



PARTNERS
ENVIRONMENTAL

**FINAL SITE
REMEDICATION REPORT
FOR THE
FORMER BROOKS & PERKINS SITE
(AAR MANUFACTURING)
12633 INKSTER ROAD
LIVONIA, MICHIGAN**

April 11, 2007

**Prepared For: AAR Manufacturing, Inc.
One AAR Place
1100 N. Wood Dale Road
Wood Dale, Illinois, 60191**

and

**United States Nuclear Regulatory Commission
Division of Waste Management
Office on Nuclear Materials Safety and Safeguards
Washington, DC, 20555-0001**

**Prepared By: Partners Environmental Consulting, Inc.
31100 Solon Road, Suite G
Solon, Ohio, 44139**



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1.0 INTRODUCTION

Partners Environmental Consulting, Inc. (Partners) has prepared this report that documents the final remedial activities conducted by AAR Manufacturing, Inc. (AAR) at the former Brooks and Perkins, Inc. facility (Brooks and Perkins) located at 12633 Inkster Road, Livonia, Michigan (Site). The Site is owned by AAR and is currently vacant. Final remedial activities were conducted in accordance with the following documents.

- The Revised Radiation Dose Assessment and Work Plan that was prepared by Partners and submitted to the United States Nuclear Regulatory Commission (NRC) in a report dated August 7, 2006.
- The Remedial Work Plan, 82A9606 that was prepared by Energy Solutions, LLC (Energy Solutions) and dated November 13, 2006. The Remedial Work Plan was submitted by Partners to the NRC on November 14, 2006.

Figure 1 shows the location of the Site on the United States Geological Survey (USGS) Redmond, Michigan 7.5-minute topographic map. **Figure 2** is presented as the Site Plan.

2.0 SITE BACKGROUND

2.1 Site Description

The Site is rectangular in shape and encompasses approximately 10.5 acres. The Site is divided into two (2) parcels, the Western and Eastern Parcels. The Western Parcel is about 1.5 acres in size and consists of vacant land that is densely vegetated. The Eastern Parcel is about 9 acres in size and contains manufacturing facilities. Development on the Eastern Parcel includes a one-story factory and office facility, a paint storage building, a gravel parking area, an asphalt parking area and driveway, an electrical substation and landscaped areas.

The Site is bordered on the north by light commercial developments, on the east by Inkster Road, on the south by railroad tracks operated by the Chessie System, and on the west by a commercial facility (trucking). Land use further east of Inkster and south of the railroad tracks is commercial. **Figure 3** depicts current surrounding property use.

2.2 Site History

Brooks and Perkins owned and operated the Site from 1957 to 1981. During this period, Brooks and Perkins manufactured products containing thorium alloys. Operations involved utilizing a master magnesium-thorium alloy containing 40% thorium to produce ingots containing approximately 2% thorium and sheets containing approximately 3% thorium. Master alloy was received and stored in closed drums until just prior to use. Large pieces of master alloy were placed on top of the melt furnace for 30 to 60 minutes to dry and preheat. Heated pieces were then placed in baskets and lowered carefully below the level of the magnesium melt, where the pieces melted completely. Melting required approximately 45 minutes. Alloy melt was then poured into book shaped molds and allowed to cool for about three days. When the book molds were cool enough to work, the castings were removed, the heads were cut off, and the bodies were scalped. All of the metal scrap recovered from cutting and scalping operations was returned to the melt stage. Trimmed castings were then heated in a furnace to 930°F for 16 hours in preparation for rolling.

Heated castings were divided into thirds and broken down to sheets approximately ½-inch thick during the first day's rolling. These sheets were trimmed and subjected to a second day's rolling, which produced sheets of the thickness desired by the customer. The sheets were annealed at 900°F for eight hours, cooled and pickled in an acid bath. Final preparation for shipping consisted of sanding, grinding and brushing.

Significant historical activities occurring at the Brooks and Perkins Site between 1959 and 1994 are described below:

- License STB-362 issued in 1959 by the Atomic Energy Commission (AEC) authorized

Brooks and Perkins to possess and use 15,000 pounds of thorium, as contained in 40% thorium master alloy and thorium magnesium alloy containing not more than 3% thorium.

