOIL SAMPLING PROCEDURE

1.0 PURPOSE

The purpose of this procedure is to present protocol for collecting soil samples for the Site.

2.0 SCOPE

This procedure applies to samples collected for radiological or geotechnical analysis. Soil samples may be collected of potential backfill soils or other soils. The Field Team Leader will coordinate the sampling efforts.

3.0 REFERENCES

U.S. Nuclear Regulatory Commission, NUREG/CR-5849, Manual for Conducting Radiological Surveys in Support of License Termination, June 1992.

4.0 EQUIPMENT AND MATERIALS

4.1 Equipment and Materials Management

Downhole tools and samplers are cleaned in accordance with the Decontamination Procedure (SOP-347).

Cuttings, fluids, samples, and water are placed in 55-gallons drums, labeled, properly stored on-site, and disposed of in a manner that does not violate local, state or federal rules or regulations and in a manner that does not damage public or private property.

4.2 Sampling Equipment and Materials

Equipment used for soil sampling includes the following:

- Auger or other Coring Tool
- Shovel and Trowel
- Plastic Collection Bags
- Plastic Sheets (optional)
- Sampling Tracking Form (Form SOP-214-1)
- Field Logbook (SOP-215)
- Field Sample Screening Form (Form SOP-214-2 or holding samples)
- Pin Flags (for marking sample locations)
- Container (for collecting potentially contaminated waste generated during the sampling process) (e.g., gloves, plastic sheets, etc.)
- Bucket (filled with clean rinse water)
- Bucket (for homogenizing samples)
- Stainless Steel Brush
- Moist Towelettes
- Paper Towels
- Latex Gloves
- Survey Instrument (for verifying clean sampling equipment and hands).

Other equipment may be substituted, if necessary, because of availability of the items listed or the conditions encountered at the site. Substitute equipment shall be documented in the Field Logbook and approved by the Field Team Leader.

5.0 SAMPLING PLAN

Selection of the sampling plan to characterize a soil is a function of the goals of the investigation, the variability of the parameters being measured, and the impact of the variability on the conclusions. Samples may be collected randomly or they may be collected from specific areas deliberately chosen to represent the range of conditions expected or unusual conditions of particular interest. In general, randomly chosen samples are appropriate to assess overall site conditions. However, there may be instances where the significance of an observed condition is of interest. The choice of method will, therefore, depend on the specific goals of the sampling activity.

The procedure presents sampling methods based on random sampling. For the reasons stated above, variations to the methods provided in this procedure may be requested by the Field Team Leader. Such variations shall be documented in the Field Logbook by field personnel.

6.0 ON-SITE STOCKPILE SOIL SAMPLING

The following are the steps to be followed for on-site stockpile soil sampling.

6.1. Excavated soil may be stockpiled. Samples from the stockpiles may be analyzed.

6.2. The soil may be stockpiled in piles varying from a few to several thousand cubic yards. Because of this potential variation in pile size, no single method for sampling or type of equipment can be prescribed that will work for every situation. The two basic methods that can be used for sampling stockpiles, core sampling method and lift sampling method, are described in paragraphs 7.3 and 7.4, respectively. Both methods are based on the premise that in order for a sample to be representative of the pile, every particle in the pile must have an equal probability of being included in the sample.

6.3 One of the methods, the core sampling method, assumes that the pile can be completely penetrated using a coring tool (i.e., sampling probe or drill rig). On conical shaped piles, the sample is to be taken approximately perpendicular to the surface of the pile, midway between the peak and the base, to the center of the pile. On piles with flattened tops, the sample is to be taken perpendicular to the surface from the top to the bottom of the pile.

6.4 The other stockpile sampling method, the lift sampling method, assumes that the pile can not be completely penetrated with a sampling tool, and therefore must be sampled either as the soil is placed in lifts onto the pile or before the soil is removed in lifts for use. The samples will, therefore, only be representative of the discrete layer of soil that is exposed to the sampling.

6.5. With either sampling method, to identify the areas to be sampled, the pile shall always be faced looking north. For flat topped piles, divide the stockpile into an imaginary grid with square or rectangular shaped sections approximately equal in area; the grids on flat topped piles should be numbered from left to right, top to bottom. For conical shaped piles, divide the stockpile into an imaginary grid with pie shaped sections of equal areas; the grids on conical shaped piles should be numbered in clockwise pattern.

6.6. Determine the initial number of grids and samples as follows:

Pile Size (cubic yards)	Number of Grids	Number of Lift Samples[1]	Number of Core Samples[2]
< 50	3	3	3
50 to 100	5	5	5
101 to 500 .	6	5	6
500 to 1,000	7	5	7
1,000 to 2,000	8	6	8

Pile Size (cubic yards)	Number of Grids	Number of Lift Samples[1]	Number of Core Samples[2]
2,000 to 4,000	9	6	9
4,000 to 6,000	10	7	10
6,000 to 8,000	11	7	11
8,000 to 10,000	13	8	13
10,000 to 20,000	16	8	16
20,000 to 40,000	20	10	20
40,000 to 70,000	30	15	30
70,000 to 100,000	36	15	36
100,000 to ---[3]	36+	15+	36+

Notes:

1 Take one sample from each grid randomly chosen. In order to choose the grids to be sampled randomly, use some blank sample identification tags and number the tags from one (1) to (n), where (n) represents the number of grids in each pile. Put the tags into a sample bag, shake the bag and reach in and blindly select a tag. Continue selecting tags until the required number of grids are selected. The numbers will be chosen without replacement, that is, without returning the used number to the bag. The samples shall be taken from the grids that correspond to the randomly chosen numbers. An alternative method would be to use a computer generated random numbering system available in various spreadsheet programs (i.e., Excel).

2 From the randomly chosen grids, take one composite sample for approximately every ten (10) feet of soil depth to obtain the required number of samples. For example: if a 98 cubic yard pile is 10 feet high, according to the above table, five (5) composite samples are required (i.e., one for each grid). If an 11,000 cubic yard pile is 30 feet deep, three composite samples, one composite sample at each ten feet of depth, will be taken from 5 of the grids and one composite sample will be taken from a sixth, randomly chosen grid.

3 Add one sample for each additional 10,000 cubic yards.

6.7 Take the sample and submit it to the laboratory for analysis.

6.8. Statistically test the results of the sample analyses to determine how much uniformity the samples show and whether more samples must be taken.

6.9. If necessary, take additional samples and analyze. Continue to repeat steps 6.7 arid 6.8 until there are enough samples to characterize the pile.

6.10. As directed by the Field Team Leader, identify materials suitable for backfill or other purpose for which the sampling was done.

6.11. To compare the sample data with the desired criteria, calculate the average (X bar of all the samples) in the pile using:

$$\bar{x} = \frac{1}{n}\sum_{i=1}^{n} xi$$

6.12 If the average satisfies the desired criteria, the results can be further evaluated to determine whether the data provide a 95 percent confidence level that the true mean (μ) meets the relevant criteria. The Field Team Leader will consult with the Project Coordinator to determine if this further evaluation is required.

7.0 IN-SITU SOIL SAMPLING

This section describes the methods for choosing sample locations and sampling methods.

7.1 Sample Location Selection

Appropriate in-situ soil sample locations are determined by the size and uniformity of the deposit being sampled. The sampling pattern depends upon the size of the area, the uniformity of the soil stratum being sampled, and the volume of soil that is being sampled.

Sampling plans for particular purposes may specify a pre-established sampling frequency in terms of the maximum volume of soil represented by a sample. If the soil being sampled is statistically homogeneous, then the locations for samples can be selected randomly over the area and thickness of the deposit. If the soil is not statistically homogeneous, then the area must be broken into sub-areas within which the soils are statistically homogeneous, and each area sampled separately. The issue of statistical homogeneity is resolved by comparing the range of variation of the property being judged to the acceptability criteria. For example, a deposit of sand and gravel may be statistically homogeneous when judged against a standard that the material not contain boulders and not be homogeneous when judged against a standard that no gravels be larger than one inch.

Clearly, also, the number of samples required to resolve the second comparison may be larger than the number required to resolve the first. The sampling frequencies given in the Sections 10.3 and 10.4 (Stockpile Sampling) may be used as a guide in estimating an initial number of samples, but the actual number required for a particular purpose depends very strongly upon the requirements and materials being sampled.

7.2 Drilling Procedures

No drilling is planned.

8.0 OPERATIONAL SUPPORT SAMPLING

Sampling may be required to support the excavation and restoration action. This sampling may be performed in instances when the Field Team Leader is interested in the significance of an observed variation or when looking for cursory information to provide operational guidance. The choice of the method will, therefore, depend on the specific goals of the sampling activity as determined by the Field Team Leader. This sampling is not a quality activity, and may be performed outside the requirements of this procedure. However, all deviations requested by the Field Team Leader must be documented in the Field Logbook by field personnel.

The sampling technique for surface sampling, subsurface sampling, and stockpile sampling, as described in this procedure, shall be used when sampling in these instances.

9.0 SAMPLE TRACKING

To establish the documentation necessary to track the sample from the time of collection, the sample identification and Sample Tracking Forms must accompany samples that are sent to the laboratory.

All potentially contaminated samples to be submitted to the laboratory will be screened for radiation in the field. Information obtained from this survey will be documented on the Sample Tracking Form (Form SOP 214-1). Samples taken from potential borrow areas generally are not screened.

10.0 SAMPLING METHODS

10.1 Surface Soil Sampling

10.1.1. If necessary, to minimize contamination, spread a clean sheet of plastic next to the area to be sampled; assemble the sampling equipment required.

10.1.2. Enter the complete information on the Sample Tracking Form:

- Sample Number
- Sample Matrix
- Sample Location
- Purpose of Sample Collection
- Include applicable comments regarding the sample, location, weather, conditions, or other factors that may be relevant
- Collected by (your name)

10.1.3. Mark the collection bag or prepare the identification tag for the sample.

10.1.4 Collect the soil samples that are representative of the soil in the area surveyed. Use a shovel or trowel to collect soil from the depth required.

10.1.5 Remove rocks, sticks, and foreign objects greater than approximately one-quarter (1/4) inch.

Stir and homogenize the soil in a bucket as much as practicable. Using the hand trowel, randomly scoop the soil from the bucket. Save alternating scoops of material to collect the required sample size; return the other material to the sampling locations.

10.1.6 Attach the identification tag to the sample bag if appropriate and place the bag in the sample container.

10.1.7 Decontaminate the sampling equipment as required by Section 11.

10.1.8 Return any location markers (such as pin flags) that, were removed in order to sample. Fill in all sampling holes to eliminate a possible tripping hazard.

10.1.9 If specific data are not available, mark a pin flag with the sample identification number and place the flag at the center of the sampling location before leaving.

10.2 Subsurface Sampling (Undisturbed Soils)

10.2.1 If necessary, to minimize contamination, spread a clean sheet of plastic next to the area to be sampled; assemble the sampling equipment required.

10.2.2 Enter the complete information on the Sample Tracking Form

- Sample Number
- Sample Matrix
- Sample Location
- Purpose of Sample Collection
- Include applicable comments regarding the sample, location, weather, conditions, or other factors that may be relevant
- Collected by (your name)

10.2.3 Mark the collection bag or prepare the identification tag for the sample.

10.2.4 Sample the material using a hand core sampling tool or hammer driven split spoon sampler.

Alternatively, an auger method may be used.

Cut a hole, approximately six (6) inches in diameter, in the center of a plastic sheet. Center the sheet of plastic over the area to be sampled. Using an auger, drill through the hole in the plastic to the desired sampling depth; keep the auger turning until no more material comes up. The soil around the hole, on the plastic sheet, is fairly well mixed and representative of the interval just drilled.

If the soil sample is to be obtained from a particular depth (not a composite from surface to depth), and the material refuses to pass into the coring tool, the following sampling method will be performed. Drill through the hole in the plastic to the top of the desired sampling depth; keep the auger turning until no more material comes up. Remove the auger and sample the material using a hand core sampling tool or hammer driven spilt spoon sampler. The first three inches of the sampled obtained will be considered slough and not part of the desired sample.

NOTE: If, due to the conditions of the sampling area, this method does not work, an alternative method(s), approved by the Field Team Leader, may be used. Alternative methods, when used, will be documented by the field personnel in the Field Logbook.

10.2.5 Remove rocks, sticks, and foreign objects greater than approximately one (1) inch in diameter.

NOTE: The removed rocks will be collected and submitted as a separate sample.

10.2.6 Using a hand trowel, collect approximately one (1) quart of the augured soil in the plastic sample bag or jar. For core segments, place each 6-9 inch (nominally 5-7 inch) segment in the plastic sample bag or jar.

10.2.7 Label the sample container.

10.2.8 Return unused material to the sampling hole and fill in the hole to eliminate possible tripping hazard.

10.2.9 Decontaminate the sampling equipment as required by Section 11.

10.2.10 When required, mark a pin flag with the sample identification number and place the flag at the center of the sampling location before leaving.

10.3 Stockpile Sampling (Core Sampling Method)

10.3.1 If necessary, to minimize contamination, spread a clean sheet of plastic next to the area to be sampled and assemble the sampling equipment required.

10.3.2 Enter the complete information on the Sample Tracking Form:

- Sample Number
- Sample Matrix
- Sample Location
- Purpose of Sample Collection
- Include applicable comments regarding the sample, location, weather, conditions, or other factors that may be relevant. Identify the approximate size of the stockpile. (A 70 cubic yard pile of soil is approximately ten feet high with a base diameter of approximately 26 feet.) Include a brief description of the equipment used to obtain the sample (i.e., sub-soil sampler, drill rig, etc.).

- Collected by (your name)

10.3.3 Before sampling, determine the number of grids and samples as described in Section 6.6. Record the information in the Field Logbook.

10.3.4 Mark the collection bag or prepare the identification tags for the samples.

10.3.5 Using an auger or other coring tool, take the required number of samples from the pile. A hollow stem auger will be used when discrete, rather than composite, samples are collected.

10.3.6 Place the sample material in the sample bag and attach the identification tags. Place the sample bag in the container.

10.3.7 Decontaminate the sampling equipment as required by Section 11.

10.4 Stockpile Sampling (Lift Sampling Method)

10.4.1 If necessary, to minimize contamination, spread a clean sheet of plastic next to the area to be sampled and assemble the sampling equipment required.

10.4.2 Enter the complete information on the Sample Tracking Form:

- Sample Number
- *Sample Matrix*
- Sample Location
- Purpose of Sample Collection
- Include applicable comments regarding the sample, location, weather, conditions, or other factors that may be relevant. Identify the approximate size of the stockpile. (A 70 cubic yard pile of soil is approximately ten feet high with a base diameter of approximately 26 feet.) Include a brief description of the equipment used to obtain the sample (i.e., sub-soil sampler, drill rig, etc.).
- Collected by (your name)

10.4.3 Before sampling, determine the number of grids and samples as described in Section 6.6. Record the information in the Field Logbook.

10.4.4 Mark the collection bag or prepare the identification tags for the samples.

10.4.5 Using the appropriate sampling tool, take the required number of samples from the lift approximately perpendicular to the surface of the lift at the appropriate locations. Composite the sample through the entire lift thickness.

10.4.6 Place the sample material in the sample bag and attach the identification tags. Place the sample bag in the container.

10.4.7 Decontaminate the sampling equipment as required by Section 11.

10.5 Soil Sample Size

10.5.1 Each soil sample will be a minimum of four (4) pounds and the sample may exceed ten (10) pounds. Sample size requirements are detailed in Sample Preparation Procedure for Gamma Spectral Analysis (SOP-364).

11.0 EQUIPMENT CLEANING

To avoid cross-contamination, the sampling equipment will be cleaned prior to and between samples. The following steps will be followed to clean equipment.

- Remove loose contamination by gently tapping/shaking the item.
- Using the stainless steel brush or paper towels, remove material that did not dislodge.
- If the item appears to be clean (i.e., no visible clinging soil), proceed to the next sampling area.
- If the item does not appear to be clean or if a survey with the appropriate instrument does not verify that it is, scrub the item with water. While holding the item over the sampling location, rinse the item with water.
- Dry the item with paper towels or repeat the scrubbing sequence as necessary.
- Rinse gloved hands. Change gloves when changing sampling areas if a self-frisking indicates that contamination is present after rinsing.
- Approximately one percent of the time, swipe the item as described in the Gamma Radiological Survey SOP (SOP-210). Submit the swipes to the laboratory for analysis to confirm the effectiveness of the decontamination protocol. (This step is necessary only when sampling soils where radiologic contamination is suspected.)
- Dispose of cleaning materials, plastic sheeting, and gloves as contaminated materials in accordance with instructions provided by the Field Team Leader.

12.0 QUALITY CONTROL

12.1 Quality Control Samples

To evaluate the variance in the soil sampling protocol, field duplicates will be collected at specified intervals. These quality control (QC) samples will be identified and noted in the Field Logbook.

To validate the sampling protocol used for surface sampling, initially one (1) area on every twenty (20) sub-grids sampled.

For surface sampling, the duplicates shall be randomly selected and identified before sampling activities begin. The duplicate sample material will be collected using the next scoop full of material each time the initial sample is saved.

For subsurface samples, one duplicate subsurface sample will be taken for every twenty (20) samples.

For subsurface sampling, the duplicate will be collected from the representative augered material.

For stockpiles, one duplicate will be taken for every twenty (20) stockpile samples, or one each day that stockpile sampling takes place, whichever is greater.

The stockpile duplicate will be taken from the node of two grids. The duplicates will be randomly selected and identified before the sampling begins.

The Field Team Leader will calculate the mean and the standard deviation for the samples analyzed. If the duplicate sample results are within three (3) standard deviations of the sample population, the sampling protocols can be considered acceptable.

If the Project Coordinator approves, the Field Team Leader can reduce the frequency of the QC duplicate sampling based on the results obtained. Changes shall be documented in the Field Logbook.

12.2 Data Review

Entries in the Field Logbook will conform to the Field Logbook Standard Operating Procedures.

Daily, the Field Team Leader will review the Field Logbook, resolve any discrepancies that were noted by field personnel, and sign the book to indicate the pages reviewed. If the Field Team Leader recorded the discrepancy, the Quality Assurance Supervisor will review the Field Logbook and resolve any discrepancies that were noted.

NOTE: Discrepancies relating to reported data will be brought to the attention of the Field Team Leader.

13.0 HEALTH AND SAFETY

Personal protective equipment and clothing, as required by the Health and Safety Plan, will be used when collecting and handling contaminated soils.

The site radiological conditions will be determined and documented before sampling begins. During the sampling process, the principles of As Low As Reasonably Achievable (ALARA) will be followed.

14.0 RECORDS

The following documents will be maintained as quality records:

- Field Logbooks
- Sampling Tracking Forms
- Results of all Calculations and Statistical Analyses Performed

FORM SOP-214-1

SAMPLE TRACKING FORM

Date: _____ Page _____ of _____

Sample Number	Matrix (S/W)	Location	Collected For	Comments	Collected By
Released by/company			All samples listed above are hereby released except for:		Date/Time
Received by/Company			All samples listed are hereby received except for:		Date/Time
Received by/Company			Data for all samples listed above are hereby received except for:		Date/Time

FORM SOP-214-2

FIELD SAMPLE SCREENING FORM

Sample Type:	Sample ID Number:
Date:	Time:
Counting Instrument:	Sample Date:
Reading Units:	
Signature of Technician:	Date:
Signature of Reviewer:	Date:

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Field Logbook Procedure

Document: SOP-215

Revision Number: 0

Date: June 19, 2002

Replaces: New

FIELD LOGBOOK PROCEDURE

1.0 PURPOSE

This procedure describes standard protocol for the use and control of the Field Logbooks used during the Site remediation.

2.0 SCOPE

This procedure applies to field activities that are associated with the Site cleanup.

3.0 REFERENCES

STS Consultants, Ltd. Quality Assurance Manual

4.0 EQUIPMENT AND MATERIALS

Field Logbook.

Indelible pen or pencil.

5.0 INSTRUCTIONS

5.1 Field Logbook Format

5.1.1 Prior to entering the field, page numbers shall be assigned to the pages of the Field Logbook. Pages shall include the date. STS may use pre-printed Field Logbooks in which some of these items are filled in. Each Field Team Leader and other field personnel taking measurements, observing tests, or performing other related work, will be issued a Field Logbook.

5.1.2 The first set of pages for a day will include the following items (in the order indicated):

- personnel on-site
- contractor personnel on-site (names of employees for the companies represented)
- others on-site (e.g., regulators, visitors)
- weather
- equipment used
- equipment calibration
- sketch of work area
- summary of work.

5.1.3 The remaining pages for a day will record the field activities and should include the following:

- meetings (meeting attendees, person who called the meeting, time, location, decisions, and decision makers)
- start and end time of activities.
- visits by others
- regulator - directed activities
- comments made by regulator, visitor, or other persons visiting Site
- weather and working conditions
- general description of work area.
- sketch work areas and show significant relative locations, etc.

- progression of work (e.g., faster or slower, reason for delays)
- description of equipment used, including general name, brand name, model number and, calibration
- description of amount of material excavated and levels of contamination observed (if known)

5.2 Quality Control

5.2.1 The Field Team Leader, or his designee, will review field logbook for completeness, proper field note correction (single line strikeout), and content.

5.2.2 Field logbooks will be audited at the discretion of the Project Quality Assurance Supervisor.

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Excavation Procedure

Document: SOP-217

Revision Number: 0

Date: June 19, 2002 Replaces: New

EXCAVATION PROCEDURE

1. PURPOSE

To provide a procedure for excavation for the Site.

2. SCOPE

This procedure will cover Site excavation activities, which are deemed quality critical by the Project Coordinator

3. REFERENCES

1992, NUREG/CR-5849, Manual for Conducting Radiological Surveys in Support of License Termination, Draft Report.

4. EQUIPMENT AND MATERIAL

None

5. INSTRUCTIONS

5.1 Delineation of extent

5.1.1 Delineate initial areas and depths. Areas and depths will extend slightly beyond estimated extent of impacted soil. Initial areal extent will be established using previously completed walkover gamma surveys and down-hole exploration and sampling information, supplemented with gamma survey data.

5.1.2 Initial excavation limits to be within three inches of the estimated bottom limit.

5.2 Excavate delineated soil mass.

5.3 Sampling scheme

5.3.1 Re-establish survey grid.

5.3.1 Locate diagonals across grid square.

5.3.2 Survey the bottom of the excavation as described in SOP-210.

5.4 Pre-Verification or Verification Sampling

5.4.1 If all measurements within a grid are less than the cleanup criteria limit, then grid is clean. No further excavation is required in this grid.

5.4.2 If any measurements within an excavation are greater than the action criteria limit, then additional excavation is required.

5.4.2.1 Proceed through sequence 5.2 through 5.4 again.

5.4.2.2 Mark subareas around grid points that exceeded the action limit.

5.4.2.2 Contact Field Team Leader for guidance of additional excavation.

5.5 Completion

5.5.1 After grid has met criteria, give documentation of delineation, excavation, and sampling to Field Team Leader.

5.5.2 Grid is available for Pre-Verification or Verification Surveying.

6. QUALITY CONTROL

6.1 Quality control for the excavation documentation will be in accordance with applicable SOPs.

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Verification Survey

Document: SOP-223

Revision Number: 0

Date: June 19, 2002 Replaces: New

VERIFICATION SURVEY PROCEDURE

1.0 PURPOSE

The purpose of this procedure is to present protocol for conducting verification surveys at the excavations at the Site.

2.0 SCOPE

This procedure applies to all completed excavations that are done as a result of the excavation area being identified as containing soil exceeding the cleanup criteria.

3.0 REFERENCES

SOP-210 - Gamma Radiological Survey

4.0 EQUIPMENT AND MATERIALS

None

5.0 PROCEDURE

5.1 Equipment and Materials

Equipment used for verification survey may include the following:

5.1.1 Compass or theodolite

5.1.2 Cloth or steel tape

5.1.3 Stakes, survey flags, or spray paint

5.2 Grid Layout

5.2.1 The verification survey will be conducted at all excavations.

5.2.2 The grid used for the STS Survey, or similar locations will be re-established for the verification survey.

5.2.3 The diagonals across each grid square will be located.

5.2.4 The location halfway between the grid corner and the center of the grid will be located.

5.3 VERIFICATION

5.3.1 Measurements will be made according to the procedures described for Gamma Radiological Surveys (SOP-210).

5.3.2 If all measurements within a grid are less than the cleanup criteria limit, then grid is clean. No further excavation is required in this grid.

5.3.3 If any measurements within an excavation are greater than the action criteria limit, then the Field Team Leader shall guide additional soil removal until the excavation measures below the cleanup criteria.

6.0 DOCUMENTATION

6.1 A scale drawing of the survey area showing the locations and results of the gamma measurements will be created.

6.2 The drawing and gamma measurements will be delivered to the USEPA with a Notice of Successful Verification and a request for approval to backfill the excavation (Form SOP 223-1).

7.0 QUALITY CONTROL

7.1 Quality control for the verification documentation will be in accordance with applicable SOPs.

FORM 223-1
NOTIFICATION OF SUCCESSFUL VERIFICATION SURVEY

Area Identification: _____

Date of Verification Survey: _____

Time of Verification Survey _____ am/pm

The above-described excavation was surveyed at the time and date indicated above. The survey indicated that all soils have been removed as required by the Site Removal Action Criteria.

Documents pertaining to this survey are attached for review and approval by the USEPA.

Signed:

Date _____

Print Name _____

Print Title _____

STS Consultants, Ltd.

The attached Verification Survey documents were reviewed by USEPA, Region 5 on _____. The results of this survey indicate that the verification criteria as contained in the UAO, have been met.

Authorization is hereby granted to commence backfill and restoration work at this excavation.

Date _____

Print Name _____

Print Title _____

For USEPA Region 5

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Radioactive Material Shipments

Document: SOP-320

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

RADIOACTIVE MATERIAL SHIPMENTS

1.0 SCOPE

1.1 Purpose

To establish a procedure that will insure the safe and proper shipment of radioactive waste material in compliance with USEPA, NRC, and DOT regulations.

1.2 Applicability

This procedure is applicable at all times for LSA shipments of radioactive materials destined for disposal at EnviroCare of Utah's Clive, Utah Facility.

2.0 REFERENCES

- 32 Illinois Administrative Code, Parts 310 and 340, Standards for Protection Against Radiation
- 32 Illinois Administrative Code, Part 400, Notices, Instructions and Reports to Workers; Inspections
- Lakeshore East Health and Safety Plan Remedial Action.
- 10 CFR Part 20.1906
- 10 CFR Part 71.47 and 71.87
- 10 CFR Part 71 Statements of Consideration
- 49 CFR Parts 172, 173, 174 and 177
- 32 Illinois Administrative Code, Part 341, Transportation of Radioactive Material
- Utah Radioactive Material License No. SMC-1559 with current amendments issued to EnviroCare of Utah, Inc.

3.0 DEFINITIONS

3.1 Definitions for transport are defined in 49CFR §171.108

This is the maximum activity of special form radioactive material permitted in a Type A package.

3.2 Limited Quantity of Radioactive Material

This is the quantity of radioactive material that does not exceed the materials package limits specified in 49 CFR 173.425 and which conforms with the requirements specified in 49 CFR 173.421.

4.0 REQUIREMENTS

4.1 Prerequisites

4.1.1 A copy of the consignee's up-to-date radioactive material license shall be on file at the Kerr-McGee West Chicago facility office so the Site Manager or his designee can verify that the consignee is licensed to receive the radioactive material.

4.1.2 All containers shall be inspected by the Project Coordinator or designee prior to loading and palletizing, to insure that the container's integrity is adequate, and then inspected again to insure that the containers have been loaded and closed in accordance with applicable procedures.

4.1.3 For shipments of radioactive material for disposal, compliance with disposal site facility criteria and specific state and federal license provisions applicable to the material shall be

verified by Project Coordinator.

4.1.4 For packages of radioactive waste material intended for shipment to EnviroCare of Utah for disposal, the Project Coordinator or designee shall verify that the pre-shipment characterization process has been completed.

4.2 Tools, Material, Equipment

4.2.1 Calculator.

4.2.2 Packaging, labels and containers

4.3 Precautions Limits

4.3.1 Radioactive waste material that is to be shipped for disposal must be classified according to 32 IAC 340.1052 and meet the requirements of 32 IAC 340.1055.

4.3.2 The maximum permissible limits for removable contamination for a package:

Contaminant	Bq/cm^2	$\mu Ci/cm^2$	Dpm/cm^2
Beta/gamma emitting nuclides; nuclides with $T_{1/2}$ <10 days; natural uranium; natural thorium; U-235; U-238; Th-232; Th-228; and Th-230 when contained in ores or physical concentrates.	0.4	10^{-5}	22
All other alpha emitting nuclides	0.04	10^{-6}	2.2

NOTE: In cases of packages transported as exclusive use shipments by rail or highway, the non-fixed radioactive contamination must not exceed the above limits at the beginning of transport, and, at any time during transport, must not exceed 10 times the above limits.

4.3.3 The radiation levels at any point on the external surface of the package must not exceed 200 mrem/hr and the Transport Index must not exceed 10. Packages transported as exclusive use by rail or highway may exceed these limits provided that the following conditions are met:

	Open Vehicle	Closed Vehicle
Package Surface	≤ 200 mrem/hr	≤ 1000 mrem/hr
Vehicle	≤ 10 mrem/hr at 2 meters from vertical planes	≤ 200 mrem/hr at any point on the outer surface of the vehicle ≤ 10 mrem/hr at 2 meters from vertical planes ≤ 2 mrem/hr in cab

4.4 Acceptance Criteria

4.4.1 Radioactive material has been properly prepared, packaged, marked, labeled, and loaded onto a vehicle and is in proper condition for transport.

4.4.2 All necessary forms, surveys, and manifests have been prepared and the "shipping papers" packet is complete.

4.4.3 All necessary state and local authorities and material receivers have been properly notified

of the shipment.

4.4.4 All necessary paperwork has been completed and signed and a copy of the "shipping papers" packet has been filed for Kerr-McGee's records.

4.4.5 For *radioactive* waste shipments for disposal, confirmation of receipt at the disposal facility is acknowledged within 20 days of shipment, or an investigation is initiated.

5.0 PROCEDURE

5.1 Verify that the intended consignee (receiver) of the material has a valid license to accept the type and quantity of radioactive material.

NOTE

Typically, groundwater samples, surface water samples, and environmental air samples that are shipped offsite do not meet the regulatory definition of "Radioactive Material" and therefore do not require radioactive material shipping paperwork.

