

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

January 26, 2005

Mr. Joe Legare
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Pre-Demolition Survey Report (PDSR) for B879 - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 879; Version 0 dated January 3, 2005. We have also received your letter dated January 26, 2005. Based on the information contained in this PDSR, we are hereby approving this PDSR for Building 879.

Although we are approving this PDSR for B879, and as addressed in your letter, we previously reviewed the draft PDSR data for B879 and agreed that this structure could be demolished, as described in a Contact Record dated December 23, 2004. We also requested that a characterization of the inaccessible portions of the slab underneath this structure be performed upon removal of this structure. It is our understanding that this was performed, with the results to be provided in the Closeout Report for B879.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruczek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Aguilar, EPA
Sam Garcia, EPA
Duane Parsons, KH
Administrative Records Building T130G

Dyan Foss, KH
Dave Shelton, KH
Steve Nesta, KH
J. Mike Swartz, KH

ADMIN RECORD

B883-A-000055

1/15

STATE OF COLORADO

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Jane E. Norton, Executive Director

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Colorado Department
of Public Health
and Environment

December 20, 2001

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

**RE: Reconnaissance Level Characterization Report (RLCR) for Buildings 883 and 879 -
Concurrence**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR for the 883 Cluster Closure Project (Buildings 883 and 879), Revision 0 dated October 17, 2001, which was received on November 28, 2001. Based on a review of the information contained in this RLCR, including discussions and modifications to be provided, we are hereby concurring with the Type 2 designation for Buildings 883 and 879.

This concurrence is limited to the designation of Buildings 883 and 879 as Type 2 buildings, and does not include specific approval of the data or information contained in this RLCR or other conclusions that may be provided therein, or drawn from this RLCR. The utilization of the results of sampling included in this RLCR will be discussed during future D&D meetings.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Krueck at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, FC, RFFO
Tim Rehder, EPA
Duane Parsons, KH

Frank Gibbs, KH
Dave Shelton, KH
Administrative Records Building 850

Final Project Closeout Report
For
Building 883 Cluster

Revision: 0

August 2005

Remediation, Industrial D&D, and Site Services
Kaiser-Hill Company, LLC

Review for Classification

Name: _____

Date: _____

I. Introduction

The 883 Cluster was located on the east half of Rocky Flats Environmental Technology Site (RFETS), just south of Central Ave on 8th Street. The structures within the 883 Cluster consisted of the main facility, Building 883, which was a two-story building with a partial basement and Building 879, the filter plenum for 883. Building 883 was a steel-framed building constructed in 1956, which housed administrative offices, shower facilities, and machining equipment to machine enriched and depleted uranium parts. Building 883 also machined other non-fissile metals such as beryllium, tungsten, stainless steel, aluminum and vanadium, which were part of plutonium weapons production.

The 883 Cluster Closure Project was completed in accordance with the Rocky Flats Cleanup Agreement (1996), the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities (DOE 2002c); and the RSOP for Facility Disposition (DOE 2000b). This document summarizes the actions taken and the final condition of the Building 883 Cluster.

883 Cluster Description

Building 883 is a high-bay single story structure with a thirty-eight foot ceiling, has a partial basement, and a small second floor on the north and south ends. The structure covers 76,500 square feet. The building was set on concrete foundations composed of individual spread footings, concrete pedestals, concrete grade beams, combined footings, and foundation walls. The building was structural steel framing for the exterior walls and roof and was built on concrete slabs on grade. The steel framing was covered with corrugated cement asbestos panels on the exterior, and the interior perimeter walls were covered with painted cement asbestos panels or concrete block. The roof was metal decking with built-up roofing material. The floor slab in the basement was eight-inch thick wire mesh reinforced concrete slab on grade. The first floor slabs were constructed of six-inch thick wire mesh reinforced concrete slab on grade, and the first floor over the basement area is six-inch reinforced concrete. The heavy equipment was placed on isolated concrete pads/pedestals where appropriate. The building was divided into three areas referred to as Sides A, B, and C. The building originally had two functional areas to prevent cross contamination (Sides A and B). A and B-Side areas were radiological controlled areas, where the use of personal protective equipment was required. Operations in this building included machining activities on DU, Be, A1, SS, and other metals.

