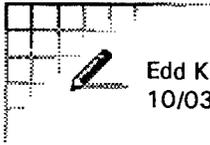


Prevention of AirBorne Releases



Edd Kray
10/03/97 10:04 AM

To: Mike Korenko
cc: 779 decommissioning team
Subject: 779 DOP

Following are my comments on the 9/25/97 DOP draft:

Kathy 1. (p1) What are the implications of the basement remaining in-place post decommissioning? Particularly, will ground water accumulate and require monitoring and treatment? We have not considered this situation in the previous draft.

K 2.(p3, par 1) Note that the chief toxicity of uranium is attributable not to its radioactive properties but rather to toxic effects upon the kidneys. Natural uranium standards are based on these properties rather than radiological effects. *chemical toxicity*

K 3. (p 43) It was unclear to me based on these sections that the RLCR was not completed nor included in the DOP preparation. Please clarify

Complete 4. (p 43) Please include a commitment that independent verification surveys are a requirement and shall be performed.

Page 49 5. (p 47, last 2 pars) Add reference to the facts that a) 5400 stds are a conservative approach (as compared to a 15 mrem standard) , b) regulators have agreed to this approach and c) they are equivalent to industry standards used in the private sector.

Mike Rudy 6 (p 48) Will RFETS claim that any areas of 779 are "non-impacted"?

7. (p 49) The table lists 500 dpm as the total std for transuranics. This is different from RG 1.86 which list numbers of 100 dpm total and 300 maximum. How will DOE interpret and use this area value. Please explain.

Greg 8. (p51, 2nd last par) For clarity, provide the full name for the acronym "SAR".

Mark 9.(p 61,62) Shouldn't the HAs for cutting out gloveboxes and decon work include mention of the potential for radiological releases and potential inhalations? Should there be a block for the HVAC removal work?

Longest 10. (p 77) Our air expert suggested minor changes in wordings of section 9.2.1. See attached.

John 11. I still don't see the new NRC decommissioning rule listed as TBC under ARARs. *10 CFR 20 etc*

Training 12. (sec 10) This section is still generic in terms of QA and training requirements. The state needs to know who will perform QA inspections and how often QA inspections of work activities will be performed. Adequate training of staff must be guaranteed by specific commitments.

Kathy *QA what kind of insps. - daily - monthly - weekly etc Shift*
Rad waste

FROM Previous DOP comments on the 12/96 draft

A) (p12) Although DOE may endorse the combination of the OSO and RSO function, this is directly contrary to NRC and State requirements. We discourage this management organization as not

organization - separate individuals

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providing adequate attention to radiation safety.

B) (p43) We still do not see adequate detail on glovebox and HVAC removal in the DOP. Any State approval will be contingent on subsequent submission of such detail. Public review will likely object to this lack of detail and hinder the approval process. I strongly recommend enhancement of these portions of the DOP.

Mark

- An extraction or destruction technologies will be selected for decontamination from the 268.45 listing, such as: acid/base washing; solvent extraction; abrasive blasting; scarification; spalling; high pressure steam; or water spray;
- Clean debris surface is attained as specified in 40 CFR 268.45; and
- All debris treatment residuals generated from extraction and/or destruction technologies used in the closure are managed and treated in compliance with ARARs.

As an alternative to treatment or if the 268.45 standards are not achieved (i.e., clean debris surface) following treatment, representative sampling may be used to demonstrate that the debris meets the treatment standards for the associated hazardous waste. In this circumstance, the debris may be disposed as low level mixed waste because the debris would no longer be prohibited from land disposal.

9.2 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

As noted earlier, decommissioning actions at RFETS must attain, to the maximum extent practicable, compliance with Federal and State ARARs. The general ARARs, relating to this proposed action are identified in this section and summarized in Table 9-1. In addition, Table 9-1 identifies whether the requirement is applicable, relevant and appropriate, or To Be Considered (TBC).

In addition, RFCA recognizes section 121(e)(1) of CERCLA, so that decommissioning may waive the procedural requirement to obtain federal, state, or local permits. (See RFCA ¶16.b.) Regardless, RFCA requires identification of the substantive requirements that would have been imposed in the permit process (RFCA ¶17). Further, the method used to attain the substantive permit requirements must be explained (RFCA ¶17c). The following discussion is intended to compliment other descriptions provided in this DOP in a manner that satisfies the RFCA permit waiver requirements.

