

STATE OF COLORADO

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HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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**Colorado Department
of Public Health
and Environment**

October 27, 2000

Joe Legare
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Comments on the Draft RFCA Standard Operating Protocol for Facility Component Removal.

Dear Mr. Legare:

The Colorado Department of Public Health and Environment (CDPHE) has reviewed the Draft RFCA Standard Operating Protocol for Facility Component Removal, Size Reduction, and Decontamination Activities, dated August 10, 2000. Our comments follow:

- 1) Section 1.0, p. 4. The discussion of the notification process appears to be less well developed than for the Facility Disposition RSOP. Given the intricacies of this document, we believe the consultation on its application will be even more intense than that suggested for the other RSOP. The notification process should be expanded and more detail provided, such as is included in the Facility Disposition RSOP Section 4, page 7 paragraph 4.
- 2) Section 1.0, p. 5, paragraph 2. Note that the entire project and the integration of D&D and ER activities is described in the Project Management Plan, as well as the Disposition RSOP.
- 3) Figures 1 & 2, p. 6 & 7. Although it may not be specifically necessary, there does not appear to be any driver or activity presented in Figures 1 or 2 that provides for earlier interaction between D&D and ER to characterize and remove UBC prior to building demolition (as proposed in B771), or slab removal. It should be recognized that these types of issues will be identified and dealt with utilizing the consultative process to generate the appropriate activities and documentation.

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4) Figure 2, p. 7 & 8. Since the PMP represents the higher level planning for the building, it seems unlikely that an RSOP or DOP approval would be granted without this degree of planning. The PMP should precede the RLC, with modification likely after the typing.

5) Section 2.1. The IWCP Hazards Identification and Assessment process must include appropriate IH personnel and the CBDPP, especially in areas with potential Beryllium contamination. This is in addition to the SMEs listed (air, water, waste, radiological, and environmental). Need to add Beryllium to the list of SMEs.

6) Section 2.7. Considering the concerns for Beryllium at RFETS, this section needs to be expanded or a section added discussing Beryllium Safety and Protection issues, the CBDPP, and requirements that will be followed.

7) Section 2.8, 2.11, and Table 1. Include appropriate documentation or documents for Beryllium concerns.

8) Table 2, p. 18. Provide appropriate references for the "Unrestricted Release Threshold" for beryllium. 0.2ug/100cm² is not supported in 10CFR850 as the unrestricted release criteria for beryllium. As such, beryllium needs to be removed from this Table or an appropriate limit and reference provided. Currently, the unrestricted release criteria for beryllium appears to be non-detect, utilizing direct sampling techniques.

9) Section 3.1, p. 19. It is indicated in item 1) that RWPs are required to perform work. Please indicate if there are Beryllium Work Permits (BWPs) that are also going to be required to perform work. If not, why not, and provide the appropriate/relevant Be requirements.

10) Section 3.2, p 20 & 21, Item 16. At the end of the first sentence, add, "after consultation with the LRA."

11) Section 3.2, p. 21, bullet 5) Delete "TSD". TSD is a RCRA term not applicable to radioactive waste disposal.

12) Tables 3 through 7, and 10. The selection of air monitoring techniques is specified, but it is not clear where this is documented or discussed.

13) Section 3.4.2, p. 46. There is apparently a typo in the first sentence. The last word looks like it should be decontaminated rather than contaminated.

14) Section 3.5, p. 51. If this section is intended to cover internal building vacuum/filtration systems, such as the machine vacuum system in B865, then it should be modified to do so.