5.1.1 The A_1 and A_2 values for radionuclides are the limits in curies from which a shipment type is determined.

5.2 Determine the following information for inclusion on the bill of lading ***and/or the radioactive waste shipment and disposal record*** form for each package in the intended shipment:

5.2.1 Proper shipping name and hazard class from 49 CFR 172.101, Columns 2 and 3.
5.2.2 Proper UN identification number from 49 CFR 172.101, Column 3.a.
5.2.3 Principal radionuclides (greater than 1% of total activity).
5.2.4 Determine whether or not Reportable Quantity (RQ) must appear on the bill of lading per 49 CFR 172.203(c)(2)

a. Using Table 2 of Appendix to 49 CFR 172.101, determine if a single radionuclide exists as a reportable quantity.
b. If a mixture of nuclides exists, use the sum of the ratios of the quantity of a nuclide per package and the RQ for the nuclide. A package contains an RQ of a hazardous substance when the sum of the ratios is ≥ 1.
c. If the quantities or identities of some of the nuclides in a package are unknown, follow the instructions found in the Appendix to 49 CFR 172.101 step 6 for RQ determination. .

5.2.5 Physical and chemical form of material.

5.2.6 Net quantity (activity) in each package.

5.2.7 For each shipment of radioactive material, emergency response information must be maintained during transportation and at facilities where hazardous materials are loaded for transportation or otherwise handled during any phase of transportation.

a. Emergency response information is not required for shipments of radioactive materials excepted from the shipping paper requirements of subchapter C of 49 CFR, such as those shipments designated as limited quantity.

b. Complete Emergency Response Information form (Attachment 2) and include with the shipping papers for the radioactive material shipment.

5.3 If the package of radioactive material is to be shipped for disposal, the following are additional required steps:

5.3.1 Use Radioactive Waste Shipment Checklist (Attachment 3) for shipments to a disposal facility.

5.3.2 Verify that the radioactive waste material has been classified in accordance with 32 IAC 340.1052.

5.3.3 Verify that the package's records meet the radwaste material form requirements of 32 IAC 341.1055.

5.3.4 Use EnviroCare's Radioactive Waste Shipment and Disposal Record form 540 and 541 as the manifest form for all shipments of radioactive waste material going to EnviroCare of Utah, Inc.

5.3.5 Mail or otherwise send, separate from the shipment, a copy of the disposal site shipping manifest to the disposal facility operator. This copy of the shipping manifest may be sent the same day that the shipment leaves tile site.

5.3.6 The disposal site operator is required to acknowledge receipt of the shipment within seven (7) days of arrival by returning a signed copy of the first page of the shipping manifest to the shipper.

5.4.7 Verify and document on the Radioactive Waste Shipment Checklist. (Attachment 3) that the return receipt for the shipment has been received within 20 days of shipment.

For shipments whose receipt has not been acknowledged within 20 days, initiate a trace investigation in accordance with 32 IAC 340.1060(h).

5.4 For packages shipped by rail or highway under the "EXCLUSIVE USE" provisions of 49 CFR 173.403 (i), the following additional steps are required:

5.4.1 Verify, that the certification statement of 49 CFR 172.204: "This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulation of the Department of Transportation," appears on the shipping paper, and is signed by the Project Coordinator, or his designee.

5.4.2 If a Radioactive Yellow II label is required, record the package contents (radionuclides), number of curies, and Transport Index (TI) on the label. Affix label to two opposite sides of the package (excluding the bottom) near the proper shipping name.

5.4.3 Verify that the radioactive material has been properly prepared, packaged, marked, labeled, and loaded on the vehicle.

5.4.4 Ensure that package radiation and contamination surveys have been performed and documented, and that package radiation and contamination levels are within the limits specified in Section 4.3.

5.4.5 Ensure that the vehicle has been completely tarped, blocked and braced, or the packaged material sufficiently restrained to preclude movement within the vehicle during normal transport.

5.4.6 Ensure that the vehicle or rail car is properly placarded and marked per Subpart D and F of 49 CFR 172. If placarding is required and shipment is by vehicle, all four sides must

have placards.

5.4.7 Verify that a radiation survey of the loaded vehicle has been performed and documented on Shipment Load Diagram (Attachment 5).

5.4.8 Complete Form Exclusive Use Vehicle Instructions to Carrier (Attachment 6), and have the vehicle operator read the exclusive use statement and acknowledge compliance his or her signature, and include a signed copy with the shipping papers.

5.4.9 Contact the Project Coordinator, or his designee, for final inspection of the vehicle, cargo and paperwork.

5.4.10 Insure that the carrier (vehicle operator) has all the required shipment papers, and appropriate copies have been retained for the site files.

5.5 For packages shipped as other than exclusive use, ensure completion of the following:

5.5.1 Certification statement of 49 CFR 172.204: "This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation," appears on the shipping paper and is signed by the Project Coordinator or his designee.

5.5.2 Package external radiation level is less than 200 mR/hr contact and 10 mR/hr at one meter.

5.5.3 Package external contamination level does not exceed 2200 dpm/100 cm^2 β and 220 dpm/100 cm^2 $\propto$

5.5.4 If the radiation level on the external surface of the package is greater than 0.5 mR/hr and less than 50 mR/hr, and the radiation level at 1 meter is less than 1 mR/hr the package may be shipped as a Radioactive Yellow II shipment.

Ensure that the shipping container meets the DOT Specification 7A Type A general packaging requirements per 49 CFR 173.415.

5.5.5 If a Radioactive Yellow II label is required, record the package contents (radionuclides), number of curies, and TI on the label. Affix label to two opposite sides of the package (excluding the bottom) near the proper shipping name.

5.5.6 Package is marked correctly in accordance with 49 CFR 172 Subpart D.

5.5.7 Ensure vehicle radiation and contamination surveys have been performed.

5.5.8 Placarding requirements in Subpart F of 49 CFR 172 are met.

5.5.9 Final inspection of the vehicle, cargo, and paperwork is performed by Project Coordinator, or his designee.

5.5.10 For radioactive waste shipments, the disposal facility operator is required to acknowledge receipt within one week by returning a signed copy of the manifest.

6.0 RECORDS/REPORTS/NOTIFICATIONS

6.1 Shipping records shall be maintained by the Project Coordinator. A complete shipment record packet includes copies of all completed and signed paperwork that accompanied the shipment.

6.2 Anyone who observes a deficiency in complying with this procedure shall notify Project Coordinator or his designee.

7.0 ATTACHMENTS

7.1	Attachment 1	Example Bill of Lading-Short Form (for Exclusive Use)
	Attachment 1A	Example Bill of Lading – Short Form for Material>2 N/gm <RQ
	Attachment 1B	Example Bill of Lading – Short Form for Material >2 N/gm >RQ
7.2	Attachment 2	Emergency Response Information Form
7.3	Attachment 2A	Emergency Procedure Form
7.4	Attachment 2B	Evaluation Questionnaire Form
7.5	Attachment 3	Radioactive Waste Shipment Checklist
7.7	Attachment 5	Shipment Load Diagram - Truck
7.8	Attachment 6	Exclusive Use Vehicle Instructions To Carrier

ATTACHMENT 1

STRAIGHT BILL OF LADING - SHORT FORM

ATTACHMENT 1 *(Example)*

STRAIGHT BILL OF LADING - SHORT FORM - Original - Not Negotiable

RECEIVED, subject to the contract in effect on the date of the issue of this Bill of Lading

From: KERR-McGEE CHEMICAL CORPORATION

the property described below in apparent good order, marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all terms and conditions of the contract in effect on the date of the issue of this Bill of Lading

SHIPMENT NUMBER

FULL NAME OF SHIPPER:

Kerr-McGee Chemical Corporation

CARRIER:	**TRUCK #:**	**DATE:**

FROM NO. STATION: STATE

SHIPPED FROM:	**CONSIGNED TO:**

ROUTE: **DELIVERING CARRIER:**

This material is routed "exclusive use". The vehicle is to remain closed between origin and destination. No material may be added to the vehicle or removed from the vehicle in route.

LINE NO.	DESCRIPTION AND CLASSIFICATION	ESTIMATED QUANTITY
	(Proper Shipping Name, Reportable Quantity, if applicable/ Hazard Class) (Proper UN identification number) (Net activity in each package) (Principal Radionuclides) (Physical and chemical form of material) (Indicate Yellow II on any applicable packages)	

TRUCK SHIPMENTS: PLACARDS REQUIRED

THIS IS TO CERTIFY THAT THE ABOVE-NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

KERR-McGEE CHEMICAL CORPORATION PER PER

Shipper Permanent post office address of shipper,

Oklahoma City, OK 73125 AGENT

ATTACHMENT 2

EMERGENCY RESPONSE INFORMATION

Shipment I.D. No._____

1. Proper Shipping Name and Hazard Class
Check one of the two types listed below

☐ Radioactive Material, Low Specific Activity, n.o.s. - Radioactive Material UN 2912

☐ Radioactive Material, n.o.s. - Radioactive Material UN 2982

DRIVER EMERGENCY PROCEDURE

A) RESCUE and LIFESAVING may be done with little fear of the hazards from the cargo on this truck. If possible, avoid breathing dust from any spilled cargo.

DO NOT DELAY RESCUE EFFORTS!

B) After providing needed rescue, lifesaving, first aid or fire-fighting, please read the attached instructions in the event of cargo spillage.

TO THE DRIVER:

Keep these emergency procedures with your shipping papers.

By my signature I certify that I have read and understand these emergency procedures.

Driver's Signature: _____

ATTACHMENT 2A
EMERGENCY PROCEDURE

This vehicle contains ____soil or debris_____, which are contaminated with natural thorium. In the event of an accident involving spillage of radioactive material, the following actions are recommended, if appropriate:

1. LIFESAVING, RESCUE AND FIREFIGHTING

This may be done with little fear towards the hazards from the debris contaminated with thorium. If possible, avoid breathing dust and avoid swallowing it. Thorium on the skin or clothing is relatively harmless and simple washing methods will remove it. If you come into contact with the debris, please wait for advice from health officials. To avoid ingestion of thorium, do not eat, drink, or smoke while near the spill.

2. CONTACT THE LOCAL LAW ENFORCEMENT AGENCY

Tell the police of the accident with spillage of "LOW SPECIFIC ACTIVITY" (LSA) radioactive material called natural thorium. Ask them to notify the state health department. Give them the location of the accident site and tell them of any injuries to persons.

3. FILL OUT ATTACHED QUESTIONNAIRE

Please obtain all of the information asked for on the attached form. You will need to relay this information to the carrier and the shipper.

4. Telephone the Carrier and Shipper (call collect)

   a) The Trucking Carrier is: Double M Trucking _____
      Telephone No.: 815-223-1828 _____

   b) The Shipper is:
      Telephone No. _____

Read the completed questionnaire to whoever answers your calls. It may be necessary to read the questionnaire a second time for complete understanding.

5. When help arrives please cooperate with all Civil Authorities and Carriers and Shipper's personnel who arrive at the scene. Follow their health safety instructions for checking possible contamination of your clothing or body.

   Please be assured that your exposure to this material will be relatively harmless, particularly if you have followed these instructions. The health and safety personnel who will arrive will be glad to answer any questions you have about this matter

ATTACHMENT 2B
EVALUATION QUESTIONNAIRE

1. Name of truck driver

2. Name of trucking company _____

3: Bill of lading number

4. Destination of shipment _____

5. Date and time of accident _____

6. Place of accident _____

7. Name of Police Department notified _____

8. Phone Number of Police notified _____

9. Is the driver injured? _____ Others? _____

10. Is or was there a fire? _____

11. Is the truck road worthy? _____

12. Are boxes off of the truck? _____ How many? _____

13. Estimate the number of square feet of spilled material _____

14. Has the spill been covered? _____

15. Is the spill on the ground? _____ Pavement? _____
16. Is the spill in water? ☐ Yes ☐ No **Lake**? ☐ Yes ☐ No **Stream**? ☐ Yes ☐ No
17. Is the spill near a building? ☐ Yes ☐ No **Sewer**? ☐ Yes ☐ No

18. Is the accident place illuminated at night? _____

19. Other comments: _____

20. Where can you be reached by phone? _____

a) Near the accident site _____
b) Home or business phone _____
c) Your name: _____

ATTACHMENT 3
RADIOACTIVE WASTE SHIPMENT CHECKLIST

DATE _____ BY _____

SHIPMENT NO. _____ CONSIGNEE _____

NOTE: Initial each statement as being completed or fill in the blank with appropriate comment(s). N/A is acceptable for those steps not required for this particular shipment.

_____ 1. General description

_____ 2. Consignee license reviewed and consignee authorized to receive type and quantity of material in shipment.

_____ 3. Number of packages in shipment. (Indicate number of packages of each type of waste.)

_____ 4. All containers inspected by Project Coordinator, or designee, to ensure compliance with all applicable laws, rules and regulations, including labeling, obliteration of old markings, radwaste classification/stability, gross weight, and package specifications.

_____ 5. A determination has been made whether or not any package in this shipment is a Reportable Quantity.

_____ 6. If this is an "Exclusive Use" shipment, the packages are loaded and blocked and braced or otherwise restrained to prevent movement.

_____ 7. Placard the vehicle per Subpart F of 49 CFR 172. For tractor-trailers, placard each side of the trailer and place one on the front of the tractor. For rail shipments, a placard must be visible on each side of a rail car not coupled to another car.

_____ 8. If applicable, the required tamper proof seals are installed.

_____ 9. EMCCs Straight Bill of Lading- Short Form, (Attachment 1, 1A or 1B) has been completed. Normal copy distribution if applicable is as follows:

a. Project files.
b. With shipment. Note: if radwaste material, the copy goes in the disposal site paperwork package.
c. With driver paperwork package.

NOTE: The following step applies to shipments for disposal at the EnviroCare of Utah facility only.

_____ 10. The EnviroCare of Utah facility's Radioactive Waste Shipment Record, is complete.

Copy distribution:

a. Original with shipment paperwork package.
b. Copy to project files.

_____ 11. The "EXCLUSIVE USE" Vehicle Instructions to Carrier, (attachment 6); his been completed.

Copy distribution:

a. Original with driver's paperwork package.
b. Copy with shipment paperwork package.
c. Copy to WCP Project files.

_____ 12. Radiation surveys have been performed.

Copy distribution:

a. Original to project files.

_____ 13. Receipt of radwaste material has been acknowledged by the disposal site operator within allotted time (10 days).

Copy distribution:

a. One copy to project files

_____ 14. Vehicle check performed.

Reviewed by: _____ Date _____

Project Manager or Designee

ATTACHMENT 5

SHIPMENT LOAD DIAGRAM - TRUCK

SHIPPER _____ CAB NUMBER _____ TRAILER NUMBER ____
SURVEY BY _____ SHIPMENT N0. _____ DATE _____

TRUCK CHECKED FOR CONTAMINATION:

BEFORE LOADING: ☐ < 02200 dpm/100 cm^2 beta-gamma ☐ < 220 dpm/100 cm^2 alpha

☐ CONTAMINATED TO _____

RADIATION LEVEL, MR/hr _____ CONTAMINATION LOCATION _____

AFTER LOADING: ☐ < 02200 dpm/100 cm^2 beta-gamma ☐ < 220 dpm/100 cm^2 alpha

Cab _____ mR/hr
(Sleeper)

Front of Van

Surface _____ mR/hr

6' _____ mR/hr

Left Side

Surface _____ mR/hr

6' _____ mR/hr

Right Side

Surface _____ mR/hr

6' _____ mR/hr

Top of Truck

Surface _____ mR/hr

6' _____ mR/hr

Under Truck

Surface _____ mR/hr

Rear Surface _____ mR/hr

6' _____ mR/hr

ATTACHMENT 6
"EXCLUSIVE USE" VEHICLE INSTRUCTIONS TO CARRIER

SHIPMENT NO. _____ Date_____

1. This shipment of radioactive material is being transported as an EXCLUSIVE USE shipment, loaded by the consignor and may only be unloaded under the direction of the consignor or consignee [49 CFR 173.403 (i)].

2. Any removal, addition to, or movement of, any material in this shipment by anyone, except under the direction of the consignee or consignor, shall constitute a violation of federal law.

3. A closed van shipment shall not be opened, nor shall any shipment be changed or modified in any manner, except by the consignee, without the prior authorization of Kerr-McGee Chemical LLC. No change of tractor is authorized without prior approval of Kerr-McGee Chemical LLC. Do not move the 5th wheel of the tractor once the shipment has left the Lakeshore East site.

In the event of an emergency, accident, or contemplated deviation from any the above instructions, notify Kerr-McGee Chemical LLC at _____. Routine inspection of placarding is required at all "off the road" stops.

Signature _____ Date_____

CARRIER ACKNOWLEDGEMENT:

I have read and understand the foregoing instructions. I agree that this shipment will be made in full accordance with these instructions.

Signature _____ Date_____

Print Name_____

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Surveys for Surface Contamination and Release of Equipment for Unrestricted Use

Document: SOP-345

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

SURVEYS FOR SURFACE CONTAMINATION AND RELEASE OF EQUIPMENT FOR UNRESTRICTED USE

1.0 SCOPE

1.1 Purpose

This procedure provides the methods for the detection and measurement of radioactive contamination within the site areas, it provides the methods for evaluating contamination, and establishes the criteria for releasing equipment or materials out of the Exclusion Zone. These methods are to be used to minimize the spread of radioactive contamination.

1.2 Applicability

This procedure applies to surveys that are performed on building surfaces, vehicles, equipment, materials (herein referred to as equipment) at the site and to the site personnel, who are required to monitor and release the equipment.

2.0 REFERENCES

2.1 10 CFR Part 20 Standards for Protection Against Radiation

2.2 U. S. Nuclear Regulatory Commission (USNRC) Regulatory Guide 1.86

2.3 Health and Safety Plan for radiologically impacted soil removal, Lakeshore East Development, Chicago, Illinois.

2.4 NUREG CR5849 Manual for Conducting Radiological Surveys in Support of License Termination

3.0 DEFINITIONS

3.1 Beta-Gamma to Alpha Decay Ratio

A thorium-232 decay series produces about 0.5 beta-gamma decays for every one alpha decay. This ratio allows the limits for alpha contamination to be verified using beta-gamma survey instruments.

3.2 Clean Area

This term defines radiation conditions within a specified area. An area where the radiation levels and contamination levels are maintained below 2 mrem/hr and 33 dpm/100 cm^2 alpha respectively.
Contamination Surveys

An assessment that may include, as appropriate, surveys for loose and fixed contamination through the use of direct frisks, large area wipes and smears, to locate and quantify the radioactive material present.

3.4 Exclusion Zone

The area on one side of the Control Line that includes Contamination Control Areas, Radiation Areas, and Airborne Radioactivity Areas.

3.5 Large Area Wipes (LAWs)

Paper towels or muslin used to wipe large areas to identify the presence of loose contamination.

3.6 Lower Limit of Detection (LLD)

The smallest amount of a radionuclide in a sample that will be detected with a probability of non-detection (Type 1 error) while accepting a probability of erroneously detecting that radionuclide in a blank sample (Type II error). These probabilities are 0.05 (5% chance of Type I or II errors). See Attachment 5 - "LLD Calculation" sheet.

3.7 Smears

Typically 2 inch disk type paper material. Smears are normally taken to identify and quantify loose contamination.

3.8 Unrestricted Release

Release of equipment or materials from the Exclusion Zone to any destination other than a licensed facility.

4.0 REQUIREMENTS

4.1 Prerequisites

4.1.1 Health Physics personnel shall ensure that all portable survey equipment used for this procedure are properly functioning and have a valid calibration sticker.

4.1.2 The Health Physics Supervisor or designee shall ensure that all personnel who are required to perform this procedure are properly trained and understand this procedure.

4.1.3 Equipment, vehicles and areas should be free of visible dirt, mud or dust prior to performing a contamination survey.

4.2 Tools, Material, Equipment

4.2.1 The following counting equipment, or their equivalents, should be used for performing contamination surveys on equipment and materials:

- Personnel and Equipment Frisking: Ludlum Model 3 Survey Meter with attached pancake G-M probe

- Alpha Smear Counting: Ludlum 2200 Scaler with attached Model 43-10 Alpha Scintillation Counter

4.2.2 Survey Maps (or lists) should be produced for each applicable type of equipment. Sketches of building surfaces (walls, floors, etc.), identifying the surveyed grids, should be produced for each surveyed building.

4.3 Precautions, Limits

4.3.1 Direct and removable surveys should not be performed on wet surfaces for alpha contamination. Wet surfaces should be surveyed only for beta-gamma contamination. However, the Health Physics Supervisor shall make the final determination as to when a wet surface is to be surveyed.

4.4 Acceptance Criteria

4.4.1 Prior to unrestricted release from the Exclusion Zone, all vehicles, equipment and materials shall be surveyed for contamination. If contamination is found, then the vehicle, equipment, or material should be decontaminated in order to be within the applicable surface contamination release limits per Attachment #3 and Attachment 6 (Beta-Gamma Survey of Truck Tires) shall be used as a guideline for meeting Department of Transportation (49CFR173.443) release criteria, when performing surveys on wet surfaces.

4.4.2 The release of items from clean areas within the Exclusion Zone will be controlled by specific criteria established on a case by case basis and approved by the Health Physics Supervisor.

5.0 PROCEDURE

5.1 Routine Surface Contamination Surveys

5.1.1 Routine surveys shall be performed by trained personnel (typically by Health Physics Technicians), in accordance with this procedure and as scheduled by the Health Physics Supervisor.

5.1.2 Routine contamination surveys are not required in the Exclusion Zone.

5.1.3 Support Zone and Contamination Reduction Zone shall be surveyed at least weekly to ensure that cross contamination is not occurring. The clean side of the Contamination Reduction Zone should be surveyed each work day.

5.1.4 Other surveys will be performed, as appropriate, to support Special Work Permits, the movement of equipment from radioactive material areas to clean areas, and to evaluate radiological conditions in specific work areas when directed by the Health Physics Supervisor.

5.2 Support/ Contamination Reduction Zone- Surface Contamination Surveys

5.2.1 Survey techniques may employ the use of large area wipes, smears, or direct frisks as appropriate to the area being surveyed.

5.2.2. Large area wipes may be used to assess floor areas for contamination. A sufficient number of large area wipes should be used to evaluate approximately 10% of the floor area being surveyed.

5.2.3 If contamination is found with the large area wipes, a more detailed smear survey should be performed.

5.2.4 Counter tops, office furniture, laboratory equipment, etc., should be included in the contamination surveys. The area immediately on the clean side of the Control Line should be included in the survey.

5.2.5 Smears shall cover approximately 100 cm^2 and should focus on areas with the highest potential for removable contamination. The smears should be placed in an envelope that is labeled with a sequential number corresponding to the Smear Number on the Radiological Survey Data Sheet (see Attachment 1).

5.2.6 The smears shall be analyzed for alpha contamination.

5.3 Equipment- Surface Contamination Surveys

5.3.1 Equipment shall be surveyed for contamination by using large area wipes, smears and by direct frisk as appropriate.

5.3.2 Take an appropriate number of smears to adequately assess the radiological conditions of the item being surveyed.

5.3.3 A large area wipe may be used as an indication of the presence of contamination.

5.3.4 Smears shall cover approximately 100 cm^2 and should focus on areas with the highest potential for removable contamination. The smears should be placed in an envelope that is labeled with a sequential number corresponding to the Smear Number on the Radiological Survey Data Sheet (see Attachment 1).

5.3.5 The smears shall be analyzed for alpha contamination.

5.4 Unrestricted Release

5.4.1 Materials, equipment and vehicles shall be surveyed for contamination prior to unrestricted release from the site, using large area wipes, smears, and by direct frisk.

5.4.2 All building surfaces, large concrete pieces, and other materials having large, smooth surfaces shall be surveyed prior to unrestricted release. A sufficient number of large area wipes and/or smears shall be taken to adequately assess any contamination present.

5.4.3 All equipment intended for unrestricted release from contaminated areas shall be surveyed for removable and fixed contamination. A sufficient number of large area wipes and/or smears shall be taken to adequately assess any contamination present. If removable contamination is within the release criteria, then perform a direct alpha frisk. Particular attention should be given to areas of the vehicle most likely to have become contaminated such as tire exterior surfaces, occupied areas, load areas, wheel wells, and the bottom of the equipment.

5.4.4 Vehicles intended for unrestricted release from contaminated areas shall be surveyed for removable contamination with large area wipes. If no contamination is found, take a confirmatory smear to document each large area wipe. If contamination is found, take an appropriate number of smears to evaluate the removable contamination present. If removable contamination is within the release criteria, then perform a direct alpha frisk. All survey results must be documented.

5.4.5 Vehicles intended for unrestricted release from clean areas in the Exclusion Zone shall be surveyed with large area wipes on accessible tire/track surfaces, with a direct frisk of tire/track surfaces, and with one smear each for two tires The results of the direct frisk and the large area wipes must indicate that the release criteria is met. The smears shall be added to the survey documentation when the results become available.

5.4.6 Large area wipes may be used as an indication of the presence of contamination.

5.4.7 If no contamination is found with a large area wipe, a confirmatory smear shall be taken for documentation.

5.4.8 If contamination is found with the large area wipe, a representative number of smears shall be taken to quantify the removable contamination present.

5.4.9 Smears shall cover approximately 100 cm' and should focus on areas with the highest potential for removable contamination. The smears should be placed in an envelope that is labeled with a sequential number corresponding to the Smear Number on the Radiological Survey Data Sheet (see Attachment 1).

5.4.10 The smears shall be transported to the Site Laboratory for analysis.

5.4.11 Perform a direct frisk on all material being surveyed for unrestricted release.

5.4.12 Personal equipment and articles (radios, pens, paper, clipboards, etc.) can be surveyed with either the large area wipes or by direct frisk, as appropriate.

NOTE
Items that have irregular surfaces, such as radios, should be wiped and frisked. Items with relatively smooth surfaces, such as paper, pens, etc., may be direct frisked only.

5.5 Documentation of Results

5.5.1 The smear counting results and data shall be documented on the Radiological Survey Data Sheet (see Attachment 1). The documentation of the release survey shall include a drawing of the item to be released.

5.5.2 The instructions for completion of the Radiological Survey Data Sheet are contained in Attachment 2.

5.5.3 A request for equipment release form (Attachment 7) shall be initiated by the equipment owner to track the decontamination process.

6.0 RECORDS/REPORTS/NOTIFICATIONS

6.1 The Health Physics Supervisor and the Project Coordinator (RSO) shall review and approve all completed survey forms required by this procedure, to comply with reference 2.5 above.

6.2 The survey maps shall be uniquely numbered and retained by Health Physics for project filing. Single item survey maps shall be attached to the survey results.

7.0 ATTACHMENTS

7.1 Attachment 1 - Radiological Survey Data Sheet (example)

7.2 Attachment 2 - Radiological Survey Data Sheet Instructions

7.3 Attachment 3 - Surface Contamination Release Limits

7.4 Attachment 4 - Large Area Wipes on Truck Tires

7.5 Attachment 5 - LLD Calculation

7.6 Attachment 6 - Beta- Gamma survey of Truck Tires (wet surfaces)

7.7 Attachment 7 - Request For Equipment Release

Attachment 1

RADIOLOGICAL SURVEY DATA SHEET

Page ___of ___

Item Description	00 ____Vehicle		98 _____Equipment		_____ _____Building ___ Other	
Reference	YR	MO	Day	Item	No.	Performed By:
Alpha Survey Instrumentation				Beta Survey Instrumentation		

Location	Smear Number	Alpha Activity (dpm/100cm^2)			Beta Gamma Direct (CPM)
		Direct	Removable	Fixed	

REMARKS

Reviewed By:	Date:

ATTACHMENT 2

RADIOLOGICAL SURVEY DATA SHEET INSTRUCTIONS

I. Select the appropriate survey category.

2. Enter the purpose of the survey in the "ITEM DESCRIPTION" section. Be specific:

- Vehicle survey for release from the site.
- Tools and equipment for use in the clean area.
- S WP support, include the S WP number.

3. Enter the survey date.

4. Enter the reference number - Year, Month, Date, Item (Use coding for categories at the top of the form) and Number.

5. Enter your signature in the "PERFORMED BY" section.

6. Enter the instrument(s), serial number(s), and background reading(s) for the survey instruments used for this survey.

7. Enter the "LOCATION OF READING." Enter descriptions such as, the location and item being surveyed, vehicle number, smear location on vehicle, etc.

8. Enter the number of the smear or large area wipe in the "SMEAR NUMBER" section.

9. All data in the "ALPHA ACTIVITY" section is recorded in dpm/100cmz, except large area wipe data.

- If equipment/material is directly frisked, the reading from the Ludlum Model 3 with pancake G-M probe is converted to dpm/100cm~ by multiplying ccpm by a factor of 4 (Gross cpm - Background cpm X 4) and enter the result in the "DIRECT" column. If the instrument response cannot be distinguished from background enter <200 dpm/l00cm^2.

- The "REMOVABLE" column may contain the result from a smear or the result from a large area wipe. Smear results that are less than the LLD shall be recorded as less than the numerical LLD value for the instrument in use. As an example, if the LLD for the 65000 is 3 dpm, then the result will should be recorded as <3 dpm/100cm^2. All results should be rounded to the nearest whole number. Results from LAWs should be recorded as dpm without regard to area, unless specific instructions are given to calculate the result per area, as in Attachment 4. Results that do not exceed background should be recorded as BKG (Background).

- Fixed contamination is the difference between the direct frisk results and the removable contamination results. If no fixed contamination is detectable, enter N/A in the "FIXED" column.

10. If a "BETA-GAMMA DIRECT" survey is performed, record the results as ccpm.

11. In the "REMARKS" section, record any identifying data on counting equipment and any other information needed for explanation or interpretation of survey data. If large area wipes are included in the removable contamination data without regard to area, note this in the "REMARKS" section.

ATTACHMENT 3

SURFACE CONTAMINATION RELEASE LIMITS

Average[a] Removable (dpm/100 cm^2)	Maximum Removable (dpm/100 cm^2)	Average[a] Fixed (dpm/100 cm^2)	Maximum Fixed (dpm/100 cm^2)
33	100	1,000	5,000
Equivalent Beta-Gamma Measurements [b,c]			
17	50	500	2,500

a The contamination levels may be averaged over one (1) square meter provided the maximum activity per any 100 cm^2 area within the one (1) square meter is less than the maximum applicable release limit.

b Beta-gamma release limits derived from the beta-gamma to alpha ratio.

c Beta-gamma surveys are not normally performed for release purposes. If alpha contamination is verified to be within specified release limits, the alpha to beta-gamma ratio indicates that the beta-gamma is also within limits.

Beta-gamma frisks may be used as appropriate to:

- Estimate contamination levels prior to performing release surveys.
- Estimate levels of contamination present on equipment, materials and work areas.

