CH2M HILL Plateau Remediation Company

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The purpose of this report is to disclose the results of an asbestos thorough inspection of 2734ZK Building located in the Plutonium Finishing Plant Complex

REVIEWERS **Others**

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RELEASE / ISSUE

DATE: Aug 18, 2016

HANFORD RELEASE

ASBESTOS NESHAP THOROUGH INSPECTION REPORT AT 2734ZK

Derivative Classifier Review

Name:Org: K.R. Herzog PFP ENG

Date 8-17-16

Executive Summary

The Plutonium Finishing Plant (PFP) Closure Project is conducting a *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA) removal action authorized by DOE/RL-2005-13, *Action Memorandum for the Plutonium Finishing Plant Above-Grade Structures Non-Time Critical Removal Action*. The work is being implemented in accordance with DOE/RL-2011-03, *Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex*. The 2734ZK Gas Bottle Storage Building is part of the PFP Complex, located in the 200 West Area of the Hanford Site in Washington State. Its demolition is part of the PFP Closure Project.

The 2734ZK Gas Bottle Storage Building was a simple lean-to structure composed of cinderblock supporting walls with a metal roof and two aluminum sidewalls. The front was composed of three metal open grid doors that formed compartments for flammable and nonflammable gas storage areas. The building was attached to the north side of the 2345Z Building.

This building was erected on a concrete slab, and the roof is a single layer of aluminum sheeting. The cinderblocks form the back wall and a separation wall between the flammable gas and nonflammable gas storage areas. The sidewalls (east and west walls) are also made of aluminum. The building is 19 ft 2 in. long and 4 ft wide and 7 ft high to the lowest portion of the roof. The 2734ZK Gas Bottle Storage Building was designed in April 1973 and built in August 1974.

Prior to demolition, a thorough inspection in accordance with the asbestos 40 CFR 61.145, "National Emission Standards for Hazardous Air Pollutants," "Standard for Demolition and Renovation," was completed by certified *Asbestos Hazard Emergency Response Act of 1986* (AHERA) Building Inspectors. The purpose of this inspection was to determine the location, condition, and quantity of any asbestos-containing material (ACM). Based on a walkdown of the building, process knowledge, and sampling of similar structures from the south side of the 2435Z Building, as well as a review of historical files/drawings conducted by a certified AHERA Building Inspector, neither suspect ACM nor known ACM were identified. Therefore, no asbestos sampling was required. All construction materials were either concrete, cinderblock, steel, or material of known composition. All areas of the facility were accessed.

This report documents results of the 2734ZK Gas Bottle Storage Building inspection. Appendix A contains the sample plan for 2734ZK. No ACM was detected during the inspection. No suspect ACM was identified that would have required sampling.

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Terms

ACM	asbestos-containing material
AHERA	*Asbestos Hazard Emergency Response Act of 1986*
Cat I	Category I
Cat II	Category II
CERCLA	*Comprehensive Environmental Response, Compensation, and Liability Act of 1980*
N/A	not applicable
NESHAP	"National Emission Standards for Hazardous Air Pollutants" (40 CFR 61)
PFP	Plutonium Finishing Plant
PACM	presumed asbestos-containing material
RACM	regulated asbestos-containing material
RAWP	removal action work plan
SWIHD	Sitewide Industrial Database
TSI	thermal system insulation

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1 Introduction

The 2734ZK Gas Bottle Storage Building was designed in April 1973 and constructed in August 1974. The 2734ZK Gas Bottle Storage Building is 19 ft 2 in. long and 4 ft wide with an 8 ft eave height. This building was used by the Plutonium Finishing Plant (PFP) to store flammable and nonflammable gasses.

The 2734ZK Gas Bottle Storage Building is part of the PFP Complex located in the 200 West Area of the Hanford Site in Washington State. The Hanford Site is owned by the U.S. Department of Energy, and the PFP Complex is currently being operated by CH2M HILL Plateau Remediation Company.

