REVIEW COMMENTS ON
729 NON-RADIOLOGICAL CLOSEOUT SURVEY REPORT
April 27, 1999

Kaiser-Hill, Tom Scott and Gerry Kelly Comments

1. In general, the Report does not adequately address the use of existing data and/or historical knowledge. This is the basis of your decision on what to sample for and how much. You're somewhat documenting this with additional sampling. Are their sampling plans, available? Also, I'm more concerned about the consistence between release criteria specified in the D&D Characterization Protocol, Revision O, and this report, i.e., RCRA Constituents, PCBs, and Asbestos. TSCA-Beryllium release limits are consistent, the only concern I have is the number of samples and locations—are they enough. Will need to review the DOP to evaluate impacts, if any.

Response

The report has been updated to address your concerns. A sampling IWCP was developed to address sampling needs in the 779 Cluster rather than a SAP. It was only recently that the 779 Closure Project became aware of any requirement to adhere to release criteria identified in the draft D&D Characterization Protocol rather than the project RFCA approved documents, specifically the 779 DOP and the RLCR. Conversations with KH legal indicate that the 779 Closure Product is not subject to the draft D&D Characterization Protocols.

2. Release criteria need to match those of the D&D Characterization Protocol (DDCP) and be based on applicable regulations.

Response

Further detail has been incorporated into the Building 729 Non-Radiological Closeout Report to represent applicable regulations and resultant criteria.

3. Pg 3, Para 2.0, separate 2nd paragraph. In first portion, make connection to previous paragraph and RFCA. In the second portion, starting with "The cleanup...," tie this material to characterization.

Response

Comment incorporated.

4. The Hazards identified, are the waste chemicals RCRA regulated? Are the Fluorescent lights and ballasts with or without PCBs?

Response

No waste chemicals were stored in Building 729 during D&D. All chemicals housed in Building 729 were product chemicals. With respect to TSCA, fluorescent are not regulated. Under the Site WSRIC, some fluorescent bulbs contain lead above regulatory threshold. One half drum of ballasts, characterized as TSCA, was removed from Building 729.

5. Para 5.2, the Be Program is titled the "Chronic Beryllium Disease Prevention Program."

Response

This has been modified.

6. Para 5.3, PCB criteria should reflect the MEGA Rule and address criteria for bulk product waste and remediation waste (not the old 50 ppm criteria (see DDCP).

Response

PCB criteria reflecting the MEGA rule have been added.

7. Address Pb-based paints separately, may not need sampling.

Response

The lead based paint discussion is included Section 5.5, Hazardous Waste Release Criteria. The 779 Closure Project provided significant paint data to RMRS Environmental Compliance (Rich Lesser) in support of the lead based paint characterization white paper.

8. The hazardous waste/RCRA criteria should be expanded to not only address TCLP but also listed wastes, etc. (see DDCP). Therefore, consider changing TCLP Release Criteria to Hazardous Waste Release Criteria. (Match DDCP to cover both characteristics and listed constituents.)

Response

Section 5.5, Hazardous Waste Release Criteria has been expanded to address waste forms relevant to Building 729.

9. Section 5.5 needs to address building process knowledge, spill history, and CERCLA (e.g., to say that if spills had occurred, they had been cleaned up pursuant to CERCLA requirements). Say that CERCLA does not apply, that demolition debris will be managed pursuant to RCRA and TSCA, and that process knowledge, including spill history, has been used to make characterization and waste management decisions (e.g., RCRA and TSCA contaminants that needed to be considered). Section 5.5 should also address waste chemicals.

Response

Further clarification has been added to Section 5.5, Hazardous Waste Release Criteria.

10. Section 5.6, last criteria, needs to address criteria to be used when conducting visual inspections.

Response

These criteria have been added.

11. Section 6.2 should refer to survey procedure used and mentioned organization that performed the survey.

Response

No approved beryllium survey procedure was used for Building 729. The project Industrial Hygienist used professional judgement to identify the areas subject to survey. Reference to the project Industrial Hygienist was added to the Non-Radiological Closeout Report.

