

Building 4343

Interim Action Work Plan

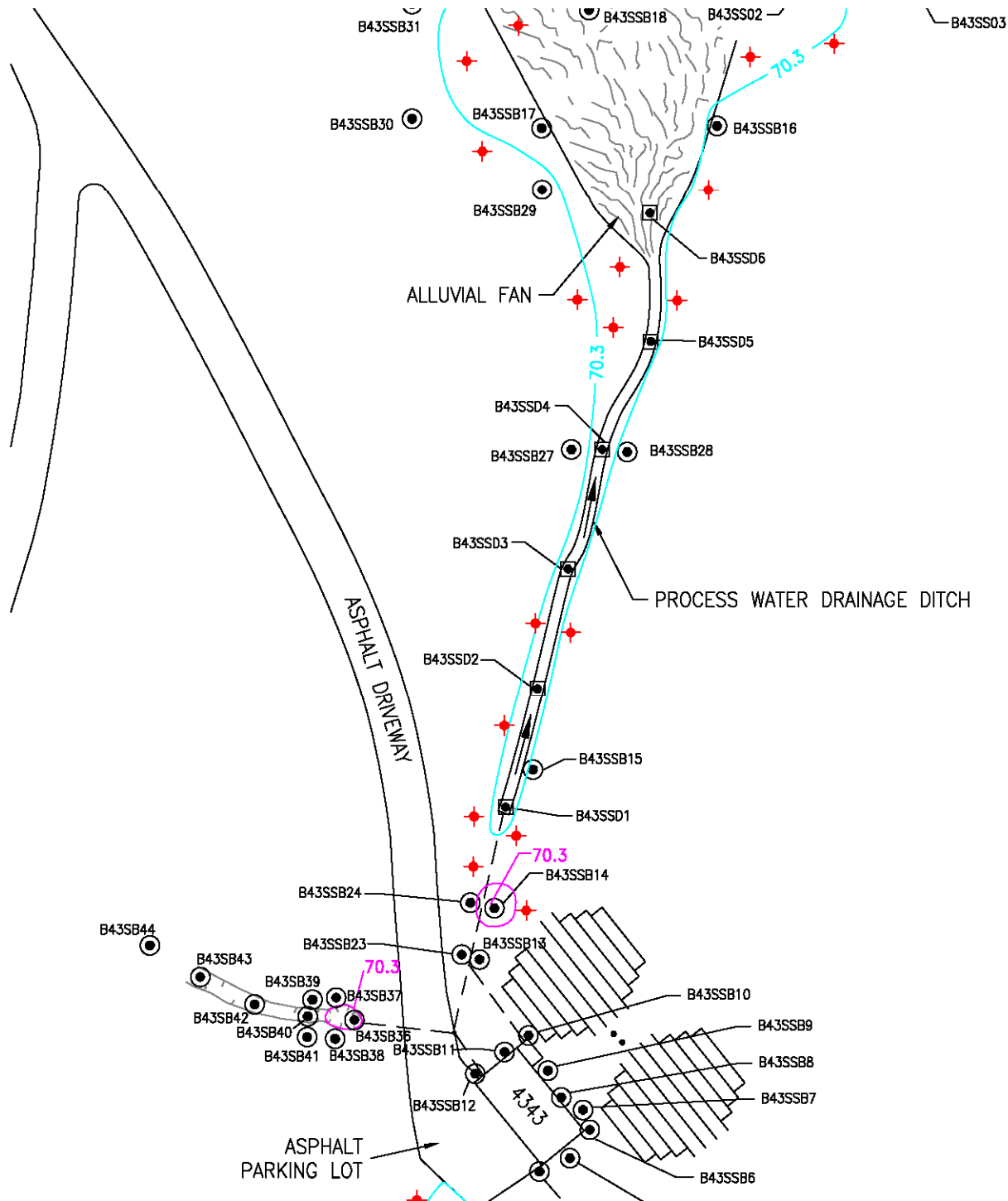


Building 4343

- Final *RCRA Facility Investigation (RFI)/Corrective Measures Study (CMS) Report* submitted in February 2004
 - *EPA approval on August 16, 2004*
 - *VDEQ approval (of Draft Document) on December 1, 2003*