The results of direct beta-gamma frisks should be quantified on survey records as CCPM (Corrected Counts Per Minute).

Results that are less than 100 CCPM should be recorded on the survey record as <100 CCPM.

ATTACHMENT 4

LARGE AREA WIPES ON TRUCK TIRES

Large area wipes are used to wipe an area of approximately 2000 cm^2 on truck tires. The wipes are then frisked with a PAC-4G.

Assuming that 50 cpm above background is readable, it can be assumed that 100 dpm is detectable on a wipe. If the area of the wipe requires two probe areas to cover the wipe, then it can be assumed that we can assess with each measurement approximately half of the total area wiped, or 1000 cm^2 or approximately 100 dpm/1000 cm^2, which is equivalent to 10 dpm/100cm^2.

Frisk results on LAWs, from truck tires, that are nondetectable may be recorded as <10 dpm/100cm^2 in the removable column of the survey report.

ATTACHMENT 5

LLD CALCULATION

$$LLD = \frac{2.71}{T_s} + 3.29 \sqrt{\left(\frac{Cb}{Tb}\right)\left(1+\frac{Tb}{Ts}\right)}$$

Where C_b = Background Counts Per Minute
T_b = Background Counting Time in minutes
T_s = Sample Counting Time in minutes

EXAMPLE: The background count rate for a given counter is 1.56 cpm over a 50 minute counting time and samples are counted for 2 minutes. The counter has an efficiency of 40.3%.

$$LLD = \frac{2.71}{2} + 3.29 \sqrt{\left(\frac{1.56}{50}\right)\left(1+\frac{50}{2}\right)}$$

LLD = 4.32 cpm

$$LLD = \frac{4.32 \text{ cpm}}{.403} = 10.7 \text{ dpm}$$

ATTACHMENT 6

BETA-GAMMA SURVEY OF TRUCK TIRES

The Department of Transportation removable contamination limits in 49CFR 173.443 are 220 dpm alpha contamination and 2200 dpm beta contamination. The most restrictive is the alpha limit. If weather prevents surveying for alpha contamination, then beta-gamma surveys will have to be utilized. The alpha to beta ratio for the thorium chain is approximately 2:1. Using an alpha to beta ratio of 2, the beta equivalent activity for the alpha limit would equal 110 dpm. 110 dpm times the probe efficiency of 0.14 cpm/dpm equals 15.7 cpm. 15.7 cpm above background is not discernable in the field. The diameter of a truck tire is 43 inches. The tread width is 9 inches. The surface area of a truck tire equals 7843.8 cm^2. Approximately 12 inches of tread is on the ground and not surveyable. This represents 3.5% of the surface area of the tire. The remaining 96.5% equals a surface area of 7569.5 cm^2. The typical area of contact for a wipe is about 3.5 inches by 4 inches. This is equal to about 90 cm^2. If the conservative area of 100 cm^2 is used the each cm^2 of wipe is equal to 57.7 cm^2 of tread area. The manufacturer lists the surface area of the probe face as 15.5 cm^2. The tread area survey under the probe equals 894.4 cm^2. To correct the measured counts to an activity/100 cm^2 the counts indicated on the meter face must be multiplied by 8.9. If 15.7 cpm/100 cm^2 beta-gamma activity equals 220 dpm/100 cm^2 alpha contamination then the measured cpm when surveying a wipe would equal 139 cpm. The manufacturer recommends limiting the background count rate to less than 300 cpm in order to see 100 cpm above background. Due to the changing background conditions this value is being reduced to 200 cpm. Therefore, if background is 200 cpm or less and the wipe on a truck tire reads less than 100 cpm above background the truck tire has less than 220 dpm/100 cm^2 removable alpha contamination.

ATTACHMENT 7
REQUEST FOR EQUIPMENT RELEASE

From: _____ Date: _____

TO: HEALTH PHYSICS SUPERVISOR

1. Equipment Type and ID # _____

2. Usage History (locations on site)

_____
_____
_____

3. Scheduled Date to Start Decontamination _____

4. HP Check for Survey Readiness: Technician _____ Date _____

5. Equipment ready for survey ☐ YES ☐ NO

Actions required _____
_____
_____

6.Date and Time Ready for Survey _____

7. Survey Date and Time _____

Results: Pass _____ Fail _____

8. Equipment Release Date _____

9.Approved for Release: HP Supervisor: _____ Date: _____

NOTE; On large earth moving equipment, substantial cleaning may be required prior to HP checking for survey readiness. Once vehicle has been checked and is ready for release survey, it may take as much as 24 hours from the time the survey is initiated until survey results are available. If fixed or removal is located, additional decontamination and surveys are required.

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Decontamination

Document Number: SOP-347

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

DECONTAMINATION

1.0 SCOPE

1.1 Purpose

The purpose of this procedure is to provide instructions for the decontamination of personnel and equipment.

1.2 Applicability

This procedure is applicable for all equipment and personnel that may become contaminated at the GMO Site.

2.0 REFERENCES

10 CFR Parts 19 and 20

U. S. Nuclear Regulatory Commission (USNRC) Regulatory Guide 1.86

Health and Safety Plan, Lakeshore East Development Radiologically Impacted Soil Removal Action, Chicago, Illinois

SOP-345 "Surveys for Surface Contamination and Release of Equipment for Unrestricted Use"

3.0 DEFINITIONS

3.1 Airborne Radioactivity Area

This term defines radiation conditions within a specified area. An area where the average concentration of airborne radioactivity could allow an individual to exceed 12 DAC-hrs over a one week period.

3.2 Clean Area

This term defines radiation conditions within a specified area. An area where the radiation levels and contamination levels are maintained below 2 mrem/hr and 33 dpm/100 cm^2 alpha respectively.

3.3 Contamination Control Area

This term defines radiation conditions within a specified area. An area that may be contaminated to a level greater than a Clean Area.

3.4 Contamination Reduction Zone

The area on one side of the Control Line where personnel can decontaminate, remove their personal protective clothing and equipment.

3.5 Control Line

The demarcation that separates a Clean Area from a Contamination Control Area. The control line is located in the personnel decon facility.

3.6 Craft Personnel

Employees and contractors who physically perform the activities described on the SWP.

3.7 Derived. Air Concentration-Hour (DAC-hour)

DAC-hour is the product of the concentration of radioactive material in air and the time of exposure to that radionuclide.

3.8 Exclusion Zone

The area on one side of the Control Line that includes Contamination Control Areas, Radiation Areas, and Airborne Radioactivity Areas.

3.9 Film Badge

Similar to the TLD, it is used to measure radiation dose.

3.10 Frisking

A personal survey of an individual's clothing and exposed body performed to determine if contamination is present.

3.11 Protective Clothing

Reusable or disposable coveralls, boots and gloves that provide a barrier between contamination and personnel.

3.12 Radiation Area

This term defines radiation conditions within a specified area. An area where the whole body radiation level is greater than 5 mrem/hr.

3.13 Special Work Permit (SWP)

A document which describes the radiological conditions of the work area or task and delineates safety and radiation protection requirements to be followed in the work area or when performing the task.

3.14 Support Zone

The area on one side of the Control Line at the entrance to the Exclusion Zone.

3.15 Optically Stimulated Luminescence Dosimeter (OSL)

A device that measures radiation dose.

4.0 REQUIREMENTS

4.1 Prerequisites

None.

4.2 Tools, Material, Equipment

4.2.1 Decontamination facility.

4.2.2 Soap, water, high pressure spray, scrub brushes and other material as necessary to decontaminate personnel and equipment.

4.3 Precautions, Limits

Decontamination of personnel with material other than soap and water will only be done when authorized by the Site Manager, Health Physics Supervisor, or a medical doctor.

4.4 Acceptance Criteria

4.4.1 Personnel shall be free of contamination after decontamination.

4.4.2 Material and equipment being decontaminated, for unrestricted release, shall meet the release limits established in Reference 2.4.

5.0 PROCEDURE

5.1 Personnel Decontamination

5.1.1 Personnel who are contaminated to greater than 100 ccpm shall notify the health physics technician (HPT) assigned to the Control Line.

5.1.2 The HPT shall resurvey the individual to determine the exact location of the contamination and document it on the Contaminated Personnel or Personal Effects Report (Attachment 1).

5.1.3 If the contamination is spotty, the HPT shall attempt to decontaminate the individual using swabs or soap and water. If the decontamination is successful, document the results on Attachment 1.

a. If contamination is determined to be in an individual's eyes, the eyes may be flushed, using an eye wash station.

b. If contamination remains in the eyes after flushing or is determined to be in an individual's nose or ears, decontamination will be performed under the direction of the Health Physics Supervisor or qualified medical personnel.

c. Cleansing methods for skin decontamination, in order of harshness are as follows:
   1. Lifting off with sticky tape
   2. Flushing with water
   3. Soap and cool water
   4. Mild abrasive soap, soft brush, and water
   5. Detergent (soap powder)
   6. Mixture 50% powdered detergent and 50% cornmeal

5.1.4 If the contamination cannot be easily removed or the contamination is wide spread, the HPT shall escort the individual to the decontamination facility and notify the Health Physics Supervisor and the Site Manager.

5.1.5 The contamination shall be removed by having the individual wash with soap and cool water several times, if necessary. The methods listed above may be used by the HPT.

5.1.6 If the decontamination is successful, document the results on Attachment 1.

5.1.7 If, after several attempts, the contamination is not successfully removed, notify the Health Physics Supervisor.

5.2 Tool Decontamination

5.2.1 All tools being removed from the Exclusion Zone shall be checked by the HPT.

5.2.2 Tools that are contaminated shall be decontaminated before they can be released from the Exclusion Zone.

5.2.3 Tools shall be decontaminated by the users under the direction of the HPT.

5.2.4 Tools can be decontaminated using scrub brushes and soap and water, wiping with damp rags or wipes, soaking in a decontamination solution, using abrasive materials ultrasonic cleaners, or any other method approved by the HPT.

5.2.5 All interior surfaces of the tools must be decontaminated as well prior to the tool being unconditionally released.

5.2.6 If the tool is decontaminated and released by the HPT, the survey results shall be documented on a Radiological Survey Data Sheet (Reference 2.4).

5.2.7 If the tool cannot be decontaminated after several tries, then the tool shall be painted or sprayed with yellow paint to indicate that the item is radioactive material and kept in the Exclusion Zone.

5.3 Equipment Decontamination

5.3.1 Heavy equipment, such as backhoes, bulldozers, trucks, cranes, shall be washed with high pressure water spray prior to being surveyed by the HPT.

5.3.2 The washing of heavy equipment shall be performed in an area designated by health physics.

5.3.3 Once the equipment is washed, it will be surveyed by the HPT. The HPT will identify any areas on the equipment that need further decontamination and will make recommendations on how to further decontaminate.

5.3.4 All surfaces of the equipment must be decontaminated and surveyed. This includes air intakes, air filters and any internal surface that is likely to be contaminated.

5.3.5 Once the equipment has been surveyed and released by the HPT, the survey results shall be documented on a Radiological Survey Data Sheet (Reference 2.4).

6.0 RECORDS/REPORTS/NOTIFICATIONS

6.1 Release surveys and personnel decontaminations shall be documented on the appropriate form.

6.2 Personal contaminations shall be reported to the Health Physics Supervisor and the Site Manager.

7.0 ATTACHMENTS

7.1 Attachment 1 Contaminated Personnel or Personal Effects Report

ATTACHMENT 1

CONTAMINATED PERSONNEL OR PERSONAL EFFECTS REPORT

DATE OF INCIDENT	TIME OF INCIDENT
NAME	BADGE NO.
LOCATION OF INCIDENT (SPECIFIC AREA)	
DESCRIPTION	DESCRIBE IN DETAIL ANATOMICAL LOCATION, CONTAMINANT, TYPE OF INJURY, OR CONTAMINATED ARTICLE

CONTAMINATED ARTICLE OR AREA	DECONTAMINATION AGENT USED	INSTRUMENT	SURVEY RESULTS		FINAL DISPOSITION OF ARTICLES
			BEFORE	AFTER	

WOUND COUNT /5 MIN	BKGD COUNT /5 MIN	SOURCE COUNT /5 MIN

SAFETY MEASURES	PERTINENT SAFETY MEASURES IN EFFECT ☐ YES ☐ NO	IF NO, EXPLAIN
REMARKS		

EMPLOYEE SIGNATURE	HEALTH PHYSICS SIGNATURE

LAKESHORE EAST

STANDARD OPERATING PROCEDURE

Title: Sample Preparation Procedure for Gamma Spectral Analysis

Document: SOP-364

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

SAMPLE PREPARATION PROCEDURE FOR GAMMA SPECTRAL ANALYSIS

1.0 SCOPE

1.1 Purpose

The purpose of this procedure is to provide guidance for the preparation of samples for analysis of radioactive nuclides. This procedure applies specifically to samples prepared for NUTRANL analysis.

1.2 Applicability

This procedure applies to all soil-type environmental samples, including soil, rocks, concrete, and construction debris.

2.0 REFERENCES

2.1 10 CFR Part 20 Standards for Protection Against Radiation

3.0 DEFINITIONS

None

4.0 REQUIREMENTS

4.1 Prerequisites

NONE

4.2 Tools, Materials, Equipment

4.2.1 The following equipment is needed to perform this procedure:

- 20 ml sample vials
- Sieve of one-quarter inch mesh
- Analytical balance
- Marinelli beakers
- Zip-lock bags
- Labels
- Paper towels

4.3 Precautions, Limits

4.3.1 Samples prepared for receipt at field laboratory for NUTRANL analysis are homogenized during sample collection prior to receipt at the field laboratory for analysis. No other physical preparation is performed at the laboratory for screening samples (NUTRANL analysis). Any corrections or analysis other than NUTRANL pulse height analysis shall be performed by an outside contract laboratory. This includes U. S. Environmental Protection Agency (USEPA) verification samples and quality control (QC) samples.

4.3.2 All samples not known to be homogenous must be homogenized prior to analysis.

4.3.3 NUTRANL analysis is designed and calibrated for analysis of low activity samples, specifically for documenting closure at less than the specified cleanup criteria. High activity samples may produce anomalous results due to algorithms in the NUTRANL programming.

4.4 Acceptance Criteria

Proper preparation during sample collection ensures that the samples submitted to the laboratory are representative of the material sampled and suitable for the required analysis. Acceptable samples will be homogeneous with regard to size of material; appearance with regard to color, moisture and soil type; shall not contain materials over the specified maximum gradation; and shall be free of external adhering soil or other materials.

5.0 PROCEDURE

5.1 All Samples

5.1.1 All samples submitted for analysis must be logged in the chain of custody book. The following information shall be recorded and shall be taken directly from the field chain of custody form or a copy of the chain of custody form must be filed in the chain of custody book.

- Description or grid location
- Purpose of sample which may include:
  - Activity screening
  - Pre-verification
  - Verification
  - Overburden
  - Imported fill
  - Calibration quality control check
- Date and time of sampling
- Originator of sample
- Corresponding count rate from survey meter (optional)

5.1.2 Ensure that outside of sample container is free from potential contamination, by wiping it clean with a paper towel.

5.1.3 Place blank label on outside of container and record the sample ID, which is a unique sequential number used to identify individual samples. The unique sequential number, sample ID, is obtained from project sample log books.

5.1.4 Weigh the sample on the analytical balance. Subtract the empty (tare) weight which is recorded on the side of each vial and record the net weight in grams on the label.

5.1.5 Prepare the sample in accordance with the requirements of the analysis requested.

5.1.6 Samples will have already been homogenized and passed through a ¼ inch mesh during sampling. It should not be necessary for any samples to be re-opened in the field laboratory. This will eliminate the potential for the field laboratory area to become cross-contaminated. This will also allow for ingrowth. Note will be made on the sample label each time the vial is opened.

5.1.7 Verification samples received for the USEPA are also logged in the chain of custody book. Verification samples are prepared in the same manner as others; however, they come in batches of five 20 ml vials. When samples are to be picked up by the USEPA, place each batch of five sub-samples in its own zip-lock bag.

5.2 Quality Control Samples

5.2.1 QC Samples shall be placed into 500 ml Marinelli beakers prior to analysis.

5.2.2 The technician obtaining the sample shall obtain a split sample into a 20 ml sample vial from the Marinelli beaker. This split is performed in the exclusion zone prior to submitting the sample for analysis. The split sample shall be labeled with the same description as the QC sample. The split sample shall be homogeneous with regard to the remainder of the QC sample.

5.2.3 The net weight of the Marinelli beaker shall be noted on the sample label attached to the beaker. The net weight is obtained by subtracting the weight of the beaker (tare) from the total weight of the filled beaker. The tare (empty) weight of the Marinelli beaker is recorded on the outside of each beaker.

5.2.4 The outside laboratory performing analysis of the QC sample shall be responsible for all additional sample preparation, and requested analysis. This includes moisture correction and/or daughter nuclide ingrowth analysis.

5.2.5 Analyze the split sample (20-ml vial) using the NUTRANL System and retain records for future comparison to gamma spectroscopy results.

6.0 RECORDS/REPORTS/NOTIFICATIONS

6.1 Notify the laboratory technician when the samples are properly labeled and ready for analysis.

6.2 Samples shall be retained until all evaluations have been completed and the sample is no longer needed. Samples will not be discarded until written notice is received from USEPA. Samples may be transferred to a secure holding area off-site.

6.3 Retain a paper copy of all sample analysis reports

7.0 ATTACHMENTS

None

APPENDIX C

Plans

Dust Control Plan
Emergency Contingency Plan
Transportation and Logistics Plan
Verification Sampling Plan

LAKESHORE EAST

Title: Dust Control Plan

Revision Number: 0

Date: June 19, 2002 Replaces: New

DUST CONTROL PLAN

1.0 PURPOSE

The Dust Control Plan (Plan) describes methods STS and its contractors on behalf of Lakeshore East, will follow to conduct operations and maintain the work area within the subject site (Site) so as to minimize the creation and dispersion of dust. This Plan also contains corrective measures that will be used in the event visual dust is created, air monitoring shows excessive particulates, or air sampling indicates limits have been exceeded.

A primary concern during the excavation activities at the Site will be the generation of radioactive particulates from excavation and earth-moving equipment. Fugitive dust generation may be caused by a range of activities including excavation, loading, and transportation of excavated soils. Traffic on the Site also may cause resuspension of particulates.

Dust control measures will be used throughout the excavation and restoration activities at the site, especially during excavation, backfilling, and grading activities.

2.0 GUIDANCE

Dust control will be performed in accordance with the Removal Action Work Plan (Work Plan), the Health and Safety Plan (HASP), and the Air Monitoring Plan (Appendix 8 to the Work Plan). STS will perform site perimeter air monitoring in accordance with the Air Monitoring Plan.

3.0 IMPLEMENTATION

STS will be responsible for implementing dust control procedures as required in this Plan, the HASP, and the Air Monitoring Plan. The Field Team Leader will be responsible for ensuring compliance with the dust control procedures at the excavation site.

4.0 PRODUCTS

Water will be used in connection with mechanical dust suppression. Chemical foams, such as fire fighter foam, may also be used if approved by USEPA. If available, water will be obtained at the Site. If water cannot be obtained at the Site, temporary sources of water can be provided for construction activities from water trucks parked adjacent to the property or from portable plastic water tanks. Small (1,800 gallon) water trucks equipped with several hundred feet of hose and a pump can be used to spray water. Also, small pumps and hose can be used with the portable tanks to provide sufficient pressure and volume for dust control.

5.0 EXECUTION

Procedures to be followed to control dust may include traffic speed control, use of stockpiles, covering vehicles transporting borrow material and waste, and wind screens around excavation areas. These procedures will be utilized during excavation, restoration, transportation and associated materials handling activities.

5.1 Traffic Speeds

Traffic speeds will be maintained in accordance with applicable County, City, State and Federal regulations. The speed limit for traffic on the site will be posted by Lakeshore East or its representatives. In no case shall speed limits in excess of 15 miles per hour be posted.

5.2 Use of Stockpiles

Where possible, excavated contaminated materials will be loaded into the transport containers the same day they are excavated. Any radiologically-impacted material stored on-site will be either in containers or in Supersacks if there is not sufficient material to mobilize a container. Stockpiled clean material, including excavated and borrow material, will be piled to minimize dust generation. Further, slopes of stockpiled materials will be minimized in the prevailing wind direction. A 5:1 slope or flatter in the prevailing wind direction will be maintained whenever possible. Stockpiles will be constructed with their length perpendicular to the prevailing wind direction.

Stockpiled material will be covered during periods of high wind or when work on a stockpile is not actively occurring, such as the end of the work day. Stockpiles will be covered with a geomembrane cover to minimize dust generation during excavation and restoration activities. Approved geomembrane covers are Griffolyn TX 1200 manufactured by REEF Industries, Inc., and Sani-Cover SC #250 manufactured by Fluid Systems, Inc., or other equivalent.

5.3 Off-Site Transportation of Excavated Materials

Trucks used for transporting non-contaminated excavated or borrow material will be equipped with truck bed covers (tarps) to prevent the generation of dust from hauling. The tarps will be fastened down tightly to prevent materials from being blown out of the trucks. Empty trucks also will be tarped.

Roll-off containers for transporting low-level radioactive materials, will be lined with plastic or suitable leakproof liner and be equipped with full covers. The covers will be securely fastened to the containers before leaving the excavation area.

Trucks and other heavy equipment will be cleaned to remove mud, soil, and loose dust prior to leaving an excavation area. This cleaning will include the truck tires. Dirt that is tracked onto paved streets will be swept and added to stockpiles at the excavation area.

5.4 Use of Water as a Dust Suppressant

Water will be applied during the course of excavation and restoration activities as directed by the Field Team Leader to prevent, mitigate, or reduce dust resulting from excavation activities. Water will be applied when:

- wind or vehicular traffic may cause visible dust generation;
- exposed surfaces of material stockpiles are potentially dry and wind or handling activities may cause dust generation;
- dust generation is possible during excavation activities on the site;
- hauling of excavated or borrow material may cause visible dust generation in truck beds; or
- dust generation is possible during placement of materials in stockpiles or fill areas.

A water truck or pump and storage tank assembly will apply water to the exposed ground surfaces via hoses, pumps, nozzles and other appurtenances as required. The truck or pump/tank assembly also will apply water to control dust generation from exposed surfaces of material stockpiles, excavation activities, and hauling or excavation of borrow material.

Water will be applied in sufficient quantity to prevent generation of dust, but not so as to cause the movement of water beyond site boundaries, ponding, or the disruption of other project site areas. Because the soils will absorb the water, watering is not expected to generate runoff. The Field Team

Leader will monitor the excavation and restoration activities to make sure that enough water is used to adequately control dust, but that not too much water is used so as to create runoff.

5.5 Corrective Measures

If visual dust is created at a location during the excavation and restoration activities, or if air monitoring shows excessive particulates, the following corrective measures will be evaluated and applied as appropriate.

1. Increased wetting of surface areas.
2. Covering additional source areas.
3. Modifying future excavations and stockpiles to decrease the source areas.
4. Halting dust-creating activities until winds moderate.
5. Modify work activities.

If overwatering creates runoff into undisturbed areas, the water will be removed as practical, and the area radiologically surveyed. If radioactivity above the action level is found, the area will be cleaned by removing the contaminated materials, or by other appropriate means. Future occurrences will be prevented by more carefully controlling the amount of water applied by constructing earth berms around the area to retain the water, or by using a method of dust control other than water.

LAKESHORE EAST

Title: Emergency Contingency Plan

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

EMERGENCY CONTINGENCY PLAN

1.0 SCOPE OF PLAN

The purpose of the Emergency Contingency Plan (ECP) is to provide guidance and direction in the event of an unanticipated exposure of an individual to hazardous substances or hazardous conditions related to the excavation and restoration activities at the Lakeshore East site (Site).

Personnel assigned to this project will be required to review thoroughly the contents of this ECP and to strictly adhere to the policies and procedures provided herein.

2.0 EMERGENCY AND EVACUATION PLAN

2.1 Emergency Coordination

The Field Team Leader will coordinate emergency response at the Site. In the event of an emergency, the Field Team Leader will immediately notify the STS Project Manager. The STS Project Manager will be responsible for notifying the proper response agencies listed in Figure 1, Emergency Phone Numbers. Emergency response procedures, instructions for emergency response to injuries, and evacuation plans will be reviewed at safety briefings.

2.2 Emergency Services Contacts

Before field activities commence, the Field Team Leader will inform the appropriate emergency contacts about the nature and duration of work expected at the Site and the type of contaminants and possible health or safety effects or emergencies involving these contaminants.

All hospital treatment should be provided via the 911 Emergency Medical System, with the Chicago Fire Department providing ambulance service. Emergency services can be provided by Northwestern Memorial Hospital located within one-half mile of the Site. The location and possible route to the hospital from the Site, including narrative directions, are shown on Figure 2.

The emergency telephone numbers listed in Figure 1 will be distributed to the Field Team Leader. Emergency numbers will be reviewed every three months by the STS Project Manager and revised, as necessary. The STS Project Manager will date and sign new revisions. The Field Team Leader will record the date of the revised telephone number list in his daily log book. Upon revision, the figure will be submitted to the USEPA, and the City.

2.3 Implementation

The Field Team Leader will implement the emergency action procedures whenever conditions at the Site warrant such action. The Field Team Leader will be responsible for coordinating the evacuation, emergency treatment, and emergency transport of site personnel, as necessary, and informing the appropriate coordinating management staff. The following conditions may require implementation of emergency action procedures:

- Fire or explosion on-site.
- Serious personal injury.

Release of radioactivity exceeding one Annual Limit of Intake (ALI) as defined in 32 IAC 340.1220 in a 24-hour period.

Release of hazardous materials, including gases or vapors, at elevated levels.

- Unsafe working conditions, such as inclement weather (tornado, hail, etc.).

2.4 Fire or Explosion

If fire or explosion takes place, emergency steps shall include: 1) evacuation of work area; and 2) notification of local fire department and other appropriate emergency response groups listed on Figure 1, as necessary (e.g., if a spill occurs, the emergency spill hotline will be notified).

2.5 Personal Injury

Actions to be taken in the event of personal injury are described in the Health and Safety Plan, Section 4.3.4, Emergency Medical Treatment.

2.6 Evacuation Plan

All project personnel will evacuate the area under the direction of the Field Team Leader. Evacuation from the affected area will be initiated by sounding an alarm, such as an air-horn, megaphone, or other form of notification.

A coordinated evacuation will be conducted with all project personnel using the most direct upwind route, avoiding the point of emergency.

All project personnel involved in the evacuation will immediately move to the Decontamination/Transition area and will remain there awaiting further instructions from the Field Team Leader.

Personal Protective Equipment will be used at all times by the project personnel during the evacuation procedures.

2.7 Accident and Incident Reporting

All accidents, injuries, and incidents shall be reported to the Field Team Leader. An Accident/Injury Form will be completed by the Field Team Leader, as described in the HASP, Section 4.4, Accident and Incident Reporting.

FIGURE 1
EMERGENCY PHONE NUMBERS

Police Department	911
Fire Department	911
Ambulance	911
Hospital Address Phone	Northwestern Memorial Hospital 250 E. Superior (312) 908-2000 (Ask for ER)
Poison Control Center	(800) 732-2200
USEPA Region 5 24-hours Emergency Number	(312) 353-2318
STS Project Coordinator Richard G. Berggreen	847-279-2500 (work) 847-417-7504 (mobile)
STS Project Manager Steven Kornder	847-279-2500 (work)
STS Field Team Leader Dumas Guerrier	847-344-6379 (mobile)

SECONDARY EMERGENCY NUMBERS

The STS Project Manager will evaluate when these agencies should be notified.

National Response Hotline	(800) 424-8802
Illinois Emergency Management Agency	(217) 782-7860
Illinois Environmental Protection Agency Emergency Response Duty Officer	(217) 782-7860 or (217) 782-3657, IEPA ERU during normal working hours.
Illinois Department of Nuclear Safety (IDNS) Emergency Number	(217) 785-0600 (24 hour Radiologic Assistance)

Hospital Location and Directions

Hospital:
Northwestern Memorial
250 E. Superior Street
Chicago, IL 60611

Directions from Lakeshore Links, 221 N. Columbus Drive	Miles
1: Start out going North on N LOWER COLUMBUS DR towards N COLUMBUS DR by turning right.	0.12 miles
2: N LOWER COLUMBUS DR becomes N COLUMBUS DR.	0.27 miles
3: N COLUMBUS DR becomes N FAIRBANKS CT.	0.11 miles
4: Turn LEFT onto E ONTARIO ST.	0.12 miles
5: Turn RIGHT onto N ST CLAIR ST.	0.17 miles
6: Turn RIGHT onto E SUPERIOR ST.	0.08 miles

LAKESHORE EAST

Title: Transportation and Logistics Plan

Revision Number: 0

Date: June 19, 2002 Replaces: New

TRANSPORTATION AND LOGISTICS PLAN

Material exceeding 7.1 pCi/g will be directly loaded into intermodal containers for shipment via rail to the Envirocare of Utah low-level radioactive material waste disposal facility in Clive, Utah. Small quantities may be stored in Supersacks temporarily staged on-site until such time as adequate material is accumulated to fill a container. Empty containers will be prepared by installing a plastic liner inside the container. Empty containers will be staged and lined on Site. Containers will remain on their trailer chassises during their time on Site.

A jockey truck will be used on Site to bring the lined, empty containers to the excavation area. Every attempt will be made to keep the container and trailer on an existing asphalt surface at the edge of the excavation to minimize the potential for cross-contaminating the Site.

After the container is loaded with approximately 22.4 tons of material exceeding 7.1 pCi/g, the Health Physicist (HP) will survey the container, the container lid will be closed, and the container will be moved to the loaded container staging area. At the staging area, the lid of the container will be secured with chains or straps inherent to the container.

Preparing, loading and sealing containers will be performed in accordance with, the HASP, Attachment 3 to the Removal Action Work Plan.

Loaded containers with their shipping papers will be staged on Site. They will be transported to the railhead in Blue Island, IL at night, after evening rush hour traffic has abated. Shipping hours are anticipated to be between 8:00 p.m. and 3:00 a.m. Horns and back up alarms will not be used on Site between these hours to minimize disturbances to the local residents.

The intermodal transport crew will consist of a jockey driver with a yard tractor, one to two over-the road transport drivers, two laborers and an HP.

Transport drivers will deliver empty intermodal containers on chassises to the Site. At the Site, the two laborers will line the empty containers. The jockey driver will bring the lined empty container into position for loading. After loading, the HP will survey the container for release, and then the jockey driver will stage the container for shipping. Later that night, transport drivers will bring the loaded containers to the railyard for eventual shipping to Envirocare of Utah.

LAKESHORE EAST

Title: Verification Sampling Plan

Revision Number: 0

Date: June 19, 2002 Replaces: New

VERIFICATION SAMPLING PLAN

1.0 INTRODUCTION

1.1 Purpose

This Verification Sampling Plan (Plan) describes the sampling activities and analytical methods that will be used to demonstrate the subject site meets the cleanup criteria. By following the protocol included in this plan, the USEPA will demonstrate the Site meets the cleanup criteria described in Section V.2.d of the Unilateral Administrative Order (UAO).

1.2 Scope

The verification survey will be conducted as excavation activities are completed at a Site. The purpose is to demonstrate the soils have been excavated to meet the cleanup criteria described in the UAO. Averaging over areas up to 100 square meters is allowed, but only after reasonable efforts have been made to achieve levels As Low As Reasonably Achievable (ALARA). (Reference SOP-223 "Verification Survey Procedure").

1.3 Contaminants of Concern

The verification program includes testing for specific constituents which are indicative of the contaminants of concern. Constituents of concern that may be encountered on the Site are the entire U-238 and Th-232 decay series; however, measurements will only be made for total radium (Ra-226 and Ra-228).

1.4 References

The following references have been used in developing this Plan:

- Administrative Order by Consent, USEPA, 1996;
- 32 IAC 332.150(b) - Soil Radioactivity and Exposure Rate Criteria;
- DOE Order 5480.11 and 10 CFR 20 - Surface Contamination and Exposures (ALARA); and
- NUREG/CR 5849 "Manual for Conducting Radiological Surveys in Support of License Termination" Draft June 92.

Standard Operating Procedures (SOPs) used during the verification sampling are included in the Standard Operating Procedures - Appendix B.

2.0 EXCAVATION CONTROL

2.1 Gamma Survey

A gamma survey will be done after the excavation is thought to be complete. The survey will comprise verification testing of the excavation.

Gamma measurements will be made over the entirety of the excavation. The procedure and instrumentation used will be 2 x 2 NaI detectors. This procedure provides a gamma measurement survey over an area of approximately one-square-meter. The gamma measurements will be collected over the entire area of the excavation to determine the concentration of radium remaining.

If the gamma survey indicates areas where the measured radium concentration exceeds the cleanup criteria of 5 pCi/g radium (Ra-226 and Ra-228) above background, additional material will be removed

until the measured radium concentration is less than 5 pCi/g above background. Exceptions may be made to this operational criterion with USEPA concurrence.

In addition to the gamma survey, STS will obtain samples for laboratory testing to measure the total radium concentration of soils. Such testing may be used to resolve ambiguous gamma survey measurements, to establish or verify gamma/radium correlations, or to provide additional data to verify that the cleanup criteria have been met at the excavation. At least one composite soil sample will be taken for laboratory analysis from each excavation. The samples will be taken in accordance with the soil sampling procedure in SOP-214, and tested for radium (Ra-226 and Ra-228). Apparently clean material below the radiologically-impacted soil may be excavated to facilitate verification. This material will require sampling as overburden if it is to be managed as clean soil for backfill.

2.1.1 Gamma Survey Procedure

The gamma survey will be performed according to the Gamma Survey Standard Operating Procedure (SOP-210).

2.1.2 Documentation

The Verification Gamma Survey drawing described above will be used to document the readings obtained during the gamma survey. The drawing also will contain information pertaining to background gamma radiation levels and instrument calibration.

2.1.3 Quality Control

The gamma survey will be performed by trained individuals who have sufficient skill to obtain accurate and consistent information. All information obtained during gamma surveys will be reviewed by the Field Team Leader for accuracy and consistency.

All field equipment will be calibrated either in accordance with NUREG/CR 5849 "Manual for Conducting Radiological Surveys in Support of License Termination" Draft June 1992 or with industry-recognized protocols. Instrument response background and check source tests will be performed and recorded daily to ensure instrument operations are within the established acceptable range.

At least 5 percent of the survey area will be resurveyed. Readings from the initial survey will be compared to those readings obtained during the quality control (QC) survey to identify instrument malfunctions or reading/document errors.

3.0 DECONTAMINATION

All discarded materials, waste materials, and otter field equipment and supplies shall be handled in such a way to prevent the potential spread of contamination during excavation and restoration activities. Discarded items that have contacted contaminated materials will be containerized and stored for disposal at the approved disposal facility. Non-contaminated items to be discarded will be collected for disposal as non-hazardous waste. Personnel and sampling equipment decontamination are described in the Decontamination Procedure included as SOP 347 of Appendix B.

APPENDIX D

Specifications

Section 01010	Summary of Work
Section 01020	Construction Health and Safety
Section 02010	Demolition and Debris Removal
Section 02200	Contaminated Material Loadout and Earthwork
Section 02840	Site Utilities

LAKESHORE EAST

Title: Summary of Work

Section 01010

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

SECTION 01010

SUMMARY OF WORK

PART 1 - GENERAL

1.1 Description of the Project

This project directed by the United States Environmental Protection Agency Region 5 (USEPA) is at a location designated by the USEPA as related to the Lindsay Light II Site (Site) in Chicago, Illinois. The work covered by these specifications includes the following.

A. Site Description

Radioactive materials in concentrations above background have been found on the Site within the City of Chicago. The presumptive source of these materials is the Lindsay Light Company in Chicago. The identified "Site" is a portion of the former Illinois Central Railyards, currently developed as a golf course and driving range.

The Site is defined, for the purposes of the excavation and restoration action and according to the UAO, as the area with soil 5 picocuries per gram (pCi/g) total radium above background within the property at the southwest corner of Wacker Drive and Lake Shore Drive, within an address of 221 North Columbus Drive, Chicago, Illinois. Final definition of the limits of soil excavation and restoration will be the responsibility of the Respondents and their consultants and contractors.

B. Project Description

1. Work for the cleanup of the Site will be excavation and removal of impacted soil.

2. Site preparation includes all of the work which must be done before any excavation and restoration can begin. Some of the work, such as determining background air quality and background radiation, will be common to the entire Site. Other work, such as verifying the extent of contamination and documenting existing physical conditions, will be area-specific.

   a. Access Agreements. Discussions with the property owner and tenant concerning access will begin promptly upon notice from the USEPA. Once the initial access agreement is signed, the work described below will begin. Every effort will be made to keep the property owner and the USEPA informed of any changes to the work and to the schedule.

   b. Permits. Under Superfund, the site developer, Lakeshore East, LLC, is exempt from obtaining permits from the City of Chicago and Cook County for the excavation work conducted on-site, but must obtain permits for portions of the work accomplished off-site. Some permits, particularly those issued by the Department of Transportation to commercial carriers to transport the excavated soils and debris over public streets, will not be sought and, therefore, are not addressed in this Plan. Lakeshore East, LLC will contract only with transportation companies qualified and licensed to carry such materials. A list of the expected permits is included in Appendix C of the Work Plan, Permitting and Access Plan.

   c. Background Air Monitoring. Monitoring and analyses to be conducted prior to beginning excavation at the Site will provide adequate data to determine a background air quality which can be used for the Site. A description of the air monitoring that will be done is included in the Air Monitoring Plan for the Site including the proposed location for the background sample.

d. Site Survey. Prior to work at the Site, a current site survey will be prepared by a licensed surveyor.

e. Soil Sampling. Soil sampling is described in the Soil Sampling Plan (SOP-214). Background gamma values are developed in accordance with Gamma Radiological Surveys (SOP-210).

f. Utilities. For the Site, "utilities" will include, but not be limited to, natural gas, drinking water, waste water, communications, electrical power distribution, and storm water collection systems. The locations of all utilities will be determined, field located and shown on all maps and drawings for the properties. All work to replace, repair or backfill utilities shall be done as required by the appropriate utility company or agency.

g. Buildings. No buildings are present within the areas proposed to be excavated.

3. Excavation and restoration work includes removing any structures, facilities, landscaping or other appurtenances as necessary, excavating contaminated soils, cleaning contaminated buildings, facilities, structures, utilities and appurtenances, verifying that radioactivity greater than the cleanup criteria has been removed and backfilling all excavations. Site restoration is not proposed pending site development and construction.

a. Work to remove asphalt paving, sidewalks, foundations, retaining walls, etc., is described in Section 02010 of these Specifications.

b. Work to excavate contaminated soils is described in Section 02200 of these Specifications and in the Health and Safety Plan (HASP) for the Site.

c. The requirements for soil sampling are described in the Soil Sampling Plan.

d. The work for properly backfilling all excavations is included in the Work Plan.

1.2 Related Work

Other Division 1 Sections of these Specifications.

1.3 Definitions

A. Access Agreement refers to a legal document between the Contractor, Property Owner and tenant authorizing the Contractor or the USEPA to complete the excavation and restoration action as described in these Specifications, the Work Plan and the HASP.

B. City refers to the City of Chicago and its representatives.

C. Contract Documents for the work consist of the drawings, these specifications and all addenda issued prior to and all modifications issued after the execution of the contract.

D. Contractor refers to STS Consultants, Ltd. (STS) and its subcontractors and consultants.

E. County refers to Cook County, Illinois and its authorized representatives.

F. USEPA refers to the Region 5 office of the United States Environmental Protection Agency and its representatives.

G. Job Set refers to a complete set of Project Record Documents used during construction activities.

H. Project refers to all activities associated with the excavation and restoration action.

I. State refers to the State of Illinois and its authorized representatives.

J. Utilities. For the project, "utilities" will include, but not be limited to, natural gas, drinking water, waste water, communications, and electrical power distribution and storm water collection systems.

K. Work Order refers to the plans, drawings, additional specifications, directions and agreements prepared for properly completing work at the Site.

PART 2 - PRODUCTS

Not used.

PART 3 - EXECUTION

3.1 Scope of Work

A. The work to be performed includes furnishing all labor, tools, equipment, materials, transportation, services, and incidentals, and performing all operations necessary for the excavation and transportation of radiologically-impacted soils, and the monitoring of those excavations as shown and noted on the drawings and as required in these Specifications.

B. The work includes the decontamination of the Site and the management of excavation and demolition materials in accordance with the Statement of Work. The work included is further described in Article 3.2, Construction Sequence.

3.2 Construction Sequence

Except as specifically noted, the construction sequence described below is intended as guidance for this project. At the discretion of the Contractor, the work may be done simultaneously or in an order other than below, as long as it will not affect the quality, timely completion, or safety of the work.

B. Mobilization

1. Mobilize personnel, equipment, materials, and temporary facilities needed for the project. Provide for electrical, water, communications and other utilities as required for the work.

2. Provide site-specific training for workers. Discuss work with crews, including areas of special concern (construction and radiological), construction schedule and sequence, and health and safety.

3. Prepare the personnel and equipment decontamination facilities.

4. Select areas within the Site for staging soils, containers and demolition materials. Prepare areas as necessary (e.g., berms for temporary water control, or plastic sheeting if on "clean" area)

5. Set up the air monitoring system and begin monitoring.

6. Set up traffic controls, as required.

C. Contamination Excavation

1. Excavation of contaminated buildings is not anticipated.

2. Excavation of contaminated soil will occur using these steps:

   a. Do construction staking or marking (additional surveying, as necessary, for horizontal and vertical limits of soil excavation). These limits will be based on the previous STS site investigation reports.

   b. As necessary, lock-out, tag-out, and/or shut down all utilities which could affect or be affected by the work. Purge, decontaminate and otherwise properly manage utilities so they can be removed, protected from damage, or relocated, as necessary.

   c. Excavate the contaminated soils on the property and transport them to the disposal facility. Stockpile soils on the Site only as necessary.

   d. Do soil sampling and gamma surveying to determine if additional excavation is necessary. Excavation will not extend below groundwater.

      (i) If necessary, do construction staking. Continue excavating until surveying and sampling indicate all contaminated materials have been removed.

      (ii) Notify the USEPA that pre-verification sampling has been completed and request verification surveying and sampling, and if found to meet the closure standard, request approval to backfill.

D. Restoration

1. Restoration is not proposed for the Site. Minimal restoration may consist of flattening the slopes of the excavations. The Site will be regraded in preparation for construction and development.

3.3 Disruption

A. The contractor will, to the extent practical, use his best efforts to undertake the project in a manner that avoids unnecessary disruption of local businesses and their customers or tenants.

3.4 Work Quality Control

A. Shop and field work shall be performed by personnel thoroughly trained and experienced in their field of expertise. Work on this project shall be performed in accordance with the best practices of the various trades involved.

B. Quality control inspections will be conducted for all construction activities under these specifications. The inspector will be independent of the work activity being inspected.

C. Work will be certified as having been completed in full satisfaction of these Specifications.

D. Work will be done as required by these Specifications, the Work Plan and other documents referenced in these Specifications.

LAKESHORE EAST

Title: Construction Health and Safety

Section 01020

Revision Number: 0

Date: June 19, 2002

Replaces: New

SECTION 01020

CONSTRUCTION HEALTH AND SAFETY

PART 1 - GENERAL

1.1 Scope

A formal Health and Safety Plan (HASP) has been prepared for the work described in these Specifications. This section of the Specifications summarizes the requirements of the HASP as they apply to the construction work, and references those sections of the HASP where detailed descriptions of the health and safety requirements and procedures can be found.

1.2 Related Work

A. Division 1 Section of these Specifications.

B. Section 02010 - Demolition and Debris Removal

C. Section 02200 – Contaminated Material Loadout and Earthwork

D. Section 02840 - Site Utilities

PART 2 - PRODUCTS

Not used.

PART 3 - EXECUTION

3.1 Safeguards will be taken to ensure the safety of workers in and around excavations. These will include, but not be limited to, the following:

a. Stairways, ladders, ramps, or other safe means of egress will be located in trench excavations that are 4 feet or more in depth.

b. No persons will be permitted underneath loads handled by lifting or digging equipment. Personnel are required to stand away from any vehicles being loaded or unloaded to avoid being struck by any spillage or falling materials.

c. All trenches and excavations 6 inches or deeper will be marked and guarded for the duration of the project with barricades placed a minimum of 2 feet from the edge of the excavation to prevent persons from falling into the opening.

d. Emergency rescue equipment such as breathing apparatus, a safety harness and line, etc., will be readily available in the project trailer.

e. Precautions will be taken to prevent surface or runoff water from entering the excavation. Ditches, dikes, or other effective means will be installed or used to prevent water from entering the excavation and to drain the surrounding areas.

f. Any excavation that meets the definition of a confined space will be treated as such, as defined by OSHA 1910.146, and all applicable procedures detailed in Section 13 of the HASP will be followed. A crawl space or storm cellar area could fall within the definition of a confined space if it: (1) is large enough and so configured that personnel can bodily enter and perform assigned work; and (2) has limited or restricted means for entry or exit; and (3) is not designed for continuous personnel occupancy.

g. All personnel in an excavation greater than four feet in depth will be protected from cave-ins by an adequate protective system. An adequate protective system will include barrier protection (e.g., shoring or trench boxes) or sloping. Other protective measures required by 29 CFR 1926, Subpart P also will be provided.

h. The determination of the angle of repose and design of any supporting system will be based on careful evaluation of pertinent factors such as depth of cut; possible variation in water content of material while the excavation is open; anticipated changes in materials from exposure to air, sun, water, or freezing; loading imposed by structures, equipment, overlying material, or stored material; and vibration from equipment, blasting, traffic, or other sources.

i. Daily inspections of excavations, the adjacent areas, and protective systems will be made and documented by a competent person. The documentation will include indications of potential cave-ins, failure of protective systems, hazardous atmospheres, or other conditions.

j. No employee or any other person will work adjacent to or enter an excavation until the work area has been inspected by the competent person. The inspection will determine if conditions exist which may expose workers to moving ground or any other unsafe conditions. Any deficiencies identified during inspections will be adequately corrected prior to work in excavation.

3.2 Training

1. All persons active in the excavation work at the Site will receive training as specified in Section 5 of the HASP for work with low-level radioactive materials. The training program in Section 5 of the HASP is in accordance with 29 CFR 1910.

2. In addition to the training above, periodic "tailgate" health and safety meetings will be held. The purpose of these meetings will be to discuss deficiencies in health and safety practices, discuss hazards specific to new properties or encountered at existing properties, discuss the results of monitoring, and generally reinforce good health and safety practices. A typical form for such meetings is found in Section 5 of the HASP.

3. Special training shall be provided or required for work such as the following.

   a. Supervisory Work. All supervisors shall have received at least the additional eight hours training required by OSHA.

   b. Truck Driver. All truck drivers shall be instructed in and knowledgeable about the routes to be used between the property and the train station, the requirements of the work (work with and transport of potentially radioactive materials), and the emergency and contingency procedures to be implemented in the event of an accident.

   All persons employed in the transport and handling of radioactive materials shall have received HAZMAT training.

   d. A competent person will be on- site for shoring.

3.3. Personal Protective Equipment (PPE) - Based on information obtained from monitoring observation of similar work at vicinity properties, work at this Site can be done in Level D PPE. The Health and Safety Coordinator will evaluate individual tasks and work areas and specify

particular types of PPE based on this evaluation. PPE utilized in the performance of the work under these specifications will be in accordance with Sections 7 and 8 of the HASP.

3.4 Hot Work

A. Flame welding and cutting operations

1. Gas bottles shall be properly color-coded, in good condition, and stored in a secured manner in racks or carts. Bottles with corroded or damaged threads will not be used.

2. Regulators shall be in good condition, and suitable for the use.

3. Fuel gas and oxygen hose shall be easily distinguishable and shall not be interchangeable. Hoses shall be inspected at the beginning of each shift and shall be repaired or replaced if defective.

3.5 Transporting Contaminated Materials Over Uncontaminated Areas

A. Transport between the Site and the Rail Terminal

1. Haul routes between the Site and the rail terminal will be defined (see Traffic Control Plans in Appendix D of the Work Plan), and all operators will be instructed in the location and use of these routes. Transport of contaminated materials will be over designated routes only.

2. Rolloff containers used to transport contaminated materials over uncontaminated areas will be capable of transporting the material without spillage. Covers will be secured onto the containers prior to exiting the contaminated area. Empty trucks returning to the site will be tarped, as will trucks supplying clean backfill, topsoil, and related construction materials. Tarps will be fastened down tightly to prevent material from being blown out of the trucks.

3. Trucks and rolloff containers used to transport contaminated materials will be frisked and decontaminated if necessary in accordance with Subpart 3.8, below, prior to exiting the contaminated area.

4. Should a truck hauling contaminated material from the Site to the rail terminal accidentally spill any part of its load, the Contractor will direct site workers to assist in the cleanup. Spill cleanup, including proper notification of agencies and authorities, will be accomplished in accordance with the Emergency Contingency Plan.

B. Transport within a Property

1. Haulage routes will be established within the Site and all workers will be instructed in the location and use of these routes. Following excavation and restoration of soils and other materials, such routes will be examined, visually and with radiation detection equipment, for the presence of spilled materials. All spilled materials will be removed.

2. Practices to control spillage will be implemented during excavation and restoration. These practices will include such things as the following:

a. Not filling haul equipment above the sides of the bed or bucket,

b. Limiting travel speed, and

c. Covering haul routes with clean soil or other materials. Such materials would be inspected as above, and decontaminated for reuse or properly transported to the rail terminal for eventual transfer to the approved disposal facility.

3.6 Equipment Decontamination Facilities

A. Equipment Decontamination Station - An equipment decontamination station will be readily available for the decontamination of vehicles, tools, and equipment, prior to exiting the controlled area. The equipment decontamination station will be located within the secured area, and will include the following:

1. A steam pressure washer for removing contamination from the wheels, tracks, and other surfaces of the equipment and trucks.

B. Release of Construction Vehicles and Equipment for Unrestricted Use - Prior to being released from the Exclusion Zone, all construction vehicles and equipment will be frisked, and decontaminated if necessary. Contaminated vehicles and equipment will be decontaminated using a pressurized water spray in accordance with Subpart A, above. Water generated during the decontamination activities will be evaporated, infiltrated within the Exclusion Zone, used for dust control, or collected and stored on the Site for other purposes or eventual disposal.

3.7 Dust and Water Runoff Control

A. Dust control measures used during work activities on the Site may include, but are not limited to the following:

1. Using hoses with mist or fog nozzles to spray light applications of water over the areas of excavation or demolition, staging, loadout, and dumping/storage. The Contractor will be responsible for the control of excess water.

2. Minimizing travel over soil areas. Some travel over contaminated soils (e.g., by excavation equipment and by haul trucks) may be necessary. Dust minimization procedures will include, but not be limited to, the following.

   a. Within the property, the speed limit for trucks and excavation equipment will be fifteen miles per hour.
   b. Areas which will be used extensively as travelways (e.g., entrances to and exits from equipment decontamination facilities) will be sprayed with water as necessary to control dust.

3. Storage and staging piles will be covered when not in use.

B. Runoff water control measures on the Site may include, but are not limited to the following:

1. Excavation of temporary swales, ditches, and/or retention ponds.

2. Construction of temporary diversion dikes and berms.

3. Pumping of water to runoff water control facilities. Water removed from contaminated excavations will be evaporated, used for dust control, or collected and stored on the Site.

3.8 Contingency Plans and Emergency Response Procedures

Contingency plans and emergency response procedures for Site activities are provided in the Emergency and Contingency Plan. These plans and procedures will be followed in the event of an emergency situation arising from the work activities or acts of God that may affect the environment or human health and safety.

LAKESHORE EAST

Title: Demolition and Debris Removal

Section 02010

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

SECTION 02010

DEMOLITION AND DEBRIS REMOVAL

1.0 GENERAL

1.1 Scope

A. This section describes excavation requirements for existing Site features, including:

1. Salvage Disposition, Storage, and Handling of Property.
2. Demolition of Existing Site Features.
3. Sawcutting.
4. Debris Segregation, Decontamination, Haulage, Storage, and Disposal.
5. Matching and Patch Repairing.

B. Descriptions for radiological surveying are specified in the Work Plan, Appendix B (Verification Sampling Plan)

1.2 Related Work

A. Division 1 Sections of these Specifications.

B. Section 02840 - Site Utilities

1.3 Salvage Disposition. Storage and Handling of Property

A. Remove all structures, equipment, facilities, materials and other items called for in the Work Plan or that otherwise must be removed to access the work areas and store as directed. Such items shall be removed completely, including appurtenances, and shall be properly protected.

B. All non-radiologically-impacted materials, equipment, and other items permanently removed from the work area for the proper completion of the excavation work shall be properly managed and/or disposed as applicable.

1.4 Submittals

A. All submittals shall be made to the STS Project Manager.

B. Submit landfill tickets for all uncontaminated debris disposed offsite, no more than five days after disposal, except where dumpsters are emptied directly into collection trucks. The use of dumpsters will be recorded in the field logbook. Each ticket shall contain at least the information below.

1. Date of disposal.
2. Estimated volume or weight of load if required by the designated measurement method of the landfill.
3. Description of materials disposed.
4. Name of wastehauling subcontractor.

1.5 Health and Safety Conditions of the Work

In addition to the hazards common to demolition, radioactive materials are known to be present at this Site, and may be present in or on slabs/paving, structures, facilities and utilities.

A. Detailed health and safety requirements for work on the vicinity properties are included in Section 01020 of these Specifications and the HASP.

B. All demolition work will be done as required by OSHA regulations published in 29 CFR 1910 and 1926. These regulations are included by reference in these Specifications.

C. Based on existing information, excavation work can proceed under Level D personal protection conditions (see HASP). Air and soil monitoring and sampling will be done during the conduct of the work to determine if modifications to Level D work conditions are necessary.

   1. The Contractor shall be prepared to discontinue work in an area and begin work in an alternate area if monitoring and sampling indicate changes in the work conditions may be necessary and if so directed by the STS Project Manager, STS Field Team Leader, or their Agent.

   2. The Contractor shall be prepared to begin working under changed conditions (greater than or equal to Level D personal protection with appropriate personal, equipment and vehicle decontamination) with minimal delay. Additional requirements which may be necessary if asphalt, concrete, wood, metal or other construction materials containing hazardous materials or levels of radiation above background are encountered are discussed in Section 01020 of these Specifications.

D. The Quality Assurance Supervisor, Field Team Leader, or Health and Safety Coordinator may bar from the Site any person or persons who shows a disregard for health and safety of themselves or others.

1.6 Permits

A. The Contractor shall be responsible for obtaining all permits required for the work and additions described in this section of these Specifications.

B. Copies of all the necessary permits shall be provided to the Project Quality Assurance Supervisor prior to beginning the work.

C. At a minimum, all work shall be done in accordance with the requirements of the permits. The requirements of these permits are included by reference in these Specifications. Where the requirements of the permits and these Specifications are in conflict, the more stringent requirements shall apply.

Part 2 - Products

Not used.

Part 3 - Execution

3.1 General

A. The work performed under these Specifications shall be done as indicated in this Work Plan, specified herein, and as required by the permits and the laws, rules and regulations of the City of Chicago, the State of Illinois and the USEPA.

B. The Contractor shall remove existing property features as indicated in the Work Plan and shall perform demolition in a manner to allow segregation and proper disposal of contaminated and uncontaminated material. The Contractor must use methods and operations which will minimize the potential for the spread of contamination.

C. It shall be the Contractor's responsibility:

1. To maintain adequate safety measures and working conditions (see Section 01020 of these Specifications and the HASP).

2. To take all measures necessary during the performance of the work to protect the entire project area and adjacent properties which would be affected by this work from storm damage, flood hazard, caving of trenches and embankments, and sloughing of material, until final acceptance by the STS Project Manager, STS Field Team Leader, or their Agent.

3. To maintain completed areas until the entire project area is in satisfactory compliance with the Specifications.

3.2 Structure Demolition

A. General

No structures are present on the site, where excavation is proposed.

B. Foundations

1. The methods used to demolish and remove foundations shall be at the discretion of the Contractor, as long as the requirements of these Specifications, the permits, and the laws, rules and regulations of the City, County, State, OSHA or the USEPA, whichever are more stringent, are met.

2. All demolition of foundations shall be done in a manner to minimize disturbance of the surrounding and underlying soil. This could include, but not be limited to, pre-breaking or sawing the foundation elements, and the measures described in Article 3.3 of these Specifications.

3. Concrete, rock or block foundations may be demolished and reduced in size as described in the foregoing subpart.

4. Foundation walls which serve as retaining walls to support earth or adjoining structures shall not be demolished until such earth has been properly braced, or adjoining structures have been underpinned to prevent movement. Bracing and shoring shall be evaluated and, if necessary, designed by a qualified Professional Engineer.

5. Adjacent foundation walls and "party" walls to a basement, which are to serve as retaining walls against which fill or debris will be placed, shall be checked for structural strength before they are to be so used. Evaluations and, if necessary, designs of shoring and bracing shall be done by a qualified Professional Engineer.

6. Foundations and basement floor slabs will be removed to verify conditions beneath them. The concrete, if not contaminated, will be staged on-site for later removal or will be removed as clean debris. Concrete found to be impacted will be decontaminated in accordance with SOP-345. If decontamination cannot be reasonably completed, the concrete will be reduced in size sufficient to be managed as impacted and loaded for off-site shipment and disposal.

C. Retaining Walls

1. The methods used to demolish and remove retaining walls shall be at the discretion of the Contractor, as long as the requirements of these Specifications, the permits, and the laws, rules and regulations of the City, County, State, OSHA or the U.S. EPA, whichever are more stringent, are met.

2. All demolition of retaining walls shall be done in a manner to minimize disturbance of the surrounding and underlying soil. This could include, but not be limited to, pre-breaking or sawing the pavement and slabs, and the measures described in Article 3.3 of these Specifications.

3. Shoring or bracing may be necessary during the demolition of retaining walls. Shoring or bracing shall be designed by a qualified Professional Engineer, competent in soils. Shoring and bracing designs shall be submitted to the Respondents or their Agent and the Field Team Leader prior to beginning excavation where their use may be necessary.

4. Concrete, rock or block foundations may be demolished and reduced in size as described in the foregoing subpart.

3.3 Sawcutting

A. The Contractor shall be responsible for all sawcutting necessary for the excavation of contamination whether described in the Work Plan or not. The Contractor shall sawcut concrete, masonry, asphalt paving, and other work as needed, observing the following requirements:

1. The Contractor shall provide liquid or other dust control for all sawcutting of contaminated materials or materials overlying contaminated materials.

2. Finished vertical concrete or masonry cuts shall be made using a track-mounted concrete saw. The finished cut shall be a minimum of three inches deep, in a straight and true line.

3. Finished horizontal concrete or masonry cuts shall be made using a cradle-mounted concrete saw. Make the finished cut a minimum of three inches deep, in a straight and true line.

4. Where portions of masonry will be removed and replaced, masonry excavation and restoration shall be along mortar joints so the finished wall will have the same masonry pattern as the existing.

5. Finished asphalt paving cuts shall be made using an asphalt blade in a cradle-mounted saw. The finished cut shall be a minimum of two inches deep, in a straight and true line.

6. If a clean break cannot be made where new concrete will be replaced against old concrete, provide sawcutting necessary to produce clean edges on the existing concrete.

3.4 Decontamination of Items

A. Some contaminated items such as slabs, pavement, and piping, can be decontaminated and disposed in industrial or other landfills. Decontamination of items will include removing the contaminated dust, dirt or encrustations from the surfaces of the items. Decontamination may be accomplished by high-pressure spraying, or manually removing contaminated materials with brushes, soap and water, rags, and miscellaneous hand tools until the items are verified as radiologically suitable for the proposed disposal.

B. Decontamination of contaminated equipment, tools, materials and supplies is described in detail in Section 01020 of these Specifications.

3.5 Contaminated Material Loadout and Transport

A. General Requirements

1. Before beginning contaminated material loadout operations, the Contractor shall construct temporary site drainage facilities and initiate dust control measures. The Contractor also shall construct all decontamination and loadout facilities and establish survey controls.

2. The Contractor shall use equipment and methods that minimize the potential for spillage of materials during loading operations.

3. At a minimum, the loadout shall be cleaned (liquid and nonliquid wastes removed) at the end of every other day. Spilled materials shall be promptly removed from the loading facility if the quantity is such that the material could be picked up and transported out of the loadout facility.

4. All decontamination of equipment shall be done as required herein and by Section 01020 of the Specifications.

5. In no case shall equipment with radioactivity above the release levels be allowed to leave the Site.

B. Loadout

1. All loadout of material will be done as required by these Specifications and the Work Plan. Loading of trucks and other containers with contaminated soil or debris shall be done only in the loadout or equipment decontamination areas.

