Michael Gorski
Regional Director – Western Region
Massachusetts Department of Environmental Protection
436 Dwight Street
Springfield, Massachusetts  01103

Subject: Rowe-DSWM-05-253-009 (July 29, 2005)
Beneficial Use Determination (BUD)
Subsurface Structures/Concrete Rubble
BWPSW013
Transmittal: W050861

Dear Mr. Gorski:

On July 29, 2005, Yankee Atomic Electric Company ("Yankee") was issued a Beneficial Use Determination ("BUD") by the Massachusetts Department of Environmental Protection ("DEP") to leave subsurface structures (foundations and buried utilities) in place, along with concrete and asphalt debris from the demolition of site structures at the former Yankee Nuclear Power Station, in Rowe, Massachusetts (the "Site") as part of its decommissioning process approved by the Nuclear Regulatory Commission ("NRC") (the "Project"). The BUD permit contained several technical criteria that Yankee desires clarification of in order to ensure compliance with such provisions. On August 3rd, and September 6th, 2005, Yankee met with representatives of the DEP Western Regional Office to discuss these provisions and associated criteria. At DEP’s recommendation, Yankee is seeking approval from DEP that the following clarifications and protocols described below are consistent with the BUD permit. As discussed with DEP, it is our mutual understanding that the following technical protocols and clarifications are the correct measures to demonstrate compliance with the BUD permit.

Yankee Site Background Levels

In order to demonstrate compliance with the BUD criterion of "no distinguishable plant-related radioactivity above background levels", it is necessary to establish screening levels that will define the site specific background levels at Yankee. The following screening levels will be used to demonstrate compliance with the BUD criterion for substructures that will remain on the site and to qualify materials as suitable for backfill in the BUD Fill Area:
For gamma emitting radionuclides, the analysis system sensitivity will be established to ensure that the environmental lower limit of detection (LLD) of 0.18 pCi/gm for Cs-137 is met. Given this level of system sensitivity, any gamma emitting radionuclides that have positive radioactivity identified above their respective minimum detectable activity (MDA) will be considered to be distinguishable above background. The instrumentation systems used to make this determination are state of the art in-situ gamma spectroscopy (e.g. Truck Monitor, ISOCS, laboratory High Purity Germanium detectors). It should be noted that 100% of all concrete and asphalt debris have been or will be screened using the Truck Monitoring/ISOCS systems described above.

Screening levels to evaluate the presence of hard to detect (HTD) radionuclides [defined as Tritium (H-3), Carbon-14 (C-14) and Strontium-90 (Sr-90)] will be based on demonstrating that they will not exceed a Detection Limit (DL) for each radionuclide of interest. Attachment A to this letter provides a protocol for demonstrating compliance to this requirement of the BUD including the specific DL for each HTD radionuclide of interest.

The demonstration that the screening levels are not exceeded and that plant related radioactivity distinguishable from background is therefore not present will be based on evaluating the average concentration of each radionuclide within each substructure selected for further characterization (summarized in Attachment A) or the quantity of concrete or asphalt qualified to be used as site backfill.

In addition to the above, it will also be demonstrated that all LTP commitments will be met and it will be demonstrated that the site meets the MADPH TEDE of 10 mrem/yr and the NRC TEDE of 25 mrem/yr.

Material/Pile Management Protocols

Department Determination # 22 in the BUD requires that all non-qualified rubble and SCFA soil material "be shipped off-site to appropriate locations prior to internment of any rubble and SCFA soils that are approved for use as fill by this BUD." Based on discussions with DEP, Yankee understands that this provision applies only to material that is not subject to Yankee’s pile management protocols and related practices discussed below. Pursuant to these protocols, Yankee will continue to disposition materials on-site simultaneously as it evaluates other materials in the context of BUD Fill Area.

Yankee has a comprehensive Site Material Management Plan and program under the direction of a dedicated Pile Manager position within the decommissioning organization. In order to support this position, Yankee has included in Attachment B, the elements that comprise our protocols for Material/Pile Management at the Yankee site. Included for DEP review is a copy of plant procedure, OP-MEMO-2DD-10, "Characterization, Utilization and Disposal (CUD) of Site Materials", a Pile Inventory Summary matrix and
Pile Management Plan, with the latter two updated on a weekly basis by the Pile Manager. All materials (concrete, soils, asphalt, steel, sediment, C&D waste) generated as a result of building demolition, material processing (crushing), soil excavations, remediation, or soil thermal desorption, are placed in piles and managed under the Site Material Management Plan.

Buried Utility Assessments

Department Determination #10.C of the BUD, requires that “Sufficient assessment shall be performed and submitted to the Department to ensure that any buried utilities are not source areas for radiological or non-radiological contamination, prior to back-filling the BUD Fill Area.” It is Yankee’s understanding that this determination means that ongoing radiological and non-radiological assessments are planned to be performed by area and component, and not on a site-wide basis. This meaning is consistent with the expectations of the NRC for Final Status Survey (FSS) protocols, EPA TSCA protocols, and our strategy for characterization/remediation of Contaminants of Concern (CoCs) described in our approach to meeting the MA DEP Massachusetts Contingency Plan requirements.

