

**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: Amendment to Order on Consent for Interim Response Action at the RMHF Complex

Project Location: Area IV, Santa Susana Field Laboratory, Simi Hills, California

County: Ventura

Project Applicant: The Department of Energy

Approval Action Under Consideration by DTSC: Amendment to Order

Statutory Authority: Health and Safety Code sections 25100 et seq., 25358.3(a), 25355.5(a)(1)(B), 58009 and 58010

Project Description:

The purpose of this project is the demolition and removal of the above ground portions of eight remaining United States Department of Energy (DOE) buildings in Area IV at the Santa Susana Field Laboratory (SSFL). Department of Toxic Substances Control (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 and to ensure physical hazards from structurally unsound, partially demolished buildings do not result in debris falling onto onsite workers. This will be accomplished through the DOE performance of closure activities under an Order on Consent for Interim Response Action at the Radioactive Materials Handling Facility (RMHF) Complex (Order) and its Amendment issued by the DTSC. The Order, as amended, governs DOE's closure activities that will remove the radiological components and chemical hazardous substances, as well as the physical hazards associated with the eight remaining DOE Area IV buildings and structures. 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 mixed low-level radioactive waste disposal facility or authorized mixed low-level radioactive waste disposal facility/site located outside the State of California. Disposal will be in accordance with the waste acceptance criteria for the receiving facility, and will be consistent with the waste disposition alternatives described in the 2010 Administrative Order on Consent (2010 AOC) Agreement in Principal. 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.

DOE will demolish and remove eight remaining DOE Area IV above-grade structures to a condition of slab-on-grade. 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.

Two of the remaining DOE-owned buildings in Area IV comprise the Hazardous Waste Management Facility (HWMF). DOE is the owner of the HWMF, at which two buildings were authorized as RCRA Part B by DTSC in 1993 for the operation of liquid metal storage and treatment. For the two RCRA permitted buildings undergoing closure subject to RCRA requirements (Buildings 4133 and 4029), 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 remaining six DOE -owned buildings in Area IV are non-RCRA permitted. Closure activities, consisting of demolition and disposal, for the six non-RCRA regulated buildings shall be conducted in accordance with a DTSC-approved Combination Demolition Plan and SOP. Closure for these buildings and ancillary structures shall demonstrate that hazardous substances have been removed. Debris from buildings having a history of radiologic use (Buildings 4019, 4024, 4029, and 4133) will be disposed out of the State of California, at a licensed mixed low-level radioactive waste disposal facility, in accordance with waste acceptance criteria for the receiving facility, consistent with the waste disposition alternatives described in the Agreement in Principal of the 2010 Administrative Order on Consent for Remedial Action (2010 AOC) signed by DOE and DTSC. Disposal of debris and waste from the four remaining buildings (4038, 4057, 4462, and 4463) that have no radiological function or history of radiological usage will be disposed out of the State of California at an authorized mixed low-level radioactive waste disposal facility, in accordance with the waste acceptance criteria of the receiving facility. Hazardous waste associated with pre-demolition activities including asbestos abatement and deactivation associated with these remaining DOE Area IV buildings has

been previously disposed of at a licensed or authorized mixed low-level radioactive waste disposal facility.

Background:

The HWMF and six remaining DOE Area IV buildings are a part of SSFL, which is comprised of 2,850 acres and is located in the Simi Hills in southeastern Ventura County. The two HWMF buildings occupy physically distinct locations separated by 1,300 feet and are located within Administrative Area IV of SSFL. The remaining six DOE buildings are also located in Area IV (Figures 1 through 4). The HWMF Building 4029 was constructed in 1959 and originally used as a radiation instrument calibration facility and Building 4133 was moved to its current location in 1977. These two buildings were authorized as RCRA Part B by DTSC in 1993 for the operation of liquid metal storage and treatment. The remaining six non-RCRA permitted and DOE-owned buildings in Area IV include: Building 4019 (Systems for Nuclear Auxiliary Power [SNAP] Criticality Test Facility, constructed in 1962), Building 4024 (SNAP Reactor Environmental Test Facility, constructed in 1960), Building 4038 (ETEC Office Building, constructed in 1963), Building 4057 (Sodium Test Rig Facility, constructed in 1963), Building 4462 (Sodium Pump Test Facility [SPTF], constructed in 1972), and Building 4463 (SPTF Pump and Mechanical Part Cleaning Facility, constructed in 1974).