- Licensed activities included rolling, melting, casting, forming, cutting, sanding and welding manufactured products containing licensed thorium source material.
- During the years from 1959 to 1971, the license was amended and/or renewed to incorporate increases in amounts of thorium that could be possessed and used, or changes in manufacturing.
- The AEC issued Brooks and Perkins a license amendment for the incineration of the thorium material on July 28, 1966.
- Brooks and Perkins performed a radiological survey to support license termination on November 19, 1969.
- Brooks and Perkins requested termination of License STB-362 on February 5, 1971.
- Brooks and Perkins' License STB-362 was terminated by the AEC Region III on May 17, 1971.
- AAR Corp. acquired the Brooks and Perkins Site property in 1981.
- On February 23, 1994, the NRC Region III inspector discovered that thorium was improperly disposed at the Site and that radiation levels were in excess of the criteria for unrestricted access.
- On March 29, 1994, the NRC requested AAR Corp. to submit a plan for site characterization and decontamination.

Activities conducted since 1994 are described in greater detail than above in the following sections.

3.0 SITE CHARACTERIZATION

3.1 Initial Characterization

Initial site characterization activities (Phase I) were conducted in accordance with the Site Characterization Plan (Characterization Plan) that was prepared by B. Koh & Associates Inc., (Koh & Associates) in a document dated June 1995. The Characterization Plan was accepted by the NRC on September 28, 1995.

Initial site characterization activities were conducted from August 7, 1995 to August 17, 1995, by Koh & Associates in the site buildings (Eastern Parcel) and on all open land areas (Western Parcel). The results of the initial characterization activities indicated that elevated radiation levels were present in floor drains located in the Old Process Building and on the floor of the New Addition. Sediment samples from the floor drains contained thorium concentrations in excess of regulatory limits. Elevated thorium concentrations were also detected in various soil samples collected from open land areas, particularly in the southwest corner of the Site. The results of these activities were presented to the NRC in a Site Characterization Report prepared by Koh & Associates and dated April 1996.

3.2 Subsequent Characterization Activities

Following completion of the initial site characterization, Koh & Associates prepared and submitted a Site Remediation Plan (dated April 1996) to the NRC for approval. In February 1997, the NRC found the Site Remediation Plan (April 1996) unacceptable and recommended that the document titled *Method for Surveying and Averaging Concentrations of Thorium in Contaminated Subsurface Soil* (NRC, February 1997) be considered for future remediation plan revisions.

Revision 1 of the Site Remediation Plan was prepared by Koh & Associates (dated October, 1997) and submitted to the NRC for approval. On May 22, 1998, the NRC approved the Site Remediation Plan and a Phase II site characterization was conducted from October 13, 1998

through November 17, 1998.

Phase II site characterization activities were conducted in accordance with the NRC document titled *Methods for Surveying and Averaging Concentrations of Thorium in Contaminated Subsurface Soil*. In accordance with the NRC methodology, the entire open land area of the Site (Western and Eastern Parcels) was divided into 5-meter by 5-meter grids. The grids were used as reference points for conducting Phase II site characterization activities.

The distribution and extent of the residual thorium contamination in the open land area of the Site was established by installing approximately 1,100 soil borings and collecting surface and subsurface soil samples for analysis. Soil borings were installed using the direct push (Geoprobe™) sampling system or by hand augering. The Geoprobe™ drives a two-inch outside diameter, stainless steel tube containing a new disposable acetate liner into the subsurface to obtain soil samples. The soil is forced into the liner at continuous 4-foot (1.22 meters) intervals, and is then retrieved to the surface. Soil samples were collected for analysis from the ground surface to 1-meter (3.28 feet) and from 1- to 2-meters (3.28 feet to 6.56 feet) below grade from the sample grid.

