

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 01/28/2002/ afternoon

Site Contact(s): Steve Nesta
Phone: 303-966-6386

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Discussion of underground piping remaining at 123 slab

Discussion

A discussion was held with James Hindman on 01/28/02, clarifying activities that were conducted under the *Closure Plan for Building 123, Components of RCRA Unit 40, Rev 0, Nov. 12, 1997*, and reported in the *Certification of Closure for the Building 123 Components of RCRA Unit 40, Rev 0, May 1998*.

In the May 1998 document it stated that the underground piping from B123, room 158, was decontaminated in accordance with the closure plan. The final rinsate was sampled for priority pollutants and heavy metals, with all analytes below the Tier II action levels required to meet clean closure, except for lead and chromium. The levels of lead and chromium in the final rinsate of the piping were 21.7 ppb and 588 ppb respectively, which are well below regulatory levels. Mr. Hindman agreed that if the piping is being removed it is not considered hazardous waste for disposal purposes, if the Site had performed appropriate decontamination activities (i.e., washing and rinsing of the piping). The May 1998 document stated that, "This entire stretch of piping was washed with a solution of trisodium phosphate and sodium carbonate. The volume of solution used was approximately 3 times the volume of the piping and the D-853 tank. The piping was then liberally rinsed with water. Finally, a specified volume of water which did not exceed 5% of the capacity of the piping and Tank D-853, was used a final rinse."

Additionally, it was discussed that although the May 1998 document attached the F001, F002 and F005 EPA codes to the piping, because the rinsate showed non-detects for any of these potential analytes these codes should not apply to the piping being removed for disposal. Mr. Hindman also agreed with this conclusion, based on the Site conducting the appropriate decontamination activities.

1/2

Contact Record Prepared By: Steve Nesta/Kim Myers

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2/2

