



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 20, 2018

MEMORANDUM TO: Stephen S. Koenick, Chief
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

FROM: Jeffrey A. Whited, Project Manager */RA/*
Materials Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
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SUBJECT: NON-MILITARY RADIUM PROGRAM-AERODATA AIRCRAFT
INSTRUMENT SERVICES INC

The purpose of this memorandum is to outline the U.S. Nuclear Regulatory Commission (NRC) staff's decision behind closing the work on Docket Number 03039079 associated with the Aerodata Aircraft Instrument Services Inc. Non-Military Radium site at 2701 North Interstate-94 Service Drive, Ypsilanti, Michigan.

Based on the information provided to the staff by the State of Michigan, the site in question was previously Aerodata Instrument Services Incorporated (Aerodata), a sales and repair operation for aircraft instruments such as altimeters, altitude alerters and engine-monitoring indicators. Information provided by the State of Michigan¹ indicated that State Inspectors found one altimeter face containing radium in a plastic box. Following this inspection, the facility indicated they would dispose of the entire box contents in the normal trash.

Following receipt of this information from the State of Michigan, the NRC contracted with Oak Ridge Associated Universities (ORAU) to compile a Site Summary Report for this site (Enclosure 1). In the Site Summary Report, ORAU determined that the property that was previously Aerodata is currently occupied by the maintenance company Master Maintenance Corporation. A review of previous Google images indicate that the site and building do not appear to have undergone any significant configuration changes since 1999.

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¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML16288A777.

Because the building is still in a condition similar to when it was owned by Aerodata, and due to the information provided by the State of Michigan, the ORAU report determined that the site was a Tier 1 site² at which Radium-226 was confirmed to previously be present and site access is not controlled.

However, because the State of Michigan only found one box during their survey and it was stated that the box would be thrown away in the normal trash, the staff has determined that it is unnecessary to contact the current site owner regarding the historic use of the site, or to request access to the property to perform an initial site visit. While it is possible Aerodata could have received other radium-containing items after the survey in 1992, it is unlikely that those items remained following the change of property ownership. Additionally, the report by the State of Michigan did not indicate any other radium-containing items or contamination.

DOCKET NO.: 03039079

Enclosure:
Aerodata Instrument Services Site Summary Report

² The site prioritization, or "Tiers," is based on the criteria provided in the attachment to this memorandum.

SUBJECT: NON-MILITARY RADIUM PROGRAM-AERODATA AIRCRAFT
INSTRUMENT SERVICES INC DATED JUNE 20, 2018

DISTRIBUTION:

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DUWP r/f
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ADAMS Accession No.: ML18130A742

***via e-mail**

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|---------------|----------|----------|------------|------------|----------|----------|
| OFFICE | DUWP/MDB | DUWP/LA | RIII/DNMS | OGC (NLO) | DUWP/MDB | DUWP/MDB |
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| DATE | 05/16/18 | 05/16/18 | 05/17/18 | 05/24/18 | 06/01/18 | 06/20/18 |

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Aerodata Aircraft Instrument Services Inc.: Site Summary

**Prepared by
Oak Ridge Associated Universities
Under NRC Contract Number HQ-50-17-A-0001**

March 23, 2018

**Prepared for
U.S. Nuclear Regulatory Commission**

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Aerodata Aircraft Instrument Services Inc.: Site Summary

The following information was extracted from public records.

Address

Address 1: 2669 North Interstate-94 Service Drive, Ypsilanti, Michigan

Address 2: 2701 North Interstate-94 Service Drive, Ypsilanti, Michigan

Address 1 is noted in letters from the State of Michigan (NRC 2017), though the township of Ypsilanti could not verify that this address ever existed (ORAU 2017).

The address of the current property occupant, 2701 North Interstate-94 Service Drive (Address 2), is assumed for this site.

Site Description/History

A press release from 1993 for American International Airways lists Aerodata Aircraft Instrument Services Incorporated (Aerodata) as “a sales and repair operation for aircraft instruments such as altimeters, altitude alerters and engine-monitoring indicators” (PR Newswire Association LLC 1993). A 1992 survey by the State of Michigan identified a radium-containing altimeter face in a plastic box (NRC 2017).

The site at 2701 North Interstate-94 Service Drive is located in a commercial complex, as seen in Figures 1 and 2. Figure 1 shows the road labeled “Service Drive,” but it has been confirmed by the Ypsilanti Assessor’s Office that it is also known as “N I-94 Service Drive” (ORAU 2017). According to the Ypsilanti Township Assessor’s database, the land area is 0.95 acres and the building is 15,170 square feet (Access My Gov 2017). The facility consists of a warehouse-like metal structure coupled to an all-brick building that appears to serve as office space. EQ Industrial Services, which provided “turnkey environmental services, specializing in industrial cleaning and maintenance, waste transportation, and environmental management services” (US Ecology 2017), previously occupied the site (shown in Figure 2). The site is now occupied by the maintenance company Master Maintenance Corporation. A review of available Google Earth images, dating back to 1999, indicates that the site and building do not appear to have undergone any significant configuration changes in the last 18 years. The oldest available aerial image is presented in Figure 3.