The PFP Closure Project is conducting a *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA) removal action authorized by DOE/RL-2005-13, *Action Memorandum for the Plutonium Finishing Plant Above-Grade Structures Non-Time Critical Removal Action*. Work is being implemented in accordance with DOE/RL-2011-03, *Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex*, hereinafter called the removal action work plan (RAWP).

Demolition of the 2734ZK Gas Bottle Storage Building will be conducted as part of the CERCLA removal action. The CERCLA RAWP (DOE/RL-2011-03) identifies substantive requirements from 40 CFR 61, "National Emission Standards for Hazardous Air Pollutants" (NESHAP), regulations as applicable or relevant and appropriate requirements to the work being performed. This includes the requirement to perform a thorough inspection to identify, quantify, and describe all friable Category I (Cat I) and Category II (Cat II) asbestos-containing material (ACM) affected by demolition. This report documents the results from that inspection of the 2734ZK Gas Bottle Storage Building.

1.1 2734ZK Gas Bottle Storage Building

The 2734ZK Gas Bottle Storage Building was constructed in 1974 and is approximately 76 ft^2. The floor plans are shown in Figures 1, 2, and 3 and illustrate the simple lean-to structure of this building. This building was erected on a concrete slab. The roof is a single layer of aluminum sheeting. Cinderblocks form the back wall and a separation wall between the flammable gas and nonflammable gas storage areas (Figure 4). The sidewalls (east and west walls) are made of aluminum, as is the roof. The building is 19 ft 2 in. long and 4 ft wide and 7 ft to the lowest portion of the roof. The 2734ZK Building was designed in April 1973 and built in August 1974. This building was not insulated and has simple 110 V lights.

1.2 2734ZK Building Interior

The 2734ZK Gas Bottle Storage Building details are shown in Figures 5 through 9, was last used to support 2345Z Building operations. The building contained no finished walls, ceiling, or floor, and the building was not insulated. The cinderblocks were hollow.

An asbestos sample plan was developed for this building following the PFP standard asbestos inspection format. A copy of the sample plan is included in Appendix A. A walkdown of the building confirmed its simple construction. The electrical system was 110 V with nonasbestos wiring. A records search revealed no historical samples for 2734ZK. Based on this review, no suspect ACM was identified, and therefore no samples were taken.