2. Contaminated soils and debris will be loaded directly into containers as they are excavated, and the container staged in a clean area for pickup and transport to the rail terminal. Materials will be placed so they do not extend above the sides of the container. Materials protruding above the sides of the container will be pushed down or removed for placement into another container. If isolated quantities of impacted soil are encountered in volumes less than necessary to fill a container, the material will be placed in Supersacks and stored temporarily until there is sufficient material accumulated to fill a container.

3. Rolloff containers will be secured with lids.

4. Drivers shall remain inside the truck with the windows closed or shall exit the truck prior to loading.

C. Decontamination

1. Detailed requirements for the decontamination of trucks and containers are provided in Section 01020 of these Specifications.

2. Following loading in the loadout area, and decontamination if such is necessary, all trucks and containers will be frisked.

3. If frisking shows such is necessary, trucks and containers will be decontaminated by wiping or spraying.

4. Trucks and containers need a final survey prior to unrestricted release from the loadout.

D. Transport

1. Trucks picking up and dropping off containers at the staging areas outside of the loadout need not be decontaminated unless a container spill has occurred.

2. Trucks shall only use the designated route(s) to transport materials from the Site to the rail terminal, and shall obey all signs, speed limits and other traffic laws. Any driver not obeying traffic laws, or the requirements of these Specifications, shall be removed from the work.

3. All trucks shall properly display decal with all information required for transport of contaminated materials.

4. Each truck shall carry the standard industry bill of lading for each shipment to the rail terminal.

5. All truck drivers shall have the training required by 29 CFR 1910.120 and shall be trained in the procedures to be used in the event of an emergency, as described in the Emergency Contingency Plan.

3.6 Storage

A. All storage or stockpiling of materials shall be done as required by Section 02200 of these Specifications and described in the Work Plan.

B. On the Subject Site

1. Non-radioactive materials, including fill, may be temporarily stockpiled (staged) on the Site in the locations noted in the Work Plan, or as approved or directed by STS or its Agent.

   a. As necessary, staged non-radioactive materials shall be covered or otherwise managed to control dust.

2. Radioactive materials may be staged on the Site only with written approval from the STS Project Manager or its Agent.

   a. Radioactive materials shall only be stored on contaminated or specially prepared areas to minimize the potential for contamination of "clean" areas.

   b. All staged radioactive materials shall be removed from the Site by the end of the day, weather permitting. If materials must be left overnight, security will be provided. If isolated quantities of impacted soil are encountered in volumes less than necessary to fill a container, the material will be placed in Supersacks and stored temporarily until there is sufficient material accumulated to fill a container.

c. Except when work is actively in progress, the staged contaminated materials that are not containerized shall be stored temporarily in Supersacks on-site. Radiologically-impacted material that cannot be placed in containers for overnight storage will not be excavated.

C. On the Rail Terminal Site

1. Loaded and tarped containers will be stored at the rail terminal temporarily until the appropriate train is loaded and dispatched to the permanent disposal facility.

3.7 Disposal

A. At a minimum, all materials shall be disposed as required by the permits, these Specifications, and the laws, rules and regulations of the State of Illinois or the USEPA, whichever are more stringent. All materials to be disposed shall be surveyed as required by Section 01020 of these Specifications to determine they are suitable for the intended disposal method and location.

B. If clean materials are disposed by landfilling or recycling, the Contractor shall provide the STS Project Manager and the Field Team Leader with the name of the landfill or recycler.

1. The landfill or recycler must be qualified to receive the waste. The landfill or recycler must provide the Contractor with qualification information.

2. The STS Project Manager or its Agent has the right to reject any landfill which does not meet qualification standards.

3.8 Cleanup

Upon completion of work in this section, all rubbish and debris shall be removed from the job site. Soils or fill materials that were excavated from the site and were determined not to exceed the radiological cleanup standard of 7.1 pCi/g total radium (Ra-226 + Ra-228) may be used or redeposited on the site as fill material. All construction equipment and implements of service shall be removed and the entire area involved shall be left in a neat, clean and acceptable condition.

LAKESHORE EAST

Title: Contaminated Material Loadout and Earthwork

Section 02200

Revision Number: 1

Date: September 30, 2002 Replaces: June 19, 2002

SECTION 02200

CONTAMINATED MATERIAL LOADOUT AND EARTHWORK

PART 1 - GENERAL

1.1 Scope

A. General

1. Detailed descriptions of the landscaping, structures, etc. for the Site are included in the Work Order of which these Specifications are a part.

1.2 Related Work

A. Division 1 Sections of these Specifications

B. Section 02010 - Demolition and Debris Removal

D. Section 02840 - Site Utilities

1.3 Site Investigation

A. Investigation Reports

Investigation reports prepared by STS Consultants, Ltd. dated September 19, 2002, September 28, 2001, January 8, 2002 and February 8, 2002 are available from the owner. These reports may be used as a guide to conditions on this project as they contain boring summaries and related information depicting surface and subsurface conditions at specific locations at the Site. Surface and soils conditions at other locations may differ from conditions occurring at the boring locations. Therefore, further investigations will be done prior to and during the excavation activities.

B. Contractor's/Subcontractor's Responsibility

The Contractor/Subcontractor shall carefully examine the Site and make all inspections necessary in order to determine the full extent of the work. The Contractor/Subcontractor shall satisfy himself as to the nature, location and conditions of the work, the conformation and condition of the existing ground surface, and the character of equipment and facilities needed prior to and during prosecution of the work. The Contractor/Subcontractor shall satisfy himself as to the character, quality, and quantity of surface and subsurface materials or obstacles to be encountered. Any inaccuracies or discrepancies between the actual field conditions and the Work Order, or between the Work Order and Specifications, must be brought to the attention of the Project Coordinator in order to clarify the exact nature of the work to be performed.

1.4 Health and Safety

A. Detailed discussions of the potential hazards and the requirements for minimizing the potential for harm to project and offsite personnel, and to the environment, are provided in Section 01020 and Article 1.5 of this section of these Specifications.

B. All work shall be done under the supervision of personnel experienced and qualified for the work.

C. All work will be done as required by OSHA regulations published in 29 CFR 1910 and 1926. These regulations are included by reference in these Specifications.

D. Based on preliminary results, sampling and analyses of soils from the Site indicate levels of radioactivity in the soils above background levels. Based on the sampling and surveys, the work can proceed under Level D personal protection conditions. Air and soil monitoring and sampling will be done during the conduct of the work to determine if modifications to Level D work conditions are necessary (see Sections 01020 and 02010 of these Specifications). A complete description of health and safety requirements for this site is provided in the Health and Safety Plan (HASP) for this project.

1. The Contractor shall be prepared to discontinue work in an area and begin work in an alternate area if monitoring and sampling indicate changes in the work conditions may be necessary and if so directed by the Respondents or his Agent.

2. The Contractor shall be prepared to begin working under changed conditions (greater than or equal to Level D personal protection with appropriate personal, equipment and vehicle decontamination) with minimal delay. The requirements which may be necessary if asphalt, concrete, wood, metal or other construction materials containing levels of radiation above background encountered are discussed in Section 02010 of these Specifications.

E. The Field Team Leader or Health and Safety Coordinator may bar any person from the site who, in their opinion, shows a disregard for health and safety requirements.

1.5 Environmental Safeguards and Regulations

A. The Contractor shall comply with all federal, State, and local regulations, and the requirements of these Specifications at all times to prevent pollution of air, water and soil.

B. The Contractor will preserve and protect all structures, equipment, and vegetation (such as trees, shrubs and grass) on or adjacent to the work area, which is not to be removed and which does not unreasonably interfere with the excavation or restoration work. The Contractor will only remove trees when such is required by the Work Order and will avoid damaging vegetation that will remain in place. Limbs or branches of trees broken by the contractor will be trimmed with a clean cut, and the cut painted with a tree-pruning compound.

C. The Contractor will control air and water pollution as described in these Specifications and the Work Plan.

1.6 Permits

A. The Contractor shall be responsible for obtaining all permits required for the work and additions described in this section of these Specifications.

B. Copies of all the necessary permits shall be provided to the Quality Assurance Supervisor prior to beginning the work.

C. At a minimum, all work shall be done in accordance with the requirements of the permits. The requirements of these permits are included by reference in these Specifications. Where the requirements of the permits and these Specifications are in conflict, the more stringent requirements shall apply.

1.7 Submittals

A. All submittals shall be made to the Respondents or their Agent, with copies submitted to the Field Team Leader.

B. The Contractor shall maintain a log of those submittals directed by the Respondents.

C. Import Backfill Materials

1. The Contractor will submit a list showing materials expected to be imported, and the name(s) and locations of the supplier(s) of each type of material.

2. Submit analyses such as radioactivity, geotechnical, gradation, and proctor test results of backfill materials, and certification of conformance with material specifications as determined by the testing consultant for each material, in accordance with testing per Section 2.E of this specification.

3. The above information shall be submitted with the Work Order for the Site for each source, prior to use.

D. Imported Backfill Material Truck Tickets

1. Submit imported backfill material truck tickets no less than five days prior to submittal of application for payment of the applicable items of work. Minimum required information on truck tickets includes the following.

   a. Date of delivery.

   b. Material description.

   c. Truck identification number or license number.

   d. Gross weight and tare weight or volume of load.

   e. Supplier name/source.

   f. Signatures of scale operator and truck driver.

2. Truck tickets without the above information will not be accepted for payment.

E. Soil Compaction Test Report

1. Submit soil compaction test reports indicating test results from the testing consultant. The Contractor shall be prepared to provide preliminary test results within 24 hours of the test. Final test results shall be submitted to the Contractor and available for review within seven days of testing.

2. Test results shall include time and date of test, test methodology, location of test, name of person and firm conducting the testing, and any pertinent information which may affect the test results.

1.8 Definitions

A. Excavation. Excavation is defined as reaching the lines, grades, elevations and contamination depths shown in the Work Order or determined by in-place monitoring. Excavation of uncontaminated topsoil, silt, clay, sand, gravel, talus, soft or disintegrated rock, boulder or detached pieces of soil rock or debris shall be included, as well as excavation of contaminated material. During the excavation work, monitoring of radiological contamination of the excavated material will be done by the Respondents.

B. Contaminated Soil

1. Soil which must be excavated, transported, or disposed under special conditions. Soil from these sites may have levels of radioactivity above background. Determining the vertical and horizontal extent of contaminated soil will be the responsibility of the Respondents.

2. Soils containing concentrations of Ra-226 plus Ra-228 greater than five picoCuries per gram (5 pCi/g) of dry soil above natural background averaged over six-inch thick layer are considered radioactively contaminated.

C. Salvaged Excavation Materials Uncontaminated soil materials from designated areas of the Site suitable for use as common or structural fill which are not otherwise classified as unsatisfactory (see Part 2 of this Section). Unless otherwise directed by the Work Order or the Respondents' Agent, salvaged excavation materials shall be used to backfill designated onsite excavations a minimum of six inches below finished grade.

D. Overexcavation. Excavation of any type of material in excess of the lines, grades or depths indicated in the Work Order or beyond the limits defined by the Work Order or Specifications.

E. Unsatisfactory Fill Materials Unsatisfactory materials for fill include, but are not limited to, materials containing organic matter, trash, debris, frozen materials, materials containing radioactivity or other hazardous contaminants in excess of regulatory standards, and materials not meeting the criteria of Part 2 of this section. Materials which are unsuitable due to excessive or insufficient moisture or gradation may be used if they can be brought into compliance with the requirements of Part 2 of this section by screening, manipulation, aerating, watering, or blending with other suitable materials. Unsatisfactory fill materials shall not be used.

F. Percent Maximum Density. Percent maximum density is a percentage of the maximum density at optimum moisture obtained by the appropriate test procedure.

G. Stockpile Construction. Stockpile construction is defined as construction of a stabilized fill which will serve as a temporary storage stockpile constructed of contaminated or uncontaminated materials.

H. Subgrade Preparation Subgrade preparation includes fine grading, scarification and compaction, of existing ground, upon which additional materials will be placed.

1.9 Applicable Publications.

The publications listed below form a part of these Specifications to the extent referenced. The publications are referred to in the text by the basic designations below.

1. American Society for Testing and Materials standard methods of testing. Hereinafter designated as ASTM. The letters and numbers following ASTM (e.g., D698) refer to a particular test.

2. Standard Specifications for Road and Bridge Construction, Illinois Department of Transportation. Hereinafter referred to as State Specifications.

3. Standard Specifications for Water and Sewer Main Construction in Illinois, Fourth Edition.

4. City of Chicago Zoning Ordinances.

1.10 Quality Assurance

A. The Respondents shall make available soil-testing services, either through its own forces or through a soils-testing consultant. The Respondents shall be responsible for taking soil samples and performing moisture-density, gradation, and other tests to ascertain the completed work is in compliance with these Specifications. Samples may be taken at the place of excavation, stockpiles, or from the fill itself. The Respondents shall conduct density and other tests on the fill as required by these Specifications. The Contractor shall assist the Respondents as necessary to enable sampling and testing.

B. The Field Team Leader shall be a person qualified and experienced in the work described in these Specifications.

C. By Contractor/Subcontractors

1. All work shall be done under the supervision and control of experienced and qualified personnel, competent in the areas of expertise required for the work described in these Specifications and other documents.

2. The Contractor, at his discretion, may have such tests and inspections as he may desire performed by other qualified personnel or independent testing services, for his guidance and control of the work. The cost for such tests and inspections shall be borne by the Contractor. The Quality Assurance Supervisor will consider the results of such testing in determining whether work has been properly done, but the approval of work shall be made by the Respondents or their Agent.

D. Applicable Criteria. Tests and Standards

1. For Excavation of Radioactive Soils. Detailed descriptions of the testing methods and equipment for radioactive soils are described in the Verification Sampling Plan. All soils containing concentrations of Ra-226 plus Ra-228 greater than five pCi/g of dry soil above background, averaged over a six inch layer, shall be removed.

2. For Disposal of Radioactive Soils. All contaminated soils will be disposed in the manner approved by the USEPA. At present, this is to transport the material to a facility licensed to accept these materials for disposal.

3. For Site Earthwork

a. Except for grading and fill under pavement, slabs or structures, surfaces shall be excavated, or filled or graded to plus or minus 0.2 feet (±0.2') of line, slope and elevation shown in the Work Order, provided in these Specifications, or as directed by the Project Coordinator or Field Team Leader.

b. Areas under pavement, slab or structures shall be filled and/or graded to t0.1 feet.

c. The Contractor will provide survey control for establishing and maintaining excavation and fill. Cut and fill stakes will be placed as necessary, but at least on 50-foot centers, to control excavation and fill. All surveys required to meet City of Chicago earthwork permit requirements shall be performed by a licensed land surveyor. Other surveying will be done by an experienced line and grade surveyor.

d. Following completion of the work, the Site shall be surveyed to confirm all regrading and reconstruction work has been done to proper line and grade.

4. Compaction

   a. Compaction of backfilled common materials shall be to at least 90 percent of maximum density (standard proctor - ASTM D698) for areas not covered by structures, paving or slabs, to at least 95% of maximum density for areas to be covered by paving or slabs, and to at least 95% for areas under structures and utilities.

   b. Compaction of backfilled select or structural materials shall be to at least 92% of maximum density (standard proctor - ASTM D698) for areas not covered by structures, paving or slabs, to at least 95% of maximum density for areas to be covered by paving or slabs, and to at least 95% for areas under structures and utilities.

   c. Maximum densities and optimum moisture information can be obtained from borrow area operators; if this information is not available, the Contractor shall obtain samples representative of all soils to be used for common backfill and provide them to the Respondents or their Agent for testing. Test samples will be provided before backfilling begins.

5. Compaction Testing shall be done on at least 50-foot centers or at least once per lift. Compaction will be tested and determined by competent personnel using methods such as nuclear density gauges (if proper calibration can be achieved), sand cones, or other methods. Compaction work shall be sufficiently observed and all areas of a lift shall be visually inspected by the Respondents or their Agent and the Field Team Leader so they can state their opinion that areas not tested for compaction have been compacted as tested areas.

6. Soils testing. All soils testing (gradations, liquid limits, etc.) will be done using American Society for Testing and Materials (ASTM) procedures and methods.

7. For Cleanup The Contractor shall remove all rubbish, debris, junk, temporary materials, and any surplus excavated materials from the Site, as directed by the Respondents or their Agent. Excavation and proper disposal of these materials and the restoration of staging and storage areas and temporary roads to the satisfaction of the Respondents or their Agent shall be a condition for final acceptance.

PART 2 - PRODUCTS

2.1 Backfill Materials

A. General - Fill materials shall be obtained from suitable stockpiles or borrow as defined in these Specifications. Materials containing organic (except topsoil), perishable, spongy, frozen, expansive or other deleterious materials shall not be acceptable.

B. Materials for Common Fill shall consist of any material imported or excavated from the cut or other borrow sources that, in the opinion of the Respondents or their Agent, are suitable for use in constructing fills. The material shall contain no rocks or hard lumps greater than four (4) inches in size and shall contain at least 40 percent of material smaller than 1/4-inch sieve opening in size. No material of a perishable, spongy, or otherwise improper nature shall be used in filling.

C. Imported Fill

   1. Roadbase materials shall conform to State Specifications Section 704.

   2. Crushed Rock or Stone for use as fill shall conform to State Specifications Section 704.01.

   3. Fine Aggregate or Sand shall conform to State Specifications Section 703.04.

4. Structural Fill under building slabs, ramps, and stairs shall conform to State Specifications Section 704.04, CA-6 or CA-10.

5. Selected Granular Backfill shall conform to Section 20-2.21 C of the Standard Specifications for Water and Sewer Main Construction in Illinois, FA-1 or FA-2.

D. Material placed within 24 inches of rough grade shall be select material that contains no rocks or hard lumps greater than four (4) inches in size and that swells less than 3% when compacted as hereinafter specified for compacted fill.

E. Soils testing

a. Prior to use, all off-site soil sources shall be tested as follows:

1. Radioactivity Material must be tested for radioactivity and found to be within background ranges (3.7 pCi/g as established by the USEPA in Tech Memo date March 15, 1995).

2. Engineering Classification ASTM D2487

3. Standard Proctor Compaction ASTM D698

b. Provide one series of tests for each 10,000 cubic yards of borrow soil used. At least one series of tests will be obtained from each borrow source to be used.

c. Testing of potential on-site soil backfill is described in the Field Sampling Plan.

PART 3 - EXECUTION

3.1 General

A. The work performed under these Specifications shall be constructed to the lines, grades, elevations, slopes and cross-sections indicated in the Work Order, specified herein, and/or directed by the Respondents or their Agent. Slopes, graded surfaces, and drainage features shall present a neat uniform appearance upon completion of the work.

B. It shall be the Contractor's responsibility:

1. To maintain adequate safety measures and working conditions.

2. To take all measures necessary during the performance of the work to protect the entire project area and adjacent properties which would be affected by this work from storm damage, flood hazard, caving of trenches and embankments, and sloughing of material, until final acceptance by the Respondents or their Agent.

3. To maintain completed areas until the entire project area is in satisfactory compliance with the Specifications.

C. Utility lines and structures indicated in the Work Order which are to remain in service shall be protected by the Contractor from any damage as a result of his operations.

1. Where utility lines or structures not shown in the Work Order are encountered, the Contractor shall report them to the Respondents or their Agent before proceeding with the work.

2. Unless their excavation is necessary to allow work to proceed or as a result of contamination, the Contractor shall bear the cost of repair or replacement of any marked utility lines or structures which are broken or damaged by his operations.

3. All repair work, including backfilling, shall be done as required by the governing utility or agency. The Contractor shall contact the governing utility or agency and determine the requirements for properly completing the work. A description of the requirements may be requested to be provided to the Respondents and the Field Team Leader before any work is done.

3.2 Excavation and Restorations. Clearing and Grubbing

A. Clearing. Clearing consists of the complete excavation of objectionable materials and obstructions above and below the ground surface, including tree stumps, brush, grass, vegetative matter and other objectionable materials within the project limits. All brush and organic material shall be removed before placing any earth fill unless the earth fill to be placed is topsoil.

B. Grubbing, Grubbing consists of the complete excavation of stumps, including tap roots or lateral roots 1-1/2 inches or more in diameter, and the excavation of brush, grass or weeds to depths below the natural ground as specified herein. Stumps shall be grubbed to a depth of 3 feet and grass or weed shall be grubbed to a depth of 12 inches below the natural ground surface, or to the depths as determined in the field by the Respondents or their Agent at the time of construction.

C. Protection. Existing items not designated to be demolished or removed shall be protected from damage. Any such item damaged by the Contractor shall be restored or replaced immediately at the Contractor's expense.

D. Debris and Surplus Material. All debris and surplus material resulting from clearing, and grubbing shall be removed from the site and properly managed by the Contractor. The requirements for managing concrete and asphalt materials are described in Section 02010 of these Specifications.

3.3 Dust Control

The Contractor shall take all steps practical to control dust arising from the construction activity. Detailed discussions of the requirements and potential methods for controlling dust are described in Appendix A of the Work Plan.

3.4 Control of Drainage Water

A. The Contractor shall control drainage water in the area of construction operations, and control storm water and wastewater reaching the construction area from any source, so that no damage will be done to the work or to the environment. The Contractor shall be responsible for any damages to persons or property on or off the construction site due to such drainage water or to the interruption or diversion of such storm water or wastewater on account of his operations.

B. Surface grading shall be done as may be necessary to prevent surface water from flowing into excavations.

1. Any water accumulating therein shall be removed by pumping or by other approved methods.

2. Any water accumulating in a work area which may be contaminated will be tested prior to disposal. If contaminated, such water will be disposed as directed by the Respondents or their Agent.

3. Any water which is the result of the Contractor's failure to properly control drainage will be removed and disposed at the Contractor's expense.

3.5 Excavation

A. General

1. The locations of surveyed benchmarks and estimated depths of cut for beginning the work are shown in the Work Order. The Contractor shall be responsible for providing additional staking and surveying, including both horizontal and vertical controls, to ensure the Work is done to the standards of these Specifications. The Project Coordinator and Field Team Leader will be available to assist and advise the Contractor.

2. The Contractor shall perform all excavation necessary or required as shown in the Work Order, or required by these Specifications or the Respondents or their Agent. The excavation shall include the disposal or stockpiling of all materials of whatever nature encountered, which shall include both contaminated soil excavation and common soil excavation when both are present, and shall include the furnishing, placing, and maintaining of shoring and bracing necessary to safely support the sides of the excavations.

3. If the horizontal and vertical limits of excavation, as determined by radiological testing, are less than shown in the Work Order, the Contractor shall excavate only those materials necessary to achieve compliance with the standards of these Specifications.

4. If the horizontal and vertical limits of excavation, as determined by radiological testing are greater than shown in the Work Order, the Contractor shall extend the limits of excavation as necessary to achieve compliance with the standards of these Specifications.

5. Excavated material shall be placed a sufficient distance from the edge of the excavation to avoid cave-ins or bank slides. In no case shall excavated materials be placed closer than three feet to the edge of the excavation.

6. Shoring and bracing, if necessary, shall be designed by a qualified Professional Engineer competent in soils engineering.

7. The work also shall include all pumping, ditching and other required measures for the removal or exclusion of water.

B. Contaminated Soils

1. Interpretation of the Work Order

   a. The Work Order indicates the estimated horizontal and vertical extent of a contaminated deposit.

   b. Depths of contaminated and uncontaminated soils indicated in the Work Order represent the total estimated depth from the ground surface to the base of the contamination. The different depths shown across a given deposit are an indication of how the actual contamination depths might be expected to change throughout a given deposit.

   c. Information in the Work Order indicates the existing surface cover material. Unless otherwise indicated in the Work Order, the replacement surface cover shall match existing.

   d. All contaminated materials, including clay, silt, sand, gravel, cobbles and boulders, and rock will be excavated. The Contractor shall be prepared to conduct whatever excavation is necessary to remove contaminated materials.

2. Excavation Procedures

a. If possible, contaminated material shall be removed from outlying areas and boundaries of contaminated areas, working toward the equipment decontamination and loadout facilities, to minimize the potential to contaminate "clean" areas.

b. Truck or container loading shall be done only on ground contaminated and designated for cleanup or on the equipment decontamination pad or other area specially prepared for such work. Care should be taken to avoid spilling during loading.

c. Contaminated (see Subpart 1.8, B, Definitions of this section) and uncontaminated soils shall be separated during excavation and kept separate during loading, transport and stockpiling to minimize the potential for cross-contamination.

d. Excavations shall be performed carefully to minimize the potential for mixing with underlying soils. Also, cleated or crawler-type equipment shall not be allowed without prior approval of the Respondents or their Agent.

e. Excavations will be radiologically monitored and surveyed by the radiologic technicians to determine if additional material must be removed. Detailed descriptions of the radiological monitoring requirements during excavation are provided in applicable SOPs.

f. The Contractor shall excavate contaminated and uncontaminated soil to within three inches of the design or estimated depth. From this point, excavation should proceed in no greater than six-inch lifts to the depths indicated in the Work Order. After excavation of each lift, the Respondents will radiologically monitor the excavation and delineate additional excavation required (see the Field Sampling Plan).

g. Exceptions to these requirements must be approved in writing by the Respondents or their Agent and provided to the Field Team Leader. The Contractor will not be paid for removing extra quantities resulting from a deviation from the above requirements, unless a specific deviation has received prior written approval.

D. Other

Uncontaminated material, including clay, silt, sand, gravel, cobbles and boulders and rock, may need to be removed for slopes on excavations, to expose contaminated soils, structures or facilities, or to facilitate work to remove contaminated soils, structures or facilities. Common materials removed from such areas may be used for backfill if they meet the requirements for fill material. If unsuitable, they shall be removed, transported and disposed as surplus excavation.

3.6 Contaminated Material Loadout and Transport

A. General Requirements

1. Before beginning contaminated material loadout operations, the Contractor shall construct temporary site drainage facilities and initiate dust control measures. The Contractor also shall construct all decontamination and loadout facilities and establish survey controls.

2. The Contractor shall use equipment and methods that minimize the potential for spillage of materials during loading operations.

3. At a minimum, the truck loadout shall be cleaned (liquid and nonliquid wastes removed) at the end of every day. Spilled materials shall be promptly removed from the loading facility if the quantity is such that the material will be picked up and transported out of the loadout facility (e.g., dirt clods which could stick to tires).

4. All decontamination of equipment shall be done as required by Section 01020 and this section of these Specifications.

B. Loadout

1. All debris, such as concrete, asphalt, etc., shall be managed as described in Section 02010 of these Specifications.

2. All loadout of material will be done as required by these Specifications and the Work Order prepared by the Contractor. Loading of trucks and other containers shall be done only in the loadout or equipment decontamination facilities.

3. Unless staging areas have been selected by the Contractor and approved by the Respondents or their Agent, soils and debris will be loaded directly into trucks or containers as they are excavated, for transport to the rail terminal. Materials will be placed so they do not extend above the sides of the truck bed or container. Materials protruding above the sides of the truck or container will be pushed down or removed for placement into another truck or container by loading equipment or personnel.

4. Truck beds and containers will be tightly covered with tarps.

5. Truck drivers will generally not enter the Contamination Reduction Zone, but shall remain inside the truck when such entry is required.

C. Decontamination

1. After a truck or container has been loaded and tarped, it will be checked for contamination. The truck tires, body and outside of the bed and the outside of the container will be frisked to determine if contaminated soils are present. If frisking does not detect any contamination, the equipment may be released for travel.

2. If frisking does detect contamination the truck or container will be decontaminated by wiping or spraying.

3. Following decontamination, all trucks and containers shall be frisked for release. If any radioactivity above release levels (see Table 02200-1 at the end of this section) is found, decontamination of those areas will be continued. If spraying or wiping is ineffective in removing contamination, brushes or other means shall be used until release levels are achieved. In no case shall a truck or container with radioactivity above the release levels be allowed to leave the site.

4. After containers are loaded and frisked for release, they- shall be staged in a clean area on the site. The trucks used to transport the containers to the rail yard will not need to be frisked prior to leaving the site, as long as the transport trucks do not enter the Contaminant Reduction Zone.

D. Transport

1. Trucks shall use only the designated route(s) to transport containers with contaminated materials from the Site to the rail terminal, and shall obey all signs, speed limits and other traffic laws. Any driver not obeying traffic laws, or the requirements of these Specifications, shall be removed from the work.

2. All trucks shall properly display a decal with all information required for transport of contaminated materials.

3. Each truck shall carry the standard industry bill of lading for each shipment.

4. All truck drivers shall have the training required by 29 CFR 1910.120 and shall be trained in the procedures to be used in the event of an emergency (see Section 01020, Articles 3.2 and 3.7, of these Specifications, and the Emergency Contingency Plan).

3.7 Fill

A. General

1. Unless otherwise specified, fill material shall be compacted by the Contractor to a density that is not less than 90% of the maximum density, standard proctor (ASTM D698).

2. The upper 18 inches of fill material placed in lawns and other areas to be revegetated shall not be compacted beyond that density needed to provide a stable land surface.

3. In areas where contaminated materials have been removed, the Contractor shall not begin backfilling until a radiological survey has been completed as described in Sections 01010 and 02010 of these Specifications and Appendix E to the Work Plan.

4. All fill shall be final graded to the requirements of Part 1 of this Section. After backfilling is completed, the fill (including topsoil) shall be graded to blend with existing contours where future construction will not be done.

B. Preparing Areas to be Filled

1. All vegetable matter and coarse material which might prevent compaction shall be removed by the Contractor from the surface upon which the fill is to be placed. Any loose and porous soils shall be removed or compacted to a depth specified by the Respondents or their Agent. The surface shall then be plowed or scarified until the surface is free from uneven features that would tend to prevent uniform compaction by the equipment to be used.

2. Where fills are constructed on hillsides or slopes, the slope of the original ground on which the fill is to be placed shall be stepped or keyed by the Contractor. The steps shall extend completely through the soil mantle, if any, and into the underlying formation materials.

3. Fill shall not be placed on ground which has frozen, unless the ground can be worked (e.g., scarified and recompacted) to remove the frost.

C. Placing and Spreading Fill Material

1. The Contractor shall not commence backfilling until a radiological survey of the excavation has been completed which verifies all contaminated materials have been removed as required by these Specifications, and the Field Team Leader has provided the Contractor with verbal authorization to begin backfilling.

2. Fill shall be placed to the line, elevation and grade as required by these Specifications, shown in the Work Order, or described or shown in the Contractor's Work Order for this Site. Unless otherwise approved in writing by the Respondents or their Agent, the Contractor shall use fill stakes to guide backfilling.

