BUILDING DEMOLITION DEBRIS CHARACTERIZATION AND MANAGEMENT STANDARD OPERATING PROCEDURES

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Today's discussion...

- Draft Standard Operating Procedures (SOP) for Building Demolition Debris Characterization and Management at SSFL – February 24, 2010
- The SOP is for Boeing owned buildings only*
- DTSC is planning a 30 day Public Comment Period to begin week of March 8

*NASA has deferred removal of buildings in Area II until later date. Removal of DOE owned buildings in Area IV on hold.

Purpose of the Building Demolition Standard Operating Procedures

- Establish procedures that will
 - Assure that building demolitions will not result in the removal and uncontrolled reuse of potentially contaminated debris;
 - Require limits on the scope of demolitions to assure the activities will not adversely affect the ongoing site investigations; and
 - Ensure that the activity does not involve removal of contaminated soil or constitute an activity requiring a workplan for DTSC approval.
 - Ensure review, approval, documentation, and the administrative record of proposed building demolitions meet federal RCRA and state Hazardous Waste Control Law regulatory requirements

Building Demolition Activities

- ➤ The building demolition activities are NOT intended to include activities involving removal of contaminated soils, or removal of waste management units where hazardous materials have been released, that would require a separate workplan for DTSC review and approval.
- A separate workplan will be required for activities involving removal of contaminated soils.

SOP Document Review

- October 14, 2009 Letter to Boeing from DTSC requesting amendment to June 2009 Building Feature Evaluation SOP (Rev 1). Purpose was to improve notification and agency review procedures.
- November 3, 2009 Draft Building Demolition Debris Characterization SOP submitted by Boeing
- February 11, 2010 Letter to Boeing with comments on the draft SOP.
- February 24, 2010 Draft Standard Operating Procedures: Building Demolition Debris Characterization and Management – Submitted by Boeing

Proposed Standard Operating Procedures for Building Demolition Activities

- > Boeing will inform DTSC 30 days in advance.
- Submit proposed demolition package with maps, figures, and description, and sample data to DTSC for review.
- Package to include a signed statement based on review of historical documents identifying radiological-related activities (if any).
- All building structures, equipment, and materials, including road base, will undergo a pre-demolition radiation screening.
- Assessment of impacts the proposed activity may have on RFI Investigation activities will be provided.

Proposed Standard Operating Procedures for Building Demolition Activities

- DTSC will visit the proposed demolition areas to evaluate the proposal and ensure the activity does require submittal of a separate workplan for DTSC review and approval
- Submittal of a Post demolition summary report with post demolition maps, field reports, screening and sample results, chemical release identification findings, photographic documentation, and copies of the debris/waste recycling and removals.

3.0 Pre-demolition document review

- Historical information pertaining to chemical use will be reviewed
- Potential chemical residues or contamination that may be present on building structure elements, floors, concrete/asphalt, ceilings, and equipment will be evaluated.
- Applicable analytical data will be reviewed.
- Facility drawings, maps, logs, photographs, will be reviewed.

4.0 Pre-demolition Inspection

- Asbestos and lead paint surveys
- > Tank and pressure vessel surveys
- General Site Safety surveys
- Concrete assessment surveys
- Energetics surveys
- Underground features surveys
- Coolant, hydraulic oil, refrigerant, other fluid surveys
- Radiological survey

5.0 Pre Demolition Planning

- Dust control methods
- Sediment runoff control measures
- Storm Water Pollution Prevention
- Traffic control measures

6.0 Demolition Preparation Activities

- > Tank and pressure vessel draining and disposition
- Removal of potentially hazardous materials from lines and equipment
- > Removal of equipment, appliances, and fixtures
- Loose paint abatement
- Asbestos Abatement
- Removal of hazardous surface deposits and residues

7.0 Containment of hazardous and potentially hazardous waste

- All hazardous waste will be accumulated in closed containers to prevent release of any material
- Potentially hazardous waste will be managed as hazardous waste until verified by analytical testing
- Hazardous waste will be managed in accordance with Title 40 CFR, Title 22 CCR, and Chapter 6.5 of the California Health and Safety Code.

8.0 Characterization of Waste during Demolition

- Characterization will be based on generator knowledge and/or a sampling plan developed in accordance with SW-846 and State certified laboratory results.
- Waste will be characterized before they are loaded into trucks and/or trailers for transport to offsite disposal facilities

9.0 Demolition Waste Recycling

- Waste will be recycled when appropriate
 - Recoverable Metals
 - Concrete and Asphalt
 - Concrete that exhibits heavy staining or history suggesting significant exposure to chemical constituents (including contact with soils) will be investigated to verify it is non-hazardous.
 - Electronic and Electrical Waste will be recycled
 Oil filled transformers will undergo verification for PCBs

10.0 Demolition Waste Disposal Facilities

- Non-hazardous non-liquid wastes not designated for recycling may be transported to Class 2 or Class 3 landfills for disposal. Boeing may elect to transport to Class 1 facilities
- Non-hazardous liquid waste will be transported to wastewater processors that accepts the type of waste
- Hazardous non-liquid waste will be transported to a permitted Treatment, Storage, and Disposal Facility (TSDF)
- Hazardous liquid waste will be transported to a permitted TSDF

11.0 Waste Monitoring and Release Investigation During Demolition

- > Soils exposed during removal of floor slabs, concrete, and pavement, will be monitored for indications of chemical release.
- During this phase of the demolition a geologist or engineer will be present to monitor subsurface conditions. DTSC may elect to be present.
- If indication of environmental impact in soils is observed work will be stopped.
- If significant soil contamination is identified indicative of a release, DTSC will be notified in writing within 24 hours.
- Resumption of demolition in suspected release location shall occur only with DTSC concurrence.

QUESTIONS