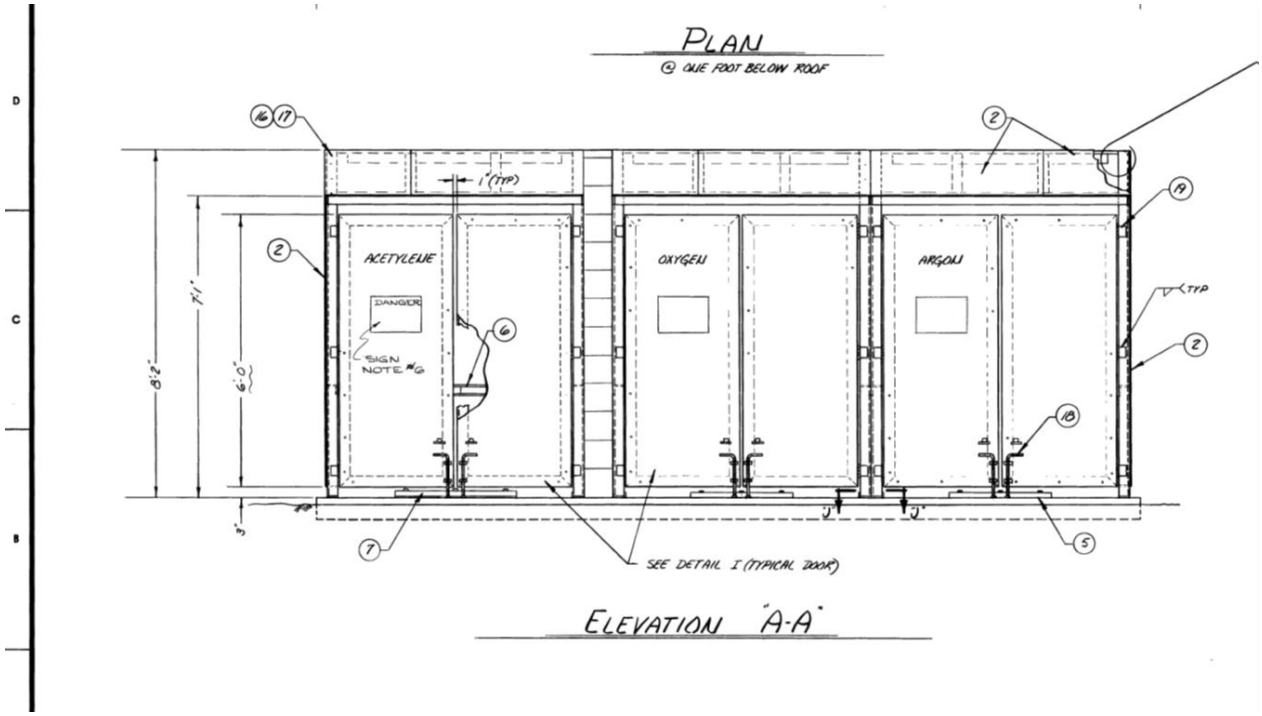


Figure 1. 2734ZK Gas Bottle Storage Building Design Drawing, Front View

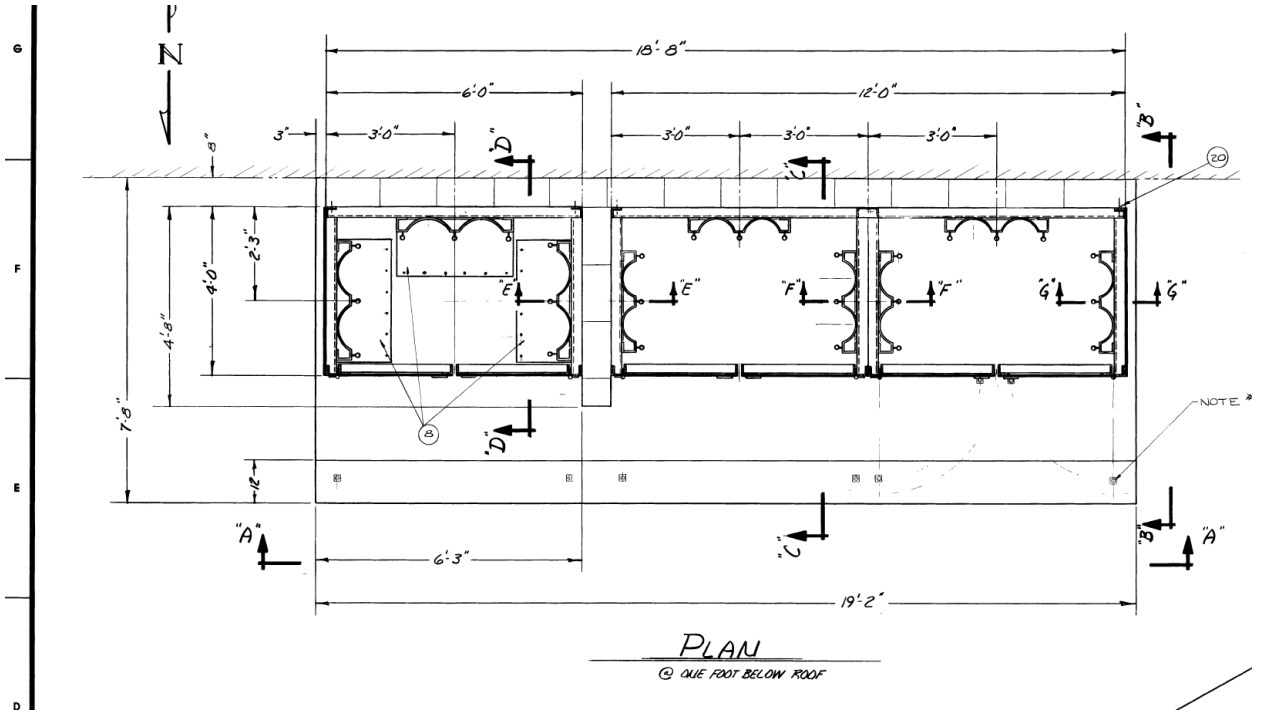


Figure 2. 2734ZK Gas Bottle Storage Building, Top View

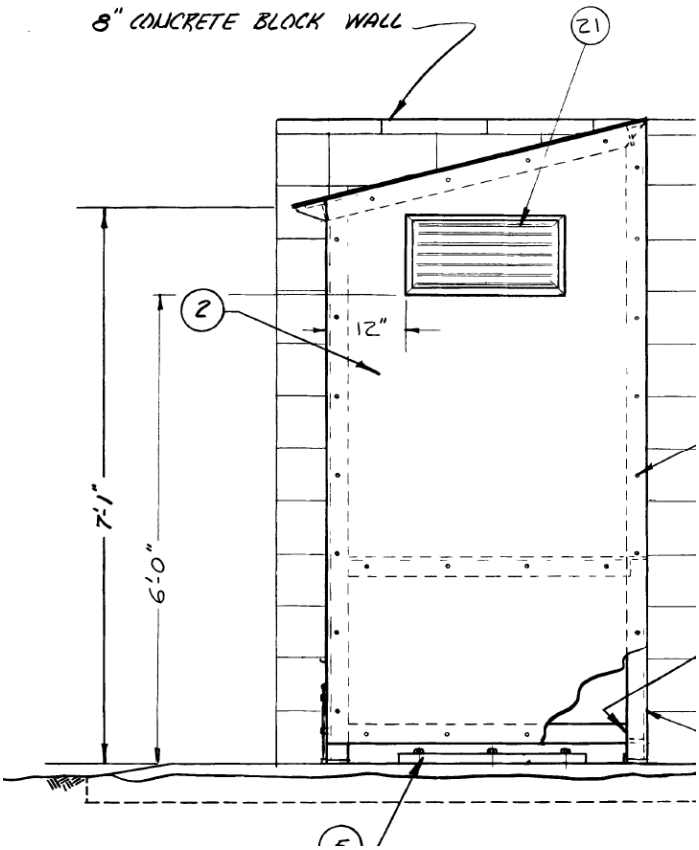
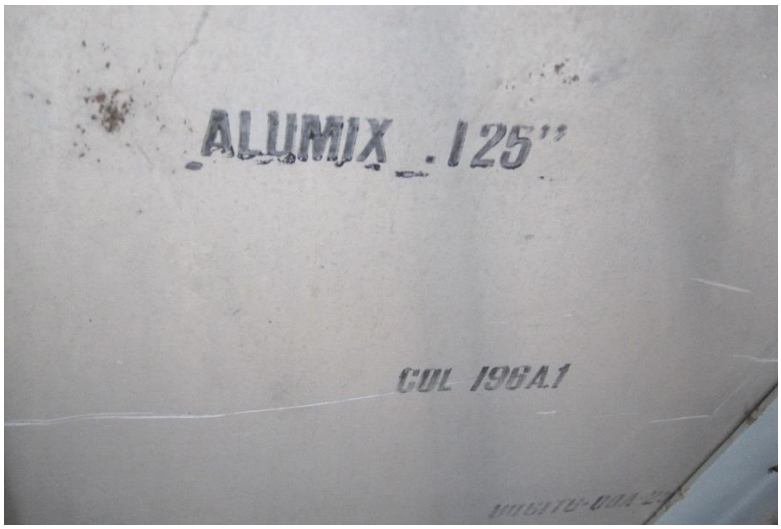


Figure 3. 2734ZK Gas Bottle Storage Building, Side View

Note: Nonflammable storage to the right of the photograph.

Figure 4. Photograph of the Front View of the 2734ZK Gas Bottle Storage Building

Figure 5. Photograph of Nonflammable Gas Storage Interior; Back Wall (Cinderblock), Sidewall (Aluminum)



Aluminum Sheets

Aluminum sheets were used for the roof and sidewalls of 2734ZK as shown in these photographs. The aluminum sheets were attached to metal support studs.