Based upon discussions with the DEP, Yankee plans to make available all records that document the results of radiological or non-radiological assessments for each area cleared for backfilling within the BUD Fill Area as requested by the DEP.

Substructure Disposition

In accordance with Department Determination #4.A of the BUD, the BUD permit approves the re-use of sub-grade concrete foundations and slabs that have no plant-related radioactivity above background levels. It is our understanding that sub-grade concrete foundations and slabs that are compliant with both the NRC (25 mrem/yr) and MA DPH (10 mrem/yr) criteria as derived from the DCGLs in the approved License Termination Plan (LTP) shall be compared against the background screening criteria established earlier in this letter to verify acceptability. Sub-grade concrete foundations and slabs that do not meet the DCGLs or are non-compliant with the BUD criterion will be remediated and/or removed as necessary.

We look forward to DEP’s approval of these clarifications and protocols. Please do not hesitate to contact me at (413) 424-2261 should you have any questions concerning this request.
Sincerely,

Joseph Lynch
Site Closure Director
Yankee Atomic Electric Company

c: David Howland, MA DEP
September 8, 2005

Attachment A
Demonstration Protocol for BUD Compliance

The following protocol was developed to demonstrate compliance with the BUD criterion of “no distinguishable plant-related radioactivity above background levels” for radionuclides in substructures and materials suitable for backfill in the BUD Fill Area.

- For gamma emitting radionuclides, the analysis system sensitivity will be established to ensure that the environmental lower limit of detection (LLD) of 0.18 pCi/gm for Cs-137 is met. Given this level of system sensitivity, any gamma emitting radionuclides that have positive radioactivity identified above their respective minimum detectable activity (MDA) will be considered to be distinguishable above background.

- The Hard-To-Detect (HTD) radionuclides that have the potential for being present in substructures and/or materials suitable for backfill and will be analyzed for are:

  Tritium (H-3)
  Carbon 14 (C-14)
  Strontium 90 (Sr-90)

- The Detection Limits (DLs) for determining background for the HTD radionuclides are:

  Tritium – 5 pCi/gram
  Carbon 14 – 2 pCi/gram
  Strontium 90 – 2 pCi/gram

- The Upper Limit (UL) for any single data point of the measurements taken will utilize a multiplier of 3 above the DL, which is consistent with DEP direction. This UL for any single data point will be used when evaluating the average concentration of each radionuclide analyzed. The resultant UL for the HTD radionuclides are:

  Tritium – 15 pCi/gram
  Carbon 14 – 6 pCi/gram
  Strontium 90 – 6 pCi/gram

- The sample locations and justification for the selection of substructures that will require further characterization to demonstrate compliance with the BUD are provided in a Yankee Sampling Plan, “Foundations HTD Investigation.”

- Sample results will be analyzed for the HTDs listed in this protocol and trended to validate the sample density determined for each sub-structure. In the event samples yield results that exceed the criteria established for BUD compliance, an investigation will be initiated to validate the results and undertake an expansion of the sampling and/or remediation, as necessary.
# YANKEE ATOMIC ELECTRIC COMPANY

## Additional Concrete Cores for Radiological Evaluations

<table>
<thead>
<tr>
<th>Core ID</th>
<th>Diam.</th>
<th>Length</th>
<th>Orientation</th>
<th>Structure Location</th>
<th>Dimensions</th>
<th>Bot. Elev. (a)</th>
<th>Remarks</th>
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<tbody>
<tr>
<td>CB-1</td>
<td>4 inch</td>
<td>6 inch</td>
<td>Horizontal</td>
<td>RSS Mat</td>
<td>23' sq. x 8'-6&quot;</td>
<td>1011.75'</td>
<td>Dwg -FC-59A &amp; -59B</td>
</tr>
<tr>
<td>CB-2</td>
<td>4 inch</td>
<td>6 inch</td>
<td>Horizontal</td>
<td>RSS Ring Foundation</td>
<td>13' wide x 7' thk.(e)</td>
<td>1011.75'</td>
<td>Dwg -FC-59A</td>
</tr>
<tr>
<td>CB-3</td>
<td>4 inch</td>
<td>6 inch</td>
<td>Horizontal</td>
<td>VC Spread Footing</td>
<td>10'-6&quot; sq. x 2'-6&quot;</td>
<td>1011.75'</td>
<td>Dwg -FC-59A &amp; -59B</td>
</tr>
<tr>
<td>CB-4</td>
<td>4 inch</td>
<td>6 inch</td>
<td>Horizontal</td>
<td>Turbine Bldg. - South Wall Fdn.</td>
<td>9' x 123' x 2'-6&quot;</td>
<td>1016.00'</td>
<td>Dwg -FC-2F</td>
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<tr>
<td>CB-5</td>
<td>4 inch</td>
<td>6 inch</td>
<td>Horizontal</td>
<td>Demin Water Tank (TK-1) Fdn.</td>
<td>20' octagon (b)</td>
<td>1017.00'</td>
<td>Dwg -FC-50A</td>
</tr>
<tr>
<td>CB-6</td>
<td>4 inch</td>
<td>4 feet</td>
<td>Vertical</td>
<td>Turbine Pedestal Mat</td>
<td>38'-6&quot; x 105'-6&quot; (c)</td>
<td>1013.67'</td>
<td>Dwg -FC-18A</td>
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<tr>
<td>CB-7</td>
<td>4 inch</td>
<td>6 inch</td>
<td>Horizontal</td>
<td>Service Bldg. Spread Footing</td>
<td>3' sq. x 1' thk.</td>
<td>1017.00'</td>
<td>Dwg - FC-1A &amp; FC-23B</td>
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</tbody>
</table>