Since its original construction, four additions were made to Building 883:

- In 1958 additional storage space was added on the east side of the structure. This area was called the "A annex."
- In 1968 an addition was built on the southeast side of the building. This addition provided space for an air supply plenum room, increased the storage space and added space in A Side for manufacturing.
- In 1972 an addition was built on the northeast corner of Building 883. This addition housed the main steam valves that supplied steam to Building 883.
- In 1985 the C Side was added to support manufacturing of armor plates containing depleted uranium for the M1A1 tanks.

The exterior walls of the 1958 addition and the lower portion of the 1968 addition were 8-inch thick concrete block. The exterior walls of the 1972 and 1985 additions was corrugated galvanized steel.

The ventilation system for Building 883 consisted of a once through system with inlet air plenums on the second floor. The air exhausted through the Building 879 plenum and then vertically through two exhaust stacks on the roof of Building 879. The C Side had a dedicated HVAC system, which used a HEPA filter to ensure that exhausted air is appropriately conditioned prior to exhaust. The office areas had a conventional HVAC system that used plant steam for heating and cooling tower water for cooling.

Along with Building 883, the Building 883 Complex consisted of:

- Building 879, Filter Plenum, which was constructed in 1975 and was located at the northwest corner of Building 883. It provided exhaust filtration for the A-side, B-side, Annex, and the basement of Building 883. The plenum was a metal frame building with corrugated sheet metal siding. The fan room had a metal roof and the plenum room had a composite roof. The building was constructed on a 12-inch slab poured on grade.

II. Action Description

Prior to the mobilization of the D&D Subcontractor, Environmental Chemical Corporation (ECC), the installation of support trailers were required as part of the D&D Project Specifications for project management, administrative support, project engineering, radiological operations, occupational safety & health, men's and women's locker rooms (shower facilities), and a break trailer for daily briefings, training, meetings and lunch area for project personnel.

Utility "tie-ins" were required for electrical power, domestic water and sanitary sewer to the trailers. Electrical distribution from the Site 13.8kVa grid was provided by GASH Electric under the Site guidelines and KH/RISS Engineering and Planning approval. The awarded subcontractor for D&D, ECC routed sanitary and domestic water distribution from the locker room trailers and tied-into the Site utility systems under Site guidelines and project specifications for utility tie-ins.

Several walkdowns were performed by GASH Electric and KH/RISS Electrical Engineers and Planners (prior to ECC's Site mobilization) for the development of work packages to remove power to B883. The electrical removal, herein referred to as "cold and dark", is to remove the "original" electrical power distribution provided to all electrical systems, transformers, HVAC Systems, lighting, alarms, and equipment associated with B883, including support Building 879 the filter plenum.

GASH Electric performed the electrical isolations of all "original" electrical feeds to equipment and systems associated with B883, by taking down specific grids by Lock-Out/Tag-Out and then isolating the main power by cutting, removing, air-gapping, or by re-routing and clearly marking re-routed power for easy identification and future use by ECC and dismantlement operations. This "cold and dark" process greatly reduces the potential for injury and/or death associated with electrical shock during dismantlement of

Appendix 3

883 Cluster Characterization Reports

Pre-Demolition Survey Reports (PDSRs)

- Article 1 Building 883**
PDSR for the Building 883 Revision 0, dated February 7, 2005
CDPHE concurrence letter dated February 7, 2005
- Article 2 Building 879**
PDSR for Building 879 Revision 0, dated January 3, 2005
CDPHE concurrence letter dated January 26, 2005

Reconnaissance Level Characterization Reports (RLCRs)

