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Colorado Department
of Public Health
and Environment

April 30, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of Building 883 RCRA Tank Units 40.27 & 40.28

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed your April 15, 2002 letter and the accompanying notification package received on April 18, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of interim status RCRA Tank Units 40.27 and 40.28 in Building 883. RCRA Tank Units 40.27 and 40.28 are also known as Acid Etch Process Waste Tanks T-1 and T-2, respectively, in Building 883. We hereby agree that the appropriate activities described in the notification may proceed utilizing the Component RSOP, with the following conditions:

1. The section within the notification documentation titled, "System Boundaries," lists the ancillary equipment associated with Tanks T-1 and T-2 and includes an item described as "Valve vault (outside the building)." It is assumed that the valve vault itself and the piping and equipment therein are not included within the scope of the RCRA closure activities described in this notification since the valve vault is not described further. Thus, closure and decontamination/demolition activities planned for the valve vault will require a separate closure description document or RSOP notification.
2. According to Division files, there is at least one documented release from these two tanks into the associated secondary containment in Building 883. Unless it can be demonstrated that an impermeable coating was maintained in good condition on the concrete secondary containment throughout the life of the unit, the application of Clean Closure Option #3 under Section 5.1.1 of the Component RSOP will require verification sampling and analysis of the remaining concrete for hazardous waste constituents that were managed within Tanks T-1 and T-2.



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3. Because there is at least one documented release from Tanks T-1 and T-2 into the associated secondary containment in Building 883, it will be necessary to thoroughly evaluate the secondary containment for potential pathways (e.g., cracks, seams, etc.) for migration of contamination to the underlying soils. The results of this evaluation and the closure verification analysis of the remaining concrete (see condition #2 above) will need to be considered in determining whether or not soil sampling will be necessary.
4. It is stated in your letter that the "subcontractor will conduct work in accordance with his work control documentation." The utilization of the approved Component RSOP includes the implementation of the work control process as provided therein. As such, the subcontractor's work control process must adhere to that described in the Component RSOP, or it must be shown to be equivalent. Any variation from the work control process as described and approved in the Component RSOP must be identified and appropriate rationale provided for our approval.

As indicated in your letter, the consultative process must be utilized to keep us informed of the decommissioning strategy, planning, and activities for this project. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or James Hindman at (303) 692-3345.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: S. MacLeod, DOE-RFFO
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