### 3 Cores (d) 4 inch 6-9 inch Horizontal RSS Ring Foundation 13' wide x 7' thk.(e) 1011.75' Completed in SE Quadrant (vert. OSF)

## NOTES

a. Referenced to original Plant datum. Add 105.66' to obtain NGVD.

b. Consists of 18" top slab and thickened perimeter wall (4'-6" high x 12" min. thk).

c. Mat thickness is 4'-6".

d. Three (3) completed cores. Documented in YNPS-FSSP-BRT01-04-01.

e. Radius R = 38'-9" to center line of ring.

f. Core bore locations were selected by evaluating ground water depth and flow patterns and correlating these with potentially impacted sub-surface structure locations and depths.

Evaluations of core bore analysis results will determine disposition of all sub-surface structures which will remain on-site.
Attachment B

Materials/Pile Management Protocol
YANKEE ATOMIC ELECTRIC COMPANY

OP-MEMO

No: 2DD-10

Date: April 25, 2005

TITLE: Characterization, Utilization and Disposal (CUD) of Site Materials Plan

REFERENCE(S): Site BUD, Landfill BUD

ENCLOSURES:

OP-MEMO 2DD-10 – Pgs. 1-24

TABLE OF CONTENTS

1.0 INTRODUCTION ........................................................................................................... 2

1.1 SCOPE ........................................................................................................................ 2

1.2 PURPOSE .................................................................................................................... 2

2.0 PROCEDURE .............................................................................................................. 2

2.1 PROCESS FLOW CONTROL .................................................................................... 2

2.2 SITE MATERIAL PILES MANAGEMENT .................................................................... 3

3.0 ATTACHMENTS ....................................................................................................... 3

3.1 ATTACHMENT A – SITE BENEFICIAL USE DETERMINATION (BUD) .................. 3

3.2 ATTACHMENT B – LANDFILL BENEFICIAL USE DETERMINATION (BUD) ........ 3

3.3 ATTACHMENT C – PILE MANAGEMENT .................................................................. 3

Prepared by:  

Reviewed and Approved by:  

Approved by:  

[Signatures]
CHARACTERIZATION, UTILIZATION AND DISPOSAL OF SITE MATERIALS PLAN
REV. 1

1.0 INTRODUCTION
The Beneficial Use Determination (BUD) process at the Yankee Nuclear Power Station is an approved regulatory plan to use concrete and asphalt for site re-grading. The BUD process also allows certain building slabs, foundations, and utility lines to be left in place. The non-native BUD materials placed by this process will be covered with at least 36 inches of soil as part of the site re-grading plan.

Since it is impractical, or possible, for this plan to account for all field conditions that may be encountered at the site, it is important that YAEC and contractor personnel responsible for oversight recognize that this plan is intended as a general guide. In any instance where conditions are encountered in the field that are not accounted for in this plan, or for which procedures are not entirely evident, then work must be stopped and the designated YAEC Environmental Manager for oversight be consulted.

1.1 Scope
This Characterization, Utilization and Disposal (CUD) Plan outlines the sequence and method to meet both the BUD and other site closure requirements. It is divided into three parts. Each part is an attachment and relates to a separate BUD-related activity and are referred to in this plan as the

- Site BUD
- Landfill BUD
- Pile Management

1.2 Purpose
The goal of the Site BUD is to ensure that certain site structures meet BUD regulatory requirements before being left in place or used to fill voids or re-grade the general plant site area.

The goal of the Landfill BUD is to reuse soil from the SCFA in grading and restoring the landfill as well as for use on the general plant site area.

The goal of Pile Management is to control material pile movement and inventory.