Approximately 2,200 soil samples were collected during Phase II site characterization activities and were analyzed for Thorium-232 by gamma spectroscopy. Isotopic ratios determined during the Phase I site characterization activities were used to calculate total thorium concentration of the samples.

The results of the Phase II site characterization activities were presented to the NRC in a report titled, *Site Characterization Report, Phase II, Former Brooks and Perkins, Inc. Site, AAR Manufacturing Group, Inc., Livonia, Michigan*, prepared by Koh & Associates and dated August 1999.

Figures 3 through 10 from the Phase II Characterization Report provide grid identifications and the concentration of Thorium 228 and Thorium 232 of the corresponding soil samples. These figures are located in **Appendix A**.

4.0 SITE REMEDIATION

4.1 Site Buildings

4.1.1 Decontamination Plan

Phase I site characterization activities conducted by Koh & Associates inside the plant buildings revealed several areas of elevated radiation. A walkover scan of the concrete floor indicated subsurface contamination at two (2) locations (designated A and B) within the New Addition. Using the scan data as guidance, eight (8) soil borings using the Geoprobe™ sampling system were advanced through the concrete floor into the underlying soil. One soil sample from each boring was collected for total thorium analysis. Soil analytical results indicated total thorium concentrations were in excess of regulatory guidelines.

The walkover scan also revealed elevated radiation levels at a floor drain in the Old Process Area. Subsequent investigations showed that the concrete surfaces of the drain were contaminated in excess of regulatory guidelines and the remaining sediment in the drain had excessive total thorium concentrations.

In accordance with the requirements of the NRC Site Decommissioning Management Plan, and NRC Regulatory Guide 1.86, the following guidelines were established for decontamination within the buildings.

Exposure Rate

- 5 micro-roentgens per hour ($\mu\text{R/hr}$) above background at one (1) meter from the surface for any occupied building areas.

Surface Contamination

- 1,000 decays per minute (dpm) alpha, beta-gamma/100 square centimeters (cm^2)

averaged over 1 square meter (m²).

- 3,000 dpm alpha, beta-gamma/100 cm² maximum over 100 m².
- 200 alpha, beta-gamma/100 cm² removable.

4.1.2 Decontamination

Decontamination activities within the plant buildings were conducted from January 10, 2000 through January 21, 2000. Decontamination activities focused on the New Addition (Areas A and B) and the Old Process area.

- Areas A and B in the New Addition were re-surveyed and the concrete floor was marked to identify the area of elevated radiation levels. The concrete floor was removed allowing access to the underlying contaminated soils. After soil removal, the excavation was backfilled with clean fill and the concrete floor replaced with like materials.
- The concrete floor located around the floor drain in the Old Process Area was removed allowing access for excavation of the underlying contaminated soils. The floor drain, sediment within the floor drain and the underlying contaminated soils were completely removed. After the decontamination, a new concrete floor was installed.

A description of the decontamination activities and the post-decontamination surveys are included in the Summary of Final Survey and Sampling Data Report that was prepared by Koh & Associates (dated March 2000) and submitted to the NRC on July 17, 2000. In a letter dated July 6, 2000, the NRC stated that its independent radiation survey showed exposure rates on the surfaces of the decontaminated areas couldn't be distinguished from background.

In a meeting on November 14, 2000, the NRC requested that AAR supplement the information in this report. Additional information was provided to the NRC in letters prepared by Koh & Associates (March 19, 2001) and AAR (July 23, 2001).

4.2 Open Land Areas and Soils

4.2.1 Remedial Plan

The Site is comprised of two (2) separate legal parcels, which are identified in this report as the Western and Eastern Parcels. The Western Parcel is about 1.5 acres in size and is densely vegetated. The Eastern Parcel is about 9 acres and contains the manufacturing facilities and associated infrastructure. **Figure 2** depicts the Site and the two (2) parcels.

After reviewing the Phase II site characterization data, a Remedial Plan was submitted to the NRC requesting release of the Site in accordance with 10 CFR Part 20. Specifically, it was proposed that the Eastern Parcel, including the buildings, be released for unrestricted use, and that the release of the Western Parcel be restricted to industrial use. The Remedial Plan was accompanied by a probabilistic dose analysis to demonstrate compliance with 10 CFR 20.1402 and 10 CFR 20.1403, respectively. These documents were prepared by Partners and dated November 2002.

