

[00788 40H]

TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 706	TPA CHANGE NOTICE FORM	Date: 1/11/2016
Document Number, Title, and Revision: DOE/RL-2010-34, Revision 2, Removal Action Work Plan for River Corridor General Decommissioning Activities 1220239		Date Document Last Issued: 4/8/2015
Originator: RF Guercia		Phone: 509 376-5494

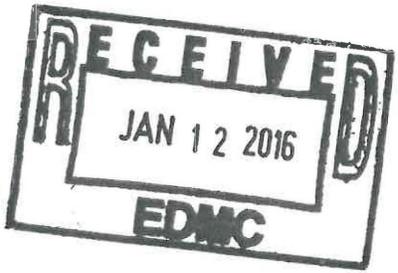
Description of Change:
Adds 20 additional Facilities Related to 324 Complex Demolition to the General Decommissioning RAWP. These facilities were not included in the Removal Action Work Plan for the 300 Area.. Also adds the demolition of a trailer to be abandoned by Pacific Northwest National Laboratory near 318.

RF Guercia DOE and C. Guzzetti & S. Schleif Lead Regulatory Agency agree that the proposed change modifies an approved work-plan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement*.

- The following Change is authorized:
- Replace pages i and ii with attached
 - Replace pages 1-3 through 1-12 with attached
 - Add new pages 1-13 through 1-16 as attached

Note: Include affected page number(s)

Justification and Impacts of Change:
Modify the Removal Action Work Plan for River Corridor General Decommissioning Activities to add the new facilities to demolish as listed in the attachment to this TPA-CN. These facilities were not included in the existing removal action work plan for the 300 Area.



Approvals:

	4/11/16	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
DOE Project Manager	Date	
	1/12/16	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA Project Manager	Date	
	1/12/16	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology Project Manager	Date	

Attachment to TPA-CN-0706

The 20 following facilities are added to the General Decommissioning Removal Action Work Plan:

CC0837

CC1046

CC1047

CC1048

HO-64-4263

HO-64-05159

HO-64-6384

HO-64-6385

HS-026

HS-027

MO-073

MO-226

MO-664

MO-779

MO-870

MO-1112

MO-2311

MO-2232

MO-2236

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Introduction

- The buildings/structures/debris have not been addressed by another approved CERCLA decision document or *Resource Conservation and Recovery Act of 1976* (RCRA) closure plan for which the implementation would eliminate the release or threat of release of hazardous substances to the environment.

1.1 PURPOSE AND OBJECTIVE OF THE REMOVAL ACTION WORK PLAN

The purpose of this RAWP is to establish the methods and activities required to perform the following functions:

- Complete D4 of excess industrial buildings and structures (e.g., building contents, aboveground structures, on-grade floor slabs, and the below-grade foundations and piping) addressed within the *Engineering Evaluation/Cost Analysis for General Hanford Decommissioning Activities* (EE/CA) (DOE-RL 2010b).
- Complete removal of miscellaneous debris that has been identified as needing cleanup to protect habitat, human health, and restore the environment.
- Manage and dispose of all waste generated during these actions.

This RAWP satisfies the requirement to submit a work plan outlining how compliance with the removal action objectives and applicable or relevant and appropriate requirements (ARARs) (Section 4.1) will be achieved.

This RAWP directs the removal action activities including the development of specific project tasks that are described in work packages and subcontract task orders. Using the most recent information concerning facility conditions, field-level work packages will be developed to direct work activities and instruct workers in the most applicable work methods. Work packages will be written in accordance with, but do not supersede, the requirements outlined in this RAWP. Existing contractor procedures and specifically developed instructions will be used to perform and control the building, structure, and solid waste debris removal and disposal actions.

Table 1-1 provides a list of the building/structures in the 100, 300, 400, and 600 Areas that have been identified to undergo D4 through implementation of this RAWP as they become excess. As identified in the Action Memorandum, additional buildings may be added, subject to review and approval by the lead regulator.