RFI/CMS

- Building 4343 was a former cadmium plating facility.
 - Process water was discharged to a dry drainage ditch and allowed to infiltrate into soil.
- Previous investigations indicated elevated levels of cadmium in surface soil near
 - The former lead catch tank,
 - Process water drainage ditch, and
 - Alluvial fan/storm water drainage ditch.



Selected Corrective Measure Alternative

- A CMS was performed to address elevated cadmium in the soil.
- Remedial goal selected:
 - Excavation of Soil for Site Close Out, Offsite Disposal, Removal of Sumps and Demolition of Building 4343.
 - Remedial goal selected was based on a residential scenario as it was the most cost effective over an industrial scenario
 - Mostly due to small difference in soil volumes plus the added long term cost associated with the industrial scenario

Selected Corrective Measure Alternative Cont.

- Remedial Objectives
 - Reduce cadmium to below the Residential Remedial Goal of 70.3 mg/kg.
 - Clean Close Out will be achieved.
 - No Land Use Controls or 5 yr Sampling/Reporting.
 - Volume of soil with cadmium above residential goals (693 yd³) was not significantly greater than volume of soil with cadmium above industrial goals (197 yd³).

Building 4343 Interim Measures Field Schedule

- Pre-approval
- Asbestos/Lead Paint Survey 1 day
- Security Meeting 1 day
- Asbestos/Lead Results and Report 10 days
- Asbestos/Lead Abatement (if req'd) TBD
- Pre-mobilization (procurement of subs & equipment; ordering delineation sampling supplies & equip, etc.) 30 days
- Approval
- Post-approval (Assume two weeks lead time from NTP to Mobilization)
- **Mobilization (excavator, trailer, etc.) 2 days**
- Soil Delineation 5 days
- Delineation Results 1 day
- **Soil Excavation/Load-Out 13 days**
- **Sump Removal 1 day**
- **Building Demo/Removal 3 days**
- Confirmation Sampling 1 day
- Confirmation Sample Results 1 day
- **Site Restoration 15 days**
- **Demob 2 days**

Note: items that are bolded will require the use of Gate 10.

Delineation/ Waste Characterization

- Delineation of soil (surface and subsurface) above residential RG (70.3 mg/kg) will be conducted prior to excavation.
 - Sample results from the soil delineation will be used as waste characterization samples to determine appropriate disposal options
 - Estimated Soil Volume is 693 yd³ (approx 970 tons).
 - Estimated load-out will proceed at the rate of 90 tons/day or 4-5 truck loads/day
- Characterize building and sump debris for disposal:
 - TCLP Metals,
 - RCRA Waste Characteristics,
 - Asbestos Survey,
 - Lead Paint Survey.

Excavation

- Direct load of pre-characterized soil and transport offsite.
- Removal of concrete sumps and associated underground piping.
- Removal of building and concrete footers.
 - Asbestos/ lead paint assumed to be present in Building 4343
 - Asbestos/ lead paint abatement will be completed prior to building demo, if necessary.

Confirmation Sampling

- Collect an estimated 30 confirmation samples after soil removal from:
 - Bottom of trench
 - Sidewalls of trench
 - Additional excavation, if necessary.
- Collect confirmation samples from under sumps and building.

Site Restoration

- Use off-site borrow material and topsoil
 - Borrow/topsoil will be analyzed for TAL metals, TCL VOCs, SVOCs, pest/PCBS, PAHs and pH before placement.
- Restore site to surrounding grade, fill in ditch
- Implement erosion control measures and seed excavation areas.
- Asphalt patch where existing asphalt was removed.