

OPTIONAL FORM 99 (7-90)

## FAX TRANSMITTAL

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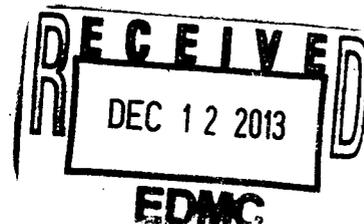
To <i>Rudy Guercia</i>	From <i>Alicia Boyd</i>
Dept./Agency	Phone # <i>376-6865</i>
Fax # <i>373-0726</i>	Fax #
NSN 7540-01-317-7368	5099-101 GENERAL SERVICES ADMINISTRATION

UNITED STATES ENVIRONMENTAL  
REGION 10 HANFORD/INL  
309 Bradley Boulevard  
Richland, Washington



February 27, 2008

Rudolph Guercia  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, MS A3-04  
Richland, Washington 99352



Re: U.S. Environmental Protection Agency Comments on WCH Work Package  
No. 300 07 10 03 001

Dear Mr. Guercia:

The Removal Action Work Plan for 300 Area Facilities (DOE/RL-2004-77 Rev. 2) states in section 4.2.3.4 that "Asbestos work, air monitoring, and worker safety requirements must 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." EPA has reviewed the white paper entitled 384 *Demolition Approach* as well as WCH Work Package No. 300 07 10 03 001 for Building 384 Demolition with Transite Siding. These documents outline the procedures that DOE and Washington Closure Hanford intend to use in order to satisfy the 40 CFR 61.145(c) (NESHAP) requirements.

Listed below are EPA's comments on WCH Work Package No. 300 07 10 03 001 for Building 384 Demolition with Transite Siding.

1. Section 5.1.2.1.A – Please specify and ensure that the demarcation of the area will be performed with asbestos hazard tape or rope as well as the use of signs.
2. Section 5.1.2.3.E – Because the air monitoring in this case is for reassurance of no release to the public, EPA does not believe that the air monitoring should be downgraded at any time during this project, regardless of what the daily results are from such monitoring. Please change the wording of the paragraph and proceed as follows:

"Monitoring shall be conducted.... Exception: When all employees ..., the employer may dispense with the ~~daily monitoring~~. ~~Daily monitoring will consist of both personnel breathing space monitoring and perimeter monitoring~~. Perimeter monitoring will continue during all asbestos operations even if a negative exposure assessment has been made."

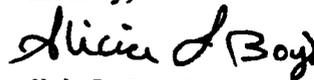
EPA would like to emphasize that this work is an exception to normal 300 Area demolition operations. The manner in which the transite panels are attached to the 384 building and to each other makes it likely that any type of asbestos mitigation, including removal by hand, would result in panels being broken apart. Breaking the panels during removal at the 384 building will not result in the transite becoming friable, but should be minimized nevertheless. As you are aware, Washington

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Closure Hanford feels that they can perform removal of the panels with heavy equipment in a manner that will break panels, but will not cause the panels to become friable. Their proposed method of stripping the panels from the building with heavy equipment prior to demolition of the majority of the structure was outlined in the work package referenced earlier in this letter. It appears that this process should satisfy the 40 CFR 51.145(c)(1)(iv) NESHAP language.

It is the responsibility of DOE to ensure that demolition occurs according to the Removal Action Work Plan and satisfies the 40 CFR 61.145(c) NESHAP requirements. Please keep me informed as the work progresses.

Sincerely,



Alicia L. Boyd  
Project Manager

cc: Rob Rodgers, BCAA  
Doug Hendrickson, Ecology  
Megan Proctor, WCH