



DATE: September 17, 1996
TO: Gary Guinn, Environmental Technical Advisor, T130F, X8043
FROM: Gary Konwinski, Environmental Manager, T130F, X2729 *[Signature]*
SUBJECT: STATUS OF THE BUILDING 889 SUMPS -GRK-249-96
ACTION: Coordinate foaming of the process waste sumps

Demolition of Building 889 has resulted in the complete removal of the structure with the exception of the sumps associated with the process waste system. It is my understanding that both sumps were washed, rinsed, sampled, and covered with a durable layer of sealant prior to being inspected and covered with metal plates. In this configuration the sumps have a quarterly inspection frequency.

Discussions with the State of Colorado indicate that there is an option to continued RCRA inspections. Filling the sumps with a material that will preclude the entrance of fluid, in this case foam, will result in the inspection requirement being waived for these two sumps. Please see the attached RFETS CDPHE/EPA contact record, dated September 17, 1996 for additional information on this subject.

The Operations Division, in conjunction with the underground storage tank program, currently has a subcontractor on site that is filling tanks with foam. I contacted Wayne Sproles, extension 5790, to inquire if the Building 889 sumps could also be filled with foam. This action is agreeable with Wayne and will follow the completion of the tank work. Please see that the responsible Project Engineer coordinates the foaming of these sumps with Wayne and his subcontractor.

Thank you for your cooperation in this matter. If you would like to further discuss this action please, contact me at extension 2729.

- cc:
- J. Wrapp K-H
- C. Jierree RMRS
- P. Bengel RMRS
- B. Henderson RMRS
- RMRS Records
- File

attachment
as stated

ADMIN RECCRD

V3

96-RF-03209



DIST.	LTR	ENC
BENSUSSEN, STAN		
BUHL, TONY		
CARD, BOB		
MANI, VIK	X	
MARTINEZ, LEN		
MCANALLY, JIM		
MCKAY, BOB		
O'BRIEN, GEORGE		
TUOR, NANCY		
VOORHEIS, GARY		
WALLER, CAL		

BENGEL, P.R.	X	
EVANS, B.L.	X	
GUINN, G.	X	
HEDHAL, T.G.	X	
THOMPSON, J.R.	X	
BRACHER, B.	Y	

May 23, 1996

96-RF-03209

D. A. Brockman
Strategic Integration & Guidance
DOE, RFFO

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) UNIT LOCATED IN BUILDING 889, ITS REGULATORY STATUS, AND HANDLING DURING DECOMMISSIONING OF THE FACILITY - KAD-031-95

PURPOSE

The purpose of this letter is to document the above mentioned subject.

DISCUSSION

"Process Waste Transfer and Collection System," RCRA permitted unit 40, encompass the two Building 889 sumps and the waste transfer line connecting these sumps to tanks #4 and #5, located in Building 866. These auxiliary system components are scheduled to be closed in accordance with State of Colorado RCRA closure requirements after the demolition of the above-ground structure of Building 889. The closure action on these components will be accomplished during the environmental remediation of the Operable Unit 9, which address this system and the below-ground structure of the industrial area.

To protect this RCRA unit's auxiliary components and to avoid the spread of contamination, protective measures will be taken. A water-tight cap will be placed over the sumps to contain the hazardous constituents and prevent any dust or debris from falling into the sump. The unit's transfer piping will be verified to be drained and a blind flange installed. These actions will be completed prior to commencement of demolition/decontamination in those areas of the building.

A section of transfer piping has been identified that will inhibit the demolition process of Building 889 and stick upward above the foundation after decommissioning. This issue was identified as a safety issue and has been discussed/authorized for removal by the State without triggering RCRA closure. The section of piping, when removed, will carry the F-listed codes associated with the RCRA permitted unit and will be properly handled, stored, and disposed of, in accordance with Rocky Flats Environmental Technology Site procedures.

These auxiliary components are the only known elements associated with the RCRA permitted units that are located in Building 889. All other elements associated will this facility, such as structural components, will be properly characterized in accordance with 6 CCR 1007-3 prior to or after generation.

CORRES. CONTROL	X
ADMIN RECRD/080	
TRAFFIC	
PATS/T130G	

CLASSIFICATION:

UCNI	
UNCLASSIFIED	<input checked="" type="checkbox"/>
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

SIGNATURE: *[Signature]*

Date: 5/23/96

IN REPLY TO RFP CC NO.:

NONE

ACTION ITEM STATUS:

PARTIAL/OPEN

CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS: r-Hill Company, L.L.C.

KAD:cmh

RF-46469 (Rev. 4/2/95)

er Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

ig Address: P.O. Box 464, Golden, Colorado 80402-0464

RFETS
CDPH&E/EPA CONTACT RECORD

DATE: September 17, 1996
KH Contact(s): John Wrapp EXT.: 5883
CDPHE/EPA Contact: Cathy Alstatt PHONE NO: 4482
AGENCY: CDPH&E

Purpose of Contact: Discuss proposal to foam the sumps under Building 889 to eliminate the need for quarterly inspections.

A meeting was held on September 16, 1996 with Cathy Alstatt (CDPH&E) and Gary Konwinski (RMRS) to propose that we fill the sumps left from the D&D of Building 889 with foam to eliminate the quarterly inspection requirement. Cathy agreed that this was a good approach since it reduced the possibility of liquid getting into the sumps either from precipitation or through the process piping connected to the sump. She also agreed that quarterly inspections would not be necessary if the sumps are inerted (foam filled).

The discussion led to whether this approach could be conducted for similar situations that occur in the future. Cathy stated that it will have to be handled on a case-by-case basis depending upon whether the sumps are rinsed and sampled and what the sample results reveal.

Follow-up Required: Konwinski - Inform project manager of approval to proceed with foaming activities.

REQUIRED DISTRIBUTION:

NOTE: Where recipients share FAX machines only one copy of this contact record will be transmitted.

FAX:	Name:
3710	D. Maxwell - RFFO
2156	F. Phillips - KH
3578	K. North - KH
2865	T. Benton - WSI
7553	B. Wierzbicki - SSOC
8244	G. Konwinski - RMRS
3744	R. Sgrignoli - Dyncorp

ADDITIONAL DISTRIBUTION (below are additional recipients of this contact record)

FAX: Name: