

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: July 6, 2000/ 2:30 p.m.

Site Contact(s): Ted A. Hopkins
Phone: 303-966-7652

Regulatory Contact: Cindy Burbach
Phone: 303-692-3315

Agency: CDPHE

Purpose of Contact: Applicability of 15-day management time limit for reactive chemicals

Discussion

One June 21, Carolyn Hicks, B776 notified Cindy Burbach that there was a potential that reactive chemicals (i.e., picric acid) would be found in fume hoods 28 and 29 in Room 445 of Building 776. Subsequent to this initial notification a visual inspection of the fume hoods identified several containers. All containers were labeled as to their content but all were secondary containers. None of the containers were labeled as containing either picric acid or perchloric acid. However, interviews with personnel that worked in the area indicate that picric acid was used in the hood. Building personnel in conjunction with Radian are preparing a sampling plan to evaluate the hoods, sinks, drains, sump and all chemical containers. The purpose of this sample event is to determine whether or not reactive chemicals are present.

The Reactive Chemical Management Plan requires the management of reactive chemicals within 15 days after confirmation of their existence. DOE representatives have questioned whether the 15-day time limit for management of reactive chemicals was triggered with the June 21 notification. Subsequently I contacted Cindy Burbach, CDPHE regarding this issue. Ms. Burbach stated that the 15 day time limit would trigger when (an if) sampling indicated that reactive chemicals were present. Upon confirmation that reactive chemicals were present, building personnel would have 15 days to move the chemicals to B881 for treatment or submit a management plan to CDPHE for approval.

Contact Record Prepared by: Ted A. Hopkins

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Page 1 of 2

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1
2

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2/2