Figure 6. Close Up of Stenciling on Sidewall (Same Material Used for the Roof)

Figure 7. Exterior; West Wall

Figure 8. Flammable Gas Storage Area, 2734ZK

Figure 9. Close Up of Roof and Supporting Interior Cinderblock Wall

2 Scope

The scope of this report is to document the thorough asbestos inspection of the 2734ZK Gas Bottle Storage Building. The current PFP schedule includes demolition of 2734ZK in March 2016.

The U.S. Environmental Protection Agency asbestos NESHAP (40 CFR 61) regulations require that prior to commencement of any demolition activity, a thorough inspection of the affected facility must be performed by a certified *Asbestos Hazard Emergency Response Act of 1986* (AHERA) Building Inspector, and that inspection must be documented. The purpose of this thorough inspection is to identify the following items:

- Homogeneous areas of ACM and their locations
- Quantity of ACM
- NESHAP (40 CFR 61) category of ACM (friable Cat I or Cat II)
- Condition of all ACM (particularly important if nonfriable Cat I or Cat II ACM is to be left in place during demolition)
- Cat I or Cat II ACM that has become regulated asbestos-containing material (RACM) based on condition
- Cat I or Cat II ACM that can become RACM, based on planned demolition techniques
- Suspect ACM that was determined (through inspection or sampling and analysis) not to be ACM

2.1 Description of Inspection and Sampling

Design drawings and other existing information were reviewed to determine what building materials were used at the time of construction and whether any renovations had been made. A search was conducted to determine if any past asbestos survey or laboratory information was available. No renovations or past asbestos surveys were found. No historical sample data exist for this building.

In February 2016, visual inspections were conducted by certified AHERA Building Inspector T.A. Hopkins (copies of AHERA Inspector Certifications are provided in Appendix B). The purpose of the visual inspection was to identify all suspect ACM and all suspect materials that would require sampling and analysis. For ACM and suspected ACM, or suspect material, the following information would need to be determined:

- Asbestos classification (miscellaneous, surfacing material, or thermal system insulation)
- Asbestos type (RACM, Cat I, or Cat II)
- Quantity (square feet or linear feet)
- Condition (poor/good)
- Location
- Sample density (for materials not handled as suspected ACM) as prescribed by AHERA (homogeneous/nonhomogeneous)
- Accessibility for sampling

After the walkdowns, a sampling plan was created (Appendix A). Based on the walkdown, records review, and process knowledge of the AHERA Certified Inspector, no suspect ACM was identified. Therefore, no sampling was conducted. In the opinion of the AHERA Inspector, there is no asbestos associated with these structures. No further evaluation will be required.

2.1.1 Description of Thorough Inspection Process

The RAWP (DOE/RL-2011-03) requires that, "Prior to the commencement of the demolition, a thorough inspection of the affected structure will be performed and documented for the presence of asbestos, including Category I and Category II non-friable ACM." The process of completing a thorough inspection of this building consisted of the following actions:

- As walkdowns of all areas were conducted, the inspector identified various materials that were suspected of containing asbestos. Walkdowns were completed in February 2016. Special attention was given to areas for which access was restricted (e.g., suspended ceilings) and would require additional means of access for the purposes of inspection. Notes were taken during the walkdown identifying sampling needs (e.g., inaccessible areas, special access requirements [confined spaces and ladders], removal of access plates/panels, and electrical isolations).
- Suspect building materials were evaluated for homogeneity (e.g., homogeneous areas).
- An asbestos sample plan was developed for this facility (Appendix A). The sample plan enabled the inspector to review the building in a systematic process and covered the following items: floors, walls, ceiling, void spaces, electrical wiring/panels, caulking, wall patches, gaskets/packings, doors, coving, thermal system insulation, and miscellaneous items.

- Based on the record review, sample plan, and process knowledge, asbestos sampling was not indicated. No further evaluation is required.
- This report will serve as the documentation to that evaluation.

2.2 Historical Asbestos Analytical Data

Asbestos bulk sampling has been conducted at PFP for many years in support of deactivation activities under CERCLA. Sample collection was mainly performed upon request in support of specific project activities (e.g., facility modifications and mechanical/electrical isolation). All sample collections were performed by insulators certified as AHERA Building Inspectors.