Table 1-1. Building/Structure List and Location. (7 Pages)

Building Number	Area	Approximate Waste Quantity (ton)
100B Electrical Switchyard	100-B	200
105B Washpad Annex (above-grade)	100-B	360
119-B Vacuum Seal House	100-B	6

Introduction**Table 1-1. Building/Structure List and Location. (7 Pages)**

Building Number	Area	Approximate Waste Quantity (ton)
151-B Substation	100-B	940
1608-B Shed	100-B	335
183B ^a	100-B	3446
MO-747 Mobile Office	100-B	395
MO-875 Mobile Office	100-B	226
MO-876 Mobile Office	100-B	226
MO-877 Mobile Office	100-B	47
MO-878 Mobile Office	100-B	63
MO-879 Mobile Office	100-B	63
MO-899 Mobile Office	100-B	105
Storage Box #1	100-B	35
Storage Box #2	100-B	35
100D Electrical Switchyard	100-D	200
100D Electrocoagulation Equipment ¹	100-D	175
210-DR Tent	100-D	25
118-D Tent	100-D	25
147D In-Situ Redox Manipulation Pond ⁱ	100-D	1000
151-D Substation	100-D	940
183D ^b	100-D	3446
1601D Pump and Treat Transfer Building and Tank	100-D	350
1902D (below grade) ^b	100-D	50
635 Shipping Shed	100-D	15
MO-084 Mobile Service Building	100-D	47
MO-784 Operator Trailer	100-D	150
MO-785 Mobile Service Building	100-D	30
MO-786 Mobile Service Building	100-D	281
MO-787 Mobile Service Building	100-D	175
MO-788 Mobile Service Building	100-D	30
MO-789 Mobile Service Building	100-D	281
MO-790 Mobile Service Building	100-D	226
MO-791 Mobile Service Building	100-D	47
MO-793 Mobile Service Building	100-D	47
MO-794 Mobile Service Building	100-D	30
MO-870 Mobile Service Building	100-D	38
MO-874 Mobile Service Building	100-D	15
MO-889 Water Trailer	100-D	25
MO-980 Mobile Office	100-D	289
MO-929 Water Trailer	100-D	15
MO-989 Water Trailer	100-D	25
HO-64-5929 Operator Trailer ^k	100-D	75
CC0643 Storage Box	100-D	35
CC60538 Storage Box	100-D	35
CC1D0545 Storage Box	100-D	35
CC1D0546 Storage Box	100-D	35
MO-417 Mobile Office	100-F	1,754
634 Shipping Shed	100-H	16

Table 1-1. Building/Structure List and Location. (7 Pages)

Building Number	Area	Approximate Waste Quantity (ton)
1601H Pump and Treat Transfer Building and Tank	100-H	350
MO-229 Mobile Office	100-H	579
MO-757 Mobile Office	100-H	175
MO-796 Mobile Office	100-H	281
MO-797 Mobile Office	100-H	175
MO-798 Mobile Office	100-H	281
MO-799 Mobile Office	100-H	63
MO-848 Mobile Office	100-H	38
HO-64-04265 Service Building	100-H	25
HO-64-4263 Service Building	100-H	25
HO-64-6383 Storage Box	100-H	25
HO-64-6387 Storage Box	100-H	25
HO-64-06067 Storage Box	100-H	47
CT0023 Storage Box	100-H	15
CT0024 Storage Box	100-H	42
CT0025 Storage Box	100-H	25
612A Skid Mount Shed	100-K	120
612B Skid Mount Shed	100-K	120
6140 Tent	100-K	25
MO-751 Mobile Service Building	100-K	2,215
MO-755 Mobile Office	100-K	2,215
MO-883 Mobile Service Building	100-K	1,804
MO-884 Mobile Service Building	100-K	601
MO-885 Mobile Service Building	100-K	2,707
MO-886 Mobile Service Building	100-K	456
HO-64-5161 Operator Trailer ^m	100-N	10
105ND ^c	100-N	87
1120N ^c	100-N	1956
181N Cable Float Barriers ⁱ	100-N	350
1143N ^c	100-N	971
1724N Nitrogen Electrical Control ^d	100-N	946
1904N ^c	100-N	916
1904NA/1904NB/1904NC ^c	100-N	320
1112NA (below grade) ^c	100-N	15
1112N (below grade) ^c	100-N	15
1902N81 Valve House	100-N	147
120-N Bioremediation Enclosure	100-N	61
HO-64-3548 Mobile Service Building	100-N	61
HO-64-6337 Mobile Service Building	100-N	35
HO-64-5865 Mobile Service Building	100-N	35
CC0576 Storage Box	100-N	15
CC0577 Storage Box	100-N	35
CC0578 Storage Box	100-N	35
CC0579 Storage Box	100-N	35
CC0580 Storage Box	100-N	35
CC0581 Storage Box	100-N	35

