

CORRES CONTROL
OUTGOING LTR. NO.

DOE ORDER
01-RF-02905



DEC 14 2001

01-RF-02905

NAME	LTR	ENC
BRAILS FORD, M.D.		
FERRI, M.S.		
MARTINEZ, L. A.		
PARKER, A.M.		
POWERS, K.		
SCOTT, G.K.		
SHELTON, D.C.		
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N. R.		
BUTLER, J. L.		
CHRITTON, M.R.		
DIETERLE, S. E.		
FERRERA, D. W.		
GIANTI, S. J.		
GIBBS, F.E.		
RICHARDELLA, R.		
STEWART, G. W.		

Steve Tower
D&D Program Lead
DOE, RFFO

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNIT CLOSURE OF INTERIM UNITS 40.27
AND 40.28 IN BUILDING 883 – FEG-013-01

Attached is a draft transmittal letter to the Colorado Department of Public Health and Environment for the RSOP notification for RCRA unit closure of interim units 40.27 and 40.28 in Building 883. The draft transmittal letter has been prepared from DOE building point of contact to CDPHE building point of contact; however, it could also be addressed from DOE RFCA coordinator to CDPHE RFCA coordinator.

Please contact Dyan Foss X7577 with questions or concerns.

Frank E. Gibbs
Frank E. Gibbs
Manager, Industrial Facility Disposition
Remediation, Industrial D&D, and Site Services
Kaiser-Hill Company, LLC

Attachment:
As Stated

DLF:jlh

Org. and 1 cc – Steve Tower

cc:
Joe Legare

DOE, KA V Y

CORRES CONTROL	X	X
ADMIN RECD/080		
TRAFFIC		
PATS/130	X	X

CLASSIFICATION:

UCNI	
UNCLASSIFIED	Y Y
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

SIGNATURE
Frank E. Gibbs

Date: *12/14/01*

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
 PARTIAL OPEN
 CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:
DLF:jlh



V10

Attachment
Steve Tower
FEG-013-01
Page 1 of 9

DRAFT

David Kruchek
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNIT CLOSURE OF INTERIM UNITS 40.27
AND 40.28 IN BUILDING 883**

Mr. Kruchek:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for RCRA unit closure of interim units 40.27 and 40.28 in Building 883. Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

The appropriate documentation required by the RSOP is attached to this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by the subcontractor. The exact methods and process selected by the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings. The facility will not be breached during the activity.

As indicated in the RSOP, the LRA has 30 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 30 days, the project will proceed as planned.

If you have any questions regarding this, please contact me at (303) 966-2133.

