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INTEROFFICE MEMORANDUM

DATE: July 10, 1997
TO: D. E. Steffen, RMRS Project Management, Bldg. T130F, X2164
FROM: C. A. Patnoe, K-H/Air Quality Management, Bldg. T130C, X2440
SUBJECT: AIR QUALITY MANAGEMENT RESPONSE TO CDPHE AIR MONITORING
COMMENTS ON THE BUILDING 123 PAM - CAP-095-97

This correspondence is in response to a request by RMRS for Air Quality Management (AQM) assistance in responding to a PAM comment from CDPHE regarding air monitoring activities associated with the Building 123 decontamination and demolition.

Comment:

The PAM does not describe necessary air monitoring during decontamination and demolition of the building. In light of the recent problems the Site experienced with remediation of the T-3 and T-4 trenches, air should be continuously monitored for radionuclides and beryllium, at a minimum. The PAM doesn't necessarily need to completely describe and define monitoring activities, but at a minimum, the PAM must reference the appropriate monitoring procedure(s) for all decontamination and demolition activities to be conducted. This monitoring plan must be available upon request prior to implementation of proposed decommissioning activities.

Response:

The existing Radioactive Ambient Air Monitoring Program (RAAMP) continuously monitors airborne dispersion of radioactive materials from the Site into the surrounding environment. Thirty-one samplers comprise the RAAMP network. Twelve of these samplers are deployed at the Site perimeter and are used for confirmatory measurements of off-site impacts. The others are used for backup, should there be a need for determining local impacts from clean-up projects. Building 123 was not a plutonium, uranium, or beryllium operations building, and based on the results of the radiological and beryllium surveys, the decontamination and demolition of Building 123 will not warrant special environmental monitoring. During the Building 123 decontamination and demolition activities, AQM will reevaluate emissions if project management surveillance of operations indicates a potential for significant increases in radionuclide emissions. It is understood that the action levels associated with surveillance activities will be defined in the Facility Implementation Plan (FIP) and AQM will be appropriately notified when they are triggered. If the decontamination and demolition of Building 123 or the remediation of the surrounding soils requires additional

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monitoring, monitors within the existing ambient network located in the immediate area of Building 123 will be identified, and the frequency of filter collection and filter analysis at those locations will be adjusted to provide timely information on the project emissions.

Please be advised that the AQM organization provides monitoring support specifically directed toward compliance with all state and federal environmental laws originating from the Clean Air Act and its amendments. AQM monitoring programs do not provide real-time monitoring and do not support Industrial Hygiene or radiation worker safety programs. Appropriate representatives from those organizations should be contacted for information pertaining to their monitoring programs and their roles in the FIP.

Please contact Mike Putney of AQM/Radian Corporation at X2692 for any questions regarding this comment response.

MTP

cc:
M. Hyder (Radian)
R. Nininger (K-H)
M. Putney (Radian)