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INTEROFFICE MEMORANDUM

DATE: October 8, 1997

TO: S. M. Nesta, K-H NEPA, T130C, X6386

FROM: *C.A. Patnoe*
C. A. Patnoe, K-H Air Quality Management, T130C, X2440

SUBJECT: AIR QUALITY REVIEW OF THE BUILDING 779 DECOMMISSIONING OPERATIONS PLAN DATED SEPTEMBER 1997 - CAP-114-97

Ref: S. M. Nesta letter #SMN-187-97 to distribution, entitled "Review of Building 779 Decommissioning Operations Plan (DOP) Dated September 1997" and attached Building 779 DOP

The modified Building 779 Decommissioning Operations Plan (DOP) dated September 1997 has been reviewed with respect to applicable air regulatory requirements and compliance. Air Quality Management/Radian Corporation reviewed the DOP, and have the following comments:

- Section 7.1.1 Health and Safety Scope

- The scope paragraph states that "the purpose of this section is to describe the controls and monitoring programs to be utilized during the decommissioning of the 779 Cluster to ensure protection of the decommissioning employees, surrounding workers, the public, and the environment from potential and real hazards...."

Comment: The Health and Safety section does not address protecting the public and surrounding environment even though you list it as part of the scope. We suggest that you address the controls and policies that are in place to protect the public and surrounding environment.

- Section 9.2.1 Air

- The first paragraph states that "fugitive particulate emissions will be generated from soil demolition and transport".

Comment: We suggest that the word soil be deleted and the sentence read "fugitive particulate emissions will be generated from demolition and transport activities".

- The first paragraph states that "The substantive requirements that would otherwise be incorporated into a control plan are embodied in the RFETS Environmental Restoration

Field Operation Procedure FO.1, Air Monitoring and Particulate Control, which will be incorporated into the project.

Comment: The control plan for the Building 779 demolition must be specific to the demolition phase of this project. The RFETS Environmental Restoration Field Operation Procedure FO.1 is not adequate to serve as the control plan for this project.

- The last sentence in the first paragraph states that “any fuel fired equipment such as generators or compressors must comply with a particulate emission limit (see Regulation No. 1, Section III.A)”.

Comment: The definition of “fuel burning equipment” for the purposes of Regulation No. 1 is limited to equipment that burns fuel solely for the purpose of producing heat. This section of Regulation No. 1 does not apply to generators or compressors. The last sentence in paragraph 1 needs to be deleted.

- The second paragraph states that “Regulation No. 3, Part A, Section II requires that RFETS submit an Air Pollutant Emission Notification (APEN) to CDPHE prior to initiation of the B779 project. RFETS will prepare an APEN to facilitate the CDPHE inventory process”.

Comment: Reg. 3, Part A, Section II does not require that RFETS submit an APEN to CDPHE unless emissions of a regulated pollutant exceed APEN thresholds. Based on a preliminary evaluation of the project, it does not appear that an APEN threshold will be exceeded. We suggest that this section read “Regulation No. 3, Part A, Section II describes Air Pollutant Emission Notice (APEN) requirements. If applicable, RFETS will prepare an APEN to facilitate the CDPHE inventory process”. (Please note that APEN stands for Air Pollutant Emission Notice, not Notification).

- The third paragraph should include more detail.

Comment: We suggest that you add the following sentences to this paragraph: “Estimated controlled radionuclide emissions are not expected to exceed the EPA notification and approval threshold of 0.1 millirem per year EDE (40CFR 61, Subpart H). Radionuclide emissions from the project will be included in the Site radionuclide annual report.

General Comment on Section 9.2.1: A fourth paragraph should be added that describes the Air Quality Management radionuclide monitoring system. We suggest that the paragraph read: “The Kaiser-Hill Air Quality Management organization provides monitoring support for the Rocky Flats Environmental Technology Site (Site) specifically directed toward compliance with all state and federal environmental laws originating from the Clean Air Act and its

amendments. The existing Radioactive Ambient Air Monitoring Program (RAAMP) continuously monitors for potential 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 decommissioning or clean-up projects. During the demolition of Building 779 additional monitors within the existing ambient network located in the immediate area of Building 779 will be identified, and the frequency of filter collection and filter analysis at those locations will be adjusted, if necessary, to provide timely information on potential project emissions. Air emissions from Building 779 strip-out activities will be monitored by the existing effluent air monitoring system currently in place in the Building 779 plenum buildings.”

- Section 9.2.6 Asbestos

Comment: You should list regulatory notification requirements for asbestos abatement mandated in Reg. 8, Part B, Section III B.

- Section 9.4.3 Air Quality

- The fifth paragraph states that “There will be significant, short term fugitive dust emissions during the demolition of the structure itself without taking mitigation measures”.

Comment: This sentence makes it sound like there will be no mitigation controls in place when the structure is demolished and it will result in significant, short term fugitive dust emissions. A CDPHE-approved dust control plan must be in place prior to the demolition of the structure. This plan must describe measures that will be implemented to control dust emissions (such as water sprays) during the demolition phase. We suggest that this section read “There is a potential for significant, short-term fugitive dust emissions during the demolition of the structure. Mitigative measures will be taken to minimize dust emissions”.

General Comment: It will be necessary for Kaiser-Hill Air Quality Management (AQM) to review subsequent documents, and to continuously provide guidance to project personnel throughout the duration of this project. Kaiser-Hill AQM has assigned Mike Putney of AQM/Radian as their representative to the Building 779 Decommissioning project team.

Air Quality Management should be informed of any changes to project parameters or the DOP. Please contact me, or Mike Putney of AQM/Radian Corporation at X2692 for any questions regarding this letter.

MTP

cc:

M. Hyder (Radian)

B. Moore (Labat Anderson)

M. Putney (Radian)