

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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**Colorado Department
of Public Health
and Environment**

April 10, 2001

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Reconnaissance Level Characterization Report (RLCR) for Buildings 111 and 333 -
Concurrence

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR for Buildings 111 and 333, Revision 0 dated February 14, 2001, which was received on March 13, 2001. Based on the information contained in this RLCR, we are hereby concurring with the Type 1 designation for Buildings 111 and 333.

It is indicated in this RLCR that additional information related to PCB contamination will be obtained and provided. The results of the additional PCB information will be utilized to determine the ultimate disposal requirements for the concrete associated with B111. The concrete associated with B333 is identified as PCB contaminated and is to be appropriately disposed as PCB contaminated waste.

According to the DDCP/RLCP, the RLCR is supposed to provide the type of waste and estimated waste volumes. Although Section 5 of the RLCR provides a list of waste volumes by material type, it does not distinguish between contaminated and non-contaminated wastes. We would appreciate identifying the amounts of contaminated wastes that are expected to be generated. As such, would you please provide a revised Section 5 that includes the type and amounts of contaminated and non-contaminated wastes expected to be generated. This should include the amounts of asbestos and PBC contaminated wastes by building and material type.

In addition, the appropriate disposal of any equipment left in the building should be provided and included in Section 5. This should include the photographic equipment and refrigerator/freezer as indicated in Section 2.1.2.2.

The results of the TCLP analyses appear to indicate that RCRA characteristic waste does not exist in either B111 or B333. However, as previously discussed, the slabs that will remain, concrete that will be recycled, and the soils adjacent to these buildings, which will be disturbed, need to be properly characterized to demonstrate that levels of hazardous substances that may be present do not exceed the appropriate ER Tier levels. In Building 333 this is also a concern with the



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abrasive blast material, since if any substance in the blast waste exceeds the relevant Tier levels then it needs to be properly managed to prevent releases during D&D activities. As such, the analytical results of the totals (6010, 7471, etc), not just the TCLP results, need to be provided to properly make these determinations, including the appropriate management, removal and disposal actions during demolition of these facilities.

Also, as previously discussed, concrete generated during the demolition of these two buildings needs to follow the requirements as identified in the Concrete Recycling RSOP. In addition, as required in the DPP, upon completion of D&D activities a Close-out Report for these two Type 1 Facilities needs to be generated.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, FC, RFFO
Tim Rehder, EPA
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