

CHANGE #1

Section 2.0 PROJECT DESCRIPTION

The project will facilitate the decommissioning efforts at Buildings 123, 113, 114, and 123S; remediation ~~characterization~~ of Individual Hazardous Substance Sites (IHSS) 121 and 148; partial closure of Resource Conservation and Recovery Act (RCRA) Unit 40; and decontamination of radiologically-contaminated facility systems. ~~Any subsurface contamination identified during the course of the project will be evaluated by ER subsequent to removal of Building 123 and is not considered to be part of the scope of this project.~~ The Building 123 slab and foundation will be removed as required to remediate any subsurface contamination as dictated by soil sampling results. The PAM will thoroughly examine building removal activities, including relocation of the building tenants; removal of furniture, equipment, and excess chemicals; characterization of the building hazards and potential contamination; and removal of all asbestos-containing material (ACM).

This change was made to clarify that soil remediation was not part of the scope of this project. Characterization of under building contamination will be conducted at a sufficient level to allow this site to be added to the ER Ranking List.

CHANGE #2

SECTION 2.4.9 Metals

~~To support industrial hygiene efforts,~~ samples were collected from selected painted surfaces in Building 123 and were analyzed for ~~the following~~ metals: lead; chromium; cadmium; and arsenic. ~~to support industrial hygiene efforts.~~ Site historical knowledge and recommendations by an accredited inspector were utilized in the sampling process. Twenty-one (21) samples were collected, and analysis was conducted using Atomic Absorption Spectroscopy by a third independent party. All paints indicated detectable levels of one or more of the metals. ~~Representative~~ samples were taken and analyzed ~~will be analyzed~~ using the Toxicity Characteristic Leaching Procedure (TCLP). ~~Should the TCLP analysis indicate the painted surfaces are leachable for heavy metals, they will be managed as hazardous waste. Otherwise,~~ Analysis indicate that although painted surfaces contain significant levels of heavy metals by total analysis, the metals are in a form that does not readily leach. None of the TCLP sampling conducted on paint samples in B123 indicated RCRA regulated levels of these metals. Therefore painted surfaces of construction materials will be managed as RCRA non-hazardous solid waste. standard construction debris.

This section was modified to clarify how painted surfaces containing heavy metals were characterized as non-hazardous.

CHANGE #6

SECTION 3.1.2.2

~~3.1.2.2~~ Soil Characterization

Soil characterization will include sampling and analysis of soil beneath and surrounding Building 123. Following removal of the building superstructure, samples will be collected through the slab to determine need for soil remediation ~~and from the surrounding area~~. A SAP will be written to guide characterization activities in these areas. ~~The SAP will be finalized prior to the award of the decommissioning contract.~~ ~~In accordance with paragraph 118 of the Rocky Flats Cleanup Agreement and the August 25, 1997 State of Colorado approval of the Building 123 PAM, the HSS 148 SAP will be submitted to CDPHE for review and approval.~~ The SAP will incorporate a review of existing records to establish the location of potentially contaminated areas and to define sampling protocol. ~~Sample location, depth and frequency will include recommendations from the RFETS-Statistical Applications Group.~~ Current planning indicates a need for approximately fifty (50) soil samples from beneath ~~soil~~ the slab of Building 123 and from areas surrounding underground OPWLs. Sample ~~locations~~ will be ~~designed~~ collected at depths immediately below the pipe to locate any contamination that may have leaked from the lines ~~OPWLs and the RCRA regulated underground waste process lines associated with Building 123.~~ Samples will be analyzed for volatile organic compounds (VOCs), Target Analyte List (TAL) metals, radionuclides, and nitrates. Data quality requirements supporting the analysis effort will conform to criteria established in *Guidance for the Data Quality Objective Process*, EPA QAIG-4 (EPA 1994).