2.0 PROCEDURE
2.1 Process Flow Control
Each BUD activity is controlled by a process flow chart (see section 3.0 of this plan) and a set of guidelines. The flow charts provide a visual perspective of the general sequence of the approved BUD process. In the case of the Site BUD (Attachment A), the flow chart has continuation sheets (sheets A through E). The continuation sheets are indicated on the Site BUD flow chart by a circle with the letter A, B, C, D, and E inside.
CHARACTERIZATION, UTILIZATION AND DISPOSAL OF SITE MATERIALS PLAN
REV. 1

The guidelines provide specific regulatory or site-imposed requirements. They are indicated by the letter S (for Site BUD, Attachment A) or L (for Landfill BUD, Attachment B). Each BUD guideline has a series of separate instructions or requirements. A number following the guideline letter, e.g., S1 or L2, indicates these instructions or requirements. In some cases, the flow charts will contain notes with specific instructions instead of referring to the guidelines.

2.2 Site Material Piles Management

The management of site material piles following excavation is controlled by the instructions and forms in Attachment C of this plan. Procedures for handling material encountered during excavation of dioxin-impacted soils are addressed in other Yankee procedural guidance (Dioxin Soil Management Plan).

For additional information or questions, contact the following sources:

<table>
<thead>
<tr>
<th>Environmental Operations Manager</th>
<th>Project Monitor</th>
<th>Soil Materials Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marynette Herndon</td>
<td>Clanbro</td>
<td>YAEC</td>
</tr>
<tr>
<td>x2262</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3.0 ATTACHMENTS

3.1 Attachment A – Site Beneficial Use Determination (BUD)
- Site BUD Flow Chart
- Site BUD Flow Chart (sheet A)
- Site BUD Flow Chart (Sheet B)
- Site BUD Flow Chart (Sheet C)
- Site BUD Flow Chart (Sheet D)
- Guidelines for Site BUD

3.2 Attachment B – Landfill Beneficial Use Determination (BUD)
- Landfill BUD Flow Chart
- Guidelines for Landfill BUD

3.3 Attachment C – Pile Management
- Individual Pile Characterization Form
- Individual Pile Inventory Form
- Pile Management request Form
- Ticket Log
Notes:
5. See Site BUD, Table1.
6. See Site BUD, Section 2.1.2.
7. Includes materials such as concrete, loose metal, soil with paint chips.
8. If in doubt, contact Environmental.

Site BUD Flow Chart (Cont'd)
Sheet A – Attachment A
Characterization Utilization and Disposal of Site Materials Plan, Rev. 1
Site BUD Flow Chart (Cont'd)
Sheet B – Attachment A
Characterization Utilization and Disposal of Site Materials Plan, Rev. 1

Notes:

9. Excludes spray paint incidental to demolition.
10. Mastic coatings (containing non-friable asbestos) are present on some below ground foundations. ONLY undisturbed mastic can remain in place; disturbed mastic MUST be removed.
11. Material includes clean concrete or block, reinforced concrete, and asphalt from above ground structures and approved clean soil(s) materials.
Utility/Pipe (Note 12)

Meet Radiological Release Protocol?

YES

ulate Contents, if Needed (Notes 13, 14 & 15)

Utility <5 ft Below Grade? (Note 16)

NO

Utility Accessible Through Other Excavation?

NO

Leaves in Place (Note 17)

S4

D

S5

Notes:

12. Excludes most of Sanitary sewer lines; see Site BUD, Section 2.1.2, page 12, for details.
13. Take reasonable measures to remove contents (e.g., water, wires/cables); however, wires/cables may remain in place in inaccessible locations.
14. Some wires could be coated with asbestos material, which is acceptable to remain on site.
15. Excludes duct banks, circulating water pipe, or utilities under a slab.
16. Any pipe that contains oil or hazardous material (OHM) shall be removed.
17. Pipes >8 in diameter will be flow filled; pipes ≤8 in diameter will be capped with grout, where practicable.
## Material Disposition Table

<table>
<thead>
<tr>
<th>Rad Level</th>
<th>Contains Hazardous Materials (see Note 18)</th>
<th>No Hazardous Materials and Meets BUD Req</th>
<th>No Hazardous Materials but Does Not Meet BUD Req</th>
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<tbody>
<tr>
<td>Class &quot;B&quot; or &quot;C&quot;</td>
<td>Special Disposal (see Note 19)</td>
<td>Special Disposal (see Note 19)</td>
<td>Special Disposal (see Note 19)</td>
</tr>
<tr>
<td>Class &quot;A&quot; Not Exempt</td>
<td>Envirocare</td>
<td>Envirocare</td>
<td>Envirocare</td>
</tr>
<tr>
<td>Exempt Quantity</td>
<td>WCS (see Note 20)</td>
<td>WCS or RACE</td>
<td>WCS or RACE</td>
</tr>
<tr>
<td>Less Than DCGL</td>
<td>WCS (see Note 20)</td>
<td>Retain on Site</td>
<td>WCS or RACE</td>
</tr>
<tr>
<td>Free Release</td>
<td>Model City</td>
<td>Retain on Site</td>
<td>C&amp;D</td>
</tr>
</tbody>
</table>

**Notes:**

18. PCBs > 50 ppm; ACM >1% by weight; or RCRA 8>limits for 8 heavy metals or other hazard determined by Environmental (i.e., OHM).
19. For Special Disposal requirements, check with the Rad Waste Shipping Manager.
20. If PCB concentration is ≤50 ppm, the material may be shipped to RACE using a Massachusetts manifest with waste code MA99 as documentation of a non-regulated EPA waste.

