

NOTICE!

**ALL DRAWINGS
ARE LOCATED
AT THE END OF
THE DOCUMENT**

B865-A-000071

CORRES CONTROL

OUTGOING LTR NO

DOE ORDER # 4700 1

04-RF-00396

| DIST | LTR | ENC |
|---------------|-----|-----|
| DIETER T | | |
| FERRERA, D W | X | |
| LINDSAY D | | |
| LYLE J | | |
| MARTINEZ, L A | | |
| PARKER, A | | |
| PIZZUTO V | | |
| SHELTON, D C | | |
| SPEARS, M S | | |
| TUOR N R | | |



April 8, 2004

04-RF-00396

Gary P Morgan, Director
Functional Lead
Cadre Project Management Division
DOE, RFPO

ADDITIONAL INFORMATION FOR FINAL CLOSEOUT REPORT FOR THE 865 CLUSTER CLOSURE PROJECT – DWF-019-04

Colorado Department of Public Health and Environment (CDPHE) provided comments on the 865 Cluster Closeout Report (DWF-011-04) To address CDPHE's comments, this letter documents the additional information identified by CDPHE for the Building 865 Cluster Transmittal to CDPHE and Environmental Protection Agency (EPA), in accordance with the Rocky Flats Clean-Up Agreement (RFCA), is requested.

Please contact Steve Nesta at extension 6386 if you have any questions

Dennis W. Ferrera

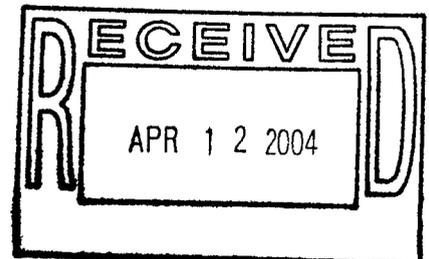
Dennis W Ferrera
Vice President & Project Manager
Remediation, Industrial D&D, and Site Services

Attachment
As Stated

JLH pvt

Orig and 1 cc – Gary Morgan

cc
Joseph Legare



| | | |
|-------------------|---|---|
| BEAN, C | | |
| BUTLER, J L | | |
| DECK, C | | |
| FRANCIS, M | | |
| FREIBOTH, C | | |
| GEIS, A | | |
| GIBBS, F | X | |
| HUME, J | X | X |
| HUMISTON, T | | |
| HUNTER, D | | |
| KNAPP S | | |
| LINSINBGLER, H | | |
| MARSCHALL JR | | |
| MYERS, K | | |
| NESTA, S | X | X |
| O'BRIEN, J J | | |
| OMAN, K | | |
| PLAPPERT, R | | |
| PRIMROSE, A | | |
| RICHARDELLA R | | |
| ROSENMAN, A | | |
| SNYDER DP | | |
| SWARTZ, JM | X | X |
| WIEMELT, K | | |
| SELAN J | | |
| CORRES CONTROL | X | X |
| ADMIN RECRD/T130G | X | X |
| TRAFFIC | | |
| PATS/130 | | |

CLASSIFICATION

| | | |
|--------------|--|--|
| UCNI | | |
| UNCLASSIFIED | | |
| CONFIDENTIAL | | |
| SECRET | | |

AUTHORIZED CLASSIFIER
SIGNATURE

Date

IN REPLY TO RFP CC NO

ACTION ITEM STATUS

PARTIAL/OPEN
 CLOSED

LTR APPROVALS

ORIG & TYPIST INITIALS

JLH pvt

1/8

865 Cluster (Type 2 Facility)

- Need a map showing all remaining infrastructure and termination locations as described in this Report and specifically Section 9

See Attachment 1, 865 Cluster Map, for location of the lines for fire protection, domestic water, natural gas, sanitary sewer, condensate, electric and alarms.

- Since B827 (the Emergency Generator Facility) is previously identified as a part of the 865 Cluster and was demolished during this activity, why isn't it included in this Closeout Report for B865 Cluster?

The Closeout Report for Building 827 was previously submitted to DOE on April 17, 2003. The Closeout Report was then forwarded from DOE to CDPHE on April 23, 2003. Kaiser Hill received concurrence for the Building 827 Closeout Report on January 12, 2004.

- Section 7 - Why isn't the weight known for all of the waste streams? Also, why isn't there specific information regarding the ACM waste, especially since it is stated in Section 1 that B865 "contained significant quantities" of ACM? If only "minor amounts of friable asbestos" were included as LLW and LLMW then what happened to the rest of the ACM, both friable and non-friable?

Waste stream measurements have been updated. All ACM was shipped out as Low Level Waste and Low Level Mixed Waste. See Attachment 2, 865 Cluster Waste Stream Disposition.

- Section 6 & 12 - It is stated in Section 6 that the air monitoring identified higher levels of Be during rubble load out than during building demolition. Yet these time periods are not identified on Figure 2 or in Section 12. As such, it would provide more useable information if the dates for the key activities provided in Section 12 would also include the dates for the demolition of the Low Bay and High Bay, rubble removal of Low Bay and High Bay, as well as ER activities.