Introduction**Table 1-1. Building/Structure List and Location. (7 Pages)**

Building Number	Area	Approximate Waste Quantity (ton)
CC0582 Storage Box	100-N	35
CC0583 Storage Box	100-N	35
CC0583 Storage Box	100-N	35
CC0584 Storage Box	100-N	35
CC0585 Storage Box	100-N	35
CC0586 Storage Box	100-N	35
CC0677 Storage Box	100-N	35
CC1N0253 Storage Box	100-N	35
CC1N0410 Storage Box	100-N	35
CC1N0543 Storage Box	100-N	35
CC1N0544 Storage Box	100-N	35
MO100 (1110N) ^c	100-N	213
MO-403 Mobile Office	100-N	434
MO415 (1103N) ^c	100-N	2295
MO425 ^c	100-N	284
MO426/MO427 ^c	100-N	349
MO-085 Mobile Service Building	100-N	376
MO-088 Mobile Service Building	100-N	15
MO-765 ^c	100-N	200
MO-769 Mobile Office	100-N	63
MO-801 Mobile Office	100-N	1,158
MO-802 Mobile Office	100-N	1,158
MO-803 Mobile Service Building	100-N	501
MO-804 Mobile Service Building	100-N	200
MO-809 Mobile Office	100-N	1,804
MO-811 Mobile Office	100-N	376
MO-865 Mobile Office	100-N	301
MO-866 Mobile Office	100-N	301
MO-868 Mobile Office	100-N	30
HS-007 ^c	100-N	15
HS-008 ^c	100-N	15
100-NR-2 Pumping Unit ^j	100-N	400
331-C ^e	300	1,127
331-D ^e	300	223
331-G ^e	300	249
331-H ^e	300	679
3506-C ^f	300	100
337 Technical Center	300	5,855
337B High-Bay Test Facility	300	14,145
371 Industrial Hygiene Facility ⁿ	300	50
MO-061 Mobile Office	300	2,245
MO-073 Shower Trailer ⁿ	300	48
MO-075 Mobile Office	300	301
MO-161 Mobile Office	300	132
MO-226 Mobile Office ⁿ	300	528
MO-245 Mobile Office	300	2,316
MO-246 Mobile Office	300	842

Introduction**Table 1-1. Building/Structure List and Location. (7 Pages)**

Building Number	Area	Approximate Waste Quantity (ton)
MO-644 Mobile Office ⁿ	300	255
MO-767 Mobile Office	300	1,804
MO-779 Mobile Office ⁿ	300	256
MO-812 Mobile Office	300	4,511
MO-827 Mobile Office	300	289
MO-870 Mobile Office ⁿ	300	41
MO-898 Mobile Office	300	47
MO-984 Mobile Office	300	226
MO-985 Mobile Office	300	226
MO-986 Mobile Office	300	47
MO-987 Mobile Office	300	47
MO-1112 Mobile Office ⁿ	300	420
MO-2311 Mobile Office ⁿ	300	51
MO-2232 Mobile Office ⁿ	300	515
MO-2236 Mobile Office ⁿ	300	132
CC0837 Sampler Connex ⁿ	300	23
CC1046 Locker Room Connex ⁿ	300	46
CC1047 Storage Room Connex ⁿ	300	46
CC1048 Locker Room Connex ⁿ	300	46
HO-64-4263 PPE Storage (Safety Equipment) ⁿ	300	23
HO-64-05159 Electrical Storage ⁿ	300	23
HO-64-6384 PPE Storage (IH) ⁿ	300	27
HO-64-6385 Electrical Office ⁿ	300	23
HS-026 Storage ⁿ	300	23
HS-027 Storage ⁿ	300	23
4220 Telephone Exchange	400	14
4221 LAN Hub	400	133
4701B Guard Station	400	205
4701C Guard Station	400	508
4702 Office Barracks	400	3,532
4704N Shop Building	400	1,494
4704S Fire Station	400	1,491
4706 Office Building	400	3,072
4707 Office Building	400	432
4719 Guard Station	400	339
4722B Shop Building	400	764
4722C Shop Building	400	811
4726 Storage Building	400	100
4727 Storage Building	400	38
4732A Warehouse	400	2,342
4732B Warehouse	400	3,633
4732C Warehouse	400	1,664
4732D Warehouse	400	1,335
4734D ^s	400	1,290
4760 Shop Building	400	1,290
4790 Guard Station	400	790
4790A Microwave Tower	400	253

Table 1-1. Building/Structure List and Location. (7 Pages)

Building Number	Area	Approximate Waste Quantity (ton)
4791TC Warehouse	400	254
4802 Shop Building	400	237
4814 Warehouse	400	852
4831 Storage Building	400	300
4843 Storage Building	400	852
CC40168 Storage Box	400	23
HS 0079 Storage Box	400	23
MO-480 ^h	600	15
MO-481 ^h	600	35

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^a Added by TPA-CN-470, 6/5/11.

^b Added by TPA-CN-493, 12/29/11.

^c Added by TPA-CN-494, 12/29/11.

^d Added by TPA-CN-496, 2/16/12.

^e Added by TPA-CN-430, 2/28/11.

^f Added by TPA-CN-492, 12/14/11

^g Added by TPA-CN-434, 7/14/11.

^h Added by TPA-CN-469, 3/10/11.

ⁱ Added by TPA-CN-557, 11/12/12.

^j Consists of HO-64-6380 Operator Trailer, TC-1301-N Tent, TC-1301-NA Small Building, TC-1301-NB Small Building, TK-1 Tank, TK-2 Tank, and above ground piping from pumping wells to injection wells.

^k Includes job boxes, sign, electrical rack, cut up hoses.

^l Includes conduit pile

^m Includes tank and miscellaneous equipment and is located between 100-K and 100-N.

ⁿ Added by TPA-CN-0706, 12/14/15

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1.2 OBJECTIVES

The primary goal of CERCLA removal actions is to minimize or eliminate threats to public health or the environment caused by the presence of hazardous substances. The EE/CA for general Hanford Site decommissioning activities (DOE-RL 2010b) presented three alternatives for future facility management and the resulting levels of protection of public health and the environment that may be anticipated. Based on the evaluation, D4 was the selected alternative. This alternative was chosen based on its overall ability to protect human health and the environment and its effectiveness in maintaining protection for both the short term and the long term. The alternative would also reduce the potential for a release by reducing the inventory of contaminants available to the environment. This alternative provides the best balance of protecting human health and the environment, protecting workers, meeting the removal action objectives, achieving cost effectiveness, and providing an end state that is consistent with future cleanup actions and commitments to the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) (Ecology et al. 2003). The selection and approval of this approach are documented in the Action Memorandum (DOE-RL 2010a).

Based on the potential hazards identified in Section 1.4, the following removal action objectives have been identified:

- Protect human receptors from exposure to radiological and hazardous substances in facility structures above acceptable exposure levels for nonradiological general employees
- Control the migration of contaminants from the buildings/structures and debris into the environment
- Facilitate and, to the extent practicable, be consistent with anticipated remedial actions at the Hanford Site
- Achieve ARARs to the fullest extent practicable
- Safely treat, as appropriate, and dispose of waste streams generated by the removal action
- Prevent adverse impacts to cultural and natural resources and threatened or endangered species, and minimize wildlife habitat disruption
- Reduce or eliminate the need for future surveillance, maintenance, or periodic inspection activities.