The NRC responded to the Remedial Plan with a Request for Additional Information (RAI) (NRC, February 2003). The RAI required additional information concerning the dose analysis and also requested an *As Low As Reasonably Achievable* (ALARA) analysis. In response to the RAI, a revised dose analysis and ALARA analysis was submitted to the NRC by Partners, in a document dated April 15, 2003.

From August 4, 2003 through August 7, 2003, a survey team from the Oak Ridge Institute of Science and Education (ORISE) conducted an independent radiological survey at the Site, under contract to the NRC. The results of the survey were provided in the report titled, *Confirmatory Survey of Portions of the AAR Manufacturing, Inc., Site in Livonia, Michigan*,

prepared by ORISE and dated January 2004. The ORISE Survey confirmed the radiation levels and soil sample results provided in the Phase II Characterization Report (Koh & Associates, August 1999), including identification of localized elevated thorium concentrations.

Based on the results of the ORISE survey and the Phase II site characterization activities, the NRC calculated allowable limits for localized elevated thorium concentrations for both the restricted (Western Parcel) and unrestricted (Eastern Parcel) releases (NRC, April 2004). A comparison of actual soil thorium concentrations with the NRC allowable limits showed that thorium concentrations exceeded the limits in a select number of grids located in both the Eastern and Western Parcels. In particular, excavation and disposal of 100 m³ (one grid) and 200 m³ (two grids) of soil in the Western and Eastern Parcels, respectively, were identified. The grid numbers that correspond to these locations are shown on **Figure 2** (grids 118, 210 and 249).

The options for dealing with the localized elevated thorium concentrations were evaluated and a revised Remedial Plan was prepared by Partners and submitted to the NRC for approval on June 1, 2005. In this submittal, excavation and disposal of the soils in grids 118, 210 and 249 was proposed. A dose analysis accompanied the submittal to show that the post remedial conditions met the requirements for unrestricted and restricted release of the Eastern and Western Parcels, respectively.

In a telephone conference on November 22, 2005, the NRC questioned some of the input parameters used in the radiation dose analysis and requested that the effect of changes in these parameters on the proposed remedial action be evaluated. The reanalysis indicated that the amount of soil that would have to be excavated in the Western Parcel had to be increased to 400 m³ to satisfy conditions for restricted release.

A revised Remedial Plan was prepared by Partners and submitted to the NRC on August 7, 2006. The revised Remedial Plan proposed the following:

- Excavation to a depth of one (1) meter and disposal of the soils located in grids 118 and 210 in the Eastern Parcel.
- Excavation to a depth of one (1) meter and disposal of the soils located in grids 73, 100, 219 and 249 in the Western Parcel.

In addition to the above activities, the revised Remedial Plan indicated that approximately 100, 55-gallon drums containing soil cuttings collected during prior Phase I and Phase II site characterization activities and five (5) B-25 boxes containing debris generated during prior decontamination activities from within the building would be disposed off-site.

In a letter dated October 27, 2006, the NRC stated: "... staff has reviewed your submittal and has determined that the revised dose analysis demonstrates that the eastern parcel of the AAR site will meet the dose criteria for unrestricted use in the License Termination Rule (LTR) (10 CFR Part 20, Subpart E). The staff has also determined that the dose analyses for the western parcel (both the scenario with institutional controls, i.e. deed restrictions, in place and the scenario with institutional controls not in place) demonstrate that the western parcel of the AAR site will meet the LTR dose criteria for restricted use. This determination of the satisfaction of the LTR dose criteria is contingent upon the remediation of the areas described in your August 7, 2006, submittal". A copy of the letter is located in **Appendix B**.

