

98-RF-05627

DIST.	LT	N
Crawford, A. C.	X	
Hamrick, J. C.		
Hickman, M. E.	X	X
Huovler, G. S.		
Guthrie, C. L.		
Korenko, M. K.	X	
Dieter, T. J.	X	X
Pasquini, L. A.		
Raish, S. C.		
Fitz, R. C.		
Hughes, F.		
Trice, K.		
Conilogue, M		
Wolf, K. Z.		
Zbryk, K. O.	X	X
Whiting, J.		
Bracken, G.		
Reynolds, R.		
Schommer, R.	X	X
Von Feldt, R		
Mills, S.		
Trice, K.	X	

HOPKINS X X

CORRES.CON X X

TRAFFIC

PATS/1130G

CLASSIFICATION:

UCNI

UNCLASSIFIED X

CONFIDENTIAL

SECRET

AUTHORIZED CLA  
SIGNATURE:  
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Date:

IN REPLY TO RFP

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CLOSED

LTR APPROVALS:

Manager \_\_\_\_\_

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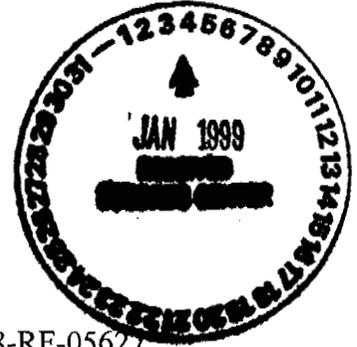


Safe Sites of Colorado & Rocky Mountain Remediation Services

# 779 Closure Project

December 7, 1998

John W. Whiting  
779 Cluster PBS Manager  
Kaiser-Hill  
Rocky Flats Environmental Technology Site



98-RF-05627

## REQUEST FOR MINOR MODIFICATION OF THE DECOMMISSIONING OPERATIONS PLAN (DOP) FOR THE 779 CLUSTER INTERIM MEASURE/INTERIM REMEDIAL ACTION - MEH-080-98

The purpose of this memorandum is to request notification to CDPHE of a minor modification to the 779 Cluster DOP. This minor modification pertains to the following: hazard waste characterization for all Permitted and Compliance Order gloveboxes deferred to D&D Closure; deletion of Gloveboxes NC-7 and 106-6 from Table 9-1; and clarification of the state in which all Permitted and Compliance Order container storage units have been maintained after all hazardous waste has been removed. This modification pertains to Units 90.37, 90.39, and 90.43.

The first minor modification will addend Section 9.0, *Regulatory and Environmental Considerations.* This modification applies to the statement: "Any residuals from size-reduction or radioactive decontamination will carry the same EPA waste codes as the unit being treated.", Section 9.1.2, *RCRA Closure Description Document*, Option #1. The aforementioned units were permitted to store hazardous waste carrying specific EPA codes identified in Table 9-1. However, process knowledge shows these gloveboxes do not meet the definition of corrosivity (D002) nor reactivity (D003). Also, EPA Code F003 clearly does not apply to Unit 90.43, as the entire waste form is not ignitable.

The second minor modification will also addend Section 9.0. This modification will delete Gloveboxes NC-7 and 106-6 from Table 9-1. These gloveboxes were never used to store hazardous waste and therefore are not required to meet formal closure standards.

Finally, the third modification omits the statement, "Quarterly inspections were instituted to verify this continued condition," of Part 9.1.1., *Background.* After all of the waste was removed from the units, inspections ceased and have not been reinstated. The aforementioned units have been maintained in a "RCRA Stable" condition since March 12, 1997 (Units 90.37 and 90.39) and April 2, 1997 (Unit 90.43).

During a telephone conversation between J. K. Wrapp (K-H) and Chris Gilbreath (CDPHE-Hazardous Materials Division), on August 25, 1998, both agreed that inspections are not required for areas that do not contain hazardous waste, and that the 779 Cluster DOP should be modified to omit this requirement.