1.3 SCOPE

Facilities and debris sites addressed in the scope of this RAWP include all those that fall within the River Corridor Project work scope, excluding those where DOE has identified a long-term

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use for the facility. These areas include the 100 Areas, 300 Area, 400 Area, and 600 Area (Figure 1-1). The list of facilities that are addressed within this RAWP is provided in Table 1-1.

Some buildings/structures slated for D4 may be found to be unsuitable for inclusion within this removal action or DOE-RL may find unforeseen future uses prior to performing the decommissioning. If this occurs, and eliminating the buildings/structures from the list identified in Table 1-1 is appropriate, documentation would be placed in the Administrative Record for this NTCRA identifying the buildings/structures and explaining why it is not being addressed under the scope of the NTCRA. Furthermore, DOE-RL may need to D4 other Hanford buildings/structures within the River Corridor Project with similar characteristics, contaminants, and complexities to those specifically identified in Table 1-1. Consistent with the Action Memorandum, this RAWP intends to allow the potential future inclusion of such buildings and structures under the scope of the NTCRA, as appropriate. If additional buildings and structures are added to Table 1-1, concurrence from Ecology and EPA would first be obtained and documentation would be placed in the Administrative Record for this NTCRA, identifying the building or structure and explaining why it is sufficiently similar to the buildings/structures specifically identified in the Action Memorandum (DOE-RL 2010a) and this RAWP.

Furthermore, it is recognized that the status of the buildings and structures facilities will change over time. Changes could include, but are not limited to, modifying the status of facilities from active to inactive, adding scope to removal action that was previously missed or excluded, and changing the status of facilities from demolished to closed and/or transferred. This RAWP will be revised and Table 1-1 updated, as needed, to incorporate the changes documented in the Administrative Record.

Where below-grade structures remain, a decision may be made to remove the foundation while performing demolition. In other cases, the below-grade structures may remain in place until they are removed to provide access to any newly discovered waste sites. If the remaining structure and underlying soils are determined to be clean, then no further action will be required. Section 2.6 establishes the site completion process.

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1.4 HAZARD DESCRIPTION

This section discusses the hazards associated with the buildings/structures and debris sites included in this RAWP. The buildings/structures addressed are limited to those facilities included in Table 1-1. Debris sites are not specifically identified in this RAWP. Rather, debris sites candidate for removal are identified through the River Corridor Project Orphan Waste Sites Program. This program, in part, includes routine inspections intended to identify and characterize undiscovered waste sites including solid waste debris locations.

At this time, not all of the building/structures and debris sites in this document have been fully characterized; therefore, CERCLA hazardous substances have not been conclusively identified in all of the facilities. Following any necessary characterization, the CERCLA hazardous substances will be known.

The hazardous substances will be managed in accordance with as low as reasonably achievable (ALARA) considerations, the applicable requirements provided in Section 4.1, and the waste management plan (Section 4.2) of this RAWP. Contaminant sources addressed by this RAWP include the potential for both radiological and chemical hazardous substances.

1.4.1 Radiological Hazards

Buildings/structures and debris sites within the scope of this RAWP have the potential to be radiologically contaminated. Radiological contaminants may include, but are not limited to the following:

- Americium-241
- Cesium isotopes
- Cobalt-60
- Curium isotopes
- Europium isotopes
- Niobium-94
- Radium-226
- Selenium-79
- Strontium-90
- Plutonium isotopes
- Technetium-99
- Thorium isotopes
- Uranium isotopes.

1.4.2 Chemical Hazards

For inactive buildings/structures that have been deactivated, all bulk chemical inventories have been removed for recycling or disposal. Bulk chemical inventories may still exist in active buildings and structure, but will be removed prior to initiating D4 activities. Some residual quantities of hazardous chemicals may remain in the process lines, tanks, and drains. Asbestos and lead are found in the greatest quantities and are located throughout many of the building and

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structures. In addition, several other hazardous materials could be present including, but not limited to, the following:

- Asbestos
- Cadmium
- Beryllium
- Lead
- Polychlorinated biphenyls (PCBs)
- Mercury (in electrical switches)
- Refrigerants (Freon®)
- Lubricants
- Commercial solvents
- Corrosives
- High-efficiency particulate air (HEPA) filter media (desiccants)
- Sodium vapor and mercury vapor lighting
- Biological hazards from animal intrusion in facilities
- Chemicals (old containers of residual chemical constituents).