4.2.2 Remedial Action

The remedial action was undertaken by Energy Solutions, LLC (Energy Solutions) under the direction of Partners. On-site activities were conducted in accordance with the Energy Solutions Remedial Work Plan, No. 82A9606 (November 2006) that was submitted by Partners to the NRC on November 14, 2006. A copy of the Remedial Work Plan by Energy Solutions is located in **Appendix D**.

Partners was on-site during all remedial activities to independently verify compliance with the

approved Remedial Plans and to confirm completion of required activities. Additionally, Energy Solutions maintained a full-time project manager on-site during all work to ensure compliance with the approved remedial program.

4.2.2.1 Establishing Grid Locations

On-site remedial activities began on November 9, 2006. Prior to initiating soil excavation activities, Energy Solutions re-established the grids from the prior site characterization activities using a Licensed Land Surveyor, Milletics and Associates, LLC, Michigan Registration Number 29249. The surveyor used the drawings from the original Site Characterization Report, Phase II, Former Brooks and Perkins Site (B. Koh & Associates, August 1999) to establish the zero point at the southwest corner of the Old Process building. The surveyor then used established practices to locate and mark the grids designated for excavation, as shown on **Figure 2**. The marked grids were then matched against the drawings and verified by a site walk and additional measurements by Energy Solutions and Partners.

A copy of the surveyor's drawing is located in **Appendix D**.

4.2.2.2 Soil Excavation

In accordance with the Revised Remedial Plan (Partners, August 2006) and the Energy Solutions Remedial Work Plan (November 2006), soil was excavated to a depth of one (1) meter from grids 118 and 210 in the Eastern Parcel and grids 73, 100, 210 and 249 in the Western Parcel. Excavation activities and all health and safety procedures were conducted as specified in the Remedial Work Plan by Energy Solutions.

Photographs documenting soil excavation activities are located in **Appendix E**.

4.2.2.3 Backfill of the Excavations

In accordance with the Revised Remedial Plan (Partners, August 2006) and the Energy Solutions Remedial Work Plan (November 2006), all excavations were backfilled with clean, imported soils. The backfill materials were not compacted to a designed engineering specification, but were physically compacted using the on-site equipment.

At the request of AAR and Partners, two (2) soil samples (Samples 1 and 2) were collected by Energy Solutions from the backfill materials and submitted to General Engineering Laboratories, LLC, for analyses. Soil samples were submitted for analysis of the following parameters:

- Volatile Organic Compounds (VOCs) by United States Environmental Protection Agency (USEPA) Method 8260B.
- Semi-Volatile Organic Compounds (SVOCs) by USEPA Method 8270.
- Polychlorinated Biphenyls (PCBs) by USEPA Method 8082
- Target Analyte List (TAL) Metals by USEPA Method 6010.
- Mercury by USEPA Method 7471.

Energy Solutions compared the analytical results to the Part 201 Generic Cleanup Criteria and Screening Levels promulgated by the State of Michigan Department of Environmental Quality (DEQ) for soils located at residential and commercial facilities. Soil analytical results indicated that all constituents were below their respective comparison standard. A copy of the laboratory analytical report is located in **Appendix F**.

4.2.2.4 Waste Handling, Storage, Characterization and Transportation

Energy Solutions' procedures 82A8052 Handling, Storing and Characterizing Radioactive Material and LLRW and 82A8053 Radioactive Material and LLRW Transportation were

used to package, classify, load and ship the drums and boxes of excavated soil. Waste handling by Energy Solutions was conducted in conjunction with two (2) certified shippers. Transportation was provided by Hittman Transportation Services, Inc., using certified United States Department of Transportation (DOT) shippers. The wastes were transported from the Site to Hittman's transload facility, located in Detroit, Michigan. At the transload facility, wastes were transferred to railcars, for final shipment to the disposal facility.

Trucks sent to the transload facility carried a maximum of four (4) waste bags to preclude exceeding DOT weight restrictions. Before departing the Site, the trucks were surveyed by Energy Solutions and released to the transload facility.

Upon arrival at the transload facility, a receipt survey was performed by Hittman and the manifest was matched to the loaded waste. The trucks were then off-loaded, surveyed and released by Hittman for the return trip to the Site.