According to information provided by the State of Michigan (NRC 2017), Aerodata was located at 2669 North Interstate-94 Service Drive. However, the address on file by the Michigan Department of Licensing and Regulatory Affairs (LARA) is 2701 North Interstate-94 Service Drive, and this was confirmed by other sources (Michigan Company Database 2017; Michigan Register 2017). LARA states that Aerodata merged with American International Airways Incorporated (AIA) in 1994. AIA later merged into Kitty Hawk International Incorporated, which declared bankruptcy in 2000, and was purchased by Kalitta Air in the same year. Kalitta Air now operates out of the Willow Run Airport in Ypsilanti, Michigan. None of these companies currently occupy the site at 2701 North Interstate-94 Service Drive. It is currently occupied by Master Maintenance Corporation (Access My Gov 2018a) and is owned by 2LN, LLC (ORAU 2017).



Figure 1. Site at 2701 N I-94 Service Drive (Google Earth Pro 2017)



Figure 2. Street View of 2701 N I-94 Service Drive from October 2014 (Google Earth Pro 2017)



Figure 3. Aerial View of the Site from March 1999 (Google Earth Pro 2017)

Information Regarding Radium Sources/Contamination at the Site

The State of Michigan surveyed the Aerodata facility on July 10, 1992 (NRC 2017). The summary of the findings indicates that the facility staff believed they had no radioactive items. However, surveyors found a radium-containing altimeter face in a plastic box. Aerodata personnel indicated they would dispose of the contents of the box in the “normal trash” (NRC 2017). It is not known if the State’s survey assessed alpha and/or beta contamination—it might have been a gamma-only survey—nor is it known if the survey included any outside areas.

It is possible that the company, which sold and serviced aircraft parts, could have received other radium-containing items after the survey in 1992.

Summary of Current Radium Levels:

As of August 2017, it is not known if radium sources and/or radium contamination are present at the site.

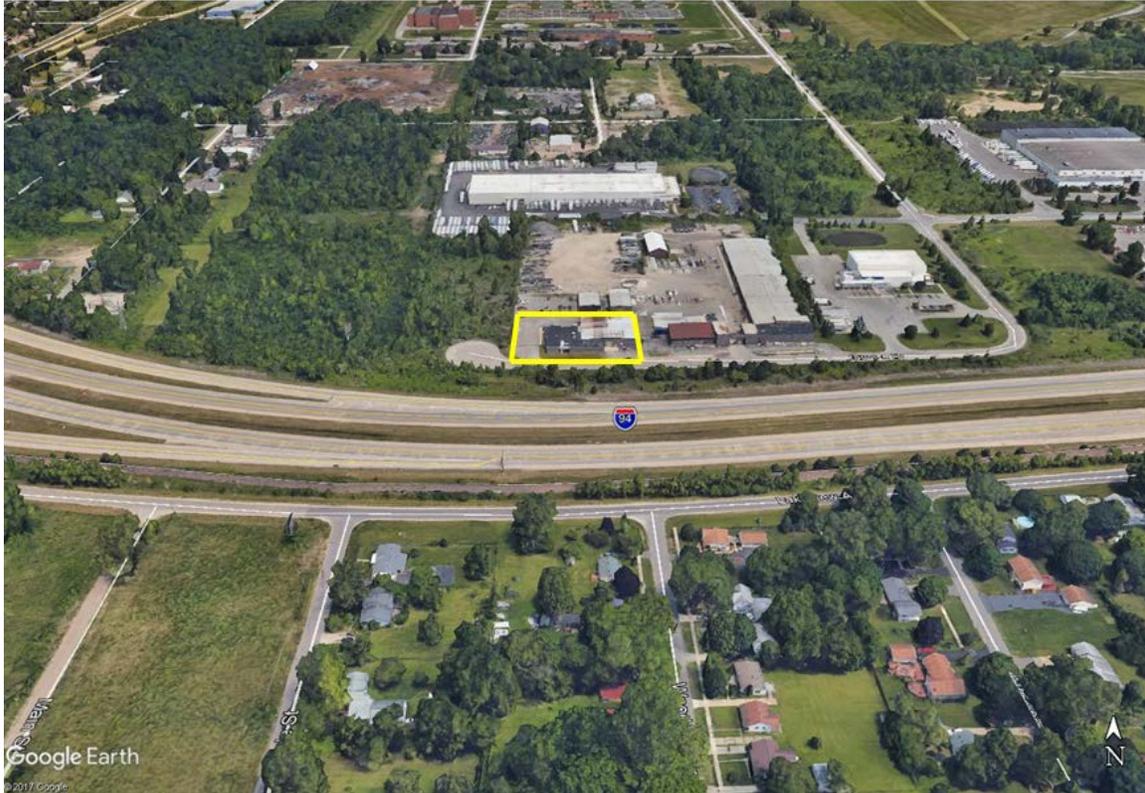


Figure 4. Area Surrounding 2701 N I-94 Service Drive (Google Earth Pro 2017)