In accordance with the Chronic Beryllium Disease Prevention Program, Building 729 meets the hazard assessment contamination category of "Assumed Clean". The definition of an "Assumed Clean" area is one where beryllium processing was never conducted and ventilation systems are not shared with rooms used for beryllium processing.

12. In Section 6.5, dismiss historical spills (see above) and state that waste chemicals have been removed.

Response

Modified.

13. Section 7.0 doesn't address the quality of data, including QC samples. The 7.1 title connotes that QA samples were taken, yet there is no discussion of QA (QC) samples and their implications. The section also needs to reference the specific QA Program document used (e.g., the Site QA Program Manual and/or a specific RMRS program document).) Have someone who understand data QA write this section (e.g., Steve Luker or Mark Brooks).

Response

The QA Samples section has been rewritten to reflect the data quality assessment process performed by the Site Analytical Services Division.

14. General editorial comments. Also, don't talk about chemical contamination in the same phrase with hazardous and toxic contaminants. Chemical contaminants don't have a regulatory basis. Hazardous refers to RCRA, and toxic refers to TSCA

Response

Modified.

Kaiser-Hill, Karan North Comments:

1. Pg 3, Para 2.0, 2nd para: What does the statement, "additionally, the RLCR states that some characterization will be completed as an on-going process in support of work activities," mean?

Response

The intent of this statement was to introduce in-process characterization. Further clarification has been added.

2. Pg 3, Para 2.0, 3rd para: What chemical hazards are associated with filter banks?

Response

There are no chemical hazards associated with the filter banks. Further clarification has been added to address facility hazards.

3. Pg 3, Para 3.0, 1st para: "*historical records*," have there been any spills? If so, what and where? Also, cite specific paragraph where information is documented in the RLCR.

Response

There have been no spills in Building 729. The historical records reviewed in support of the 779 RLCR are identified in the RLCR References.

4. Pg 4, Para 3.0, last para: Why is diesel fuel a hazard? State if CERCLA regulated.

Response

Modified.

5. Pg 4, Para 5.1: Does the lab have to be certified? What is a building inspector?

Response

A laboratory must be certified by the American Industrial Hygiene Association for asbestos in air analysis and the National Voluntary Laboratory Accreditation Program for bulk asbestos analysis. These certification requirements have been added to the report.

A building inspector is a generic term used for the State Certified Asbestos Inspector. This reference has amended to reflect the more appropriate terminology.

6. Pg 5, Para 5.2, what is "*where beryllium is known or suspected to exist*" based on?

Response

Process knowledge is the primary basis for where any constituent or contaminant is known or suspected to exist.

7. Pg 5, Para 5.3, is there any bulk remediation waste?

Response

No only PCB bulk product waste is anticipated.

8. Pg 5, Para 5.5, What about CERCLA constituents? Any solvent or P&U waste concerns under RCRA? Why not use existing site data and knowledge, contact Rich Lesser, X2298.

Response

The following verbiage has been added to the report. "No spills have occurred in Building 729, therefore no cleanup has been performed pursuant to CERCLA. Building use and process knowledge investigation have excluded the need to perform TCLP for organic

constituents and CERCLA hazardous substances. Consequently, the demolition debris will be managed pursuant to RCRA and TSCA."

9. Pg 6, Para 5.6, Title paragraph "CERCLA Release Criteria". Freon can be a RCRA F listed waste. What if you find some unusual staining from the visual inspection?

Response

Reference the response provided in Question 8 regarding "CERCLA Release Criteria".

Criteria have been identified for the visual inspection process and incorporated into the report. No unusual staining was found in Building 729.

10. Pg 6, Para 6.1, who is RFEC? The waste was removed and properly managed?

Response

RFEC is the subcontractor who performed the asbestos abatement in Building 729. This wording has been amended to the word "subcontractor". The waste generated from asbestos abatement was managed properly.

11. Pg 7, Para 6.5, what about other CERCLA/RCRA constituents?

Response

Only constituents relevant to Building 729 were addressed in this report.

12. General editorial comments such as spelling out acronyms or making active voice.

Response

Modified.