No historical samples were taken in these structures.

2.3 Asbestos Characterization Results

Based on the walkdown, process knowledge, and the experience of the AHERA Inspector, no samples were required to characterize this facility as having No Asbestos Detected. Floors are concrete; the sidewalls and roof are aluminum; and the back wall and support wall are cinderblock. Electrical wiring is nonasbestos.

No ACM is associated with the 2734ZK Gas Bottle Storage Building.

3 References

40 CFR 61, "National Emission Standards for Hazardous Air Pollutants," *Code of Federal Regulations*. Available at: http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol8/xml/CFR-2010-title40-vol8-part61.xml.

61.145, "Standard for Demolition and Renovation."

Asbestos Hazard Emergency Response Act of 1986, 15 USC 2641, et seq. Available at: http://www.gpo.gov/fdsys/pkg/USCODE-2009-title15/html/USCODE-2009-title15-chap53-subchapII.htm.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC 9601, et seq., Pub. L. 107-377, December 31, 2002. Available at: http://epw.senate.gov/cercla.pdf.

DOE/RL-2005-13, 2005, *Action Memorandum for the Plutonium Finishing Plant Above-Grade Structures Non-Time Critical Removal Action*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: http://pdw.hanford.gov/arpir/pdf.cfm?accession=DA00914134.

DOE/RL-2011-03, 2014, *Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington. Available at: http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0084836.

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Appendix A

2734ZK Asbestos Sampling Plan

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Table A-1. 2734ZK Asbestos Sampling Plan Details

System	Sampling Directions	Location (e.g., Room or Area)	Sampling Required? (Y/N)	Number of Samples	Verification: Present (Y/N)	Verification: Not Accessible (Y/N)	SWIHD No..	Field Description	Total Number of Samples Taken	Date Sampled	Homogenous Material?	Condition of Material Sampled (Good or Poor)	Extent of Material Sampled (square feet or linear feet)
Sample Location: The 2734ZK Gas Bottle Storage Building is attached to the north wall of the 234-5Z Building, near the 14A Airlock. This building is approximately 19 by 4 ft (76 ft^2). The 2734ZK Gas Bottle Storage Building is a lean-to structure made of cinderblock with the west and east walls constructed with aluminum sheeting, as is the roof. The back wall and a separation wall (between flammable and nonflammable gas storage areas) are made of cinderblock. The building was used to house gas bottles and has a single layer metal roof. This sampling plan is based on historical data (file search, photographs, engineering plans, etc.) and walkdowns completed in March 2016. An AHERA trained inspector will verify accuracy during the sampling event and is authorized to modify this plan in the field as required. Sampling to be conducted by an AHERA-certified inspector. Photographs will be taken of each sample location and a unique SWIHDs number will be assigned to each room for each sample phases.													
Floors (General Directions): Identify flooring material. If tile or linoleum, schedule for sampling. Exceptions: process knowledge, previous sampling, or determined to be PACM because of radiological conditions.													
Bare Concrete Floor	Bare concrete floor with a metal grate.	Interior 2734ZK	No	N/A	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Walls (General Directions): Identify wall construction material; sample if anything other than concrete.													
	Cinderblock, no sampling required. Previous sampling of similar structures, (i.e., 2734ZA and 2734ZC, 234-5Z, 2729Z have shown no vermiculite to be present. Using process knowledge, no further sampling was required.	Interior 2734ZK	No	N/A	Yes	No	N/A	Cinderblock, no sampling required	N/A	N/A	N/A	N/A	N/A
Ceiling–Directions: Sheet aluminum, no sampling required.													
	Sheet aluminum, no sampling required.	Interior 2734ZK	No	N/A	N/A	N/A	N/A	Sheet aluminum, no sampling required	N/A	N/A	N/A	N/A	N/A
Roof (General Directions): Area must be investigated for various ACM items (e.g., sprayed on insulation, textured coating, coated piping, and coated ducting).													
Roof Visual Inspection	Roof is constructed of sheet aluminum.	Exterior	No	N/A	N/A	N/A	N/A	Sheet aluminum, no sampling required	N/A	N/A	N/A	N/A	N/A
Electrical/Wire and Panels (Directions): PRIOR TO SAMPLING ANY ELECTRICAL MATERIAL (WIRE/PANELS/COMPONENTS), THE SYSTEM MUST BE COLD AND DARK AND VERIFIED AS SUCH BY AN ELECTRICIAN. Evaluate electrical wires from conduit, junction boxes or panels for presence of asbestos. Project to make determination (sample or treat as PACM). If the Project wants to leave the wiring in place during demolition, the Project must determine: (1) whether the wire is ACM or not, or (2) presume the wire is PACM and apply for a justification from EPA (need to know how much wire is in place and its condition.)													
Electrical Wiring	Electrical wire: sample each type of wire and estimate the quantity of material. Simple 110 volt lighting system. View of wiring required. / Wire is rubber coated, no sampling required	Interior 2734ZK	No	N/A	Yes	No	A	Wire is rubber coated, no sampling required	N/A	N/A	N/A	N/A	N/A
Caulking: Sample each type of caulk. Miscellaneous each type of caulk; two samples.													
–	None	Interior 2734ZK	No	N/A	No	No	N/A	None	N/A	N/A	N/A	N/A	N/A
Wall Patches: Identify all areas where pipe penetrations through wall have been patched. If results show material is predominantly asbestos, handle all remaining patches as PACM. If that determination is made, the inspector will have to identify all patches (size and number). This information will be included in a justification to EPA for leaving the patches during demolition.													
–	None	Interior 2734ZK	No	N/A	No	No	N/A	None	N/A	N/A	N/A	N/A	N/A
Doors: Project to make determination (sample or treat as PACM). Project must determine how to manage these doors. Options include removing prior to demolition, seeking a justification to EPA to leave during demolition or sample each door. Identify each door and its location.													
–	Corrugated metal	Exterior	No	N/A	N/A	N/A	N/A	Corrugated metal, no sampling required	N/A	N/A	N/A	N/A	N/A