3. Salvaged soil materials shall be used for backfilling unless determined unsuitable by the Respondents or their Agent.

4. When conditions require that contaminated soil will be left in place, backfill will be placed against contaminated soils. In this situation, a six mil polyethylene barrier will be placed to mark the separation between the soils and to minimize the potential for contaminated soils to fall into the "clean" area. Care will be taken during subsequent operations to prevent contaminated soils from mixing with "clean" soils.

5. Fill material to be compacted shall be placed by the Contractor in one foot , even, continuous layers. Each layer shall be spread evenly and shall be thoroughly mixed during the spreading to obtain uniformity of material in each layer.

6. Uniform moisture distribution in the fill to be compacted shall be obtained by discing, blading or other approved methods prior to compaction of a layer.

   a. When the moisture content of the fill material is insufficient to achieve specified density requirements, water shall be added by the Contractor until the moisture content is as specified.

   b. When the moisture content of the fill material is too high to achieve specified density requirements, the fill material shall be aerated by the Contractor by blading, mixing, or other satisfactory methods until the moisture content is reduced.

7. Unless otherwise shown in the Work Order, the Contractor shall maintain a minimum of 10 feet of separation between excavation of contaminated soils and placement of clean fill.

8. Fill on City of Chicago street rights-of-way shall be done as required by City of Chicago Standard Specifications.

D. Compaction

1. After each layer has been placed, mixed and spread evenly, it shall be thoroughly compacted by the Contractor to the required density (see below).

2. Compaction shall be accomplished by sheepsfoot rollers, vibratory rollers, multiple-wheel, pneumatic-tired rollers or other types of acceptable compacting equipment.

   a. Selection of compaction equipment will be at the discretion of the Contractor. Equipment shall be of such design that it will be able to compact the fill to the specified density.

   b. In areas not accessible to or suitable for larger self-propelled roller or vibratory equipment (e.g., small areas, within 12 inches over the top of utilities, etc.), the maximum loose-layer thickness will be four inches.

   c. Compaction shall be continuous over the entire area and the equipment shall make sufficient passes over the material to ensure that the desired density has been obtained over the entire area.

   d. The surface of fill slopes shall be compacted so that the slopes are stable and there shall be no excessive loose soil on the slopes.

3. Roadbase backfill shall be compacted to at least 95% of maximum density (ASTM D698 - standard proctor).

4. Common backfill shall be compacted as follows:

   a. To at least 90% of maximum density (ASTM D698 - standard proctor) for all areas except as noted below.

b. To at least 95% of maximum density (ASTM D698 - standard proctor) for all areas to be covered with paving.

c. To at least 95% according to ASTM D698 in City of Chicago street right of-ways where asphalt will be placed, except for the upper six-inch layer which will be compacted to not less than 100%.

5. Structural fill under buildings, slabs, ramps and stair shall be compacted to at least 95% of maximum density (ASTM D698).

6. Compaction will not be required in the upper 18 inches of soil placed in lawns or other areas to be revegetated.

E. When an area has been prepared to receive concrete or asphalt, applicable moisture and density requirements shall be maintained in the upper layer until the surface construction is completed.

F. The Contractor shall provide and maintain adequate erosion and drainage control facilities during the construction of the fill areas. The erosion control facilities shall be maintained in optimum condition until the work is complete. The facilities shall be inspected following significant rainfall, repairs made and excess sediment removed. It shall be the Contractor's responsibility to prevent the discharge of sediment offsite or to adjacent water courses.

G. Backfill around Utilities. In any case where utilities are disturbed or exposed, all repair work shall be done in accordance with the requirements of the utility, or the governing agency (see Specification 02840 Site Utilities).

3.8 Storage(Stockpiling)

A. On the Site

1. Non-radioactive materials, including fill, may be temporarily stockpiled on the Site in the locations noted in the Contractor's approved Work Order, or as approved or directed by the Respondents or their Agent.

a. As necessary, staged non-radioactive materials shall be covered or otherwise managed to control dust.

b. Non-radioactive materials shall be removed from the vicinity of the property by the end of the work.

2. Radioactive materials may be staged (temporarily stored) on the Site in locations noted in the Contractor's approved Work Order.

a. If not in the approved Work Order, radioactive materials may be staged on the Site only with written approval from the Respondents or their Agent. These materials shall only be stored on contaminated or specially prepared areas to minimize the potential for contamination of "clean" areas.

b. Except when work is actively in progress, the staged materials shall be completely covered with impermeable plastic sheeting or other approved covers.

3.9 Disposal

A. At a minimum, all materials shall be disposed as required by the permits, these Specifications, and the laws, rules and regulations of the USEPA, State of Illinois, and the State of Utah.. All

materials disposed off the Site shall be surveyed as required by Section 01020 of these Specifications to determine they are suitable for the intended disposal.

B. If the materials are disposed by landfilling or by recycling, the Contractor shall provide the Respondents or their Agent and the Project Coordinator with the name of the landfill or recycler.

1. The landfill and recycler must be qualified to receive the waste. Qualification information must be provided for the landfill or recycler, by the Contractor.

2. The Respondents or their Agent has the right to reject any landfill or recycler which does not meet qualification standards.

3.10 Landscaping

Following completion of backfilling to proper line, elevation and grade, the Contractor shall return to the site and reinstall or replace all designated items to at least original condition, or as otherwise agreed by the Respondents and the property owner. This includes paving, slabs, fences, retaining walls, sprinkler systems, sod, shrubs, bushes, trees and any other appurtenant landscaping, facilities and structures which were removed for or damaged by the work.

3.11 Surveying

A. A baseline will be established for the Site. This baseline will be tied to the previous U.S. EPA survey done for the property.

B. Items including, but not limited to, the following will be located or identified in relation to the baseline.

1. Visible property boundaries.

2. Landscaping.

3. Facilities.

4. Structures.

5. Utilities.

6. Limits of radioactive contamination. Using the results of previous investigations and the baseline, sufficient stakes or markers will be placed to visibly mark the limits so any contaminated soil can be properly removed.

C. The baseline, as above, and the previous surveys also will be used to locate grids for verification surveying. The size of the grids will depend on the location and the extent of contamination.

D. The work for locating items such as the above can be done with equipment and materials such as the following:

1. Theodolite.

2. Compass.

3. Cloth or steel measuring tape.

3.12 Cleanup

Upon completion of work in this section, all rubbish, debris and excess soils (including fill materials) shall be removed from the job site. All construction equipment and implements of service shall be removed and the entire area involved shall be left in a neat, clean and acceptable condition. Proper cleanup of the properties shall be a condition of acceptance of the work and final payment.

TABLE 02200-1
RELEASE CRITERIA

From U.S. NRC, Regulatory Guide 1.86, Table 1

Nuclide [a]	Average [b,c]	Maximum [b,d]	Removable [b,e]
U_{nat}, U_{235}, U_{238}, and associated decay products	5,000 dpm α per 100 cm^2	15,000 dpm α per 100 cm^2	1,000 dpm α per 100 cm^2
Transuranics, Ra_{226}, Ra_{228}, Th_{230}, Th_{228}, Th_{230}, Pa_{231}, Ac_{227}, I_{125} and I_{129}	100 dpm per 100 cm^2	300 dpm per 100 cm^2	20 dpm per 100 cm^2
Thnat, Th_{232}, Sr_{90}, Ra_{223}, Ra_{224}, U_{232}, I_{126}, I_{131} and I_{133}	1,000 dpm per 100 cm^2	3,000 dpm per 100 cm^2	200 dpm per 100 cm^2
Beta-gamma emitters (nuclides with decay modes other than alpha emission or spontaneous fission) except Sr_{90} and others noted above.	5,000 dpm β-γ per 100 cm^2	15,000 dpm β-γ per 100 cm^2	1,000 dpm β-γ per 100 cm^2

a Where surface contamination by both alpha- and beta-gamma-emitting nuclides exists, the limits established for alpha- and beta-gamma-emitting nuclides should apply independently.

b As used in this table, dpm (disintegrations per minute) means the rate of emission by radioactive material as determined by correcting the counts per minute observed by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

c Measurements of average contaminant should not be averaged over more than one square meter. For objects of less surface area, the average should be derived for each such object.

d The maximum contamination level applies to an area of not more than 100 cm^2.

e The amount of removable radioactive material per 100 cm^2 of surface area should be determined by wiping that area with dry filter or soft absorbent paper, applying moderate pressure, and assessing the amount of radioactive material on the wipe with an appropriate instrument of known efficiency. When removable contamination on objects of less surface area is determined, the pertinent levels should be reduced proportionally and the entire surface should be wiped.

LAKESHORE EAST

Title: Site Utilities

Section 02840

Revision Number: 0

Date: June 19, 2002

Replaces: New

SECTION 02840

SITE UTILITIES

1.0 GENERAL

1.1 Scope

A. This section describes the general requirements for locating, protecting, removing and installing site utilities.

B. The known locations of utilities will be marked prior to start of work by utility locating contractors (DIGGER)..

1. Excavation to or below the locations of known utilities is expected as part of the work for the Site.

2. Utility lines and structures which are to remain in service shall be protected by the Contractor from any damage as a result of his operations.

3. All repair work, including backfilling, shall be done as required by the governing utility or agency. The Contractor shall contact the governing utility or agency and determine the requirements for properly completing the work.

1.2 Related Work

A. Division 1 Sections of these Specifications

B. Section 02010 - Demolition and Debris Removal

C. Section 02200 - Contaminated Material Loadout and Earthwork

1.3 Health and Safety

A. Detailed discussions of the potential hazards and the requirements for minimizing the potential for harm to project and offsite personnel, and to the environment, are provided in Section 01020 of these Specifications and the HASP.

B. All work shall be done under the supervision of personnel experienced and qualified for the work.

C. All work will be done as required by OSHA regulations published in 29 CFR 1910 and 1926. These regulations are included by reference in these Specifications.

D. Sampling and analyses of soils from the Site indicate levels of radioactivity in the soils above background levels. Based on the sampling and surveys, the work can proceed under Level D personal protection conditions (see HASP). Air and soil monitoring and sampling will be done during the work to determine if modifications to Level D work conditions are necessary (see Section 02010). Complete descriptions of health and safety requirements for this Site are provided in Section 01020 of these Specifications and the HASP.

1. The Contractor shall be prepared to discontinue work in an area and begin work in an alternate area if monitoring and sampling indicate changes in the work conditions may be necessary and if so directed by STS Consultants, Ltd. (STS).

2. The Contractor shall be prepared to begin working under changed conditions (greater than or equal to Level D personal protection with appropriate personal equipment and vehicle

decontamination) with minimal delay. The requirements which may be necessary if asphalt, concrete, wood, metal or other construction materials containing hazardous materials or levels of radiation above background are encountered are discussed in Section 02010 of these Specifications.

E. The Field Team Leader or Health and Safety Coordinator may bar any person from the Site who, in their opinion, shows a disregard for health and safety requirements.

1.4 Environmental Safeguards and Regulations

The Contractor shall comply with all federal, state, and local regulations, and the requirements of these Specifications at all times to prevent pollution of air, water and soil. Detailed requirements for the protection of the environment are provided in Section 01020 and the HASP.

1.5 Permits

A. The Contractor shall be responsible for obtaining all permits required for the work and additions described in this section of these Specifications.

B. Copies of all the necessary permits shall be provided to STS or their Agent and to the Project Manager prior to beginning the work.

C. At a minimum, all work shall be done in accordance with the requirements of the permits or, if the work is exempted under CERCLA from any permits, in accordance with the substantive requirements which would apply if the work were not exempted from such permits. The requirements of these permits are included by reference in these Specifications. Where the requirements of the permits and these Specifications are in conflict, the more stringent requirements shall apply.

1.6 Quality Assurance

A. Contractor personnel shall be persons qualified by education and experience to perform the duties assigned.

B. The Field Team Leader shall be a person qualified and experienced in the work described in these Specifications. STS will provide a Quality Assurance Officer to review all project submittals.

C. All work shall be done according to the requirements of these Specifications.

1.7 Submittals.

All submittals shall be made to the STS or its Agent.

2.0 PRODUCTS

2.1 Backfill Materials

A. General. Fill materials shall be obtained from suitable stockpiles or borrow as defined in these Specifications. Materials containing organic (except topsoil), perishable, spongy, frozen, expansive or other deleterious materials shall not be acceptable.

B. Embedment. Embedment material shall be fine aggregate or sand as defined by Part 2 of Section 02200 of these Specifications.

2.2 Utilities

Materials used to reconstruct utilities shall be as required by the utility company, the governing municipal agency, or the building code.

3.0 EXECUTION

3.1 Location

A. The known locations of utilities shall be identified prior to the start of any excavation. The Contractor shall be responsible for field verifying utility locations and for obtaining any necessary additional information to properly implement and execute the Work Plan.

1. Known and suspected utilities are shown on the current site survey. The locations as shown may prove to be inaccurate and other obstructions not shown may be encountered. Any reliance on this information will be at the Contractor's risk. The Contractor shall arrange to have all utilities located by the utility companies or a utility location service prior to beginning work (e.g., DIGGER).

2. Excavations in the areas of suspected underground utilities shall be done in compliance with current regulations for protection of utilities for the City of Chicago.

B. Utility lines and structures which are to remain in service shall be protected by the Contractor from any damage as a result of his operations.

1. Where utility lines or structures not shown on the site survey are encountered, the Contractor shall report them to STS or its Agent before proceeding with the work.

2. Unless their excavation is necessary to allow work to proceed or as a result of contamination, the Contractor shall bear the cost of repair or replacement of any marked utility lines or structures which are broken or damaged by his operations.

3. All repair work, including backfilling, shall be done as required by the governing utility or agency. The Contractor shall contact the governing utility or agency and determine the requirements for properly completing the work.

3.2 Existing Utilities Designated for Excavation

A. Overhead Utilities shall be removed and replaced by the utility if such is necessary for proper completion of the work. If the utility will not or cannot remove them, procedures for excavation will be discussed with and approved by the utility. At a minimum, removal of overhead utilities shall include the following.

1. Obtain the necessary disconnects and verify the utilities are de-energized and grounded prior to the work.

2. Remove cables and guy-wires from the utility poles.

3. Determine if the above- and below-grade sections of the poles are contaminated with radiological materials.

a. If the above-grade sections are not contaminated and the lower section is, or if the potential for contamination of the below-grade section is unknown, fell above-grade sections of utility poles by sawing or other suitable methods to separate the uncontaminated above-grade sections from the potentially contaminated below-ground section.

b. If both sections are contaminated, the pole may be removed by felling the above-grade part and excavating the below-grade part, or by pulling the pole from the ground with a crane or other equipment.

4. Uncontaminated components of overhead utilities, such as cables, guy-wires, etc., shall be disposed as required by Section 02010 of these Specifications.

5. Contaminated components of overhead utilities shall be removed and processed for loadout and disposal as other contaminated debris (see Section 02010 of these Specifications).

6. Excavated materials shall be handled as required by Subparts 3.5, 3.6, 3.8 and 3.9 of Section 02010 of these Specifications.

B. Underground Utilities to be removed may be removed by the utility. At a minimum, the following procedures shall be used.

1.. Obtain the necessary disconnects or shutoffs prior to the work and verify the utility is de-energized, drained, or purged as necessary (lock-out and tag-out procedures properly implemented).

2. Excavate and manage materials to access contaminated utilities or bedding materials as required in Subparts 3.5, 3.6, 3.8 and 3.9 of Section 02010 of these Specifications. Monitoring of excavations will be required both on-site and in adjacent rights-of-way.

3. Remove, decontaminate and dispose of contaminated utility materials as required in subparts 3.5, 3.6, 3.8 and 3.9 of Section 02010 of these Specifications.

4. Replace, repair, or abandon the removed utility as directed by these Specifications and the Work Plan, or the utility company or municipal agency having jurisdiction.

a. Replacement or repairs of the utilities shall be in accordance with the requirements of these Specifications or the utility or agency.

b. Abandoned utilities shall be capped as required by Article 3.3 of this section.

3.3 Underground Utilities Encountered During Excavation

A. Damage to utilities shall be repaired under the supervision of the respective utility service or municipal agency having jurisdiction.

B. Abandoned utilities shall be cleaned of all encrusted contamination. Open ends or broken pipes shall be properly capped.

1. At a minimum, capping may be done by crimping, pouring concrete around, or plugging the open end in such a way as to prevent a "least path of resistance" for any future gas leaks.

2. Capping will be done as required by the utility or municipal agency if their requirements exceed those above.

C. Active utilities shall be supported in-place, if suitable, or removed and replaced as necessary to excavate to the depths shown in the Work Plan.

1. Support or removal and replacement shall comply with the more stringent requirements of the affected utility or municipal agency or these Specifications.

2. Utility lines, whether removed or left in-place, shall be cleaned of encrusted contamination as required and described by Section 02010 of these Specifications.

3. Removed utilities shall be managed and disposed as required in Section 02010 for other demolition debris.

3.4 Underground Utility Installations

A. The Contractor shall coordinate interruptions of utility services through STS or its Agent.

B. If utilities are installed after backfilling is complete, all excavations shall be by open cut.

1. The banks of the trenches should be as vertical as possible. Shoring and bracing, as necessary shall be designed by a qualified Professional Engineer competent in soils engineering. The design of shoring and bracing shall be provided to STS or its Agent.

2. If rock is encountered, the base of the trench will be overexcavated at least six inches to allow for placement of bedding material.

C. If utilities are installed before backfilling is completed to final line, elevation and grade, the fill shall be to at least 12 inches above the top of the utility before excavation and placement of the utility is begun.

D. Trench Preparation. The bottom of the trench shall be accurately excavated to line, and graded and shaped to fit the lower one-quarter of the pipe to provide uniform bearing and support for each section; wedging and blocking will not be permitted. If the pipe has bell ends, the trench shall be overexcavated at the joints. If the common fill is granular, the base of the trench shall be scarified to a depth of six inches and recompacted to at least 95% of maximum density at ±2% of optimum moisture (standard proctor, ASTM D698). If the common backfill is not granular in nature, the base of the trench shall be overexcavated six inches and backfilled with granular (embedment) material compacted to at least 95% of maximum density at ±2% of optimum moisture.

E. Utility Embedment. All utility lines except electric lines and irrigation lines two inches or less in diameter shall be embedded in fine aggregate (see Subpart 2.1.13 of this section).

1. Embedment material shall extend a distance equivalent to the utility diameter above, below and to the sides of the utility for utilities greater than six inches in diameter. A six-inch embedment shall be provided for utilities less than or equal to six inches in diameter.

2. Care shall be taken not to disturb either the horizontal or vertical alignment of the utility; embed both sides of the utility simultaneously. If necessary, compact embedment material by hand to avoid displacement and damage to the utility.

F. All utility installations shall be inspected by STS, and by the utility or municipal agency if necessary, at the following times.

1. Before placing embedment material over the utility.

2. Before placing common fill over the embedment material.

G. Compaction of common material over the utility shall be by manually-operated power equipment or by hand until at least 12 inches of fill has been placed over the utility. Damage to the utility by compaction or other causes after proper installation shall be the responsibility of the Contractor.

H. Tests. Testing shall be done on all repaired or replaced systems. Testing may be done by the utility or municipal agency or Contractor. All testing will be done as required by the utility, municipal agency or applicable building code. All testing will be done in the presence of STS, and utility , municipal agency or building inspectors, as necessary.

APPENDIX E

Health and Safety Plan

LAKESHORE EAST

Title: Health and Safety Plan

Revision Number: 1

Date: September 30, 2002

Replaces: June 19, 2002

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EMERGENCY PHONE NUMBERS

IN THE EVENT OF AN EMERGENCY DIAL 911

AMBULANCE SERVICE	911
FIRE DEPARTMENT	911
EMERGENCY RESCUE SERVICE	911
POLICE DEPARTMENT	911
NATIONAL RESPONSE CENTER	1-800-424-8802
POISON CONTROL CENTER	1-800-732-2200
NORTHWESTERN MEMORIAL HOSPITAL	(312) 908-2000
PROJECT COORDINATOR (Richard Berggreen)	(847) 279-2500
ILLINOIS EMERGENCY MANAGEMENT	(217) 782-7860
USEPA REGION 5 24-HOUR EMERGENCY NUMBER	**(312) 353-2318**
ILLINOIS DEPARTMENT OF NUCLEAR SAFETY (IDNS) EMERGENCY NUMBER	(217) 785-0600 [1]

[1] Primary notification should be made to USEPA Region 5. The IDNS emergency number (217-785-6000) can be used as a secondary notification number.

Hospital Location and Directions

Hospital:
Northwestern Memorial
250 E. Superior Street
Chicago, IL 60611

Directions from Lakeshore Links, 221 N. Columbus Drive	Miles
1: Start out going North on N LOWER COLUMBUS DR towards N COLUMBUS DR by turning right.	0.12 miles
2: N LOWER COLUMBUS DR becomes N COLUMBUS DR.	0.27 miles
3: N COLUMBUS DR becomes N FAIRBANKS CT.	0.11 miles
4: Turn LEFT onto E ONTARIO ST.	0.12 miles
5: Turn RIGHT onto N ST CLAIR ST.	0.17 miles
6: Turn RIGHT onto E SUPERIOR ST.	0.08 miles

1.0 SCOPE OF PLAN

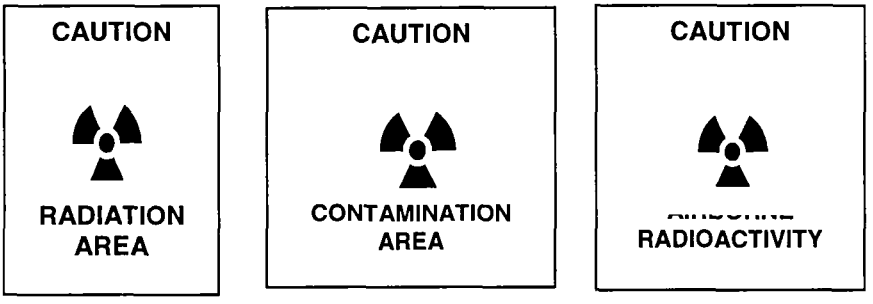
The following Health and Safety Plan (HASP) will be utilized and modified as necessary in order to minimize and prevent exposures to hazardous substances and conditions related to all excavation and restoration activities at the Lakeshore East Development site (Site). All personnel assigned to this project will be required to review thoroughly the contents of the HASP and to strictly adhere to the policies and procedures listed herein. This HASP is for use only by STS Consultants, Ltd. (STS) as the remediation manager and by their designated contractors and consultants, and approved Site visitors. USEPA, and other agencies, are not considered visitors and will be required to conform to their own Health and Safety Plans.

This plan meets the requirements of OSHA 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, and applicable subparts of OSHA 29 CFR 1926, 1910 and 10 CFR. Visitors will be required to review the health and safety plan and read and sign the visitor information sheet (Figure 1.1).

FIGURE 1.1
VISITOR INFORMATION SHEET

NOTICE TO VISITOR: ALL VISITORS MUST BE ESCORTED AT ALL TIMES WHILE ON THIS SITE.

CAUTON. Radioactive materials may be present on this site. Radioactive materials may be found throughout the site. Grounds, and equipment have low levels of contamination.



CONTROLLED AREAS: Do not enter areas with these signs unless you have an escort or health physics has given specific approval and you understand access limitations.

You must wear protective clothing in controlled areas. Health physics will provide you with instructions.

You must wear a personal radiation dosimeter if you enter an area which is controlled.

No smoking, eating, drinking or chewing in controlled areas.
NO EXCEPTIONS.

.Notify Health Physics if you do not understand these instructions.

Signature _____ Date _____

Figure 1.1

2.0 SAFETY MANAGEMENT

The following safety management structure, Figure 2.1, will be utilized for the implementation, administration, and monitoring of the HASP.

2.1 Health and Safety Coordinator

The Health and Safety Coordinator (HSC), Mr. Keith Carlson, shall assume overall responsibility for the HASP. The HSC or designee shall monitor and maintain quality assurance of the HASP until project completion. Principal duties of the HSC include:

- Review project background data,
- Approve all HASP modifications,
- Administer and enforce the HASP,
- Evaluate the adequacy of personal protective equipment (PPE) to be used by Site personnel,
- Conduct required on-site training except tailgate safety meetings that will be conducted by the Field Team Leader (Mr. Dumas Guerrier),
- Brief visitors on work Site conditions, and
- Administer personnel and perform ambient air monitoring procedures.

The HSC or designee has the authority to stop work in the event conditions develop which pose an unreasonable risk to Site personnel or persons in the vicinity.

PROJECT MANAGEMENT ORGANIZATION CHART

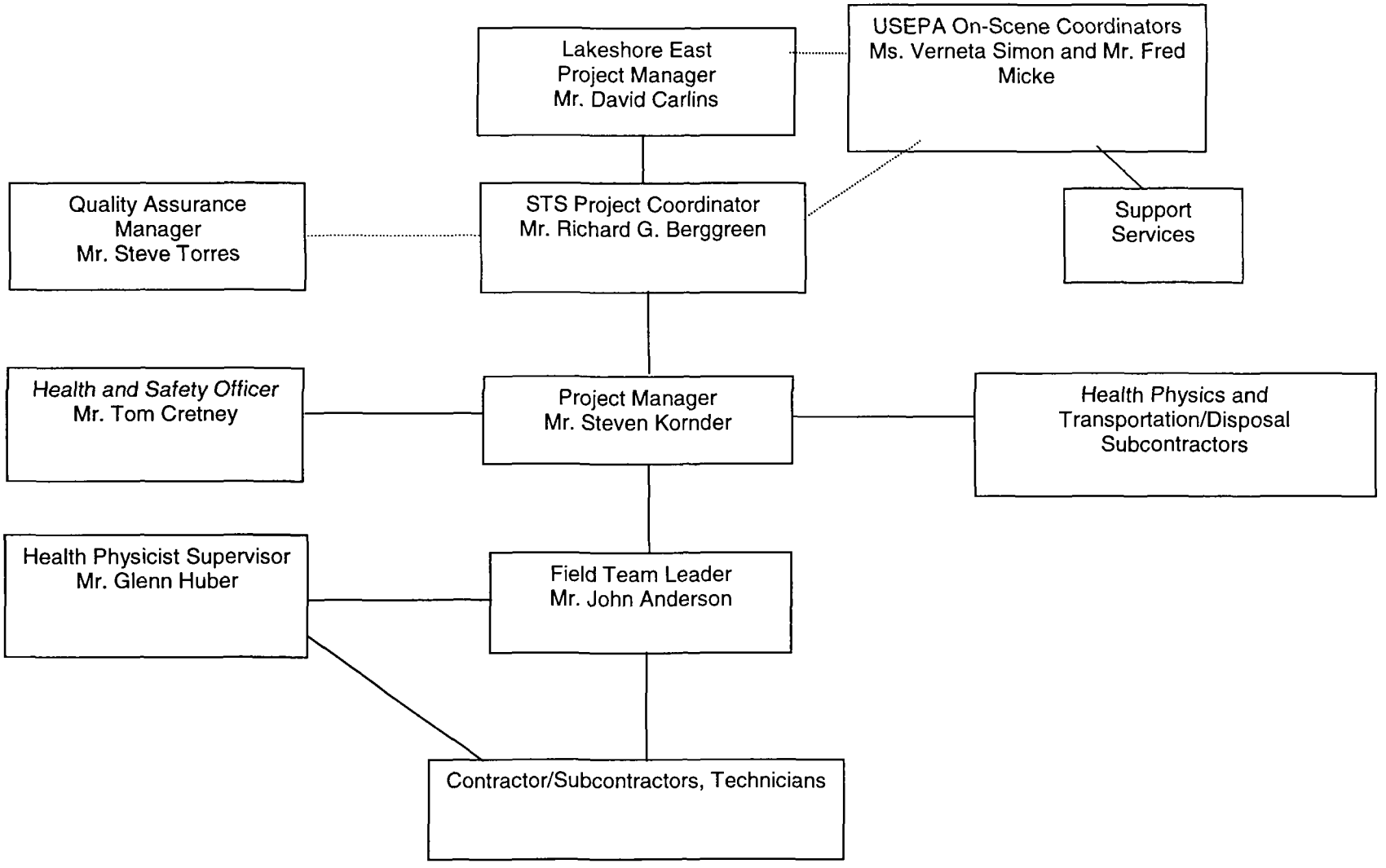


Figure 2.1

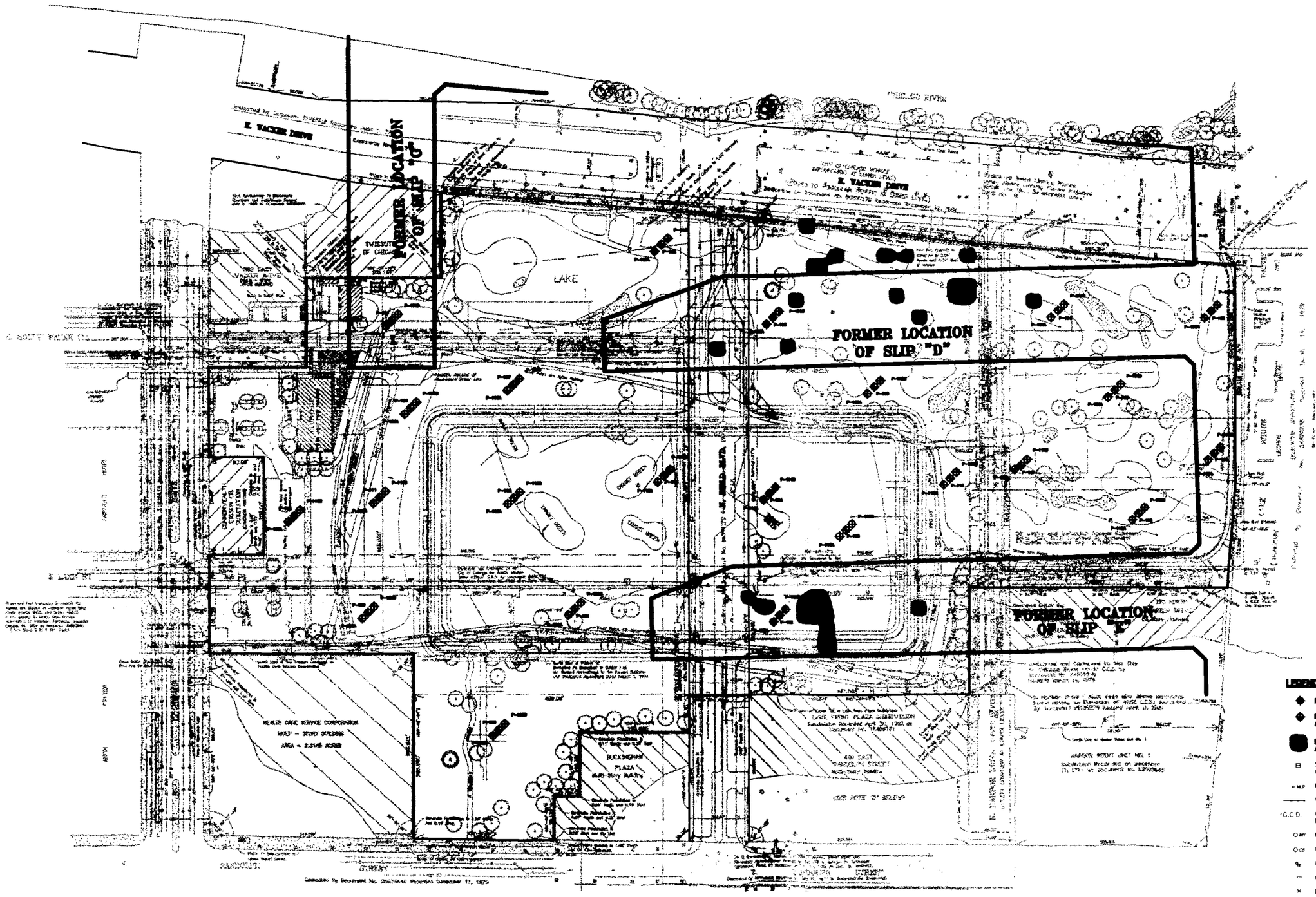
3.0 PERSONNEL RESPONSIBILITIES

The HSC or designee will administer and supervise the HASP at the work-site level. He will monitor all operations and will be the primary on-site contact for health and safety issues, and will have full authority to stop operations if conditions are judged to be hazardous to on-site personnel or the public.