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Site BUD Flow Chart (Cont'd)
Sheet D - Attachment A
Characterization Utilization and Disposal of Site Materials Plan, Rev. 1
Notes:

21. The BUD and C&A (processed concrete and asphalt) boundaries are delineated in the Site BUD, Figure 3.

22. Excludes road from Gate House to ISFSI.

23. Option is to remove.
Guidelines for Site Beneficial Use Determination (BUD)

S1 General

- Comply with all radiological and non-radiological YAEC and regulatory criteria.
- Keep chipping or scraping of paint to a minimum.
- Notify Environmental if paint chips found on ground or building surface.
- Ensure storm water system protection controls are in place, inspected, maintained, and replaced as needed.

S2 Concrete Segregation

- Exposed concrete covered with mastic MUST be evaluated for asbestos prior to demolition.
- Segregate the following from backfill material (either prior to or during demolition) before final placement:
  - Small areas of painted wall or slabs (Large areas of painted wall will be evaluated BEFORE demolition OR when first exposed below grade).
  - Concrete coated with contaminated paint (PCB or RCRA 8 metals).
  - Concrete with lengths of exposed REBAR* that has potential to create void spaces. (If in doubt, contact YAEC Structural Engineer or Environmental.)

* Exposed REBAR with the potential to create voids will be removed as close to the surface of concrete as practicable.

S3 Metal Segregation

- Segregate all of the following from backfill material (either prior to or during demolition) before final placement:
  - Structural and support steel beams (CAUTION: take care to keep from chipping or scraping paint)
  - Galvanized pipe
  - Metal with painted surfaces, including
    - wall sleeves
    - door frames
    - steel plate
    - door plates
    - other miscellaneous metal
  - Remnants of Q deck flooring
  - Lead anchors
Characterization Utilization and Disposal of Site Materials Plan
Attachment A, Rev. 1

- Loose rebar NOT imbedded in concrete
- DO NOT segregate the following IF imbedded in concrete backfill
  - Unpainted pipe penetrations and conduit penetrations/sleeves in walls
  - Metal mesh between concrete block courses

S4 Underground Utility Lines Remaining In-Place

Underground utilities, including pipes, are divided into nine categories. The action to be taken depends on the category as follows:

- **Deep Pipes (>5 feet below grade)**
  - Pipes >8 inch diameter:
    - flow fill
  - Pipes <8 inch diameter
    - remove contents (wires, etc.), if practical
    - cap ends with grout
    - excavate if majority is <5 feet below grade

- **Under Building Slab (pipes)**
  - Leave in place, but
    - If pipes >8 inch diameter
      - flow fill
    - If pipes ≤8 inch diameter
      - remove contents (wires, etc.) and
      - cap ends with grout, as feasible

- **Concrete Encased Duct Bank (5-foot below grade rule doesn’t apply)**
  - Remove ACM in manhole prior to pulling cables (If cable cannot be removed fully, ACM can remain)
  - Gout ends of accessible conduits
  - Flow fill manholes

- **Creosote Timbers over Concrete Duct Bank (2-inch wooden timbers)**
  - Leave in place as is

- **Concrete and Steel Pipes**
  - Pipes <5 feet below grade
    - remove
  - Pipes ≥5 feet below grade
    - If >8 inch diameter
      - flow fill
    - If ≤8 inch diameter
      - remove contents (wires, etc.), as practical
      - cap ends with grout
  - Pipes encountered during other site excavation
    - remove
Characterization Utilization and Disposal of Site Materials Plan
Attachment A, Rev. 1

- Storm Water System
  - Leave in place and flow-fill voids (see Site BUD, Section 2.1.2, for exceptions)
  - Individual Electrical Conduits/Utility Lines
    - Lines <5 feet below grade
      - remove
    - Lines >5 feet below grade
      - remove, IF FEASIBLE; otherwise, leave in place
  - Electrical Grounding Grid
    - Leave in place UNLESS portions encountered during other excavation; if so, remove encountered portions
  - Fire Water System
    - Leave in place, UNLESS encountered during other excavation, then remove
    - Remove hydrants to depth of header pipes
  - Sanitary System
    - Outside BUD scope, UNLESS
    - Within footprint of Sherman Dam extension, then
      - remove

- Processed Concrete, Asphalt (C&A) and Soils
  - Use as backfill ONLY if
    - Free of PCBs, i.e., no visible paint chips
    - Concrete debris generated from above or below grade structures (including slabs that are broken up into debris) is
      - <1 mrem/yr DCGL's
    - In-place foundations (including in-place slabs, perforated or cracked) is
      - <10 mrem/yr DCGL's
    - Asphalt debris generated from site paving
      - <10 mrem/yr DCGL's [may go to <1; check DEP-approved BUD]
    - Soils, in-place or excavated prior to backfill is
      - <10 mrem/yr DCGL's
    - Soils from the SCFA prior to backfill is
      - <1 mrem/yr DCGL's
### Material Disposition Table

<table>
<thead>
<tr>
<th>Rad Level</th>
<th>Contains Hazardous Materials (see Note 1)</th>
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<td>Less Than DCGL</td>
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</tbody>
</table>

**Notes:**

1. PCBs > 50 ppm; ACM >1% by weight; or RCRA 8 limits for 8 heavy metals or other hazards determined by Environmental (i.e., OHM).

