

## CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

To: Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room 212  
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control  
Site Mitigation and Restoration Program  
Cal Center Drive  
Sacramento, CA 95826-3200

**Project Title:** Order on Consent for Interim Response Action at the RMHF Complex

**Project Location:** Radioactive Materials Handling Facility Complex, Santa Susana Field Laboratory, Simi Hills, California

**County:** Ventura

**Project Applicant:** The Department of Energy

**Approval Action Under Consideration by DTSC:** Order on Consent

**Statutory Authority:** Health and Safety Code sections 25100 et seq., 25358.3(a), 25355.5(a)(l)(B), 58009 and 58010

**Project Description:** The purpose of this project is to remove the above ground portions of the Radioactive Materials Handling Facility Complex (RMHF Complex or Site) at the Santa Susana Field Laboratory (SSFL) as soon as possible so that contaminants released after potential fire and erosion do not migrate to surrounding communities and the environment. This will be accomplished through the United States Department of Energy's (DOE) performance of closure activities under an Order on Consent for Interim Response Action (Order) issued by the Department of Toxic Substances Control (DTSC). The Order governs DOE's closure activities that will remove the radiological components and chemical hazardous substances associated with above-grade buildings and structures at the RMHF Complex. To achieve these goals, DOE will conduct building demolition activities to slab-on-grade under DTSC oversight and will dispose of the resulting building demolition debris at a licensed low-level radioactive waste disposal facility or authorized mixed low-level radioactive waste disposal facility located outside the State of California. All response actions shall be performed in a manner consistent with the requirements of Chapters 6.8 (commencing with section 25300) and 6.5 (commencing with section 25100) of Division 20 of the Health and Safety Code, and any other applicable state or federal statutes and regulations.

DTSC and DOE have agreed that it is necessary to mitigate the potential release of hazardous substances at or emanating from the Site in the event of a wildfire or a significant storm that causes erosion. DOE will demolish and remove ten above-grade structures to a condition of slab-on-grade for all ten structures at the RMHF Complex, including three Resource Conservation and Recovery Act (RCRA)-permitted units. Building demolition and debris transportation shall be conducted in a manner that protects public health and the environment, including populations along the transport route. Demolition and removal of the remaining surface and below-grade structures and materials associated with the RCRA-permitted facilities will be conducted when soils cleanup occurs and will fulfill the requirements for RCRA soils closure.

Ten buildings and structures currently comprise the RMHF Complex; however, only three specific units are subject to the RCRA Closure requirements described in the Order: Building 4021 - previously used for treatment; Building 4022 - currently used for waste storage; and Building 4621 - also previously used for waste storage and which includes the adjacent outdoor, asphalt-paved area.

For the units undergoing closure subject to RCRA requirements (Buildings 4021, 4022, and 4621), closure shall be conducted in accordance with a DTSC-approved RCRA facility Closure Plan and Standard Operating Procedure (SOP), and shall achieve RCRA Closure Performance Standards by demonstrating that hazardous substances have been removed (i.e., through removal of the buildings) or are left in place at levels that are controlled such that they do not pose a threat to public health and the environment (i.e., remaining slabs having residual hazardous substances will be mitigated by placement of suitable material, sealant, shielding and administrative or institutional controls until future removal when ground-disturbing cleanup occurs).

The Order for the RMHF Complex also addresses the remaining seven buildings and ancillary structures on Site. The ancillary structures include the above-grade filter/blower area including a three-foot diameter, 130-foot tall exhaust stack located between buildings 4021 and 4022 (see Figure 2). Closure activities, consisting of demolition and disposal, for the seven non-RCRA regulated units shall be conducted in accordance with a DTSC-approved SOP. Closure for these buildings and ancillary structures shall demonstrate that hazardous substances have been removed as described above for the three buildings subject to RCRA closure requirements.



**Background:** The RMHF Complex is a part of SSFL, which is comprised of 2,850 acres and is located in the Simi Hills in southeastern Ventura County. The RMHF Complex is within an area of approximately 1.5 acres and is located within Administrative Area IV of SSFL (Figures 1 through 4). The RMHF Complex was constructed in 1959 and consists of ten buildings with ancillary structures (Buildings 4021, 4022, 4621, 4034, 4044, 4075, 4563, 4658, 4665, and 4688), which were built to handle new and spent (i.e., irradiated) nuclear fuel. In 1989, the RMHF Complex was authorized for the storage and treatment of radioactive waste having a hazardous chemical component.

The following hazardous substances are identified in the Draft RCRA RMHF Closure Plan as being present in Buildings 4021, 4022, and 4621: heavy metals, solvents, oils and greases, lead-based paint, and asbestos-containing materials. In addition, radionuclides are present, as some buildings still contain radionuclides embedded in building material. An electrical substation was present at the RMHF Complex and as a result, polychlorinated biphenyls (PCBs) are considered present as well. These and other potentially hazardous substances are considered applicable to the entire RMHF Complex. The observed hazardous substances may present a threat to human health through ingestion, inhalation, and dermal contact exposure pathways on and off-site from SSFL. The observed hazardous substances may present a threat to the environment, because they may release from structures into the environment, including migrating off-site from SSFL.