Table A-1. 2734ZK Asbestos Sampling Plan Details

System	Sample Planning				Field Execution								
					Verification								
	Sampling Directions	Location (e.g., Room or Area)	Sampling Required? (Y/N)	Number of Samples	Present (Y/N)	Not Accessible (Y/N)	SWIHD No..	Field Description	Total Number of Samples Taken	Date Sampled	Homogenous Material?	Condition of Material Sampled (Good or Poor)	Extent of Material Sampled (square feet or linear feet)
Miscellaneous: Look for PACM not previously identified in this sampling plan. If present, sample and record material sampled.													
–	None	Interior 2734ZK	No	N/A	No	No	N/A	None	N/A	N/A	N/A	N/A	N/A
TSI Piping: If TSI is present, confirm that it is scheduled for abatement prior to demolition.													
–	None	Interior 2734ZK	No	N/A	No	No	N/A	None	N/A	N/A	N/A	N/A	N/A

Notes: All terms used in table are defined in the main Terms list.

All sampling excursions will be (no exceptions) conducted by a certified AHERA Building Inspector who will adhere to all regulatory requirements.

All sampling plans have been developed by a certified AHERA Building Inspector using historical drawings, documents, and photographs as well as interviews with engineers and subject matter experts.

During the sampling campaign, the certified AHERA Building Inspector, while in the field, has the latitude to modify the plan, as needed.

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Appendix B

AHERA Certifications

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Certificate of Completion
This is to certify that
James M. Leary

Has satisfactory Completed 24 hours of Initial training as an
AHERA Building Inspector
In compliance with TSCA Title II AHERA 40 CFR Part 763 & Missouri State RSMo 643.230

Michael J. Moore
Instructor/Consultant

R.H. Welch, Inc.

Course Presented By R. H. Welch, Inc.
AHERA Building Inspector Refresher

R.H. Welch, Inc.
Certificate # RHW-BI-15-005

Course Completion Date: **2-19-15**
Refresher Required By: **2-19-16**

96902 E. Kaitlyn Rd. Kennewick, WA 99338 m.j.moore@frontier.com

Certificate of Completion
This is to certify that
James M. Leary

Has satisfactory Completed 24 hours of Initial training as an
AHERA Project Designer
In compliance with TSCA Title II AHERA 40 CFR Part 763 & Missouri State RSMo 643.230

Robert H. Welch PhD (ABD
Safety Engineer/Consultant

R.H. Welch, Inc.