2. For Special Disposal requirements, check with the Rad Waste Shipping Manager.

3. If PCB concentration is ≤50 ppm, the material may be shipped to RACE using a Massachusetts manifest with waste code MA99 as documentation of a non-regulated EPA waste.
Guidelines for Landfill Beneficial Use Determination (BUD)

The landfill is divided into three layers, described from top to bottom as follows:

- **ISFSI soil** – up to 15 ft thick, the layer has 10,000 cu. yd. of brown silty sand with some gravel.
- **Historic soil** – up to 30 ft. thick (15 ft. average), the layer consists of poorly sorted sands, cobbles and boulders, with some C&D debris.
- **Native soil** – up to 27 ft. thick of glaciofluvial deposits, the layer consists of brown, stratified medium to fine sands and silts with some medium to coarse gravel.

**L1 General**

- Comply with all radiological and non-radiological YAEC and regulatory criteria.
- Stop work and consult with YAEC RP or Environmental for any and all instances where field conditions encountered are not accounted for in this plan.
- Notify YAEC RP or Environmental immediately for which procedures for proceeding with work are not entirely evident.
- Take reasonable care in removal of ISFSI soil to prevent commingling the ISFSI soil with the historic landfill soil.
- Inspect the erosion protection controls daily and
  - Ensure that are maintained and replaced as needed.
  - Document the results.

**L2 Area H**

- Excavate Area H (after removal of ISFSI soil) in accordance with YAEC site procedure, “SCFA Area H Excavation Survey Sampling Plan.”
- Manage any material containing plant-related radioactivity in accordance with the YAEC work practice.

**L3 Soil Demarcation**

- Contact between the ISFSI and Historic soils is demarcated by a thin organic layer consisting of traces of small roots and high moisture content.
- Contact between the Historic and Native soils is defined by a wet organic layer consisting of traces of small roots, underlain by dry gray, silty sand.

**L4 Stockpile Categories**

- Segregate soils and stockpile into categories as follows:
Characterization Utilization and Disposal of Site Materials Plan
Attachment B, Rev. 1

- Category #1 – All ISFSI soil.
- Category #2 – Clean soils comprised of materials that will be used as part of the 3-feet of natural material soil for site cover or for extension of the dam.
- Category #3 - Clean fill including rock, asphalt, brick and concrete <2-feet diameter. Clean boulders (>2-ft dia.) should be stored in a separate stockpile.
- Category #4 – All other C&D material not in Category #1 (wood, metal, material >2 feet.
- Category #5 – All material with a PID jar headspace reading >100 ppm.
- Category #6 – PCB-contaminated material >1 mg/kg (ppm) as surveyed by EVS and any soil with visible paint chips or sand blast grit.
- Category #7 – Soils, C&D and any other material with radioactivity greater than background levels.
- Category #8 – Soil containing and any potentially unidentified OHM or radioactivity (STOP work and immediately notify YAEC Environmental Operations Manager).

- IF any soil does not fall into one of the above categories,
  - Segregate and stockpile separately and
  - NOTIFY YAEC Environmental Operations Manager immediately.

L5 Field Screening

- Collect a discrete soil grab sample for approximately every 200 cu. yd. excavated of clean soil (Category #2).
- Field screen each discrete grab soil sample for VOCs using PID by a qualified person.
- Prepare a composite sample from for every 1,000 cu. yd. excavated consisting of 5 consecutive grab samples (each from within the same cell and grid), and
  - Field screen soils for PCBs using RATS field kit. If paint chips are observed, segregate soils and take representative samples for laboratory analysis.
  - Field screen soils for radiological elements using gamma spectroscopy [RP Tech].
- STOP activities in immediate area if a hazardous or suspicious waste is encountered.
  o Contact Environmental Operations Manager.
  o If hazardous or suspicious waste has been excavated, place on poly sheeting and secure.
Stockpiling Materials

