

**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  
Hazardous Waste Management Program  
8800 Cal Center Drive  
Sacramento, CA 95826

Project Title: Closure of Building 233 Container Storage Unit at the Lawrence Livermore National Laboratory

Project Location: 7000 East Avenue, Livermore, CA 94550

County: Alameda

Project Description: The project under consideration by the Department of Toxic Substances Control (DTSC) is the approval of the Closure Plan for the Building 233 (B-233), Container Storage Unit (CSU) at the Lawrence Livermore National Laboratory (LLNL). The B-233 CSU consists of two bays, each approximately 15 feet by 45 feet. The bays are of simple construction; the foundation is concrete with two foot high cinder block retaining wall, the bay walls are constructed of wire netting with wooden slats and the roof is sheet metal. The CSU is a Resource Conservation and Recovery Act (RCRA) interim status hazardous waste storage unit. Hazardous wastes formerly stored at the unit include: metals, volatile organic compounds, semi-volatile organic compounds, and radioactive materials.

Background: LLNL has removed all hazardous waste from the B-233 CSU. In addition, LLNL has completed three phases of sampling and decontamination work at the unit. Phase one sampling results indicated the presence of metals in the soil, concrete, cinder blocks and bricks above the background levels. The metals of potential health risk concern identified in the concrete were barium, lead and zinc. The metals identified in the soil were all below residential screening levels; namely the California Human Health Screening Levels and/or U.S. Environmental Protection Agency, Region IX, Preliminary Remediation Goals. Phase one testing also indicated detectable concentrations of pesticides in the cinder block retaining walls.

Radiation surveys performed during Phase one sampling indicated that radiation levels were below background levels for the site.

Phase two testing of paint chip samples showed that the metals detected in the concrete and cinder block samples in Phase one were confined to the paint and surface coatings applied to the CSU. Test results indicate that the CSU surfaces had not been contaminated through operation of the unit. Rather, the metals detected were constituents of paint and other surface coatings intentionally applied to the CSU. The paint on the CSU surfaces is in good condition (it is not peeling) and the exterior (surface) coats do not contain metals. Therefore, the paint of the CSU surface does not present an immediate risk to human health or the environment.

Phase three work involved pressure washing the CSU bays in an effort to remove any remaining pesticide residues. Rinsate water generated during the decontamination was collected and analyzed and tested positive for trace amounts of several pesticides. Pressure washing the CSU bays removed the dermal contact exposure pathway that previous existed. The risk to human health and the environment posed by residual pesticide that may remain is thus low.

The groundwater is not threatened by the low constituent levels because the CSU and surrounding areas are covered with concrete, and the depth to groundwater is approximately 80 feet.

Based on the CSU decontamination and investigation results the Closure Plan does not require any further field work to close the B-233 CSU.

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

Name of Person or Agency Carrying Out Project: Lawrence Livermore National Laboratory

**Exemption Status:** (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
- Categorical Exemption: [State type and section number]
- Statutory Exemptions: [State code section number]
- General Rule [CCR, Sec. 15061(b)(3)]

**Exemption Title:** With Certainty, No Possibility of a Significant Environmental Effect

**Reasons Why Project is Exempt:** As described in the Closure Plan, no further physical field activities are required for the B-233 CSU to meet the health risk based closure criteria.

The project is not located in a significant historical or biological resource area; consequently, no effects to resources can result from the project. In addition, the project is not located within a scenic resources area.

DTSC can therefore say with certainty, that there is no possibility, that the decision to approve the Closure Plan for the B-233 CSU could have a significant detrimental effect on human health or the environment.

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Branch Chief Signature		Date
Mohinder S Sandhu Branch Chief Name	Chief, Standardized Permitting & Corrective Action Branch Branch Chief Title	(916) 255-3716 Phone #

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