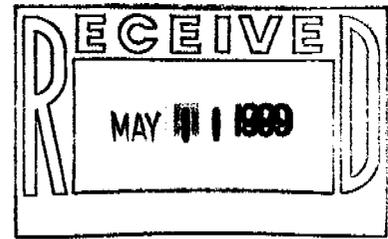


copies to:
Bob Buffis
Lana Tyler



INTEROFFICE MEMORANDUM

DATE: May 7, 1999

TO: Kent Dorr, K-H, Bldg 130, X6034

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *sm Nesta*

SUBJECT: NEPA DETERMINATION FOR THE DEMOLITION OF TENTS 7, 8, AND 9 – SMN-068-99

I have reviewed the project for the demolition and removal of Tents 7, 8, and 9. My understanding is that the project will consist of cutting up the tents and recycling the materials as possible. An estimated 78,000 pounds of metal frame will be generated and recycled, and about 20,000 pounds of construction debris and sanitary waste will be generated. All components of the tents will be removed to ground level, and the underlying asphalt pad will be cleaned to meet closure standards as needed. Cleaning, if necessary, would likely consist of sweeping or washing the asphalt. The RCRA closure for the site is anticipated to be a RCRA partial closure, but is dependent on an upcoming CDPHE decision on the appropriate type of RCRA closure. If this description is incorrect in any way, please notify me immediately.

Several potential air quality environmental compliance issues were identified during the review. These concerns are based on the current characterization of the facilities, and are identified in the attached letter from Air Quality Management. No other environmental compliance issues were identified during the review.

As you may know, Tents 7, 8, and 9 are being considered for temporary TRU/TRUM storage in an Environmental Assessment (EA) currently being prepared by Kaiser Hill; this storage may be required in the event that shipments to WIPP cannot be made on a schedule to support RFETS generation rates. Current plans are to publish this EA for public comment in June. Since DOE has directed that these tents be considered, it is assumed that at least some RFFO personnel expect them to remain erect for potential future use. I recommend that you confirm DOE's intent through the appropriate RFFO chain-of-command prior to initiating this demolition project. Please advise me of your findings in this regard so that the EA scope can be tailored accordingly.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any

Tim Rehder
Steve Gunderson
99-DOE-03384

2

MAY 20 1999

cc w/o Enc:

J. Rampe, DAMEI, RFFO

R. Tyler, ERWM, RFFO

N. Castaneda, ERWM, RFFO

G. Setlock, K-H

L. Butler, K-H

S. Singer, RMRS

changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will also forward an electronic copy of the CX to Mr. Morris for his use.

To assist you in properly transmitting the document, a sample transmittal letter from you to the RFFO NEPA Compliance Officer is attached. If any changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:

Karan North, K-H
Ted Hopkins, RMRS

file



KAISER ♦ HILL
COMPANY

INTEROFFICE MEMORANDUM

DATE: April 28, 1999

TO: S. M. Nesta, National Environmental Policy Act, T130C, X6386

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

SUBJECT: REVIEW OF TENTS 7, 8, & 9 DEMOLITION - CAP-048-99

Ref: Letter #SMN-056-99 from S. M. Nesta to distribution entitled "Review of Tents 7, 8, & 9 Demolition", attached Environmental Checklist, and information from project personnel

Per your request, Air Quality Management/Radian International (AQM) has evaluated the Tents 7, 8, and 9 demolition project for air quality regulatory issues. Based on information provided in the NEPA checklist and by project personnel, the project has the potential to emit regulated air pollutants and was assessed to determine air regulatory requirements. The following is a list of air regulatory requirements that will apply, or could potentially apply, to the demolition project:

Air Quality Applicable Regulatory Requirements

Colorado Air Quality Control Commission Regulation No. 1 (CAQCC Reg. 1) regulates particulates, smoke, carbon monoxide, and sulfur oxides. Parts of this regulation will apply to the project.

- Reg. 1, Section II, A. 1 (smoke and opacity) will apply to any non-electric compressors, pumps, or generators used in conjunction with the project. Smoke emissions from the compressors, pumps, or generators may not exceed 20% opacity. Air Quality Management must be notified if non-electric compressors, pumps, and/or generators are used in conjunction with the project.
- Reg. 1, Section III, D. 2.(f) (fugitive particulate emissions from haul trucks) will apply to haul trucks associated with decommissioning projects. It may require that a control plan be developed that utilizes all available practical methods that are technologically feasible and economically reasonable to minimize fugitive dust emissions from haul trucks.
- Reg. 1, Section III, D. 2.(h) (fugitive particulate emissions from demolition activities) applies to demolition projects. It requires that a control plan be developed that utilizes all available practical methods that are technologically feasible and economically reasonable to minimize fugitive dust emissions during demolition activities.

CAQCC Reg. 3 regulates non-radionuclide air pollutant emissions for all Colorado industries. The provisions of this regulation identify criteria air pollutants and hazardous air pollutants, establish air pollutant emission notice (APEN) thresholds for these regulated air pollutants, and set forth both construction and operating permit application guidelines. Based on information in the Environmental Checklist the Tents 7, 8, & 9 demolition project will be exempt from Reg. 3 requirements. However, portable generators and compressors utilized in conjunction with the project may have Reg. 3 requirements. Air Quality Management must be notified if non-electric compressors, pumps, and/or generators are used in conjunction with the project.

CAQCC Reg. 8 regulates emissions of hazardous air pollutants. Various parts will apply, or could apply to the project.

- CAQCC Reg. 8, Part A, Subpart H (40 CFR 61, Subpart H) regulates radionuclide emissions other than radon from Department of Energy facilities.
 - Section 61.92 requires that emissions of radionuclides to the ambient air from Department of Energy facilities shall not exceed those amounts that would cause any member of the public to receive in one year an effective dose equivalent (EDE) of 10 millirem. The EDE from each project will be calculated and added to the Site radionuclide emissions total to demonstrate compliance with the 10 millirem per year Site standard.
 - Section 61.93 specifies required radionuclide air emission monitoring and test procedures and establishes an uncontrolled radionuclide emission level (1% of the 10 millirem per year Site standard) at which monitoring is required for each release point.
 - Section 61.96 establishes a controlled radionuclide emission level (1% of the 10 millirem per year Site standard) at which an application for project approval must be filed with the U. S. Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE), and specifies methods for calculating radionuclide emissions from individual release points.

- Preliminary Information in the environmental checklist indicates that there will be no radionuclide air monitoring or regulatory approval requirements for this project, however, according to project personnel, radiological characterization work hasn't been completed. AQM must be provided with final radionuclide characterization data for the three tents as soon as it is available. At that time, AQM will calculate potential project radionuclide emissions and determine radionuclide air monitoring and regulatory approval requirements.

- CAQCC Reg. 8, Part B (Emission Standards For Asbestos) details the regulatory requirements for asbestos. These requirements may be applicable to the Tents 7, 8, & 9 demolition project if asbestos abatement activities are conducted in conjunction with the project.

- Section II outlines certification and training requirements for asbestos abatement activities. Air Quality Management assumes that the asbestos abatement subcontractor meets the Reg. 8 training and certification requirements.
- Section III. B outlines regulatory notification requirements. Air Quality Management assumes that the asbestos abatement subcontractor will complete and submit the necessary notice of intent to conduct asbestos abatement or demolition. **Also, even with a non-asbestos facility, a Demolition Notification must be submitted to CDPHE at least 10 working days prior to demolition activities (including preparation work).**
- Section III. C. 6 outlines required standards for asbestos inspection, sampling, assessment, and sample analysis for demolition projects.
- Section III. C. 8 outlines requirements for storage and handling of asbestos waste.

CAQCC Reg. 15 and 40 CFR Part 82 regulate emissions of ozone-depleting compounds (ODCs), and will apply to the project if any refrigeration system or appliance that contains a regulated ODC is disassembled or disposed of. All ODCs must be recovered by registered and certified technicians into an approved recovery vessel by an approved method prior to disassembly or disposal. Also, Air Quality Management maintains an inventory of all ODC-containing refrigeration equipment at the Rocky Flats Environmental Technology Site to satisfy regulatory reporting requirements. Information regarding transfer, removal, or disposition of refrigeration equipment in the course of a demolition project must be provided to Air Quality Management.

Please provide AQM with final project description documents and radionuclide characterization data as soon as they become available. For questions regarding this air compliance review, please contact me at the above listed number, or contact Mike Putney of Air Quality Management/Radian at X2692.

MTP

cc:

M. Hyder (Radian)
M. Putney (Radian)

<DATE>

98-RF-XXXX

J. Morris, NEPA Compliance Officer
DOE, RFFO

**NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR
[PROJECT NAME] - YYY-XXX-98**

Attached is a draft categorical exclusion for the subject project. Kaiser-Hill NEPA staff recommend that this project be categorically excluded from further NEPA documentation requirements. A draft Categorical Exclusion Determination is included for your review and an electronic copy of the draft Determination has been made available to you.

Please provide a final NEPA determination for this project at your earliest convenience. If you have any questions or need additional information, please contact [PROJECT CONTACT AND EXTENSION].

Name, Director
Division
XXX:xx
Orig. and T cc - J. Morris

SAMPLE

Attachments:
As Stated (1).

cc:
S. M. Nesta, K-H

DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99

Proposed Action: Demolition and Removal of Tents 7, 8, and 9.

Location: Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the Proposed Action:

The Rocky Flats Field Office (RFFO) proposes to demolish and remove Tents 7, 8, and 9 at Pad 904. The tents will be cut up and recycled to the extent possible; about 78,000 pounds of metal frame and 20,000 pounds of construction debris and sanitary waste will be generated. All components of the tents will be removed to ground level, and the underlying asphalt pad will be cleaned to meet RCRA closure standards as needed. Cleaning, if necessary, would likely consist of sweeping or washing the asphalt.

Categorical Exclusion to be Applied:

B1.23 Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces).

Justification:

The project is a small-scale action to demolish and dispose of three facilities (tents) that were used for storing wastes. The three facilities collectively encompass less than 50,000 square feet in area, and are located in a developed area that has utilities and access roads. The facilities will be cleaned to meet applicable RCRA closure standards.

In addition, in accordance with 10 CFR 1021.410(b), the project (a) fits within the class of actions listed in Appendix B of Subpart D of 10 CFR 1021, (b) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (c) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders, (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or (4) adversely affect environmentally sensitive resources.

I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: _____

Signature: _____

RFFO NEPA Compliance Officer