In the recent past, SSFL and other areas in Ventura County and nearby Los Angeles County have been ravaged by extensive wildfires. These fires have reached near proximity to buildings within Area IV, scorching one of the structures. The proposed response action is considered necessary, out of an abundance of caution, to protect public health and the environment from potential exposures to radioactive and hazardous substances identified at the RMHF Complex and is necessary to remove radioactive and hazardous substances from the existing RMHF Complex buildings.

**Project Activities:** Closure of Buildings 4021, 4022 and 4621 will follow the general sequence discussed below:

- Initial closure/pre-demolition activities, including completion and approval of Stormwater Pollution Prevention Plan (SWPPP); detailed building surveys and inspections; preparation and approval of the Decontamination and Demolition (D&D) Work Package documents, including sub-plans; cultural surveys and preparation of information for waste disposition
- Mobilization and site set-up
- Implementation of Closure and Pre-Demolition Surveys
- Selective Decontamination and Removal of Non-Essential Equipment/Removal of Existing Waste
- Abatement of Asbestos Containing Material (ACM)/Other Regulated Material (ORM)/Hazardous Wastes
- Demolition and Disposition of Waste
- Site Restoration and Post-Closure Surveys
- Above-grade structures will be removed to a condition of slab-on-grade where the above-grade portions of the structures are removed but the slabs and the foundations will be left in place to provide a barrier to the soil and/or subsurface structures.
- If the structures have below grade structures, the below grade foundation and walls will be left in place.
- Asphalt surfaces inside the RMHF Complex will also be left in place.
- The Demolition Plan will include pre- and post-demolition inspections and identify and appropriately address issues such as potential for water intrusion and fixed contamination remaining on a slab that is exposed to the weather.
- A suitable material to prevent water accumulation on the slab will be added after the demolition. Additionally, all vaults and entries to basements will be sealed to prevent water intrusion.
- Any slabs with excess ionizing radiation present following building demolition will be addressed through additional steps DOE will take, such as shielding and administrative and/or institutional control (i.e., surveys, posting, controlled access) to ensure workers and the public do not receive exposure above background levels.



Demolition of the remaining seven structures at the RMHF Complex will be ongoing concurrently. In general, except for specific RCRA closure activities for buildings 4021, 4022 and 4621, demolition and disposal of the other 7 buildings will follow the same process outlined above. Abatement of hazardous substances may occur throughout the closure process and may be sequenced with all of the above steps.

Routine, ambient air monitoring is ongoing and will continue, along with additional air monitoring that will occur in the vicinity of the buildings during demolition activities.

DOE will coordinate with the California Department of Fish and Wildlife and the United States Fish and Wildlife Service agencies to ensure that any demolition will be implemented to avoid, minimize, and/or mitigate for adverse effects on federally listed and proposed species and designated critical habitat. A Mitigation and Monitoring Plan shall be developed to reduce or avoid such impacts, as well as a consultation plan with applicable Tribes for purposes of ensuring appropriate Tribal monitoring and avoidance processes are established. DOE will provide a schedule to DTSC for the RMHF Complex for DTSC's review and approval.

Based on the Draft RMHF Closure Plan and DTSC's Draft Program Environmental Impact Report, the total estimated volume of demolition debris to be disposed of from the ten buildings at the RMHF Complex is approximately 1,500 tons, requiring approximately 100 truck trips, with an estimated total duration of 6 months. The estimate assumes demolition to slab-on-grade, and the remaining surface and below-grade structures and materials will undergo future demolition when soils cleanup occurs.

**Name of Public Agency Approving Project:** Department of Toxic Substances Control

**Name of Person or Agency Carrying Out Project:** The Department of Energy – Energy Technology and Engineering Center (ETEC)

**Exempt Status:** Emergency Project [PRC, Sec. 21080(b)(4); 14 CCR, Sec.15269(c)]

**Reasons Why Project is Exempt:** Project consists of specific actions necessary to prevent or mitigate an emergency, determined by DTSC to be, "...an imminent or substantial endangerment to the public health or welfare or to the environment, because of the release or a threatened release of a hazardous substance..." [Health and Safety Code section 25358.3(a)]. See Attachment A for additional information.

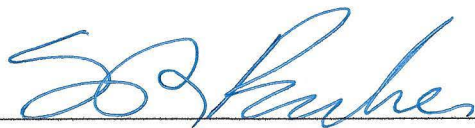
The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control  
 Site Mitigation and Restoration Program  
 9211 Oakdale Avenue  
 Chatsworth, CA 91311-6505

Additional project information is available on EnviroStor: [www.envirostor.dtsc.ca.gov/public/](http://www.envirostor.dtsc.ca.gov/public/)

Contact Person	Contact Title	Phone Number
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Approver's Signature:



Date:  
 May 19, 2020

Approver's Name	Approver's Title	Approver's Phone Number
Steven Becker	Chief, Santa Susana Field Laboratory and LABRIC Branch	916 255-3717

TO BE COMPLETED BY OPR ONLY

Governor's Office of Planning & Research

Date Received for Filing and Posting at OPR:

**MAY 20 2020**

**STATE CLEARINGHOUSE**