- Article 3 Building 883 and 879**
RLCR for the 883 Cluster Closure Project, Revision 0, dated October 17, 2001
CDPHE concurrence letter dated December 20, 2001

Appendix 5

CDPHE RSOP Notification Concurrence

Building 883 and 879

- | | |
|------------------|--|
| Article 1 | January 9, 2002, Facility Component RSOP – Component removal and decontamination activities |
| Article 2 | April 30, 2002, Facility Component RSOP – Closure of RCRA Tank Units 40.27 and 40.28 in Buildings 883 |
| Article 3 | October 6, 2004, Facility Disposition RSOP – Demolition of C side, office area and East Annex. |
| Article 4 | January 4, 2005, Facility Disposition RSOP, Component Removal RSOP and the Environmental Remediation RSOP – Demolition of Building 883 and 879 Slab |

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Colorado Department
of Public Health
and Environment

January 9, 2002

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

RE: Buildings 883 and 879 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your letter dated December 20, 2001, received on December 31, 2001, notifying us of your intent to utilize the Component RSOP for component removal, size reduction, and decontamination activities that are to occur in Buildings 883 and 879. We hereby agree that the appropriate activities may proceed utilizing the Component RSOP.

Although these activities may proceed utilizing the Component RSOP, as indicated in your letter, the consultative process will be utilized to keep us informed of the decommissioning strategy and activities to occur prior to performing the decommissioning activities.

It is stated in your letter that the "subcontractor will conduct work in accordance with his work control documentation". The utilization of the Component RSOP also includes implementation of the work control process as provided and approved in the Component RSOP. 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.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Krueck at (303) 692-3328.

Sincerely,


Steven H. Gunderson
RPCA Project Coordinator

cc: Steve Tower, RFPO
Tim Rehder, EPA
Kent Dott, KH
Administrative Records Building 850

Frank Gibbs, KH
Dave Shelton, KH
Dyan Foss, KH

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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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Colorado Department
of Public Health
and Environment

January 4, 2005

Mr. Joseph Legare
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: B883 Facility Disposition RSOP Notification

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your December 23, 2004 letter (received December 29, 2004) notifying us that the Facility Disposition RSOP and Component Removal RSOP, as well as the ER RSOP, will be utilized during the demolition of Building 883 and 879. We hereby agree that Buildings 883 and 879 may be demolished utilizing the Facility Disposition RSOP and Component Removal RSOP as discussed.

Your letter discusses 3 separate enclosures, however, we recognize that only two enclosures are provided, with the appropriate information contained in these two enclosures.

Although we agree with utilization of the RSOPs, we also recognize the need to be provided with the appropriate information regarding the final environmental condition or characterization of these facilities prior to initiating demolition activities. This includes our receipt and approval of the PDSRs. The PDSRs must be provided to identify the pre-demolition condition of all of B883 and B879. Not only do the PDSRs need to properly characterize the areas meeting unrestricted release criteria, they also need to demonstrate that there is no removable contamination above unrestricted release levels in those areas with remaining fixed contamination above unrestricted release levels.

With specific regard to B879, it is recognized that this building is a metal plenum sitting on a concrete slab, the demolition of which we previously approved in a Contact Record dated December 23, 2004, with the slab to remain for proper characterization.

In addition, detailed work plans will also need to be provided prior to initiating demolition activities. These work plans and other information as requested should be provided utilizing the consultative process.

CLOSURE SUMMARY INFORMATION FOR INTERIM STATUS RCRA UNITS 40.27 AND 40.28, IN BUILDINGS 883

Pursuant to the *Rocky Flats Environmental Technology Site's (RFETS) "Closure Plan for Interim Status Units at RFETS,"* Rev. 2/15/2000, the *Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Notification Letter, April 15, 2002"* (02-RF-00235), Kaiser-Hill Company L.L.C. is submitting the following closure summary information for the units in Building 883.