The HSC will brief all Site personnel on the contents of the HASP. Personnel will be required to review the HASP, and have the opportunity to ask questions about the planned work or hazards. The Field Team Leader, Mr. Dumas Guerrier, will conduct tailgate safety meetings to familiarize the Site personnel with Site conditions, boundaries, and physical hazards. Site personnel will conduct their assigned tasks in accordance with the HASP at all times. As necessary, the Field Team Leader will conduct radiation training and provide briefings on radiation issues that arise during construction. These activities will take place as part of the tailgate safety meetings, or during special meetings to address more immediate concerns, dependent on the issues being addressed.

If at any time Site personnel observe unsafe conditions, faulty equipment or other conditions which could jeopardize personnel health and safety, they are required to immediately report their observations to the HSC or Field Team Leader.

Work zones will be established at the Site. These zones include clean/support zones, decontamination zones, and exclusion zones. Known impacted areas where exclusion zones are to be established during the removal effort are shown on Figure 3.1. Although the clean/support zones are anticipated to remain fixed, other zones will move about the Site as excavation work progresses.



1 PLAN VIEW
SCALE: NTS (+0.00 C.C.D.)

LEGEND OF SYMBOLS

- PROPOSED SOIL BORING
- PROPOSED SOIL BORING ALTERNATE LOCATION
- ELEVATED GAMMA RADIATION AREAS
- STRUCTURAL STEEL COLUMN ON CONCRETE BASE
- M.LP METAL LIGHT POLE
- WOVEN WIRE FENCE
- C.C.D. CITY OF CHICAGO ELEVATION DATUM
- MH MANHOLE
- CB CATCH BASIN
- CE CITY ELECTRIC HANDHOLE
- INLET
- LIGHT POLE
- FIRE HYDRANT
- STREET LIGHT CONTROL BOX

NOTE:
ELEVATIONS SHOWN HEREON ARE WITH RESPECT TO CHICAGO CITY DATUM.

DRAWN BY	BWB	DATE	6/17/02
CHECKED BY	RGB	DATE	6/17/02
APPROVED BY	RGB	DATE	6/17/02

CADFILE: U:\PROJECTS\32163\32163A\REVISION 6-17-02\
06/24/2002 07:07

REVISION NO.	DESCRIPTION	DATE	BY

SITE PLAN
SHOWING STREETS, UTILITIES AND IDENTIFIED RADIOLOGICALLY IMPACTED LOCATIONS
LAKESHORE EAST
CHICAGO, ILLINOIS

STS Consultants Ltd.
Consulting Engineers

STS PROJECT NUMBER
32163-XA

STS PROJECT FILE

SCALE
NTS

SHEET NUMBER
3.1

4.0 HAZARD ASSESSMENT

The following represents potential hazards associated with this project.

4.1 Principal Contaminants (Known or Suspected)

Radioactive Contamination

- Thorium: the entire thorium (Th-232) decay chain
- Uranium: the entire uranium (U-238) decay chain
- Radium: Ra-226 and Ra-228
- Radon: Rn-220 and Rn-222

The known total radium concentration present in the soil exceeds 100 pCi/g for some locations within the project site. The following primary routes of entry to the body will be considered:

ROUTE	ENTRY MADE VIA:
Inhalation	Airborne dust containing heavy metal radionuclides and radon.
Ingestion	Airborne dust containing heavy metal radionuclides/contaminants.
	Improper or poor personal hygiene practices.
Eye and Skin	Direct contact with contaminants.
	Improper or poor personal hygiene practices.
	Airborne dust containing heavy metal/radionuclide contaminant.
	Cuts and abrasions.
Direct Exposure	Penetrating gamma radiation in air and soil.
	Exposure to X-rays.

Chemical Contamination

- Polynuclear Aromatic Hydrocarbons (PAHs)

PAH contamination is present in the urban fill materials on site. These materials include coal cinders, ash and fire debris. Typical PAH concentrations are in the low part per million range.

The use of personal protective equipment, proper procedures and dust suppression activities will minimize any hazard to site personnel from either the elevated radioactivity or PAH contamination. Specific safety procedures will be covered in subsequent sections of this Site Safety Plan.

Route	Entry Made Via
Inhalation	Airborne dust
Ingestion	Airborne dust Improper or poor personal hygiene

Skin and Eye	Direct contact with contaminated soil Improper or poor personal hygiene Airborne dust Cuts and abrasions

4.2 Physical Hazards

Before field activities begin, the HSC will conduct a Site reconnaissance to identify any real or potential hazards created from Site activities. Physical hazards inherent to construction activities and power-operated equipment may exist.

4.2.1 Heat Stress

Field activities in hot weather create a potential for heat stress. The warning symptoms of heat stress include fatigue; loss of strength; reduced accuracy, comprehension and retention; and reduced alertness and mental capacity. To prevent heat stress, personnel shall receive adequate water supplies and electrolyte replacement fluids, and maintain scheduled work/rest periods.

The Field Team Leader or designee shall continuously visually monitor personnel for signs of heat stress. In addition, field personnel will be instructed to observe for symptoms of heat stress and methods on how to control it. One or more of the following control measures can be used to help control heat stress.

- Provision of adequate liquids to replace lost body fluids. Employees must replace body fluids lost from sweating. Employees must be encouraged to drink more than the amount required to satisfy thirst, 12 to 16 ounces every half-hour is recommended. Thirst satisfaction is not an accurate indicator of adequate salt and fluid replacement. Replacement fluids can be commercial mixes such as Gatorade.
- Establishment of a work regimen that will provide adequate rest periods for cooling down. This may require additional shifts of workers.
- Breaks should be taken in a cool and shaded rest area (77 degrees is best).
- Employees shall remove impermeable protective garments during rest periods.
- Employees shall not be assigned other tasks during rest periods.
- All employees shall be informed of the importance of adequate rest, acclimation, and proper diet in the prevention of heat stress.

4.2.2 Cold Stress

Field activities are anticipated during cold weather during a period when temperatures average below freezing. The following guidelines will be followed.

Persons working outdoors in temperatures of 40 degrees and below may suffer from cold exposure. During prolonged outdoor periods with inadequate clothing, effects of cold exposure may even occur at temperatures well above freezing. Cold exposure may cause severe injury by freezing exposed body surfaces (frostbite) or result in profound generalized cooling, possibly causing death. Areas of the body which have high surface area-to-volume ratios such as fingers, toes and ears are the most susceptible to frostbite.

Two factors influence the development of a cold injury: ambient temperature and the velocity of the wind. Wind chill is used to describe the chilling effect of moving air in combination with low temperature. For instance, 10° F with a wind of 15 miles per hour (mph) is equivalent in chilling effect to still air at -18°F.

As a general rule, the greatest incremental increase in wind chill occurs when a wind of 5 mph increases to 10 mph. Additionally, water conducts heat 240 times faster than air. Thus, the body cools suddenly when external chemical-protective equipment is removed if the clothing underneath is perspiration-soaked.

Local injury resulting from cold is included in the generic term "frostbite". There are several degrees of damage. Frostbite of the extremities can be categorized into:

- Frost nip or incipient frostbite: Characterized by sudden blanching or whitening of skin.
- Superficial frostbite: Skin has a waxy or white appearance and is firm to the touch, but tissue beneath is resilient.
- Deep frostbite: Tissues are cold, pale, and solid; extremely serious injury.

Prevention of frostbite is vital. Keep the extremities warm. Wear insulated clothing as part of one's protective gear during extremely cold conditions. Check for symptoms of frostbite at every break. The onset is painless and gradual - you might not know you have been injured until it is too late.

To administer first aid for frostbite, bring the victim indoors and rewarm the areas quickly in water 95° to 100°F. Give individual a warm drink - not coffee, tea, or alcohol. The victim should not smoke. Keep the frozen parts in warm water or covered with warm clothes for 30 minutes, even though the tissue will be very painful as it thaws; then elevate the injured area and protect it from injury. Do not allow blisters to be broken. Use sterile, soft, dry material to cover the injured areas. Keep victim warm and get immediate medical care.

4.2.3 Electrical Hazards

Overhead power lines, downed electrical wires, buried cables and improper use of electrical extension cords can pose a danger of shock or electrocution. All Site personnel should immediately report to the Field Team Leader any condition that could result in a potential electrical hazard.

The Field Team Leader will notify Site personnel during the safety meetings of the locations of known underground cables and utilities.

4.2.4 Noise Hazard

Operation of equipment may present a noise hazard to workers. Site personnel will utilize hearing protection when noise levels are determined to be in excess of 29 CFR 1910.95 requirements. Noise monitoring will be performed by the HSC as needed.

4.2.5 Overt Chemical Exposure

Typical response procedures include:

SKIN CONTACT:
Use copious amounts of soap and water. Wash/rinse affected area thoroughly, then provide appropriate medical attention. Eye wash will be provided on-site at the work zone and support zone as appropriate. If affected, eyes should be continuously flushed for a minimum of 15 minutes.

INHALATION:
Move to fresh air and transport to hospital. Decontaminate as other actions permit.

INGESTION:
Transport to emergency medical facility. Decontaminate as permitted by other requirements.

PUNCTURE WOUND OR LACERATIONS:
Transport to emergency medical facility. Field Team Leader will provide chemical safety information to medical personnel as requested. Decontaminate as permitted by other requirements.

4.2.6 Adverse Weather Conditions

In the event of adverse weather conditions, the Field Team Leader will determine if work can continue without endangering the health and safety of field workers. Some items to be considered before determining if work should continue are:

- Potential for heat stress and heat-related injuries.
- Potential for cold stress and cold-related injuries.
- Treacherous weather-related working conditions.
- Limited visibility.
- Potential for electrical storms or high winds.

4.3 Medical Evaluation and Surveillance Program

All field project personnel shall receive a medical evaluation in accordance with 29 CFR 1910.120. Personnel who receive a medical evaluation will be notified by the medical contractor as to the outcome of their evaluation. This will be in the form of a confidential report addressed to the individual and will contain a breakdown of the clinical findings. In addition, it will indicate any areas of concern which would justify further medical consultation by the individual's personal physician. In the event that the areas of concern are of a severe nature, a follow-up notification will be made to the individual by the medical consultant to answer any questions the employee may have.

4.3.1 Dosimetry/Personnel Monitoring

All project personnel shall participate in a dosimetry program administered by the HSC. (The dosimetry program shall comply with 32 IAC 340[1] , i.e. dosimeters shall be processed by a dosimetry processor accredited by the National Voluntary Laboratory Accreditation Program.) The HSC shall maintain records of all radiation exposures incurred by field personnel including all contractors. These records will be maintained in an up-to-date manner to comply with the requirements of 32 IAC 340.4010. The HSC shall review the results of personal exposure monitoring to determine compliance with exposure limit requirements.

4.3.2 Requirement for Dosimetry

Personal dosimetry is required for anyone who enters a radiologically controlled area in which he/she may receive in one calendar year a dose in excess of 10% of the limits in 32 IAC 340. Any person who works in a radiation area will be required to have a personal dosimeter. As a matter of policy, all individuals shall be required to use a dosimeter (either self-reading type, film badge, Thermoluminescence Detector (TLD) or Optically Stimulated Luminescence Dosimeter (OSL)) whenever they enter the Exclusion Zone.

4.3.3 Bioassay

Bioassay is the determination of the types and amounts of radioactive materials, which are inside the body. By analyzing the rate of deposition, the rate of excretion, and any other available information regarding placement in the body, internal exposures from radioactive materials can be estimated.

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[1] The IDNS regulations are usually more restrictive than US Nuclear Regulatory Commission (NRC) regulations. However, if there is a conflict between IDNS and NRC regulations, the NRC regulations will be used to determine compliance.

Procedures for bioassay will be consistent with the previous Lindsay Light Health and Safety Plan. Bioassays are not anticipated to be required for the excavation and removal activities proposed, based on levels documented as present.

The decision to use bioassay shall be made by the Health and Safety Coordinator. In the event that a worker has an excessive intake or the potential to receive greater than 10% of the Annual Limit on Intake (ALI) , bioassay shall be ordered. Data from Lapel Air Samplers shall be used as a factor in determining whether or not bioassay is warranted. If workers are found to have been present in locations where airborne radioactivity concentrations are found to be greater than 30% of the Derived Air Concentration, bioassay will be considered.

4.3.4 Emergency Medical Treatment

Emergency first aid should be administered on-site as appropriate. The individual should be decontaminated if possible, depending on the severity of the injury, and transported to the nearest medical facility, if needed. Treatment of the injury is of primary concern and decontamination a secondary concern. Levels of radioactive contamination at the Site could be acutely hazardous if decontamination is not undertaken during an emergency situation. The Field Team Leader will complete the appropriate incident report, if warranted. See Section 4.4, Accident and Incident Reporting.

An emergency first-aid station will be established and will include a first-aid kit for onsite emergency first aid.

Provisions for emergency medical treatment shall be integrated with the following guidelines:

- At least one individual qualified to render first aid and Cardiopulmonary Resuscitation (CPR) will be assigned to each shift.
- At least one individual trained in radiation emergency response will be assigned to each shift
- Emergency first aid stations in the immediate work vicinity.
- Conspicuously posted phone numbers and procedures for contacting ambulance services, fire department, police, and medical facilities.
- Maps and directions to medical facilities.
- Conspicuously posted evacuation routes and gathering area locations shall be posted around the Site.

4.4 Accident and Incident Reporting

All accidents, injuries, or incidents will be reported to the HSC. This accident/incident will be reported as soon as possible to the employee's supervisor. An Accident/Incident Form will be completed by the Field Team Leader, and a copy will be forwarded to the STS Project Manager. A copy of the form is shown as Figure 4.1.

FIGURE 4.1
ACCIDENT/EXPOSURE INVESTIGATION REPORT

COMPANY		DATE	
INVESTIGATION TEAM			
EMPLOYEE'S NAME & ID			
SEX	AGE	JOB DESCRIPTION	
DEPARTMENT & LOCATION			
ACCIDENT DATE & TIME			
DATE & TIME ACCIDENT REPORTED TO SUPERVISOR			
NATURE OF INCIDENT			
NATURE OF INJURY			
REFERRED TO MEDICAL FACILITY/DOCTOR ☐ YES ☐ NO			
EMPLOYEE RETURNED TO WORK ☐ YES DATE/TIME_____ ☐ NO			
☐ INJURED EMPLOYEE INTERVIEW/STATEMENT - ATTACHED			
WITNESSES			
☐ WITNESSES INTERVIEWS/STATEMENTS ATTACHED			
☐ PHOTOGRAPHS OF SITE - ATTACHED			
☐ DIAGRAMS OF SITE - ATTACHED			
EQUIPMENT RECORDS - ATTACHED - REVIEWED	☐ YES	☐ NO	
ACCIDENT/EXPOSURE INCIDENT DESCRIPTION			

FIGURE 4.1
ACCIDENT/EXPOSURE INVESTIGATION REPORT

ACCIDENT DESCRIPTION		
DATE & TIME	LOCATION	
EMPLOYEES INVOLVED		
PREVENTIVE ACTION RECOMMENDATIONS		
CORRECTIVE ACTIONS COMPLETED	MANAGER RESPONSIBLE	DATE COMPLETED
EMPLOYEE LOST TIME - TEMPORARY HELP - CLEANUP - REPAIR - DISCUSSION		
ACCIDENT COST ANALYSIS	INVESTIGATION	COMPLIANCE	TOTAL COST
MEDICAL			
PRODUCTION LOSS			
REPORT PREPARED BY	DATE COMPLETED		
SAFETY COMMITTEE REVIEW	☐ YES	☐ NO	
CORRECTIVE ACTION	DATE STARTED		
SAFETY COMMUNICATION NOTICE PREPARED	DATE		
SAFETY DIRECTOR SIGNATURE			

FIGURE 4.1
ACCIDENT/EXPOSURE INVESTIGATION REPORT

ACCIDENT DESCRIPTION	
DATE & TIME	LOCATION
EMPLOYEES INVOLVED	
EMPLOYEE INTERVIEW/STATEMENT - INJURED EMPLOYEE - WITNESS	
EMPLOYEE NAME	
INTERVIEWED BY	

ACCIDENT DIAGRAM/PHOTOGRAPHS

5.0 TRAINING

All Site personnel potentially in contact with impacted soil or who are involved in the excavation and/or loading for transport of radiologically-impacted soil shall be trained and certified in accordance with 29 CFR 1910.120.

5.1 Project- and Site-Specific Training

Prior to project start-up, all assigned personnel shall receive an initial project- and site-specific training session. This training shall include, but not be limited to, the following areas:

- Review of the Health and Safety Plan;
- Review of general radiation principles and compounds;
- Review of applicable radiological chemical and physical hazards;
- PPE levels to be used by Site personnel;
- Site security control;
- Emergency response and evacuation procedures;
- Project communication;
- Required decontamination procedures;
- Prohibited on-site activities;
- Instructions to workers in accordance with 10 CFR 1912; and
- U.S. NRC Regulatory Guide 8.13 and Declared Pregnant Woman Policies (Females).

5.2 Visitor Orientation

All non-essential personnel and visitors who plan to enter the exclusion zone will be briefed on the HASP requirements and 10 CFR 1912 requirements prior to entry with a trained Site escort. In addition, female visitors will be instructed regarding U.S. NRC Regulatory Guide 8.13 and Declared Pregnant Woman Policies.

5.3 Safety Tailgate Meetings

Before the start of the work week, on Monday morning, the Field Team Leader will assemble the Site personnel for a brief safety meeting. Additional meetings will be conducted throughout the week, as needed, to address safety concerns and precautions. The purpose of these meetings will be to discuss project status, problem areas, conditions, safety concerns, PPE levels and to reiterate HASP requirements. The Field Team Leader will complete a Safety Meeting Report (Figure 5.1) to indicate the contents of the meeting and the attendees.

5.4 First Aid

At least one (1) individual, trained and qualified to administer first aid and CPR in accordance with American Red Cross requirements, who is also trained in radiological response, will be present at the Site.

5.5 Safe Work Permit

Site workers in special work conditions such as confined space, hot work, trenching, or other physical hazards, must be skilled at such work and trained to recognize these as special work conditions. Confined space is defined by OSHA 1910.146. Section 13 of this HASP contains further information on the confined space program to be followed.

Figure 5.2 shows the Safe Work Permit to be completed by the HSC and signed by workers for special work conditions.

Figure 5.3 show the issues which will be addressed in the event soil is encountered which exhibits low level contamination. The potential low level contamination includes the presence of possible residual petroleum products from an existing or former underground storage tank or other source of fuel or polynuclear aromatics hydrocarbons (PAHs) contamination, such as tar, cinders, or coal ash.

FIGURE 5.1
SAFETY MEETING REPORT (Page 1 of 2)

DATE		DURATION OF MEETING	
		FROM: ☐ A.M. ☐ P.M.	TO: ☐ A.M. ☐ P.M.
NUMBER PRESENT	NUMBER ABSENT	MEETING CONDUCTED BY	DID MEETING INCLUDE REQUIRED TRAINING? ☐ YES (DESCRIBE BELOW) ☐ NO

HEALTH AND SAFETY COORDINATOR'S PRESENTATION	DISCUSSION OF SAFE/UNSAFE WORK PRACTICES, MATERIALS, PRECAUTIONS, HAZARDS, EQUIPMENT FAMILIARIZATION, ETC.
SITE WORKER FEEDBACK	COMMENTS, QUESTIONS, COMPLAINTS, ETC.
HEALTH AND SAFETY COORDINATOR'S CORRECTIVE ACTION PLAN	KNOWN PLANS FOR CORRECTION, PARTS ON ORDER, ITEMS TO BE DISCUSSED WITH DEPART. HEAD, AND CORRECTION OF ITEMS PREVIOUSLY SUBMITTED
PROJECT MANAGER'S COMMENTS	RESOLUTION OF QUESTIONS, ITEMS OR ISSUES RAISED IN MEETING OR WITH SUPERVISOR

HEALTH AND SAFETY COORDINATOR	PROJECT MANAGER
FIELD TEAM LEADER	HAVE SITE WORKERS ATTENDING SIGN ON REVERSE SIDE. FORWARD A COPY TO THE PROJECT COORDINATOR

FIGURE 5.1

SAFETY MEETING REPORT (PAGE 2 OF 2)

TO BE SIGNED BY ALL SITE WORKERS ATTENDING THE MEETING

I HAVE RECEIVED AND UNDERSTAND THE INFORMATION AND/OR TRAINING INDICATED ON THE REVERSE SIDE.

SIGNATURE	DATE	SIGNATURE	DATE

LIST ALL SITE WORKERS ABSENT FROM THE MEETING	

FIGURE 5.2
SAFE WORK PERMIT (Page 1 of 2)

COMPLETED PERMIT MUST BE POSTED AT THE ENTRY OR WORK SITE.

ISSUED BY	DATE	TIME (FROM) ☐ A.M. ☐ P.M.	TIME (TO) ☐ A.M. ☐ P.M.
ACCEPTED BY		RESPONSIBILITY TRANSFERRED TO (NAME)	
LIST ALL WORKS (ON BACK) OR ATTACH ROSTER			

SECTION 1 — GENERAL AREA WORK PERMIT

1. WORK LIMITED TO THE FOLLOWING: (DESCRIPTION AND AREA/EQUIPMENT)

2. SAFETY EQUIPMENT (OTHER THAN AREA REQUIREMENTS) ☐ NONE

☐ RAIN SUIT	☐ GLOVES	☐ FACE SHIELD	☐ GROUND FAULT CIRCUIT INT.	☐ AIR PACK (SCBA)	☐ FIRE RESISTANT CLOTHING
☐ CHEMICAL SUIT	☐ HEARING PROTECTION	☐ HOOD	☐ BARRICADES/WARNING SIGN	☐ SUPPLIED AIR	☐ LONG SLEEVES
☐ RUBBER BOOTS	☐ CHEMICAL GOGGLES	☐ FALL RESTRAINT DEVICE	☐ COMMUNICATIONS EQPT (EST)	☐ RESPIRATOR	☐ OTHER

3. THE PERSON RECEIVING THE PERMIT VERIFIES THAT ALL WORKERS:

A. HAVE BEEN THROUGH THE SAFETY ORIENTATION	☐ YES	E. KNOW THE LOCATION OF THE PHONE OR INTERCOM	☐ YES
B. UNDERSTAND APPLICABLE HAZCOM AND RADIATION REQUIREMENTS	☐ YES	F. KNOW THE PROCEDURES FOR SAFE JOB COMPLETION	☐ YES
C. HAVE DISCUSSED HAZARDS OF THE JOB AND AREA	☐ YES	G. HAVE INSPECTED ALL TOOLS/EQUIPMENT	☐ YES
D. KNOW THE LOCATION/USE OF SAFETY EQUIPMENT	☐ YES	H. UNDERSTAND THE CLEAN UP REQUIREMENTS	☐ YES

PERMIT RECEIVER INITIALS _____

4. POTENTIALLY AFFECTED AREA PERSONNEL AND WORKERS NOTIFIED OF WORK TO BE DONE ☐ YES ☐ N/A

5. THE FOLLOWING RESPONSIBILITIES HAVE BEEN COMMUNICATED TO THE PERSON RECEIVING THIS PERMIT:

☐ CONDITIONS FOR WORK STOPPAGE	☐ PERFORMING THE WORK SAFELY	☐ COMPLETION OF SECTION 6 AND PERMIT RETURN
☐ CREW ACCOUNTABILITY	☐ REPORTING CHANGES THAT AFFECT JOB SAFETY	

SECTION 2 — AIR TESTS

PRIOR TO ENTRY OR HOT WORK ☐ DOES NOT APPLY

TEST IN ORDER INDICATED

1. OXYGEN METER TEST PERFORMED	☐ YES ☐ N/A	READING	$\%O_2$	RANGE 19.5-23.5% O_2	TESTED BY	LOCATION OF TEST	TIME	☐ AM ☐ PM
2. COMBUSTIBLE GASES AND VAPORS TEST	☐ YES ☐ N/A	READING	%LEL	MAXIMUM 10% LEL	TESTED BY	LOCATION OF TEST	TIME	☐ AM ☐ PM
3. TESTS FOR TOXICS	☐ YES ☐ N/A	READING	☐ PPM ☐ MA/M³	PEL/TLV ☐ PPM ☐ MA/M³	TESTED BY	LOCATION OF TEST	TIME	☐ AM ☐ PM

SECTION 3 — HOT WORK

☐ DOES NOT APPLY

	YES	N/A		YES	N/A
1. FIRE EXTINGUISHER (TYPE) _____ IS IT FULL?			8. GROUND LEAD ATTACHED TO WORK		
2. SURVEY AREA FOR COMBUSTIONS AND OPENINGS, HOSES, TRENCHES, ETC.			9. PREVENTION OF HEAT EXPOSURE TO GASKET, SEALS, LINERS		
3. COMBUSTIBLE MATERIALS REMOVED OR PROTECTED			10. OTHER WORK IN AREA WHICH SHOULD BE STOPPED		
4. HEAT/SPARK CONTROL - TARPS, COVERS, WATER, ETC.			11. MATERIAL PRESENT WHICH EMITS VAPOR WHEN HEATED		
5. PRECAUTION TAKEN FOR HIDDEN COMBUSTIBLES			12. RADIANT HEAT TRANSFER CONSIDERED		
6. PURGE GAS USED. TYPE _____			13. EQUIPMENT OPERATING OR CONTAINS ORIGINAL CONTENTS		
7. ADJACENT AREAS SAFE/SEWERS PROTECTED			14. DUCTS OR CONVEYORS PLUGGES OR PROTECTED		

SECTION 4 — CONFINED SPACE

☐ DOES NOT APPLY

	YES	NO	N/A		YES	NO	N/A
1. CONFINED SPACE ENTRY REQUIRED?				5. HAVE AUTHORIZED ENTRANTS SIGNED OPPOSITE SIDE OF THIS FORM?			
2. SPACE TO BE ENTERED _____				6. HAVE DESIGNATED ATTENDANTS SIGNED OPPOSITE SIDE OF THIS FORM?			
3. PURPOSE OF ENTRY _____				7. HAVE ALL NECESSARY HAZARD CONTROL MEASURES BEEN TAKEN?			
4. IS SPACE A PERMIT-ENTRY SPACE? IF YES, COMPLETE OPPOSITE COLUMN				8. HAS ALL REQUIRED EQUIPMENT BEEN PROVIDED?			

SECTION 5 — TRENCHING/EXCAVATION

☐ DOES NOT APPLY

	YES	NO	N/A		YES	NO	N/A
1. HAS THE AREA BEEN INSPECTED FOR UNDERGROUND POWER LINES OR PRODUCT LINES?				4. HAVE PRECAUTIONS BEEN TAKEN IF THE TRENCH/EXCAVATION DEVELOPS INTO A CONFINED SPACE?			
2. DOES THE TRENCH REQUIRE SHORING/BRACING/SUPPORT?				5. HAVE OVERHEAD POWER/PRODUCT LINES BEEN REMOVED OR IDENTIFIED?			
3. HAS THE SOIL BEEN EVALUATED FOR STABILITY?				6. WILL LEAKING WATER OR RAIN WATER AFFECT THE STABILITY OF THE TRENCH/EXCAVATION?			

SAFE WORK PERMIT (Page 2 of 2)

SECTION 6			YES	NO	N/A		YES	NO	N/A
	QUESTIONS TO BE COMPLETED ON PERMIT EXPIRATION OR JOB COMPLETION.	1. HAS THE JOB BEEN COMPLETED?				5. HAVE SAFETY DEVICES BEEN REINSTALLED?			
	WORKER CLOSEOUT SIGNATURE	2. HAS THE AREA BEEN CLEANED OF WORK MATERIAL?				6. HAS HOT WORK AREA BEEN SURVEYED FOR SMOLDERING MATERIALS?			
	TIME ☐ AM ☐ PM	3. HAVE MANAGEMENT PERSONNEL BEEN INFORMED JOB IS DONE?				7. SPECIAL PRECAUTIONS, CONCERNS OR REMARKS			
		4. HAVE ALL LOCKS AND/OR TAGS BEEN REMOVED?				COMMENTS:			

OBSERVERS, WATCHERS, RESCUERS	I HAVE BEEN INSTRUCTED AS A CONFINED SPACE ATTENDANT, SAFETY WATCHER OR RESCUER AND UNDERSTAND MY DUTIES.			
	SIGNATURE	DATE	SIGNATURE	DATE

PERSONS AUTHORIZED TO PERFORM WORK AND/OR TO ENTER CONFINED SPACE	I HAVE BEEN INSTRUCTED IN AND AM AWARE OF THE POSSIBLE HAZARDS AND CONDITIONS I MAY ENCOUNTER IN THIS ENTRY WORK							
	SIGNATURE	TIME		DATE	SIGNATURE	TIME		DATE
		IN	OUT			IN	OUT	

COMMENTS	

AUDIT PURPOSE ONLY	

CORRECTIVE ACTIONS	

COMPLETED BY	NAME	TITLE	DATE

FIGURE 5.3
SITE SAFETY PLAN
LOW CONTAMINATION OF FUEL, CHLORINATED PESTICIDES AND PNAs IN SOILS

SUMMARY INFORMATION

DATE: _____ UPDATE: _____

PROJECT NAME: _____ PROJECT NO: _____

LOCATION: _____

SITE CONTACT AND PHONE NUMBER: _____

TYPE OF FACILITY: (active or inactive - describe previous use, previous agency action, soil type, topography, surrounding community)

PLAN PREPARED BY: _____

SITE SAFETY OFFICER: _____ CPR/FIRST AID TRAINED STAFF: _____

REVIEWED BY: _____ DATE: _____

WORK SCOPE/CONSTRUCTION/INVESTIGATION
Task 1 _____
Task 2 _____
Task 3 _____

PROPOSED START DATE: _____

UNUSUAL FEATURES/SITE SECURITY (include site map): _____

UTILITIES: ☐ Marked ☐ Scheduled Meet Date _____ Time _____

ANALYTICAL DATA (to be summarized below or attached, if available)

_____

_____

CONFINED SPACE: ☐ Yes ☐ No (If yes, describe and address permitting and entry procedures in an attachment.) _____

_____

AIR MONITORING:
Monitoring equipment: HNu meter with 10.2 eV lamp or _____
Action level = 15 PID units in breathing zone for Level C upgrade. Stop work = 50 PID units in breathing zone.
☐ O_2 meter, ☐ FID, ☐ Detector tubes, ☐ L.E.L. meter, ☐ Other _____

Other action levels: _____

PERSONAL PROTECTION: Level of Protection: ☐ A ☐ B ☐ C ☐ D
Special Requirements _____

COMMUNICATION EQUIPMENT: (Mobile Phone or other phone location and number, etc.)

