

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

Date/Time: January 19, 2000 / 8:30 a.m.

Site Contact(s): Gary Konwinski **Phone:** 966-2729

Regulatory Contact: Dave Kruchek **Phone:** 692-3328

Agency: Colorado Department of Public Health & Environment

Purpose of Contact: Discussed proposed equipment removal activities for B865.

Discussion

Attendees: Dave Kruchek, Ed Pietsch, Ron Carlson, Jerry Long, Gary Konwinski, Rebecca Mitchell and Bob Cathel.

Vent System (as discussed during 7/2/99 meeting with CDPHE)

Regarding the system that vents to a "drop box", Chris is of the opinion that this doesn't have a pathway to the environment. This is a system of stand-alone vents that draw particulates away from a machine (e.g., bandsaw and grinders). All of these vents are connected to a single overhead duct, which then deposits the particulate matter into a drop box. The collected particulate materials are then bagged out and managed appropriately.

Pursuant to sections 1.1.4 and 1.1.5 of the Decommissioning Program Plan (DPP), removal of certain fixed equipment and systems conforming to these sections may not need additional RFCA decision documents beyond the DPP. This decision would be based on collaborative agreement that the activity does not require such a decision document. Furthermore, the Site project point of contact will:

- Document the agreement in the manner agreed to during the meeting with the LRA (Lead Regulatory Agency, CDPHE) project point of contact (this contact record satisfies this requirement)
- Document the decision in the Administrative Record
- Monitor the project scope to ensure it remains within that agreed to and
- Notify the LRA before the project goes out of scope if possible, in sufficient time to initiate consultation with the LRA on the issue.

Based on the referenced sections of the DPP, the consultative process was invoked for this scope of work. A meeting was held with personnel from CDPHE, DOE, K-H and RMRS

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in attendance. The general scope of work includes removal of equipment within the beryllium Machine Shop and the Utility Room and the removal of ductwork as described in the "Vent System" discussion above. The ductwork will be removed or severed from the main conduit at points easily accessible to workers (i.e., not in the upper spaces of the building. Where the ductwork is severed, it will be isolated in accordance with Industrial Hygiene direction. Also, Dave Kruchek stated that where the ductwork is severed, that these "openings" be plugged in some manner (i.e., tape plastic sheeting over the opening). A fork truck will be utilized to relocate the equipment to a staging area to be broken down (i.e., size reduced and readied for packaging). The equipment and removed ductwork will be packaged in waste containers, in accordance with site-approved procedures. It is assumed that the machinery and ductwork is contaminated with beryllium and will be handled accordingly. Dave Kruchek stated that he was especially concerned with the potential to contaminate workers with beryllium dust. This work will follow site-approved procedures for handling such contaminated equipment. Furthermore, Andre Gonzales was identified as the Industrial Hygienist that will be overseeing this activity.

Prior to beginning this activity, the RMRS project manager will provide the LRA project point of contact with a Integrated Work Control Package (IWCP) for this activity, and Job Hazard Analysis, especially worker safety regarding beryllium dust control.

Contact Record Prepared By: Bob Cathel, RMRS, Environmental Compliance

Distribution:

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