The removal of these materials will be performed in accordance with contractor procedures that ensure control over hazardous substances. The contractor's standards and procedures for asbestos and lead ensures that personnel removing, handling, and disposing of waste is performed in a manner that achieves the following objectives:

- Protect the safety of employees and the general public
- Minimize spills and releases to the environment
- Meet applicable DOE, federal, state, and local regulatory requirements.

1.4.2.1 Asbestos. Asbestos-containing material (ACM) could be found in and around the building and structures addressed by this RAWP. Personnel involved in asbestos cleanup will follow the applicable requirements of 29 *Code of Federal Regulations* (CFR) 1926.1101, "Asbestos." Task-specific requirements for controls will be contained within the associated work package.

1.4.2.2 Cadmium. Cadmium is a byproduct of the metal finishing process. Cadmium could also be present in electrical equipment. At certain levels, cadmium is regulated as a hazardous waste. Waste containing cadmium above regulatory limits will require treatment prior to disposal.

1.4.2.3 Beryllium. Beryllium contamination may be present in buildings and structures addressed under this removal action. Although beryllium is not regulated as a dangerous waste, there are health and safety requirements that must be addressed when working with beryllium-contaminated structures.

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1.4.2.4 Lead. Lead may exist in surface coatings (e.g., lead-based paint, lead-shielded cables), plumbing, and as radiological shielding (e.g., lead shot, brick, sheet, and cast-lead forms) inside some of the buildings and structures. Personnel must exercise caution to avoid disturbing or contacting lead or suspect lead material. Workers performing job tasks that involve lead shall follow the applicable requirements in the contractor's procedures and the associated work package.

1.4.2.5 PCBs. PCBs may be found in the painted surfaces of facilities and in the waste oils generated during facility decontamination and deactivation. Material that is painted, and for which the paint contains PCBs, will be managed as "PCB Bulk Product Waste."

1.4.2.6 Mercury. Mercury could be present in electrical equipment. At certain levels, mercury is regulated as a dangerous waste. Waste containing mercury above regulatory limits will require treatment prior to disposal.

1.4.2.7 Refrigerants. Refrigerants are regulated due to their effect on the ozone layer of the atmosphere. Refrigerants will be "recovered" prior to disposal of the equipment.

1.4.2.8 Lubricants. Lubricants sometimes contain hazardous substances. Equipment will be drained of lubricants to the extent practical prior to disposal.

1.4.2.9 Commercial Solvents. Commercial solvents may be designated as a dangerous waste. Equipment will be drained of commercial solvents and may require treatment prior to disposal.

1.4.2.10 Corrosives. Corrosives may be present in facilities that have not been deactivated. In the state of Washington, corrosive solids and liquid waste above the regulatory limits must be managed, treated, and disposed of as a dangerous waste.

1.4.2.11 HEPA Filter Media. HEPA filter media may contain toxic metals above the regulatory limits. HEPA filters may need to be sampled prior to disposal to demonstrate whether or not they contain toxic metals above the regulatory limits.

1.4.2.12 Sodium Vapor and Mercury Vapor Lighting. Sodium vapor and mercury vapor lighting will be dispositioned through the Hanford Site Centralized Consolidated Recycling Center (CCRC) whenever possible. Sodium above a certain concentration is regulated within the state of Washington as a dangerous waste. Mercury above a certain concentration is regulated as a dangerous waste.

1.4.2.13 Biological Hazards. Biological hazards could be encountered in the facilities contained in this RAWP. Examples of biological hazards include bird and rodent carcasses and feces. Biological hazards will be identified as part of the surveillance and maintenance (S&M) and facility deactivation process.

1.4.2.14 Chemicals. Some bulk chemical inventories have been disposed or recycled during deactivation of these facilities; however, the potential exists for the discovery of old containers of

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residual chemical constituents (e.g., solvents, greases, hydraulic and fuel oils, aerosols, preservative treated wood).

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