The following hazardous substances associated with waste storage and treatment are identified in the Draft RCRA HWMF Closure Plan (Revision 3) as being potentially present at the HWMF buildings: sodium metal, sodium-potassium alloy, sodium oxide, potassium oxide, sodium hydroxide solution, pH, various metals, lithium metal, zirconium, Total Petroleum Hydrocarbons associated with mineral oil and kerosene, volatile organic compounds, semi-volatile organic compounds, and fluoride. In addition, the Draft HWMF Standard Operating Procedure for Phase 1 of Demolition of Facilities at the HWMF (SOP, Revision 1) indicates following potential hazardous wastes associated with the buildings: hazardous materials from facility lines and equipment, universal wastes and other regulated materials, lead-based paint, asbestos-containing materials, and potentially hazardous surface deposits and residues. Buildings 4019, 4024, 4029, and 4133 have a history of radiological use. Buildings 4462 and 4463 also contain some residual asbestos containing materials and universal wastes (e.g., light bulbs/tubes and oil). Each of the remaining DOE Area IV buildings may have some minor residual amounts of residual hazardous waste. Demolition and removal of the buildings will eliminate any threat to human health and the environment posed by residual contamination located in the above ground portions of the buildings, particularly as a result of a wildfire.

In the recent past, SSFL and other areas in Ventura County and nearby Los Angeles County have been ravaged by extensive wildfires. The proposed response action is

considered necessary to protect public health and the environment from potential exposures to radioactive and hazardous substances present at the remaining eight DOE Area IV buildings and is necessary to remove radioactive and hazardous substances, and physical hazards from the remaining DOE Area IV buildings.

In addition, Building 4462 was partially demolished in 2007, and that demolition activity has left the building structurally unsound. The high winds experienced during Santa Ana wind conditions have the potential for loosening and freeing metals sheeting from the roof and sides of the building. This condition puts site workers at risk from falling debris. Completion of demolition of the building will alleviate this risk.

Project Activities:

Closure of Buildings 4029 and 4133 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 Demolition (D&D) Work Package documents, including sub-plans; biological 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 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 D O E 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.

In general, except for specific RCRA closure activities for buildings 4029 and 4133, demolition and disposal of the other 6 remaining DOE Area IV 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 would avoid, minimize, or compensate 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 DTSC's review and approval.

Based on the Draft HWMF Closure Plan and DTSC's Draft Program Environmental Impact Report, the total estimated volume of steel and mixed debris (office furniture, wood/fiberglass, etc.) to be disposed of from the two buildings at the HWMF (exclusive of asphalt and concrete on grade and below grade) is approximately 900 tons, requiring approximately 40 truck trips, with an estimated total duration of two months. The estimate assumes above-grade building demolition will not involve concrete, as concrete comprises the surface and below-grade structures and materials that will undergo future demolition when soils cleanup occurs. The total estimated volume of steel and mixed debris (office furniture, wood/fiberglass, etc.) to be disposed of from the six remaining DOE Area IV buildings (exclusive of asphalt and concrete on grade and below grade) is approximately 8,300 tons, requiring approximately 400 truck trips. This estimate assumes an average of 16 truck trips a day, on days when transportation occurs, for a period of three months.

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/

Contact Person: Laura Rainey
Project Manager
Santa Susana Field Laboratory
Site Mitigation & Restoration Program
Department of Toxic Substances Control
714 484-5434

Approver's Signature: _____



Date: 10/30/2020

Steven Becker, P.G., Chief
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TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR:

Governor's Office of Planning & Research

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