_____

Scheduled Safety Meetings Interval: (daily, weekly, as needed)

SPECIAL SITE EMERGENCY COMMUNICATION PROCEDURES: (Evacuation signals, routes, spill containment)

HEAT/COLD STRESS CONTROLS:

SPECIAL PHYSICAL HAZARD CONTROLS: Barricades for work area, reflective vests, other, etc.

_____

LOCAL EMERGENCY RESOURCES AND TELEPHONE NUMBERS
Emergency Eye Wash/Shower Location:
Fire Extinguisher: _____
Police: _____
Fire Department: _____
Poison Control: _____
HOSPITAL: _____
Address: _____
Telephone: _____
Directions (supply map): _____

_____

EMERGENCY CONTACTS (name and phone number)
1. Construction Manager Contact: _____
2. Owner Contact: _____
3. Contractor Contact: _____
4. Subcontractor Contact: _____
5. Subcontractor Contact: _____
6. _____
7. _____

PRE-ENTRY SAFETY BRIEFING
I have received and read the _____ Low Contamination Health and Safety Plan. I understand the plan and had the opportunity to ask questions. I understand the information and instructions in the plan. I understand that medicine can complicate the effects from exposure to toxic chemicals. If I am taking any prescription or over the counter medicine or have a current medical condition which may increase my risks, I will advise my supervisor or Site Safety Officer.

Signature	Responsibility	Date

6.0 COMMUNICATIONS

6.1 General Communications

The Field Team Leader will have available at the Site the means for telephone communications, or an equivalent means of communication, for summoning emergency assistance from the fire/ambulance and police departments in the event they are required. The telephone will also act as a direct link to technical personnel for information pertaining to all phases of the project.

6.2 Radio/Telephones

Short-range walkie-talkies or cellular telephones will be made available to designated personnel working at the Site.

6.3 Emergency Warning

In the event of an emergency condition, the Field Team Leader will notify project personnel verbally if all are within immediate hearing and via a bullhorn if the Site area is large. The Field Team Leader will also notify visitors present within the area. Site personnel will immediately proceed to a pre-designated assembly area as designated by the Field Team Leader during the daily safety meeting. Personnel will remain in the designated area until further instructions are received by the Field Team Leader.

All communication equipment will be tested at the beginning of each day to verify operational integrity.

6.4 Hand Signals

Hand signals will be used by field teams in conjunction with the buddy system. Hand signals shall be familiar to the entire field team before operations commence and should be reviewed during site-specific training.

Signal	Meaning
Hand gripping throat	Out of air; can't breathe
Grip partner's wrist	Leave area immediately; no debate
Hands on top of head	Need assistance
Thumbs up	OK; I'm all right; I understand
Thumbs down	No; negative

6.5 Site Security

Only authorized personnel will be permitted on the Site in accordance with the requirements of this HASP. Visitors and other non-essential personnel may enter the work area only upon authorization by the Field Team Leader. This restricted access will ensure that the Field Team Leader can communicate with each person authorized to enter the work area.

7.0 PERSONNEL EXPOSURE AND AIR QUALITY MONITORING

7.1 Air Quality (Dust)

Due to the nature of the principal contaminants associated with the project (radiation and PAHs), dust suppression will be important as a means of minimizing exposure levels and off-site migration of contaminants. A key control measure to minimize exposure levels and off-site migration of contaminants will be a policy of "no visible dust". The Field Team Leader will routinely monitor the project area. Acceptable dust levels (controlling all visible dust) will result in airborne dust levels of less than 1 mg/m^3. The OSHA nuisance dust standard of 15 mg/m^3 is not acceptable at this site, because of contaminants in the dust.

7.2 Airborne Radioactivity Monitoring

Monitoring for airborne radioactivity exposure is as important as monitoring for external radiation exposure. Monitoring for airborne radioactivity exposure requires the following elements:

- Air sampling for radioactive particulates,
- Recordkeeping regarding personnel work locations and time in location,
- Respiratory protective equipment records regarding devices used by workers in airborne radioactivity areas,
- Counting and analyzing air sample filters,
- Calculating air concentrations of radioactive material, and
- Comparing air concentrations to applicable air quality criteria

By closely monitoring these elements, a continuous record of personnel exposure to airborne radioactivity is maintained.

Lapel samplers worn for personal air monitoring shall be utilized for airborne radioactivity monitoring any time a worker enters a radiological exclusion zone. The filters from the lapel samplers shall be analyzed the following day after use for comparison purposes to assess the need for procedural changes. It is expected that naturally occurring radon and thorium daughters will interfere with analyses. Additional evaluation of samples shall be performed when determined necessary based upon elevated results. If sample analysis shows concentrations greater than background levels a follow-up analysis shall be performed. The follow-up analysis shall be performed after four days to allow for the decay of the thoron daughter Pb-212 (10.6 hour half life). The "four day count" should be free from radon daughter interference and will serve as the official measurement of Th-Alpha.

High volume air samplers shall be utilized so that effluent air quality can be gathered on a daily basis. High volume air sampling allows for much shorter collection times than low volume sampling and has equivalent dust loading for needed collection durations. Both high and low volume air samplings require a sufficient volume of air to be collected in order for the Minimum Detectable Activity (MDA) to be below the most restrictive air effluent guidelines. Daily analysis of samples will allow for necessary procedural changes to be made and alert health and safety staff to potential problems on a continuous basis, rather than once per week.

Time decay of interfering nuclides generally refers to radon-222 decay and daughters but may also include thoron decay. The specific times for decay of samples are best addressed in procedures rather than in the health and safety plan.

After filters have been collected and decayed overnight, there will be a morning count of the filter that will serve to identify high gross counts for the previous day. This will alert health and safety staff of a potential problem which they can investigate more promptly. The count, after 4 days decay, will serve to be the official measurement of Th-Alpha.

7.3 Internal Monitoring

Internal monitoring to determine intakes of radioactive material will be performed as needed based upon the results of the air sampling program. Bioassay methods to be considered should include in-vivo, as well as in-vitro, assessments. Routine bioassay of workers is not anticipated based upon the low concentrations of radioactivity in soils to be excavated.

7.4 External Radiation Monitoring

External radiation monitoring of workers will be performed using film badges or thermoluminescent dosimeters. Dosimetry will be provided and processed by a service holding National Voluntary Laboratory Accreditation Program (NVLAP) certification. Pocket dosimeters may also be utilized for visitors and other infrequent personnel requiring access to the Site.

7.5 Radiological Surveys

Radiological surveys will be performed to ensure that radiation levels and contamination levels are within applicable guidelines for workers and the general public. Radiation surveys will be performed using the following instrumentation:

- Ludlum Model 2221 Portable Scaler/Ratemeter with 2"x2" NaI probe (or equivalent). This instrument will be used to conduct surface soil scans. Instrument specific action levels shall be used to determine approximate radiological soil concentrations. Any areas where the count rate is greater than the determined action level shall be considered exclusion zones and marked appropriately.

- Ludlum Model 3 Survey Meter with pancake G-M probe (or equivalent). This instrument will be used to conduct surveillance surveys of both personnel and equipment leaving exclusion zones. The action level for both equipment and personnel surveys is any count rate that exceeds background level. Decontamination procedures detailed in section 9.0 of the HSP will be used when contamination is located.

- Ludlum Model 3 Survey Meter with 1"x1" NaI probe "MicroR meter" (or equivalent) and Eberline Model RO-2 Ion Chamber (or equivalent). These instruments will be used periodically to ensure that dose rates in work areas as well as the Site perimeter are below prescribed levels. The action levels for both on and off site are detailed in Section 7.8 of the HSP in Table 7.1

Airborne radioactivity measurements will be performed as described in the Air Monitoring Plan (Appendix 8 to the Removal Action Work Plan).

7.6 Contamination Monitoring

Samples shall be obtained periodically in work areas to ensure that radioactivity is present at acceptable levels and is prevented from leaving the Site. Decontamination of elevated areas will be performed to maintain contamination at levels that are ALARA.

Before leaving the exclusion zone, Site personnel shall be checked through use of a hand-held frisker to ensure that contamination is not present on skin or clothes. The frisker will be a Ludlum Model 3 survey meter with a pancake G-M probe (or equivalent). The Field Team Leader will be immediately informed regarding any contamination on individuals and will initiate appropriate decontamination techniques. Proper disposition of contaminated personal effects and clothing also will be the responsibility of the Field Team Leader.

7.7 Total Organic Vapor Monitoring

In addition to the radiological contaminants, there is a very slight potential of encountering organic vapors. Thus, no routine screening for organic vapors will be conducted during the removal action. However, if organic odors are encountered during the field work screening for total organic vapors will be conducted with a photoionization detector (PID), or similar type equipment, on a daily basis. The screening will evaluate ambient photoionization volatile organic vapors and some semivolatile organic vapors.

Total organic vapors in ambient air will be obtained periodically with a PID during daily field activities. The PID provides real-time readings of exposure to volatile organics and some semi-volatile organics. Measurements will be made daily, prior to activities, to determine background levels. Monitoring measurements will be taken when:

- operations change,
- work moves to a different portion of the Site, and
- personnel observe contaminated materials.

These screening operations will be used to identify conditions requiring an upgrade to full-face respirators as described in Section 7.8.2.

7.8 Action Levels

7.8.1 Radiological Action Levels

Radiological action levels for on-site workers will be determined by performing surveillance surveys as well as airborne particulate monitoring for the presence of radioactivity. Properly trained Health Physics Technicians will perform radiological monitoring. The radioactive contamination on the Site is particulate and insoluble in water. Therefore, there will be no fixed contamination on the workers. Action levels as determined by radioactive monitoring can be found in Table 7.1.

To avoid the need for upgrade of personal protection equipment due to airborne contamination, engineering controls such as the use of water to minimize dust levels will be implemented as necessary during excavation and restoration activities.

7.8.2 Organic Vapors Action Levels

STS Consultants, Ltd. is taking a conservative approach to organic vapor monitoring at the Site. A PID will be used to periodically monitor for organic vapors or when odors indicated the possibility of organic contamination. Operations will be discontinued if the PID reads 5 ppm or greater above background and the area will be evacuated. The Site Health and Safety Officer will retest the area wearing a full-face respirator. Operations will not resume until the PID reads less than 5 ppm, and remains below 5 ppm.

TABLE 7-1
ACTION LEVELS AS DETERMINED BY RADIOACTIVITY

Note:

Personnel shall not be exposed to airborne radioactivity such that their weekly intake exceeds 12 Derived Air Concentration (DAC)-hours without prior approval of the Field Team Leader or designee.

Level of protection may be increased to Level C (full-face air purifying respirator) when airborne monitoring indicates that contamination levels have reached 30% of the DAC. All assessments shall incorporate ALARA principles. Engineering controls shall be used prior to assignment of respiratory protective equipment.

Signs shall be posted at entrances to areas where airborne radioactivity levels exceed, or have the potential to exceed, 25% of the DAC.

The most restrictive DAC of the nuclides which may be present onsite is Th-232. The DAC for Th-232 Class W is $5x10^{-13}$ uCi/ml. The air effluent limit is $4x10^{-15}$ uCi/ml. Engineering controls will be utilized so that no visible dust is present and airborne radionuclide concentrations will be kept ALARA.

Radiation Type	Action Level	Level of Respiratory Protection/Action
a. Contamination on smear samples of equipment	30 dpm/100 cm^2 gross alpha	Decontamination required prior to release for unrestricted use.
b. *Contamination surveys of* personnel or equipment	*Count rate greater than* background levels	*Decontamination required prior to* leaving exclusion zone.
c. Airborne Radioactivity	30% DAC[c]	Consider Level C (full-face APR) based upon ALARA evaluation. Ensure proper posting. Consider internal monitoring
d. Ambient Gamma (work areas)	5 mrem/hr[d]	Consider procedures for shielding of soils. Ensure proper posting.
e. Ambient Gamma (off-site areas)	2 mrem/hr[e]	Implement immediate controls to reduce dose equivalent rate.

Notes

(c) Potential Airborne Radioactivity Area as defined in 10 CFR 20. Workers with 1000 DAC-hours per year to date must wear modified Level C (full-face APR) until the end of the calendar year.

(d) The ambient gamma dose equivalent rate action level of 5 mrem/hr stems, from the 10 CFR 20 radiation area definition. If the ambient gamma dose equivalent rate reaches 2 mrem/hr, one or more of the following actions will be implemented: The source may be shielded; the working distance from the source may be increased; or the worker's exposure time may be limited.

(e) The ambient gamma action level for off-site is based upon the 10 CFR 20 requirements to maintain dose equivalent rates in unrestricted areas such that they do not exceed 0.002 rem in any one hour.

8.0 PERSONAL PROTECTIVE EQUIPMENT

It is anticipated that most excavation activities in designated exclusion zones can be conducted in Level D personal protective equipment (PPE), with a contingency upgrade to Level C, based on the action levels listed in Section 7. Level C will be used when required by Special Work Permits, or when directed by the Field Team Leader.

Level D personal protective clothing and equipment for excavation activities includes:

- Coveralls, disposable or washable through a contaminated clothing vendor. Coveralls are to be removed at the boundary of the exclusion zone.
- Hard hat
- Steel toed boots and chemically resistant booties (exclusion zone)
- Cotton or leather gloves (no soil contact); Nitrile gloves (Edmont 37-15 or equivalent) 0.40 mm thickness to be used if hand contact with soils is probable.
- Safety glasses
- Dust mask (optional)

Level C protective clothing and equipment includes:

- Full-face air-purifying respirator (NIOSH/MSHA approved) fitted with radionuclides/HEPA cartridges and/or organic vapor cartridges, depending on which action levels are exceeded (see Section 7 of this HASP)
- Coveralls
- Tyvek coveralls - required in areas when splashing by contaminated soils or water is a possibility
- Nitrile gloves (Edmond 37-15 or equivalent) 0.40 mm thickness
- Disposable latex inner gloves - required in areas when splashing by contaminated soils or water is a possibility
- Nitrile outer gloves (taped) - required in areas when splashing by contaminated soils or water is a possibility
- Steel toe boots with outer chemically resistant booties (taped)
- Hard hat

Action levels used to determine the need to upgrade or downgrade the levels of protection are described in Section 7 of this HASP.

9.0 CONTAMINATION REDUCTION PROCEDURES

9.1 Equipment

Portable equipment will be decontaminated with soap and water and rinsed with tap water. Heavy equipment will be steam-cleaned with water and, if necessary, a detergent solution.

9.2 Personnel

If levels of radioactivity show that individuals can remove coveralls and other personal protective clothing and equipment before leaving the exclusion zone and, thus complete decontamination, the individuals may leave the exclusion zone. If, however, levels of radioactivity show that individuals cannot achieve decontamination by the removal of coveralls and showering is required, they will be dressed in clean coveralls, boots and gloves and be transported to Northwestern Memorial Hospital to complete decontamination.

If substantial skin contamination occurs on an individual working with radioactive materials, the following specific procedures should be followed to prevent fixation of the material in the skin or absorption of the radioactivity through the skin.

> **Immediate Action**: Notify the HSC or Field Team Leader, who will supervise the decontamination. If contamination is spotty, the HSC or Field Team Leader will supervise the cleaning of the individual spots with swabs, soap, or water. If the contamination is general, the HSC or Field Team Leader may recommend washing the area gently in warm or cool water (not hot) using hand soap (not detergent) for one minute. Rinse, dry, and monitor for radioactivity. This soap wash step may be repeated three times.
>
> **Evaluation**: If the above procedure fails to remove all the skin contamination, the treatment should cease. An evaluation of the skin contamination should be performed by the HSC or Field Team Leader including an estimate of the dose commitment to the skin, and the quantity and identity of the nuclides contaminating the skin If additional decontamination steps are necessary, they are performed and documented by the HSC. The guidelines for Personnel Decontamination in the Radiological Health Handbook, HEW 1970, beginning on page 194, can be used as applicable. **CAUTION**: Do not use chemicals for personnel decontamination until full evaluation of the contamination is made by the HSC or Field Team Leader.

9.3 Contamination Prevention

Work practices that minimize the spread of contamination will reduce worker exposure and help ensure valid sample results by precluding cross-contamination. Procedures for contamination avoidance include:

- knowing the limitations of all personal protective equipment being used
- avoiding walking through areas of obvious or known contamination
- refraining from handling or touching contaminated materials directly. Do not sit or lean on potentially contaminated surfaces
- ensuring personal protective equipment has no cuts or tears prior to donning
- fastening all closures on suits, covering with tape if necessary
- taking steps to protect against any skin injuries
- staying upwind of airborne contaminants

- When working in contaminated areas, refraining from eating, chewing gum, smoking, or engaging in any activity from which contaminated materials may be ingested

9.4 Disposal Procedures

All discarded materials, waste materials, or other field equipment and supplies should be handled in such a way as to preclude the spread of contamination, creating a sanitary hazard, or causing litter to be left on-site. All potentially contaminated waste materials (e.g., clothing, gloves) shall be monitored and segregated in accordance with monitoring results into either radioactive or non-radioactive waste. Appropriate labels shall be affixed to all containers of radioactive materials.

10.0 GENERAL WORK PRECAUTIONS

10.1 General Work Precautions

The following general work precautions apply to all Site personnel.

- Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand-to-mouth transfer and ingestion of material is prohibited in the work area.
- Hands and face must be thoroughly washed upon leaving the work area. Wash water will be provided at the Site for this purpose.
- Whenever levels of radioactivity warrant, the entire body should be thoroughly washed, as soon as possible, after the protective coveralls and other clothing are removed as part of the *decontamination process.*
- No facial hair that interferes with a satisfactory fit of the mask-to-face-seal is allowed on personnel required to wear respirators.
- Contact with contaminated or suspected contaminated surfaces should be avoided. Whenever possible, do not walk through puddles, leachate, discolored surfaces, kneel on ground, lean, sit, or place equipment on drums, containers, or the ground.
- Medicine, drugs and alcohol may interfere with or impair judgment and reaction times. Therefore, usage of prescribed drugs must be specifically approved by a qualified physician and made known to the Field Team Leader prior to an individuals' presence on the work-site. Alcoholic beverage intake is strictly prohibited at the Site and prior to work.
- All personnel must be familiar with standard operating procedures and any additional instructions and information contained in the HASP.
- All personnel must adhere to the requirements of the HASP.
- Contact lenses are not permitted when respiratory protection is required or where the possibility of a splash exists.
- Personnel must be cognizant of symptoms for radiological exposure onsite, for heat stress and cold stress, and knowledgeable regarding emergency measures contained in the Emergency Contingency Plan.
- Respirators shall be cleaned and disinfected after each day's use or more often, if necessary.
- Prior to donning, respirators shall be inspected for worn or deteriorated parts. Emergency respirators or self-contained devices will be inspected at least once a month and after each use.
- Each employee shall be familiar with the project's Respiratory Protection Program.

10.2 Operational Precautions

The following operational precautions must be observed at all times.

- All Site personnel shall be adequately trained and thoroughly briefed on anticipated hazards, equipment to be worn, safety practices to be followed, emergency procedures, and communications.

- All required respiratory protective devices and clothing shall be worn by all personnel going into areas designated for wearing protective equipment.

- All Site personnel shall use the buddy system when wearing respiratory protective equipment. At a minimum, a third person, suitably equipped as a safety backup, is required during extremely hazardous entries.

- During continual operations, on-site workers act as a safety backup to each other. Off-site personnel provide emergency assistance.

- Personnel should practice any unfamiliar operations prior to undertaking the actual procedure.

- Entrance and exit locations shall be designated and emergency escape routes delineated. Warning signals for Site evacuation must be established.

- Personnel and equipment in the contaminated. work area should be minimized, consistent with effective Site operations.

- Work areas for various operational activities shall be established.

- Procedures for leaving a contaminated area shall be planned and implemented prior to going on-site. Work areas and decontamination procedures shall be established based on expected Site conditions.

- Frequent and regular inspection of Site operations will be conducted to ensure compliance with the HASP. If any changes in operation occur, the HASP will be modified to reflect those changes.

11.0 SANITARY FACILITIES

11.1 Potable Water

a. An adequate supply of potable drinking water shall be maintained at all times immediately outside the Site. Drinking water shall meet all federal, state and local health requirements.
b. Drinking water shall be supplied to project personnel via approved dispensing sources.
c. Paper cups shall be permitted for the drinking of potable water supplies.
d. Drinking water dispensers shall be clearly marked and shall, in no way, have the potential for contamination from non-potable supplies.
e. Site personnel must be fully decontaminated prior to approaching the drinking water supply.

11.2 Toilet Facilities

a. Adequate toilet facilities shall be provided at the Site.
b. These facilities shall be in the form of portable chemical toilets.
c. Routine servicing and cleaning of the toilets should be established with the selected contractor and shall be in accordance with federal, state, and local health regulations.
d. Site, personnel must be fully decontaminated prior to approaching the toilet facilities.

11.3 Washing Areas

a. Adequate washing areas shall be provided for personal use within the work area.
b. Washing areas shall be maintained in a sanitary condition and will be provided with adequate supplies of soap, towels for drying, and covered waste receptacles.
c. Washing areas shall be maintained and sanitized daily.
d. No eating, drinking or smoking shall be permitted in the work area. This policy will be strictly enforced by the Field Team Leader.

12.0 FIRE CONTROL EQUIPMENT

An adequate number of approved portable fire extinguishers (class rated A, B and C) shall be readily available at the Site at all times.

All Site personnel shall be trained in the use of the extinguishers. Extinguishers shall only be used on outbreak stage fires or fires of minor nature. The local fire department shall be contacted in the event of a larger fire and Site evacuation procedures should be commenced in accordance with the procedures described in the Emergency Contingency Plan.

13.0 CONFINED SPACE PROGRAM

13.1 Purpose

In the event that confined space work is a necessity, a Confined Space Program will be implemented. Training in the recognition of confined spaces is a component of the health and safety training program.

The purpose of the Confined Space Program is to establish procedures to protect personnel from this serious hazard in the course of their work; and at a minimum, to comply with 29 CFR OSHA 1910.146. This document assigns responsibilities and sets standards for personnel engaged in activities where confined spaces may be present.

13.2 Responsibilities

13.2.1 Health and Safety Coordinator

The Health and Safety Coordinator administers the Confined Space Program. The Health and Safety Coordinator's responsibilities include:

- Review of the HASP for potential confined space hazards and design alternative approaches to accomplish the confined space tasks;
- Coordinating and managing the Confined Space Program in the event one is required;
- Establishing priorities for implementation of the program;
- Assisting with recognition and implementation of the Confined Space Program;
- Advising project management on confined space issues; and
- Communicating the Confined Space Program to personnel by training related to specific Site activities.

13.2.2 Project Manager

The Project Manager directs the application of the Confined Space Program to project work. The Project Manager is responsible for:

- Working with the Health and Safety Coordinator to prepare information describing activities that might be conducted in a confined space area;
- Assuring that all personnel engaged in project activities are familiar with the definition of a confined space;
- Assuring that personnel are familiar with the Confined Space Program, and that project activities are conducted in compliance with the Confined Space Program;
- Assuming the responsibilities of the Field Team Leader if another person is not assigned these responsibilities.

13.2.3 Field Team Leader

The Field Team Leader is responsible for the implementation of the Confined Space Program on-site during field activities. The Field Team Leader is responsible for:

- Overseeing implementation of the Confined Space Program during field operations; and
- Reporting confined space work activity, and any violations of the Confined Space Program, to the Project Manager and the Health and Safety Coordinator.

13.2.4 Personnel

Personnel are responsible for:

- Familiarizing themselves with the Confined Space Program and following it;
- Becoming familiar with the criteria for determining a confined space, and with the monitoring, permitting, and other requirements of the program; and
- Reporting immediately a confined space condition to the Field Team Leader.

13.3 Definition of a Confined Space

Confined space means a space that:

1. Is large enough and so configured that an employee can bodily enter and perform assigned work
2. Has limited or restricted means for entry or exit (such as pits, storage bins, hoppers, crawl spaces, and storm cellar areas)
3. Is not designed for continuous employee occupancy

Any workspace meeting all of these criteria is a confined space and the Confined Space Program must be followed.

13.4 Confined Space Entry Procedures

13.4.1 Safety Work Permit Required

All spaces shall be considered permit-required confined spaces until the pre-entry procedures demonstrate otherwise. The Safe Work Permit for entry into a confined space must be completed before work begins; it verifies completion of the items necessary for confined space entry. The Permit will be kept at the Site for the duration of the confined space work. If there is an interruption of work, or the alarm conditions change, a new Permit must be obtained before work begins.

A permit is not required when the space can be maintained for safe entry by 100% fresh air mechanical ventilation. This must be documented and approved by the Health and Safety Coordinator. Mechanical ventilation systems, where applicable, shall be set at 100% fresh air.

The Field Team Leader must certify that all hazards have been eliminated on the Entry Permit. If conditions change, a new permit is required.

13.4.2 Pre-entry Testing for Potential Hazards

a. Surveillance

Personnel first will survey the surrounding area to assure the absence of hazards such as contaminated water, soil, or sediment, barrels, tanks, or piping where vapors may drift into the confined space.

b. Testing

No personnel will enter a confined space if any one. of these conditions exists during pre-entry testing. Determinations will be made for the following conditions:

1. Presence of toxic gases or dusts: Equal to or more than 5 parts per million (ppm) on the organic vapor analyzer with an alarm, above background outside the confined space area; or other action levels for specific gases, vapors, or dusts as specified in the Health and Safety Plan and the Confined Space Permit based on knowledge of Site constituents;

2. Presence of explosive/flammable gases: Equal to or greater than 10% of the Lower Explosive Limit (LEL) as measured with a combustible gas indicator or similar instrument (with an alarm); and

3. Oxygen Deficiency: A concentration of oxygen in the atmosphere equal to or less than 19.5% by volume as measured with an oxygen meter.

Pre-entry test results will be recorded and kept at the Site for the duration of the job by the Field Team Leader. Affected personnel can review the test results.

c. Authorization

Only the Field Team Leader and the Health and Safety Coordinator can authorize any personnel to enter into a confined space. This is reflected on the Safe Work Permit for entry into a confined space. The Field Team Leader must assure that conditions in the confined space meet permit requirements before authorizing entry.,

d. Safe Work Permit

A Safe Work Permit for confined space entry must be filled out by the Health and Safety Coordinator or Field Team Leader. A copy of the Safe Work Permit is included as Figure 5.2.

e. Attendants

One worker will stand by outside the confined space ready to give assistance in the case of an emergency. Under no circumstances will the standby worker enter the confined space or leave the standby position. There shall be at least one other worker not in the confined space within sight or call of the standby worker.

f. Observation and Communication

Communications between standby worker and entrant(s) shall be maintained at all times. Methods of communication that may be specified in the Safe Work Permit and the HASP may include voice, voice by powered radio, tapping or rapping codes, signaling tugs on rope, and standby worker's observations that activity appears normal.

13.4.3 Rescue Procedures

Acceptable rescue procedures include entry by a team of rescuers only if the appropriate self-contained breathing apparatus (SCBA) is available; or use of public emergency services.

The standby worker must be trained in first aid, CPR, and respirator use. A first aid kit should be on hand and ready for emergency use. The standby worker must be trained in rescue procedures. Retrieval of an unconscious victim in a confined space will only be conducted by trained rescue personnel. An emergency call to 911 will be initiated to assist the victim.

13.5 Training

Personnel who will engage in field activities will be given annual training on the requirements and responsibilities in the Confined Space Program and on OSHA 1910.146. Only trained personnel can work in confined spaces. Workers should be experienced in the tasks to be performed, instructed in proper use of respirators, lifelines and other equipment, and practice emergency procedures and self-rescue.

Before each Site activity, the determination of confined space work will be part of the Site characterization process. Training in the site-specific confined space activities will be part of the site-specific health and safety training:

13.6 Safe Work Practices

- Warning signs should be posted. These include warnings for entry permits, respirator use, prohibition of hot work and emergency procedures and phone numbers.

- Cylinders containing oxygen, acetylene or other fuel such as gasoline must be removed a safe distance from the confined space work area.

- Purging and ventilating is done before work begins to remove hazardous vapors from the space. The space should be monitored to ensure that the gas used to purge the space (e.g. tank) has also been removed. Local exhaust should be used where general exhaust is not practical.

- The buddy system is used at all times. A standby person always must be posted within sight of, or in communication with, the person inside the confined space. The standby should not enter the confined space, but instead will call for help in an emergency and not leave the post. Communication should be maintained at all times with workers inside the confined space.

- Emergency planning in the HASP and a Safe Work Permit must be approved in advance and the proper rescue equipment must be immediately available.

14.0 ELECTRICAL LOCKOUT/TAGOUT

The Field Team Leader must approve all work in areas requiring lockout/tagout procedures. Specific procedures and permitting requirements will be specified in the HASP, or in a revised HASP based on the need for a worker to work around electrical equipment.

All systems must be locked out and tagged before the work begins. This includes pipes, air lines, electrical equipment and mechanical devices. The equipment must be start tested and approved for use by a worker by the Health and Safety Coordinator or the Field Team Leader by start-testing to make sure the locked-out equipment does not operate.