9.2.1 Air

Decommissioning has the potential to generate particulate, radionuclide, fugitive dust, and HAP emissions. 5 CCR 1001-3, Regulation No. 1, governs opacity and particulate emissions. Regulation No. 1, Section II addresses opacity and require that stack emissions from the fuel-fired equipment must not exceed 20% opacity. Regulation No. 1, Section III addresses the control of particulate emissions. Fugitive particulate emissions will be generated from soil demolition and transport. Control methods for fugitive particulate emission should be practical, economically reasonable, and technologically feasible. During demolition activities, dust minimization techniques such as water sprays, will be used to minimize suspension of particulates. In addition, demolition operations will not be conducted during periods of high wind. The substantive requirements that would otherwise be incorporated into a control plan (see Regulation No. 1, Section III.D) are embodied in the RFETS Environmental Restoration Field Operation Procedure FO.1, Air Monitoring and Particulate Control, which will be incorporated into the project. In addition, any fuel-fired equipment such as generators or compressors must comply with a particulate emission limit (See Regulation No. 1, Section III.A) and opacity limits (See Regulation No. 1, Section II. A).

5 CCR 1001-3, Regulation No. 3, provides authority to CDPHE to inventory emissions. Regulation No. 3, Part A, Section II requires that RFETS submit an Air Pollution Emission Notification (APEN) to CDPHE prior to initiation of the B779 project. Although this is an administrative requirement, RFETS will prepare an APEN to facilitate the CDPHE inventory process.

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Additionally, the National Emission Standards For Hazardous Air Pollutants (NESHAP) (5 CCR 1001-10; 40 CFR 61 Subpart H) have been identified as a chemical-specific ARAR to evaluate potential radionuclide emissions. The EDE will be calculated for those emissions anticipated from the operations associated with facility demolition.

9.2.2 Waste Storage

Also needs statement concerning asbestos containing material (ACM) removal prior to demolition. See Reg. No. 8 for references.

The waste generated during the closure and decommissioning activities governed by this DOP are remediation wastes. (See RFCA ¶25bf. and RFCA Appendix 3, the Implementation Guidance Document, section 3.1.10). Remediation waste generated during this removal action will be evaluated consistent with the requirements of RCRA Part 261, Identification and Listing of Hazardous Waste, specifically Subparts A through C. Solid remediation waste will be generated and managed in accordance with the Colorado Solid Waste Disposal requirements, 6 CCR 1007-2. In addition, sections of Part 268, Land Disposal Restrictions, applicable to off-site shipment and disposal of hazardous waste are ARAR.

If necessary, remediation waste will be managed in a temporary unit established pursuant to §264.553. The requirements governing Temporary Units (TUs) are applicable to tanks and containers used for storage and treatment of hazardous remediation wastes generated in conjunction with the decommissioning. Incompatible wastes, if encountered, will be segregated within the units. Secondary containment will be provided, where practical, when liquid wastes are stored or treated in tanks or containers. Waste characterization will be provided, as appropriate, in accordance with the SAP. Inspections, at a minimum of once a week, will be provided during operations in accordance with the Waste Management Plan. Training for individuals generating and handling hazardous remediation waste will be implemented using the framework identified in the RFETS Part B permit. To close a TU, waste and contaminated soils will be removed, as appropriate. The information in the paragraph is being provided to satisfy the permit waiver conditions in RFCA ¶16.

9.2.3 Waste Treatment

Any waste, soil/waste mixture, debris or liquid that is identified as a hazardous waste requires treatment to the Land Disposal Restrictions (LDR) levels for wastewater or non-wastewaters, as appropriate. (See 40 CFR §268.40, Treatment Standards for Hazardous Wastes).

Solidification of characteristic hazardous remediation wastes may be conducted within a temporary unit. For example, scabbling of low level, RCRA characteristic lead-based paint may result in a remediation waste form amenable to solidification. The solidification would be conducted within competent tanks or containers and subject to waste analysis conditions imposed in the waste management plan.

9.2.4 Debris Treatment

Where appropriate, tanks, the project decontamination pad or the Main Decontamination Facility may be configured to perform low level, hazardous or mixed waste debris treatment in accordance with 40 CFR §262.34, §268.7(a)(4) and §268.45.

Solid residues from the treatment of debris containing listed hazardous wastes will be collected and managed in accordance with RCRA hazardous waste management ARARs. Any solid residues from debris treatment that exhibit a hazardous waste characteristic will also be managed in accordance with RCRA hazardous waste management requirements.

Liquid residues from the treatment of debris containing listed hazardous wastes that comply with the CDPHE Wastewater Treatment Unit Policy are subject to RCRA hazardous waste management ARARs until they are placed into the B891 Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Wastewater Treatment Unit headworks.