

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** January 26, 2005

**Site Contact(s):** Dyan Foss  
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**Regulatory Contact:** Edd Kray  
**Phone:** (303) 994-3441

**Agency:** CDPHE

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**Purpose of Contact:** Disposition of Area 5 Survey unit 9

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### **Discussion**

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Area 5, survey unit 9 for demolition. Survey unit 9 consisted of rooms 118, 118A-H, 134 West, 138, 146, 146A and 146B.

The preparation process for survey unit 9 was initiated May 14, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving, concrete scraping, hydrolasing, joint removals, and hotspot removals were performed on various floor and wall surfaces.
- The floor was removed.
- Walls were decontaminated or removed as necessary

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in survey unit 9. The following summarizes the non-radiological activities:

- Room 134 West was a permitted RCRA container storage unit in Unit 776.1 and also provided secondary containment for RCRA tanks and piping associated with Units 776.2, 44.01 and 44.02. CDPHE approved closure of this area in a contact record dated 11/23/04, contingent on final disposition of the building by removal. Room 118 contained an interim status treatment unit, the Fluidized Bed Incinerator, Unit 49.01. The incinerator was closed by removal, and the

secondary containment was closed by the rinsate method and approved by CDPHE in a contact record dated July 28, 2004, contingent of final disposition of the building by removal. Room 146 provided secondary containment for the Size Reduction Vault, interim status storage and treatment Unit 61, and mixed residue tanks 94.009 – 94.011. This room was hydrolased prior to removing the floor, which met the “debris rule” RCRA closure standard in the DOP.

- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Rooms 134 and 146, in survey unit 9, were on the historical list of rooms with potential beryllium contamination. Room 134 was on the historical list due to potential beryllium contamination inside the ASRF, but was never posted as a beryllium controlled or regulated area. Room 146 was historically posted as a beryllium controlled area. Room 146 was decontaminated and released from beryllium controls prior to removal of the floors and walls of this room; therefore, no final beryllium samples were collected in this area. Baseline beryllium characterization and subsequent surveys following equipment removal in the rest of the survey unit found no removable beryllium contamination. Prior to final encapsulation of the survey unit, twenty-two (22) samples were collected on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm<sup>2</sup>.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Since the floor was removed and the exposed soil may have radiological contamination, the soil will be treated with an encapsulant, such as soil cement will be placed over the soil to limit the potential for dispersion during demolition activities. The area will be noted on project maps, and activities in this area will be coordinated with Environmental Restoration personnel.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey unit 9 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey unit 9 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included in the demolition file to ensure the controls and requirements are included in the demolition work packages for this survey unit.

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**Contact Record Prepared By:** Dyan Foss

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