This summary information pertains to RCRA closure activities for Tanks T-1 and T-2, ancillary piping, pumps, and secondary containment lining in B883. This summary is a requirement of Section 5, Closure of RCRA – Regulated Units, of the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities. This report contains a description of major closure activities and any deviations from those stated in the RSOP Notification Letter and other relevant information.

1.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

As discussed in the RSOP Notification Letter the tanks, the piping, the pumps, and the secondary containment lining from Building 883, was managed as LLMW. Approximately 2.1 m³ of LLW was generated from this pipe removal action.

After the tanks and ancillary equipment was removed, a fiberglass liner was noted in the pit (Contact Record, between D. Foss and H. Ainscough, 8/18/04). This liner was removed and managed as LLMW, as noted above. In the contact record it was agreed that if there was no visible staining and no radiological contamination, the concrete would be rinsed and the rinsate analyzed (Clean Closure Option #2 in the RSOP). The rinsate was sampled under RIN #04C0809, and all constituents of concern were below the RFCA Tier II action levels for groundwater.

2.0 SUMMARY

The requirements stated in the RSOP Notification Letter for closure of RCRA Interim Status Units 40.27 and 40.28 has been fulfilled. The tanks, ancillary equipment, and secondary containment liner has been disassembled and packaged as LLM waste for appropriate disposal.

RES. CONTROL
INCOMING LTR NO.

RECEIVED STATE OF COLORADO

00313 RF05

Bill Owens, Governor
Douglas H. Benevento, Executive Director
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Colorado Department
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June 7, 2005

Mr. John Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

RE: Closeout Report for IHSS Group 800-3 (B883) - Approval

Dear Mr. Rampe:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the Draft Closeout Report for IHSS Group 800-3, dated May 2005. Comments were provided, and resolutions reached regarding modifications to be made. The IHSS Group 800-3 includes: UBC 883, IHSS 000-121/Tanks 25 & 26, PAC 800-1200, and PAC 800-1201. Based on the information contained in this Closeout Report, including revisions made and as agreed, the Division is hereby approving the IHSS Group 800-3 Closeout Report for No Further Accelerated Action (NFAA).

Although we are approving this Closeout Report based on previous discussions and agreed upon modifications, we look forward to verifying the final IHSS Group 800-3 Closeout Report document.

It should also be recognized that although this ER Closeout Report includes information regarding the final disposition of the slab and associated below grade infrastructure, we still expect to receive a comprehensive D&D Closeout Report for B883.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, David Kruchek at (303) 692-3328, Harlen Ainscough at (303) 692-3337, or Elizabeth Pottorff at (303) 692-3429.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Norma Castaneda, DOE
Mark Aguilar, EPA
Larry Kimmel, EPA
Mark Sattelberg, U.S.F&W

Dave Shelton, KH
Steve Nesta, KH
Karen Wiemelt, KH
Administrative Records - Mountain View

DIST.	LTR	ENC
BERARDINI, J.H.	X	
BOGNAR, E.S.	X	
BROOKS, L.	X	
CARPENTER, M.	X	
CRUCCI, J.A.		
CROCKETT, G. A.	X	
DECK, C. A.	X	
DEGENHART, K. R.	X	
DEL VECCHIO, D.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
GILPIN, H.		
LINDSAY, D. C.	X	
LONG, J. W.		
NESTA, S.	X	
SHELTON, D. C.	X	
SPEARS, M. S.		
TUOR, N. R.	X	
VARD, D.	X	
WIEMELT, K.	X	
ZAHM, C.	X	

