

TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 546	TPA CHANGE NOTICE FORM	Date: 9/19/2012
Document Number, Title, and Revision: DOE/RL-2004-77, Removal Action Work Plan for 300 Area Facilities, Rev. 2		Date Document Last Issued: December 2007
Originator: R. F. Guercia (U.S. Department of Energy, Richland Operations Office [DOE])		Phone: (509) 376-5494

Description of Change:
Modify the document to add new text clarifying the *Asbestos National Emissions Standards for Hazardous Air Pollutants* (NESHAP) requirements.

Rudy Guercia **DOE** and Larry Gadbois (EPA) **Lead Regulatory Agency** agree that the proposed change modifies an approved workplan/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*.

DOE/RL-2004-77, Removal Action Work Plan for 300 Area Facilities, Rev. 2, documents the process to be performed in order to achieve the non-time-critical removal action for surplus facilities located in the 300 Area of the Hanford Site. The removal process is achieved through deactivation, decontamination, decommissioning, and demolition (D4) of surplus facilities.

Changes are necessary to incorporate the agreed upon approach to asbestos abatement. The following sections of the Removal Action Work Plan are changed:

- Section 2.4, Deactivation, Decontamination, Decommissioning and Demolition Activities (Attachment 1)
- Section 4.2, Waste Management Plan (Attachment 2)

Note: Include affected page number(s)

Justification and Impacts of Change:

The attached changes are made to accomplish the following:

- Clarify D4 approach consistent with stated EPA expectations.

Approvals:			
Rudy Guercia 	<u>9/19/12</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
DOE Project Manager	Date		
Larry Gadbois 	<u>9-19-2012</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
EPA Project Manager	Date		
N/A		<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
Ecology Project Manager	Date		

ATTACHMENT 1

2.4 DEACTIVATION, DECONTAMINATION, DECOMMISSIONING AND DEMOLITION ACTIVITIES

In general, work activities will begin by developing a baseline of the facility conditions. Biological cleanup, general housekeeping, and removal of hazardous materials may also be necessary. For facilities, fluids will be drained from piping and equipment. Overhead utilities and adjacent concrete and asphalt will be removed, as needed, from the BFA to support demolition activities. Contaminated materials may be fixed in place. These activities will be managed in accordance with the contractor's procedures and work packages that address removing, handling, and disposing of these materials in a manner that protects the safety of employees and the general public, minimizes spills and releases to the environment, and meets all regulatory requirements.

Many of the facilities are suspected to contain beryllium contamination. Special controls will be necessary when working with beryllium-contaminated materials. Beryllium-contaminated materials will be managed in a manner that ensures worker protection. Prior to facility demolition, beryllium contamination may be fixed in place, as required.

Friable and nonfriable ACM and presumed ACM will be removed prior to demolition of the area, ~~as appropriate~~ in accordance with Section 4.2.3.4 of the Waste Management Plan. Unattached, not-in-use, and accessible lead bricks and sheeting; PCBs (primarily motor oils, and light ballasts); mercury (primarily in lighting components and switches); and other hazardous materials will be removed and disposed as hazardous or mixed waste or will be recycled.

ATTACHMENT 2

Asbestos. Multiple forms of asbestos are expected to be encountered. Removal and disposal of asbestos and ACM are regulated under the *Clean Air Act Amendments of 1977* (implemented via 40 CFR 61, Subpart M) and under health and safety regulations promulgated pursuant to the OSHA regulations (implemented via 29 CFR 1926.1101, 29 CFR 1910.1001, and WAC 296-62 Part I). The 40 CFR 61 requirements applicable to this removal action are contained in 40 CFR 61.145(c) and 40 CFR 61.150. These regulations establish removal requirements based on quantity present, and specify handling, packaging, and disposal requirements for regulated sources having the potential to emit asbestos. Asbestos work, air monitoring, and worker safety requirements will be performed in accordance with 40 CFR 61.145(c), 40 CFR 61.150, 29 CFR 1926.1101, and the contractor's procedures for ACM removal.

~~Friable and nonfriable ACMs and presumed ACMs will be removed prior to demolition of the area. Asbestos removal will be performed by trained asbestos certified workers, and oversight will be provided by a competent person trained in asbestos regulations. This person must be on site at all times that work is being performed on ACMs. ACM typically consists of insulation for piping, floor tiles, and cement asbestos board. Insulation on piping and surfacing materials (e.g., sprayed on fire stop) will be removed as Class I asbestos work, and nearly all other ACM in the facilities will be removed as Class II (e.g., floor tiles and cement asbestos board). There could be instances where asbestos is to be left in place during demolition because removal poses a greater hazard to the employee (e.g., high radiation areas or the facility is structurally unsound and in danger of imminent collapse). In these cases only the requirements of 40 CFR 61.145(c)(4) through (c)(9) would apply, in accordance with 40 CFR 61.145(a)(3). The substantive requirements of the *Clean Air Act Amendments of 1977* standards are applicable to the abatement of asbestos and ACMs. Both the substantive and administrative requirements of the OSHA standards are applicable to the removal of asbestos and ACM. Asbestos removal and waste management practices will be further addressed in work specific documents.~~

Asbestos abatement activities will be performed in full compliance with all substantive NESHAP standards that are ARAR for the work. Prior to the commencement of the demolition a thorough inspection of the affected facility will be performed for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material (ACM). All Category II nonfriable ACM will be generally presumed to be potentially friable and will be removed prior to the start of actual demolition activities. If DOE identifies any Category II ACM that should be allowed to remain in place during demolition based on knowledge that the demolition will not render it friable, information identifying the planned demolition approach and describing how the Category II ACM will not become crumbled, pulverized, or reduced to powder, by the forces expected to act upon it during the demolition or otherwise friable will be provided in advance to EPA for approval. Category I nonfriable ACM will also be removed prior to the start of actual demolition activities, except in situations where demolition practices will be used that can be or have been demonstrated to the satisfaction of the EPA not to

ATTACHMENT 2 continued.

render the Category I ACM friable, consistent with HESHAP standards. Demonstration can be performed using existing EPA or Washington State guidance regarding asbestos abatement under NESHAP. Such Category I nonfriable ACM must not be in poor condition and planned demolition activities must not subject the ACM to sanding, grinding, cutting, or abrading. In all cases, ACM that is either friable or cannot be demonstrated to remain nonfriable during demolition will be removed prior to such demolition as required by NESHAP.