The reasons for these modifications are:

- To remove any linkage between the development and approval of the SAP and the awarding of the decommissioning contract. The SAP has to be approved by CDPHE as required by RFCA and the approval letter for the 123 PAM. There is no need for any further linkage; and*
- Specific details of the SAP should not be incorporated into the PAM but left to the review and approval of CDPHE regarding that specific document. Therefore, specific details regarding the SAP have been removed.*

Remedial actions will be contingent upon compliance of sample analysis results with Tier II "action level" criteria defined in Appendix 6 of the RFCA. The extent of subsurface contamination will dictate the method of remediation. Areas in which soil sample results meet Tier II criteria will require no further action. Areas that exhibit radioactive or chemical contamination at levels in excess of RCRA regulatory levels will be excavated using conventional techniques and removed and disposed offsite as RCRA hazardous waste. Soil will be moved to a temporary staging area immediately adjacent to the site and placed in rolloff containers until proper disposition is determined. Contaminated soil will ultimately be disposed offsite as RCRA hazardous waste. At the completion of excavation activities, verification samples will be collected along the base and sides of the excavation(s) to determine post action condition of the subsurface soils. Samples will be analyzed according to the SAP. If analytical results indicate that contamination is present above Tier II Action Levels, further excavation and sampling will continue until the Tier II criteria are met.

This change was made to clarify that soil remediation was not part of the scope of this project. Characterization of under building contamination will be conducted at a sufficient level to allow this site to be added to the ER Ranking List.

CHANGE #9

SECTION 3.1.3.3

3.1.3.3 Evaluation of Process Waste Lines and Active Sumps OPWL Remediation

RCRA Clean Closure of the active process waste lines and their associated sumps
Proper closure of active lines will be contingent upon insate and soil sampling analyses results. Partial closure of RCRA Unit 40 will be conducted in accordance with Colorado Hazardous Waste Regulations (265, Subpart C) which requires a 30-day public comment period. Remedial and disposal options for partial closure of RCRA Unit 40 will be further defined in a separate closure plan. In the event that no contamination above Tier II action levels is found or detected, no further closure work will be required except that underground active lines will be foamed and capped in place. In the event that contamination above the Tier II action levels is detected, these portions of RCRA Unit 40 will either be deferred to ER for evaluation or the decontamination process as defined in the RCRA Closure Plan will be repeated.

Soil contamination associated with abandoned lines will be characterized to the extent that ER can use this information to rank the site and determine, what if any, remediation will take place.

~~Final D&D activities would include remediation of soil and underground piping beneath and surrounding the building slab. Remediation may include removal of contaminated soil, associated pipelines, and/or the concrete slab. Following proper remediation, the site would be regraded and seeded in an attempt to return the site to a natural state.~~

This change was made to clarify that soil remediation was not part of the scope of this project. Characterization of under building contamination will be conducted at a sufficient level to allow this site to be added to the ER Ranking List.

WASTE STREAM	PACKAGING AND ONSITE STORAGE	FINAL DISPOSITION	ESTIMATED GENERATION VOLUME
Hazardous waste rinsate (rad and non-rad) This waste stream will be generated during RCRA closure of part of RCRA Unit 40.	Process waste system,	Managed onsite in a wastewater treatment unit (building 374)	600 gallons 7500 gallons
Mixed Wastes RAD Non-homogeneous Homogeneous	White 55 gallon drum 904A or Unit 14 or Unit 15A in Building 906	Non homogeneous LLMW does not have a designated disposal site at this time Homogeneous Oak Ridge LLM and LL solvents Envirocare, Utah	25 cu yds Envirocare can take solids and liquids (non organics) that can be solidified Homogeneous 9 yd³ Non-homogeneous 5 yd³
Low Level Waste plaster, wall materials, windows, panels, cement, etc.	White drum or white boxes or full size wooden crates complying with WO 1100 or WO 4034 B664 Cargo Containers or B440 Cargo Containers	Nevada Test Site	300 cu yds 375 yd³
Sanitary or Industrial Waste NON-RAD	Rolloffs either 20 or 30 yard roll offs	U.S.A. Waste, Erie, Colorado	450 cu yds 3500 yd³
PU&D materials and processed RCRA Scrap Metal destined for reclamation NON-RAD	Not regulated under RCRA [file systems, cabinets, shelves, desks, fumes hoods, muffler furnaces, lab benches, etc.]	Per PU&D; or Per RF contract	500 cu yds
Processed RCRA Scrap Metal destined for reclamation RAD	White box and/or container	No contract yet in place. Options include SEG and MSC. No shipments will be made until a contract is in place with a K-H approved vendor.	Characterization not complete, estimate unavailable. 5 yd³

In the event a waste stream, not identified in this summary, is generated by this project and the waste stream has the potential of impacting human health or the environment, then RMRS or its subcontractor is required to immediately notify Kaiser-Hill's Environmental Compliance.

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