- 15) Sections 3.6, 4 and 5. The header in these sections refers to the B707 DOP.
- 16) Section 3.6, p. 53. Analysis #3 must also include concerns related to Beryllium as applicable. Air monitoring for Beryllium within and adjacent to known Be buildings needs to be included as necessary during D&D and especially demolition activities.
- 17) Section 3.6, p.53. The consultative process should be explicitly defined for this activity.
- 18) Section 4. This section needs to specify/reference the RFETS waste management procedures that will be used, including procedures for characterizing wastes (e.g., waste analysis plan).
- 19) Sections 4.2.3.1 and 4.2.3.2. These sections have incorrect references to other sections of the RSOP.
- 20) Section 4.2.6. Please indicate if all Be suspected equipment and articles removed from suspected or known Be contaminated areas will be identified as Be waste. If sampling is to be performed to determine the appropriate disposal of equipment and articles, please provide the specific criteria and protocols for determining the difference between Be and non-Be contaminated equipment and articles, and the appropriate disposal for each. As written, this section does not provide enough information to make a proper determination. One sample does not provide sufficient information regarding possible contamination or non-contamination. The identified level of Be contamination, 0.2ug/100cm², is not an appropriate level to identify Be vs. non-Be contamination for disposal purposes.
- 21) Table 14, p. 65. Please provide the specific release criteria provided in 10CFR850 that addresses scrap metal contaminated with Beryllium. Otherwise this is not an appropriate reference for Be release criteria and should be removed, and an appropriate release criteria provided for recycling.
- 22) Section 5.0, p. 67, first paragraph. The second sentence needs to be fixed to state that the unit-specific closure information ". . . will be submitted with the closure notification letter." The unit-specific closure information needs to be submitted thirty (30) days prior to the implementation of the related closure activities, and RFETS must obtain CDPHE concurrence prior to implementing such activities.
- 23) Section 5.0, p. 67, second paragraph. It is not now appropriate to propose an option other than complete RCRA closure of units prior to building demolition. RCRA units need to be closed prior to building demolition so that the resulting demolition wastes can be characterized and managed appropriately. Demolishing a building containing an unclosed RCRA unit could potentially spread contamination and could result in the unnecessary generation of additional RCRA hazardous/mixed waste.

24) Section 5.0, p. 67, third paragraph: RFETS needs to be aware that any portions of the RCRA unit that are removed prior to submittal of required unit-specific closure information will have to meet one of the closure performance standards in order to obtain our concurrence.

25) Figure 8. The first decision point must also consider whether or not the unit has treated hazardous or mixed waste.

26) Section 5.1, p.68. Clean Closure Option #1 language in the first bullet needs to be revised as follows to be consistent with what has been approved in the B776 DOP: ". . . or if a spill did occur, it was cleaned up and the area was decontaminated;" Additionally, verification of such decontamination will be necessary.

27) Section 5.1, p. 69, Clean Closure Option #3. Verification sampling may be required (in addition to radiological surveys) for some units depending on the contaminants involved and the condition of the floor (e.g., amount of cracks, potential migration pathways, etc.). Additionally, this option needs to describe how to characterize and manage the residuals resulting from the use of abrasive techniques.

28) Section 6.4, p.76. Paragraph 3 states: "The CID reports the following estimated annual radiation doses from site closure activities: maximally exposed collocated worker - 5.4 mrem....". What actual exposures have resulted to actual D&D workers? Do they exceed the CID report estimated maximum?

29) Section 6.2, p.73. Releases to air might also include beryllium from Be contaminated buildings. This should be recognized, and included as a possibility requiring monitoring if warranted. EPA has set the community permissible exposure limit (24-hour ambient air limit) for Be at 0.01ug/m3.

30) Section 6.3 & Table 15. Water in sumps, vaults, basements, etc. should be removed as necessary to allow completion of D&D activities to properly characterize and/or remove contamination on interior surfaces even if the water is collected prior to D&D activities. Potential surface water impacts must be prevented during D&D activities, not waiting for ER to mitigate these impacts at a later date. RFETS, either D&D or ER must immediately prevent surface water impacts from occurring. As such, this description needs to indicate that actions will be performed immediately to prevent surface water impacts.

31) Section 6.4, p.75. This section also needs to include the worker health protective levels for Beryllium identified in 10CFR850 and the CBDPP, which are lower and more protective than OSHA requirements.

32) Section 7.0, p.79, and Appendix B. ARARs are still being resolved by the attorneys for the RFCA Parties, and comments on ARARs will be withheld until final ARARs are completed. This section should note the lack of agreement among RFCA Parties.

33) Appendix A, p. A-1. In order for the checklists to be of value, they should be completed on a set or smaller activity basis. Notification will require a detailed description of which specific activities will be addressed through an RSOP, and which would require other authorization.

We appreciate the opportunity to comment on this document. Should you have any questions, please contact me at 303-692-3367 or Steve Tarlton at 303-692-3423.

Sincerely,



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RFCA Project Coordinator

cc: Dave Shelton, KH
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Administrative Record, Bldg. 850