DR. CONTROL	X
MIN. RECORD	X
ITS	

Reviewed for Addressee
Corres. Control RFP
11/6/05
By

f. Ltr. #

5400.1

	A	B	C	D	E	F	G	H	I	J
	Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
27	26	881	Container Storage, Rm. 266B	IM/IRA - CLOSED per Work Plan for OU 15	CLOSED in accordance with "Final Phase I RF/RI Work Plan for Operable Unit (OU) 15" (DOE 1993); Closure Certification signed 4/6/95 (ref. 01331-RF-95, 4/28/95).	CC 4/6/95	NA		CC 4/28/95 COR 11/18/04	PDSR 6/28/04
31	32	881	Cyanide Bench Scale Treatment, Rm. 131C	IM/IRA - CLOSED per Work Plan for OU 15	CLOSED in accordance with "Final Phase I RF/RI Work Plan for Operable Unit (OU) 15" (DOE 1993); Closure Certification signed 4/6/95 (ref. 01331-RF-95, 4/28/95).	CC 4/6/95	NA		CC 4/28/95 COR 11/18/04	PDSR 7/15/04
740	881.3A	881	Electrochemical Chlorination (Reactive Cyanide Treatment) Process, Rm. 245 (80.1)	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL. Modification Request 01-04, submitted to (CDPHE 03/23/01) and approved on 11/26/01 removes RCRA Unit 881.3A from the RFETS 1997 permit	11/26/01	RSOP		COR 11/18/04	PDSR 6/28/04
741	881.3B	881	Bench-Scale Hazardous Waste Treatment Process, B881 Rm. 267	PERMITTED - CLOSED per a RFCA decision document	Unit in 881 was closed (removal) in approximately 1/03. However, capability to perform bench-scale treatment in any RCRA permitted unit was available with notice		B881 RSOP		COR 11/18/04	PDSR 6/28/04

15/15

	A	B	C	D	E	F	G	H	I	J
	Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
79	40.27	883	Acid Etch Process Waste Tank T-1	INTERIM STATUS - CLOSED per a RFCA decision document	CLOSED per CDPHE conditions. Notification to invoke the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities received by CDPHE on 4/18/02 and approved by CDPHE on 4/30/02 with four conditions: the activities do not include the valve vault outside B883, verification sampling and analysis of the remaining concrete is required unless it can be demonstrated the secondary containment's impermeable coating can be demonstrated that it was maintained in good condition during the life of the unit, perform an evaluation of the potential pathways for migration of contamination to determine if soil sampling is necessary, and adherence to the work control process outlined in the RSOP. RCRA STABLE (99-DOE-03494, 1/28/99) approved by CDPHE 8/23/99; originally subject to quarterly inspections; request for approval to move to annual inspections approved by CDPHE 07/13/00 (00-RF-01359); to be closed in accordance with "Closure Plan for Interim Status Units at RFETS."	COR 9/7/05	RSOP 4/30/02		COR 9/7/05	PDSR 2/7/05
80	40.28	883	Acid Etch Process Waste Tank T-2							
81	40.29	883	Foundry Process Waste Tank B-17							
82	40.30	883	Foundry Process Waste Tank B-18	INTERIM STATUS - CLOSED per the 1997 permit and 6 CCR 1007-3, Part 265	CLOSED in accordance with "Closure Plan, Building 883 A&B Series Waste Water Tank Systems" (dated 6/23/97; approved by CDPHE 10/16/97); Closure Certification signed 4/30/98 (ref. 98-DOE-03363, 6/10/98).	4/30/98	CDD 10/16/97		CC 4/30/98 COR 9/7/05	PDSR 2/7/05
83	40.31	883	Foundry Process Waste Tank B-19							
89	40.38	883	Foundry Process Waste Tank B-16	INTERIM STATUS - CLOSED per the 1997 permit and 6 CCR 1007-3, Part 265	CLOSED in accordance with "Closure Plan, B883 A&B Series Waste Water Tank Systems" (dated 6/23/97; approved by CDPHE 10/16/97); Closure Certification signed 4/30/98 (ref. 98-DOE-03363, 6/10/98).	4/30/98	10/16/97		CC 6/10/98 COR 9/17/05	PDSR 2/7/05
90	40.39	883	Foundry Process Waste Tank A-24							
91	40.40	883	Foundry Process Waste Tank A-25							
92	40.41	883	Foundry Process Waste Tank A-26							