- Keep materials on YAEC property AND outside the 100-foot Wetland Buffer Zone* (see Figure 7).
  - IF materials must be placed within the 100-foot Wetland Buffer Zone, Contact Environmental AND provide the erosion controls below.
- Segregate any excavated material that does not fall into any one of the stockpile categories and notify YAEC Environmental.
- Stockpiles in place for >24 hours shall be
  - Ringed with an entrenched slit fence, and
  - Covered with a tarpaulin (or equivalent) and properly secured at the end of each day.
- Stockpile Category #’s 5, 6, 7 and 8 will be
  - Placed entirely on an impermeable base (such as polyethylene or equivalent), and
  - Covered with polyethylene sheeting (or equivalent) when not being actively managed.
- Inspect stockpiles daily to ensure that they are maintained and BMPs replaced as needed.
- Keep stockpile soils covered and in category area until transport, disposal, or reuse.
- Leave erosion controls in place until all work is completed and remaining soils are stabilized and vegetated.
Characterization, Utilization and Disposal of Site Materials Plan
Attachment C, Rev. 0

Pile Management

1.0 Individual Pile Characterization Form

This form will ultimately be maintained by the Pile Manager and will be the basic instrument used to consolidate what information is known (and thus unknown) about a given pile. This form will be started by whoever first creates a new pile and it will be the responsibility of that person to fill out as much information as possible. The form will be passed over to the Pile Manager when the responsibility for the pile changes hands (as noted by a signature from the Pile Manager at that time). The Individual Pile Inventory form will be its companion document.

Information to be recorded will include:

- Name of Pile (ultimately to become a numeric designation when turned over to the Pile Manager)
- Location of the pile
- Date pile created and by whom
- Narrative description of the origin of the materials
- Narrative description of the make-up of the materials in the pile
- Available rad and non-rad screening and testing results; hard copies of supporting data should be appended.

2.0 Individual Pile Inventory Form

This form would be used by the Pile Manager in a similar manner as a checkbook to keep track of additions to and removals from existing or newly created material piles. It would be a companion document to the Individual Pile Characterization form. This Pile Inventory form would be a dynamic document used to keep track of movements into and out of a pile, whereas the Individual Pile Characterization Form would be more of a static document establishing the factual history of the content of the pile.

Information to be recorded will include:

- Name of Pile

For each entry line, the Pile Manager will record information such as need to keep track of pile volume inventory, such as

- ticket number issued
- name or party adding or removing material
- amount added or amount to be removed
Characterization, Utilization and Disposal of Site Materials Plan  
Attachment C, Rev. 0

- where the added material is coming from or where the removed material is destined
- calculated running balance of pile inventory
- target beginning and ending dates for the addition/removal
- actual completion date
- actual amount removed
- notation whether adjustment to inventory balance is needed and at what line below the adjustment has been made

3.0 Pile Management Request Form

This form is the most multi-purpose of the four. It would originally start with someone needing permission to move soil and would be filled out on the left side and submitted to Pile Manager for approval. When approved, Pile Manager would sign it, identify which pile they could remove material from, and give them a Ticket No. Before returning the form to the requestor, the Pile Manager would log this ticket number onto the Ticket Log and also would add the removal request onto the Individual Pile Inventory from which the material will be removed. Once the material has been moved, the requestor will complete the right-hand side (or attach some similar documentation) and return to the Pile Manager, who would log its return onto both the Ticket Log (as completed) and the Individual Pile Inventory to confirm the inventory balance.

During the permission request stage, the following information would be required:

- Name of requestor
- Date of request
- Total amount of fill needed (in cubic yards)
- Brief narrative describing where the fill will be used
- Description of acceptable physical characteristics of material that can be used
- Estimated schedule for moving the material

When the form is returned to the Pile Manager, documentation of some form should be supplied that supports the amount of material moved. Completing the load-by-load transfer log shown on this form is one option, but other documentation acceptable to the Pile Manager can be accepted at his discretion.

4.0 Ticket Log

This form would be used by the Pile Manager to keep a running list of ticket numbers that had been issued. This will ensure that each number is only assigned once, and also serve to keep a reminder of which soil movements have been requested/approved but not completed/final-documented.
Information to be recorded by the Pile Manager include

- Ticket number (assigned in sequence)
- Party receiving the ticket
- Amount of material approved to be moved
- Destination of material
- Pile from which the material is to be removed
- Estimated dates of removal
- Date when movement has been competed
- Actual amount of materials moved.
Pile Name:

Date of Creation

Origin of materials (describe with narrative)

General Description of materials (soil, concrete, rubble, asphalt)

General Location on-site

Original Responsible Owner (Name of PM)

Responsibility Assumed by Pile Manager

Responsibility Assumed by Pile Manager

Available Characterization

Radiological Analysis (Spectrum No)

Non-Radiological Analysis

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Characterization, Utilization and Disposal of Site
Materials Plan
Attachment C  Rev. 0
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Characterization, Utilization and Disposal of Site Materials Plan
Attachment C  Rev. 0
Soil Requisition Form

Requested by: ____________________________

Date of Request: ____________________________

Amount of Fill Needed?: ____________________________

To be used where (describe)
__________________________________________________________________________

Check all that are acceptable

soil only
soil w/ 6" minus only
C&D unrestricted
C&D not larger than

Likely Dates of Transfer
Start ____________________________ (date)
End ____________________________ (date)