Steve Tower
U.S. Department of Energy

2

Project scope: RCRA Unit closure of units 40.27 and 40.28					
Facility description: Building 883, Uranium Rolling and Forming Facility					
Description of planned activity(ies): RCRA unit closure					
Facility/rooms/sets/areas involved: Building 883, Room 139, Area AD					
Is RCRA unit closure(s) part of the planned activity?					
<table border="1"> <tr> <td><input checked="" type="checkbox"/></td> <td>Yes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>No</td> </tr> </table>		<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes				
<input type="checkbox"/>	No				
If RCRA units are included, attach unit specific information sheets and drawings					
Attach checklists from Appendix A of the RSOP.					
<i>Complete checklists by room/set/area/facility, as appropriate</i>					
<table border="1"> <tr> <td><input type="checkbox"/></td> <td>Component Removal/Size Reduction</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Decontamination</td> </tr> </table>		<input type="checkbox"/>	Component Removal/Size Reduction	<input type="checkbox"/>	Decontamination
<input type="checkbox"/>	Component Removal/Size Reduction				
<input type="checkbox"/>	Decontamination				
RLCR Status	RLCR complete and concurrence received:				
<input checked="" type="checkbox"/>	RLCR initiated but incomplete; concurrence anticipated: Submitted to CDPHE 11/27/01				
<input type="checkbox"/>	RLC has not been initiated ¹ and is scheduled for initiation on:				
If RLCR is not complete or initiated, what data will be used to plan the work activities?					
Activity requires modification to the ARARs listed in the RSOP.					
<table border="1"> <tr> <td><input type="checkbox"/></td> <td>Yes, attach to letter</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>No</td> </tr> </table>		<input type="checkbox"/>	Yes, attach to letter	<input checked="" type="checkbox"/>	No
<input type="checkbox"/>	Yes, attach to letter				
<input checked="" type="checkbox"/>	No				
Attach Administrative Record file requirements for the activity.					
Point of contact for each facility/activity: Kent Dorr, 303-966-6034					
Duration of work activities: 2 months Anticipated work start: February 1, 2002					
Attach schedule for each facility or activity for information purposes.					
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls					
<table border="1"> <tr> <td><input type="checkbox"/></td> <td>Yes, LRA consultation and concurrence required</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>No</td> </tr> </table>		<input type="checkbox"/>	Yes, LRA consultation and concurrence required	<input checked="" type="checkbox"/>	No
<input type="checkbox"/>	Yes, LRA consultation and concurrence required				
<input checked="" type="checkbox"/>	No				
Are there deviations/exceptions to the RSOP for the proposed activity(ies)?					
<table border="1"> <tr> <td><input type="checkbox"/></td> <td>Yes</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>No</td> </tr> </table>		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
<input type="checkbox"/>	Yes				
<input checked="" type="checkbox"/>	No				
Provide an explanation of deviation/exception to the RSOP: Not applicable					
C. Check the appropriate resulting action box below					
Additional RFCA decision document required (PAM - IM/IRA)					
Major modification to RSOP					
Field change to RSOP					
Minor modification to RSOP					
LRA consultation					
Activity(ies) will result in the following waste types					
<table border="1"> <tr> <td><input type="checkbox"/></td> <td>Process waste</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Remediation waste</td> </tr> </table>		<input type="checkbox"/>	Process waste	<input checked="" type="checkbox"/>	Remediation waste
<input type="checkbox"/>	Process waste				
<input checked="" type="checkbox"/>	Remediation waste				
<input type="checkbox"/>	TRU				
<input checked="" type="checkbox"/>	LLW				
<input checked="" type="checkbox"/>	LLMW				
<input checked="" type="checkbox"/>	Haz.				
<input checked="" type="checkbox"/>	Sanitary				
<input type="checkbox"/>	Other:				
LRA Notification Review Time					
<input type="checkbox"/>	14 days, no RCRA unit closure involved				
<input checked="" type="checkbox"/>	30 days, RCRA unit closure involved				

¹ Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

3

Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report 883 Cluster Closure Project
- Building 883 Closure Project Scoping Meeting Minutes/Disposition
- Notification Letter and subsequent CDPHE correspondence, if appropriate

INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Revision 0, 4 February 2001" addresses closure of RCRA regulated units. Although these are interim status units, the closure requirements are the same as for RCRA regulated units.

This document applies to Tank T-1, Tank T-2, all ancillary equipment, and secondary containment. Complete closure will be accomplished in accordance with one of the options noted in the RSOP. Furthermore, if clean closure cannot be attained, the tanks will be deformed in such a way that the tanks are incapable of holding 75 percent of their original volume.

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

The (T-1 and T-2) Interim Status Units 40.27 and 40.28 were utilized to capture spent nitric acid from the metal fabrication and etching process located on the "C" side of B883. Waste in the T-1 and T-2 tank system was characterized as corrosive, due to the nitric acid. Acids in the tanks were neutralized with caustic prior to transfer to the B374 Liquid Waste Operations.

Closure was attempted on Tanks T-1 and T-2 during 1998 via the wash, triple-rinse and sample method. Closure standards were not attained. Based on the EPA's Toxicity Characteristic Leaching Procedure (TCLP) results of the rinsate, arsenic (D004) concentrations in Tank T-1 were reported to be 5.6 mg/l and Tank T-2 concentrations were not detectable by the laboratory method. The secondary containment structure for these tanks is also RCRA Stable.

SYSTEM BOUNDARIES

The boundary of the interim status unit includes tanks T-1, T-2, all ancillary equipment, and secondary containment. Each stainless tank is rectangular, measuring 3-ft wide, 8-ft long, and 6-ft deep. These tanks are physically located in a concrete pit on the west side of B883 having dimensions 12 feet 9 inch by 15 feet by 12 feet deep. This pit is located on the first floor of B883 in room 139. The area is considered confined space and a contaminated area (CA). The ancillary equipment includes:

- Ancillary piping
- Secondary containment (concrete pit)
- Transfer pump
- Waste transfer station
- Valve vault
- Sump

SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Tanks T-1 and T-2 are currently contained in a concrete pit. Therefore, it anticipated that soil in the area will not be exposed to contaminants (if any) associated with these tanks and/or associated equipment or structures. Soil sampling is not planned with regard to the activities covered by this RSOP. Below grade (process waste) pipes associated with these tanks will be addressed by ER during remediation activities. Any soil sampling associated with removal of below grade piping will be performed at that time.