Rail cars were loaded with no more than 100 tons of excavated soils. Once loaded, the tops were replaced on rail cars and sealed for shipment. The rail cars were surveyed by Hittman and placards were displayed as required by DOT regulations. The excavated soils were transported to the Energy Solutions licensed waste disposal facility in Clive, Utah, for disposal. Photographs provided by Energy Solutions of the labels and placards at the transload facility are located in **Appendix E**.

4.2.3 Drum Storage Area

As previously indicated (**Section 4.2.1**), approximately 100, 55-gallon drums containing soil cuttings collected during prior Phase I and Phase II site characterization activities and five (5) B-25 boxes (100 cubic feet) containing debris generated during prior decontamination activities had been temporarily stored at the Site until the time of the remediation. The drums and boxes were staged on a concrete pad located adjacent to the manufacturing building. The drums and boxes were covered with a tarpaulin to protect them from the elements. Photographs documenting these conditions are located in **Appendix E**.

As part of the Site remediation, the drums and boxes were removed from the Site and disposed in the Energy Solutions licensed waste disposal facility in Clive, Utah.

4.2.3.1 Drum Handling

Based on visual observations at the Site and for ease of transportation, a field decision was made to load all of the drums into B-25 boxes for transportation to the disposal facility. The B-25 boxes were supplied by Energy Solutions. Each drum was rigged with a lifting sling and suspended over a B-25 box containing approximately 16-cubic feet of Stabl-Cob absorbent. Several small holes were drilled into the bottom of each drum and any contained liquid was allowed to drain into the box, where it was absorbed. The drum was then lowered into the box. Each box contained four (4) drums. After loading, the boxes were sealed, surveyed and loaded onto trucks for transport to the transload facility. At the transload facility, the drums were transferred into Sea-Land containers, which were then placed on flat bed rail cars for shipment to the waste disposal facility (Energy Solutions, Clive, Utah).

4.2.3.2 Final Status Survey

After drum removal, the concrete storage pad and adjacent areas were surveyed to confirm that there was no contamination in excess of the following criteria established in NRC Regulatory Guide 1.86 (NRC, June 1974):

- 1,000 dpm alpha, beta-gamma/100 cm² averaged over 1 m²
- 3,000 dpm alpha, beta-gamma/100 cm² maximum over 100 m²
- 200 alpha, beta-gamma/100 cm² removable

In addition to conducting a final survey on the former drum storage pad, other areas of the Site, where soil and drum handling operations occurred, were resurveyed and compared to prior base line surveys to confirm that no additional contamination was present. In all cases, no additional contamination was identified.

Energy Solutions' Final Status Survey Report, 82A9611, which provides a description of the Final Status Survey activities, is located in **Appendix G**.

4.2.3.3 Equipment Decontamination

Prior to release from the Site, leased earth-moving and handling equipment used during remediation activities were cleaned and surveyed in accordance with Energy Solutions' Procedure 82A8034. The survey reports of the equipment are located in **Appendix H**. In all cases, sufficient decontamination levels were achieved.

4.2.3.4 Waste Disposal

All excavated soils, drummed samples and boxed debris were disposed at the Energy Solutions licensed waste disposal facility located in Clive, Utah. Signed manifests for the waste received at the facility are located in **Appendix I**.

5.0 CONCLUSIONS

Decontamination and remediation of the former Brooks and Perkins facility (Site) in Livonia, Michigan has been successfully completed in accordance with the NRC's requirements.

Decontamination of the plant buildings is documented in the report titled, *Summary of Final Survey and Sampling Data for the Former Brooks and Perkins, Inc. Site*, prepared by B. Koh & Associates, Inc., and dated March 2000.

Remediation, in accordance with the Remedial Work Plan 82A9606, dated November 13, 2006, is complete, as reported herein. Accordingly, the radiological conditions of the Eastern Parcel of the Site comply with the dose limit of 10 CFR 20.1402 for unrestricted release, and the radiological conditions of the Western Parcel of the Site comply with the dose limits of 10 CFR 20.1403 for restricted release.