J. W. Whiting  
December 7, 1998  
MEH-080-98  
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Please contact myself or Kathy Zbryk at X6647 if you have any questions.



Mark E. Hickman  
Integration Manager  
779 Cluster Closure Project  
Rocky Mountain Remediation Services

MC/ras

Attachments:

- DOE draft letter
- Spreadsheet

cc:

C. Gilbreath  
J. K. Wrapp

Date: December 7, 1998

TO: Mr. Steve Tarlton, Rocky Flats Cleanup Agreement Project Coordinator  
Hazardous Materials and Waste Management Division  
Colorado Department Public Health and Environment  
4300 Cherry Creek Drive, South  
Denver, Colorado 80222-1530

FROM: DOE

Subject: Notification of Minor Modification of Decommissioning Operations Plan for the 779 Cluster Interim Measure/Interim Remedial Action (IM/IRA) Effective Date: February 6, 1998.

In accordance with the Rocky Flats Cleanup Agreement, Part 10, Changes to Work, Paragraph 127, DOE is providing written notice to CDPHE of its intent to make minor modification to work conducted pursuant to the Decommissioning Operations Plan for the 779 Cluster Interim Measure/Interim Remedial Action, here after referred to as the 779 DOP. These modifications are made to:

- Correct errors and omissions.

The changes identified in this letter are minor in nature and do not represent a major modification to the 779 DOP. The first modification applies to the statement: *"Any residuals from size-reduction or radioactive decontamination will carry the same EPA waste codes as the unit being treated"*, Section 9.1.2, RCRA Closure Description Document, Option #1. The aforementioned units were permitted to store hazardous waste carrying specific EPA codes identified in Table 9-1. However, process knowledge clearly shows these gloveboxes do not meet the definition of corrosivity (D002) nor reactivity (D003). Also, EPA Code F003 clearly does not apply to Unit 90.43, as the entire waste form is not ignitable.

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RFCA does not provide a formal requirement that the Lead Regulatory Agency (CDPHE) approve minor modifications to an IM/IMRA. However, Part 10 of RFCA states; "The Lead Regulatory Agency (LRA) may issue a Stop Work Order within seven days of receipt of the notification of any such modification." To avoid issuance of a Stop Work Order, it is imperative that the lines of communication between DOE and CDPHE be clearly delineated.

If you have any questions in regard to these modifications, please contact Dave Nickless at extension 5221.

ATTACHMENT #1

The changes as identified in this letter are minor in nature and do not represent a major modification to the 779 DOP. The proposed minor modifications are:

1. Section 9.0 Regulatory and Environmental Considerations, Table 9-1: Decommissioning the 779 Cluster.

90.37	779	Room 131 Gloveboxes	Container Storage Gloveboxes	D004,D005,D006 D007,D008,D009 D010,D011.	90.37 consists of four gloveboxes in Bldg.779 and is used for container storage. The gloveboxes are 131A, 131B, 131D, and 131E.	Liquid capacity 12 gallons each.	Solid and liquid mixed residues, TRU mixed waste, and low-level mixed waste.
90.39	779	Room 137 Gloveboxes	Container Storage Gloveboxes	D004,D005,D006 D007,D008,D009 D010, D011, F001	Unit 90.39 consists of six gloveboxes, and two hoods in Bldg.779 and is used for container storage. They are gloveboxes 106-3,106-4, and 106-5, 106-1,106-2, hoods H106-1, H106-2 and unit NC-7.	Liquid capacity 8 gallons each	Solid and liquid mixed residues, TRU mixed waste, and low-level waste.
90.43	779	Room 160 Glovebox	Container Storage Glovebox	D004,D005 D006,D007,D008 D009,D010,D011 F001,F002, and F005	Note: Gloveboxes 106-2,106-6,NC-7 and H106-1 did not store listed waste.  Gloveboxes 106-1, 106-3,106-4,106-5 and H106-2 did store F001 wastes.	Liquid capacity 17 gallons	Solid and liquid mixed residues, TRU mixed waste and low-level mixed waste.