Course Presented By R. H. Welch, Inc.
AHERA Project Designer Refresher

R.H. Welch, Inc.
Certificate # RHW-PD-15-007

Course Date: **3-31-15 – 4-2-15**
Refresher Required By: **4-2-16**

Certificate of Completion
This is to certify that
William G. Cox

Has satisfactory Completed 24 hours of Initial training as an
AHERA Building Inspector
In compliance with TSCA Title II AHERA 40 CFR Part 763 & Missouri State RSMo 643.230

Michael J. Moore
Instructor/Consultant

R.H. Welch, Inc.

Course Presented By R. H. Welch, Inc.
AHERA Building Inspector Refresher

R.H. Welch, Inc.
Certificate # RHW-BI-15-003

Course Completion Date: **2-19-15**
Refresher Required By: **2-19-16**

96902 E. Kaitlyn Rd. Kennewick, WA 99338 m.j.moore@frontier.com

Certificate of Completion
This is to certify that
William G. Cox

Has satisfactory Completed 24 hours of Initial training as an
AHERA Project Designer
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Robert H. Welch PhD (ABD
Safety Engineer/Consultant

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AHERA Project Designer Refresher

R.H. Welch, Inc.
Certificate # RHW-PD-15-004

Course Date: **3-31-15 – 4-2-15**
Refresher Required By: **4-2-16**

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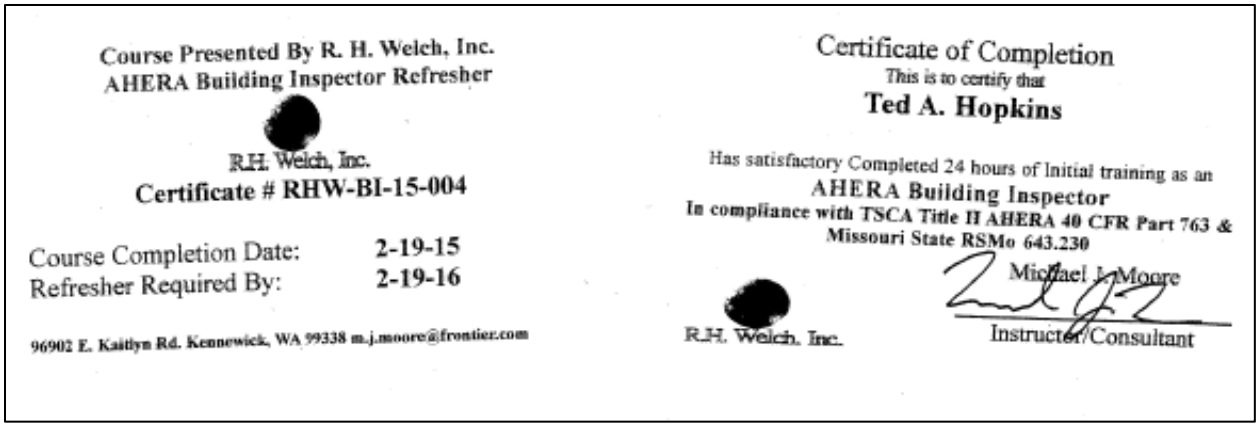

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R.H. Welch, Inc.
Certificate # RHW-BI-15-004

Course Completion Date: 2-19-15
Refresher Required By: 2-19-16

96902 E. Kaitlyn Rd. Kennewick, WA 99338 m.j.moore@frontier.com

Certificate of Completion
This is to certify that
Ted A. Hopkins

Has satisfactory Completed 24 hours of Initial training as an
AHERA Building Inspector
In compliance with TSCA Title II AHERA 40 CFR Part 763 &
Missouri State RSMo 643.230

R.H. Welch, Inc.

Michael J. Moore
Instructor/Consultant

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