Approved by Pile Manager:
Signature: ____________________________
Date: ____________________________

Soil to be Taken From: ____________________________

Ticket # ____________________________

copy of approval to:
Requestor
Pile Manager

Completion Report

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<tr>
<th>Transfer Log</th>
<th>Amount</th>
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Signature of Completion
Date: ____________________________

Copy to be sent to Pile Manager when transfer is complete

Characterization, Utilization and Disposal of Site Materials Plan
Attachment C Rev. 0
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<td>1B</td>
<td>VARIOUS</td>
<td>N4 + 50 W5 + 50</td>
<td>SCFA</td>
<td>Construction Excavation</td>
<td>Soil &amp; Rock</td>
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<td>13</td>
<td>Mar-Apr 2005</td>
<td>N9 + 50 W9 + 20</td>
<td>Hillside, South of Switchyard</td>
<td>PCB Excavation Areas 1 &amp; 3, Landfill Areas A, B, &amp; C</td>
<td>Soil &amp; Rock</td>
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<td>17</td>
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<td>N14 + 50 W12 + 50</td>
<td>Lower Lot Area</td>
<td>Soil from Pile 2 Lot (Mid-Lot)</td>
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<td>N6 + 70 W12 + 50</td>
<td>PCA 2 Pad</td>
<td>SFP Excavation</td>
<td>Soil &amp; Rock</td>
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<td>24</td>
<td>June 2005</td>
<td>N 5 + 80 W 4 + 20</td>
<td>West Side of Landfill</td>
<td>From Pile 20 (RRS)</td>
<td>Concrete Rubble</td>
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<tr>
<td>37</td>
<td>April 2005</td>
<td>N 12 + 80 W 9 + 20</td>
<td>Off of North Road Across from Pile 34</td>
<td>Site Wide</td>
<td>Sand/Stone/Asphalt</td>
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<td>Outside Contractor</td>
<td>Bark Mulch</td>
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<td>Thermal Desorption Unit</td>
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<td>Rad (To be TM) Env TBD</td>
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<td>Revolving</td>
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<td>Site Wide (See Pile Dispositions)</td>
<td>Soil/Rock</td>
<td>Rad (To be TM) PCBs/VOCs</td>
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<td>South of Drive to Upper Lot</td>
<td>Pile 47 (Untreated PCB Soils &amp; Rock)</td>
<td>Oversized Material (Rock/Rubble)</td>
<td>Rad &lt; DCGL</td>
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<td>06/30/05</td>
<td>N 9 + 80 W 5 + 85 East of Truck Monitor</td>
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<td>Treated PCB Soils</td>
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<td>108</td>
<td>02/23/05</td>
<td>N 10 - 30 W 4 + 70</td>
<td>Near Gate 5</td>
<td>Area 1.4, 1.8, and SFP Excavations</td>
<td>Oversized Material (Rock/Rubble)</td>
</tr>
<tr>
<td>109</td>
<td>02/24/05</td>
<td>N 10 - 30 W 4 + 80</td>
<td>W of Pile 108</td>
<td>Area 1.4, 1.8, and SFP Excavations</td>
<td>Oversized Material (Rock/Rubble)</td>
</tr>
<tr>
<td>110</td>
<td>02/28/05</td>
<td>NW of Pile 19</td>
<td>Excavation for Decon Area</td>
<td>Asphalt</td>
<td>TBD</td>
</tr>
<tr>
<td>112</td>
<td>02/29/05</td>
<td>NW of Pile 19</td>
<td>Excavation for Decon Area</td>
<td>Soil</td>
<td>TBD</td>
</tr>
<tr>
<td>113</td>
<td>03/31/05</td>
<td>North of Control Point</td>
<td>Off-Site Contractor</td>
<td>6&quot; Stone</td>
<td>TBD</td>
</tr>
<tr>
<td>114</td>
<td>04/30/05</td>
<td>North of Control Point</td>
<td>Off-Site Contractor</td>
<td>1 1/2&quot; Stone/Traprock</td>
<td>Rad/Env Clean (Came from Approved Pit)</td>
</tr>
<tr>
<td>116</td>
<td>05/01/05</td>
<td>Off NW Corner of Rad Waste Slag</td>
<td>Site Wide Street Sweepings</td>
<td>Soil</td>
<td>TBD</td>
</tr>
<tr>
<td>117</td>
<td>09/07/05</td>
<td>Across from Control Point</td>
<td>Woodchips from Landfill Road Clearing</td>
<td>Woodchips</td>
<td>TBD</td>
</tr>
<tr>
<td>118</td>
<td>09/08/05</td>
<td>West of Pile 115</td>
<td>Fire Tank Dry Well Excavation</td>
<td>Soil</td>
<td>TBD</td>
</tr>
<tr>
<td>119</td>
<td>09/08/05</td>
<td>NE of Tank 55</td>
<td>Fire Tank Dry Well Excavation</td>
<td>Asphalt</td>
<td>TBD</td>
</tr>
</tbody>
</table>