



Department of Energy

ROCKY FLATS OFFICE
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DEC 07 1993

93-DOE-13407

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Baughman:

Members of your staff, along with those of the Environmental Protection Agency (EPA), have participated in two recent meetings where the subject of the regulatory process for Building 788 Decontamination and Decommissioning (D&D) has been discussed. On November 9, 1993, the subject of the regulatory requirements and documents necessary for the D&D of Building 788 was raised in the weekly Solar Ponds IM/IRA team meeting. On November 10, 1993, a specific meeting on the subject indicated that there was no explicit requirement for inclusion of this project under the IAG or for an IM/IRA process to be followed. Therefore, in the interest of expedience and cost effectiveness it appears that the best regulatory approach to cover this action is first to close the RCRA units under a normal closure process and then proceed with building removal under DOE's operational authority. The foundation of the building and buried utilities will be addressed under the pond closure Interim Measure/Interim Remedial Action agreement.

A key factor in this decision is that the character of the Building 788 project is changing. Building 788 is a pre-engineered building that is relatively lightly contaminated by comparison with other Rocky Flats facilities. Originally, it was considered a reasonable, although fairly simple, pilot for the establishment of various management approaches for subsequent D&D projects. It now appears demolition of the structure is not desired, and that to disassemble and then reassemble the building at a site not impacting any Individual Hazardous Substance Sites would provide floorspace for waste storage in lieu of constructing a new structure. While the details of the procedure necessary to cleanup and relocate this building have not been fully developed, the major project activities are losing their "decommissioning and demolition" character. Thus it becomes less beneficial to use this project to define a D&D process and establish a regulatory precedence; it is more likely that a future project will serve as a better pilot of the future D&D process. Given these circumstances we are proceeding expeditiously to close the units under the RCRA permit and attempt to relocate the building by September 30, 1994, and supporting the Operable Unit No. 4 accelerated closure schedule.

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We look forward to joint participation in the continued definition of how best to implement this approach for the Building 788 project; either in the forum already established for the Solar Ponds, or separately as required.

Sincerely,



Martin H. McBride
Acting Assistant Manager for
Environmental Restoration

cc:

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A. Rampertaap, EM-453
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