Demolition started on the low bay of Building 865 approximately August 20, 2003. Demolition continued on to the high bay and was completed approximately August 28, 2003. Rubble removal started approximately September 3, 2003 and commenced approximately September 18, 2003. ER took over Building 865 approximately October 7, 2003 and completed work approximately December 12, 2003.

- The closure summary does not mention the disposition of the 8' section of piping over the hall between rooms 108 and 135. This needs to be included in the closure summary unless it has been discussed adequately elsewhere. I don't remember seeing anything about it anywhere else.

All of the piping that was in Building 865 was removed and managed as LLW as per the CDD. That includes the 8' section of pipe that was over the hall between rooms 108 and 135.

- Based on the May 9, 2002 contact record referenced in our June 7, 2002 concurrence letter, it appears that waste code F008 is missing from the B866 sump. Also, it appears that waste codes D008 and D011 should be applied to this sump since they are not covered by the listed waste codes.

The F008 code was removed from the Building 866 sump based on a historical WSRIC review that showed this waste was not generated in Building 889. D008 and D011 were also removed from the sump because the treatment standards for these are covered under treatment for F007 and F009 waste.

- It seems that F-listed solvent waste codes should apply to the sludge removed from Tanks T-1, T-2, and T-3.

As stated in the CDD, Tanks T-1, T-2 and T-3 met clean closure for the F-listed codes, but not for four characteristic codes. Therefore, the sludge was only hazardous for the characteristic codes applied.

- Section 4.0, "Summary" in the report should state that closure of Sump 145A was not accomplished and is deferred to Environmental Restoration.

Closure of Sump 145A was not accomplished by D&D, but was deferred to ER. ER did remove Sump 145A as LLW. See last paragraph of section 1 of the RCRA Closure Summary Report.

Attachment 1

**Building 865 Cluster Map – Fire Protection Lines, Domestic Water
Lines, Sanitary Sewer Lines, Natural Gas Lines, Steam/Condensate
Lines, Electrical Lines and Alarm Lines**

Attachment 2

Building 865 Cluster Waste Steam Disposition

| | |
|------------------------------------|--|
| 1. Sanitary Disposal | |
| Disposal Site | Front Range Landfill, Erie, Colorado |
| Waste Volume (m3) | 9800 |
| Waste Weight (tons) | 5062.4 |
| Additional Information | This waste included building structural material that met the free-release criteria from Buildings 865, 867, 863, and valve vaults 5 and 6 |
| 2. Hazardous Disposal | |
| Disposal Site | On site RFCA units |
| Waste Volume (m3) | 21 |
| Waste Weight (tons) | 164 lbs |
| Additional Information | This waste consisted of mercury switches, nickel-cadmium batteries, and other minor quantities of hazardous waste |
| 3. TSCA Waste Disposal | |
| Disposal Site | Onyx Special Services, Inc Phoenix, AZ and Onyx Environmental Services, Port Arthur, TX |
| Waste Volume (m3) | 2.3 |
| Waste Weight (tons) | 1,262 lbs |
| Additional Information | This waste consisted of large liquid filled capacitors and PCB contaminated oil |
| 4. Asbestos Waste Disposal | |
| Disposal Site | |
| Waste Volume (m3) | |
| Waste Weight (tons) | |
| Additional Information | See low-level and low-level mixed waste sections |
| 5. Low Level Waste Disposal | |
| Disposal Site | Nevada Test Site, NV |
| Waste Volume (m3) | 4739 |
| Waste Weight (tons) | 1,437 tons total |
| Additional Information | This waste included machinery, building structures, piping, ductwork, and low-level friable and non-friable asbestos |
| 6. Low Level Waste Disposal | |
| Disposal Site | DSSI, Kingston TN |
| Waste Volume (m3) | 3.98 |
| Waste Weight (tons) | 1,437 tons total |
| Additional Information | This waste included low-level oils drained from equipment |

| | |
|--------------------------------|---|
| 7. LLM Waste Disposal | |
| Disposal Site | Envirocare of Utah, Inc , Salt Lake City, UT |
| Waste Volume (m3) | 82 75 |
| Waste Weight (tons) | 14 9 tons |
| Additional Information | This waste includes crushed light bulbs, lead piping, circuit boards, metal fines, lead lined equipment, friable and non-friable asbestos and 3 RCRA interim status tanks and ancillary equipment |
| 8. Recycled Material | |
| Disposal Site | Exide Technologies, Reading PA |
| Waste Volume (m3) | 1 |
| Waste Weight (tons) | NA |
| Additional Information | Lead acid batteries for recycle |
| 9. Property Disposition | |
| Disposal Site | PU&D for resale |
| Waste Volume (m3) | 1 |
| Waste Weight (tons) | 5 |
| Additional Information | This waste included the motors from the filter plenums, the electrical equipment from B863, and minor quantities of circuit boards from outside areas |