RECORDKEEPING

RCRA unit closure activities will be documented in the Pre-Demolition Survey Report (PDSR) which will be completed prior to building demolition.

BUILDING 883, RCRA UNIT-SPECIFIC CLOSURE INFORMATION

BUILDING 883, RCRA UNIT-SPECIFIC CLOSURE INFORMATION			
AD	40.27	Acid Etch Tank T-1	RCRA stable
AD	40.28	Acid Etch Tank T-2	RCRA stable
Closure Method:		RCRA-regulated units will be closed by removal or clean closed.	
Waste Disposal:		Non-contaminated concrete rubble will be managed in accordance with the RSOP For Recycling Concrete or packaged to meet disposal facility WAC. Other waste, including tanks, gloveboxes, ancillary equipment, contaminated concrete, etc., will be shipped directly to an approved disposal facility or stored in an onsite storage unit until shipment can be scheduled.	

BUILDING 883, RCRA-REGULATED UNITS

AD	40.27	883	Acid Etch Tank T-1	Interim	D004
AD	40.28	883	Acid Etch Tank T-2	Interim	D004

7

RCRA Stable
Units 40-27 & 40-28

- EXISTING PIPING
- - - REMOVED PIPING
- CLEANED SUMPS & TANKS
- ▨ REMOVED SUMPS & TANKS

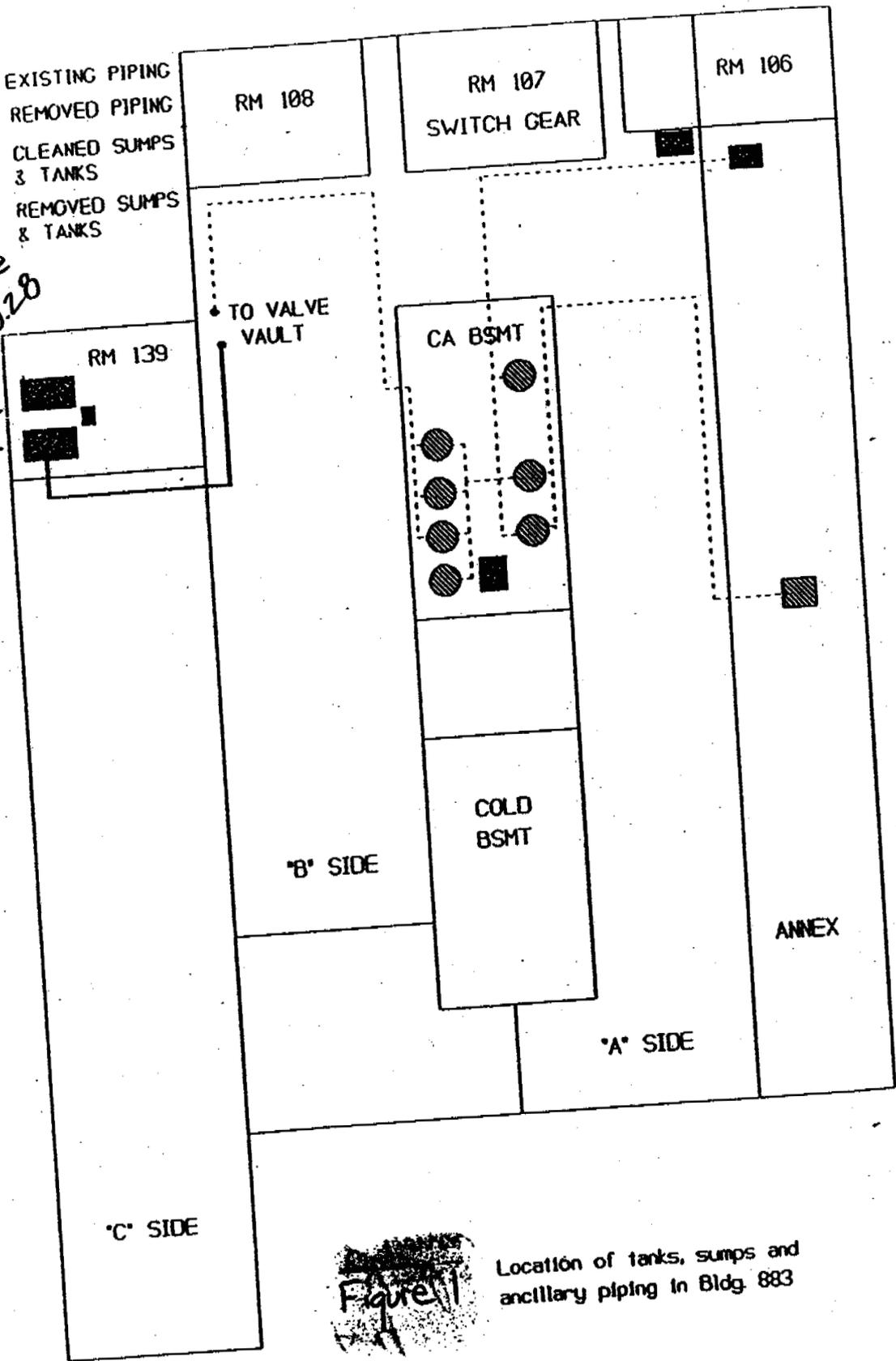
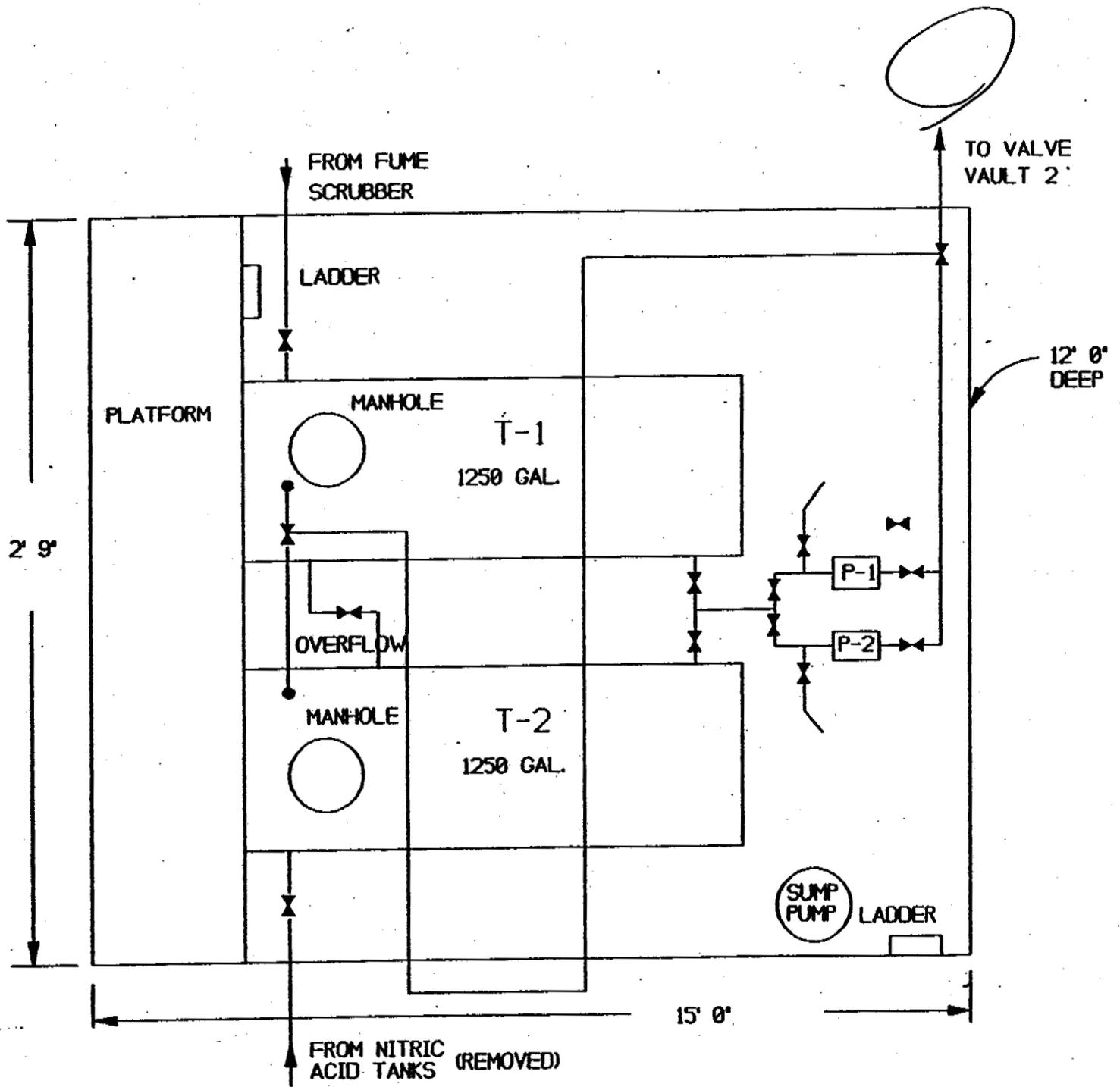


