

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD**

Date/Time: 04/10/03 - 1654

Site Contact(s): C. J. Freiboth (KH) – (CJF-054)
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Regulatory Contact: James Hindman, CDPHE
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Agency: CDPHE

Purpose of Contact: State (CDPHE) concurrence on Work Package T0110697 – Remove Process Waste Equipment from Building 447

Meeting Attendance

C. J. Freiboth, KH PM James Hindman, CDPHE

Discussion

On October 23, 2002, at 1355, a copy of Work Package T0110697 – Remove Process Waste Equipment from Building 447, was provided to the State (Hindman).

On December 13, 2002, at 1635, the State (Hindman) provided questions related to the work described in T0110697. These questions are summarized below. Responses to these questions were provided to the State (Hindman) on Monday, December 23, 2002, at 0812. Photographs and requested forms were also provided on December 23, 2002, at 0812.

I have finished reviewing the work package titled "Remove Process Waste (PW) Equipment from Building 447" (Work Tracking No. T0110697). I concur with the work described therein for the following items: Items #2 & #3 (PW sump and sink in Room 401); Item #10 (PW sink in Room 407); Item #11 (PW sump in Room 420A); and Items #13 & #14 (PW sink and floor drain #1 in Room 501). For the remaining items in the work package, I request additional photos of the PW lines and termination points, or a tour to walk down the items. Additionally, I have the following questions about the work package:



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1. **QUESTION** – Why are the following PW items (which are shown on the floor plan in the related CDD) not included in this work package: PW sumps #1 & #3 in Room 31A; PW sink in Room 401A; PW sump in Room 31; and PW sump near the stairway in Room 406A?

RESPONSE - The PW Sump #1, Room 31, is still required for building operation. It is used to collect liquid from PW Sump #1 in Room 31A (collects liquid from the return air plenum), the PW Sump in the stairwell of Room 406A (drains liquid in the elevator pit) and pumps the liquid to B444 Process Waste system. Items required to maintain building operations have been identified to be removed when all building essential equipment is removed.

PW Sump #3, Room 31A, is the Chip Shredder Tank. See answer to question #2.

PW Sump, Room 401A, was a water fountain and has been removed.

2. **QUESTION** – The work instructions in Appendix 7 for Item #1 (PW sump #2) in Room 31A mentions a “Chip Shredder Tank located in Room 31B” The floor plans I have do not show Room 31B – where is it? Additionally, provide a description of the Chip Shredder Tank including its regulatory status, materials/wastes managed within it, and how it was used.

RESPONSE – “Room 31B” is a typo and has been corrected in the instructions. The tank is located in Room 31A.

The Chip Shredder Tank was identified in the CDD as PW Sump #3. This tank was used to hold rinse water. It is not a true tank, but rather a tub type apparatus. The rinse water in the tank was pumped to a spray nozzle in the chute from Room 502 to the Shredder mounted on the tank. The water was used to rinse stainless steel shavings before it was shredded and carried on a conveyor from the tank to the calciner where the residual solvents/oils were burned off. When the water became too dirty to use, it was drained down the process waste system, and fresh water was then introduced to the spray unit and the process was repeated. The tank cannot be removed until the shredder and conveyor are removed. (Photographs were provided to the State). Sump #3 is part of Unit 40, and it will be removed as part of the process waste system. This piece of equipment is considered ancillary equipment associated with Unit 40, and is not considered a tank. Hence, its status is Interim Status, like the rest of Unit 40.

3. **QUESTION** – What is meant by the phrase “accessibility problem” for the work instructions in Appendix 7 for work in Room 405? Does this mean the PW sump (pit) in Room 405 will not be entered?

RESPONSE – The PW Sump (pit), Room 405, is in the Arc Furnace pit. The pit is confined space, Beryllium contaminated and an airborne contamination area (ACA). Entry into the pit was not permitted when the process waste equipment in B447 was walked down.

4. **QUESTION** – The work instructions in Appendix 7 do not mention any work to be conducted in Room 405B. However, a photo in the work package indicates that work will be conducted in Room 405B. Are some instructions missing?

RESPONSE – This photograph has been removed from the work instructions. No process waste removal activities will occur in Room 405B.

5. **QUESTION** – Has the form “Process Waste Sump Hazard Evaluation for Hot Side Process Waste Equipment, Bldg 447” been completed yet? Please provide a copy of this form when completed.

RESPONSE - The form ““Process Waste Sump Hazard Evaluation for Hot Side Process Waste Equipment, Bldg. 447” is filled out by the Industrial Hygienist before work starts on each individual item. It will be completed as a work step similar to those in Sections 8 and 9 of the IWDP. Attached is a copy of the now completed form.

On December 18, 2002, at 1030, a walkdown of various process waste items discussed in T0110697, was conducted with the State (Hindman).

On December 26, 2002, at 1410, during a meeting with the State (Hindman), a request was made for additional information related to Building 447 process waste items in Room 31A (sump #2) and the Room 405 Pit. Included was a request for additional photographs.

On December 26, 2002, at 1432, during a meeting with the State (Hindman), concurrence was provided to conduct the activities (process waste removal) for all items described in Work Package T0110697 with the exception of Process Waste sump #2 in Room 31A and the Room 405 pit. The State (Hindman) requested additional information / photographs related to the sump and Room 405 process waste items.

On January 2, 2003, at 0624, an email with photographs and additional information, including work instruction changes, on the Room 31A (sump #2) and the Room 405 Pit was sent to the State (Hindman).

On April 3, 2003, at 1030, a cross-walk matrix listing what items were included in the CDD and Work Package T0110697 was provided to the State (Hindman). During this meeting, it was agreed that additional process waste items could be added to the CDD utilizing the Consultative Process, and documenting this in a contact record.

On April 10, 2003, at 1654, the State (Hindman) concurred with the removal of the remaining items listed in Appendix 7 of Work Package T0110697, including changes to the work instructions submitted on January 2, 2003.

Contact Record Prepared By: C. J. Freiboth

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