Location and Population Near the Site

The site at 2701 North Interstate-94 Service Drive is located in the township of Ypsilanti in Washtenaw County, Michigan. According to the 2010 U.S. Census, the population of Ypsilanti charter township was 53,362; the 2016 population estimate for the township was 54,875 (United State Census Bureau 2017). Figure 4 shows the location of the facility within the local community.

Current State/other Federal Involvement

After the 1992 State of Michigan survey, Aerodata informed the state it would dispose of the altimeter face containing radium. An extensive internet search of public records did not reveal any other information about state or federal involvement at the site.

Current Access and Activities at the Site

The site appears to be accessible and is currently occupied by Master Maintenance Corporation, a commercial cleaning and building maintenance service.

The current owner of the property is 2LN, LLC. The address on file for 2LN, LLC is P.O. Box 601 in Belleville, Michigan (Access My Gov 2018b). This mailing address is also listed for Master Maintenance Corporation on accessmygov.com. Therefore, it is assumed that 2LN, LLC and Master Maintenance Corporation are owned by the same individual.

Existing Engineering and Administrative Controls

No information about engineering or administrative controls could be identified.

Prioritization Ranking

NRC assigns a prioritization ranking for each site based on two factors. The first factor relates to whether or not the historical record confirms the presence of radium and there is no documentation that the radium contamination was previously remediated. The second factor considers the potential for human exposure. Based on these factors, the site is assigned Tier 1, 2, 3, or 4 using the following criteria:

- Tier 1 = the historical record confirms the presence of radium, the building or adjacent lands are occupied or frequented by visitors, and site access is not controlled.
- Tier 2 = the historical record confirms the presence of radium, the building or adjacent lands are not occupied or frequented by visitors, and site access is weakly controlled.
- Tier 3 = the historical record confirms the presence of radium, the building or adjacent lands are not occupied or frequented by visitors, and site access is strongly controlled.
- Tier 4 = the presence of radium is suspected but not confirmed by the historical record.

Radium is confirmed to have been present at the site based on the 1992 survey, and the site appears to be occupied; therefore, the site is classified as Tier 1.

References

Access My Gov 2017. <https://accessmygov.com/SiteSearch/SiteSearchDetails?SearchFocus=All+Records&SearchCategory=Address&SearchText=2701++Service+Drive&uid=182&PageIndex=1&ReferenceKey=K+-11-13-384-011&ReferenceType=0&SortBy=&SearchOrigin=0&RecordKeyDisplayString=K+-11-13-384-011&RecordKey=1%3dK+-11-13-384-011%3a%3a4%3dK+-11-13-384-011%3a%3a7%3d5c116e7c-5fe6-4850-9832-a60800bf6b7&RecordKeyType=1%3d0%3a%3a4%3d0%3a%3a7%3d2>, accessed August 29.

Access My Gov 2018a. <https://accessmygov.com/SiteSearch/SiteSearchDetails?SearchFocus=All+Records&SearchCategory=Address&SearchText=2701+Service+Drive&uid=182&PageIndex=1&ReferenceKey=K+-99-931-411-03&ReferenceType=0&SortBy=&SearchOrigin=0&RecordKeyDisplayString=K+-99-931-411-03&RecordKey=1%3dK+-99-931-411-03%3a%3a4%3dK+-99-931-411-03&RecordKeyType=1%3d0%3a%3a4%3d0>, accessed February 14.

Access My Gov 2018b. <https://accessmygov.com/SiteSearch/SiteSearchDetails?SearchFocus=All+Records&SearchCategory=Address&SearchText=2701+Service+Drive&uid=182&PageIndex=1&ReferenceKey=K+-11-13-384-006&ReferenceType=0&SortBy=&SearchOrigin=0&RecordKeyDisplayString=K+-11-13-384-006&RecordKey=4%3dK+-11-13-384-006%3a%3a7%3d42e82bb6-8ad3-4afa-b100-9fb400ef8563&RecordKeyType=4%3d0%3a%3a7%3d2>, accessed February 14.

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ORAU 2017. Notes on personal communication between Andrew Owens (ORAU) and the Township of Ypsilanti Assessing Department 734-487-4927, phone conversations, August 15.

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US Ecology 2017. <https://www.usecology.com/Locations/oldlocations/EQ-Industrial-Services-Headquarters.aspx>, accessed August 29.