Figure 1

Location of tanks, sumps and ancillary piping in Bldg 883

8

Figure 2 Secondary Containment Diagram



FLOOR PLAN

N

1 Rocky Flats Closure Project

1.E Industrial Building Demolition Services Project

1.E.D.03.01 13:02 Decommissioning

Activity ID	Description	Start	End	Duration	ES	EF	LS	LF	TF	Slack
1EED3012	B883 Decommissioning Characterization	94	1	99	23	APR	01	26	NOV	153
1EED3012A	DOE Review 883 Characterization Report	20	1	0	22	OCT	01	26	NOV	170
1EED3012B	(GFS& Code) DOE Submit 883 RLCR to LRA	0	0	0				26	NOV	179
1EED3012D	Submit RSOP Notification to DOE	6	6	0	26	NOV	01	03	DEC	170
1EED3012C	883 RLCR LRA Concurrence	14	14	0	27	NOV	01	10	DEC	255
1EED3012E	(GFS& Code) DOE Submit RSOP Notification to LRA	0	0	0				03	DEC	170
1EED3012F	LRA RSOP Notification Review Period	14	14	0	04	DEC	01	21	DEC	170
1EED3011	B883 Decommissioning Planning & Engineering	170	170	0	24	JUN	02	21	MAR	-21
1EED3013	B883 Decommissioning Dismantlement	67	67	0	26	SEP	02	14	JAN	-21
1EED3014	B883 Decommissioning Decontamination	67	67	0	14	OCT	02	28	JAN	-11
1EED3015	B883 Decommissioning Final Surveys	19	19	0	06	JAN	03	03	FEB	-21
1EED3015A	DOE Review 883 PDSR and Finalize IVV	20	20	0	04	FEB	03	03	MAR	-24
1EED3015B	(GFS& Code) DOE Submit PDSR/IVV to LRA	0	0	0				03	MAR	-34
1EED3015C	883 PDSR/IVV LRA Approval	20	20	0	04	MAR	03	31	MAR	-24
1EED3015D	Submit RSOP Notification to DOE	6	6	0	10	MAR	03	17	MAR	-24
1EED3015E	(GFS& Code) DOE Submit RSOP Notification to LRA	0	0	0				17	MAR	-34
1EED3015F	LRA RSOP Notification Review Period	14	14	0	18	MAR	03	31	MAR	-34
1EED3016	B883 Decommissioning Demolition & Disposal	60	60	0	01	APR	03	02	JUL	-21
1EED3017	B883 Demolition Complete	0	0	0				02	JUL	-21
1EED3015G	Submit Closeout Report to DOE	20	20	0	04	JUL	03	31	JUL	13
1EED3015H	(GFS& Code) DOE Submit Closeout Report to LRA	0	0	0				31	JUL	19
1EED3015J	LRA Closeout Report Review Period	14	14	0	01	AUG	03	14	AUG	19

Sheet 1 of 1

KAISER-HILL COMPANY
 Facility Group 25 (883)
 Demolition Schedule

CPBA - RISS

Early Bar
 Progress Bar
 Critical Activity

01FEB99 Start Date
 15DEC05 Finish Date
 26NOV01 Data Date
 03DEC01 13:02 Run Date

© Primavera Systems, Inc.



60/10