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DUE DATE  
ACTION

Bill Owens, Governor  
Douglas H Benevento, Acting Executive Director  
*Dedicated to protecting and improving the health and environment of the people of Colorado*

4300 Cherry Creek Dr S  
Denver, Colorado 80246-1530  
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Located in Glendale, Colorado

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8100 Lowry Blvd  
Denver, Colorado 80230-6928  
(303) 692-3090



Colorado Department  
of Public Health  
and Environment

DIST	LTR	ENC
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WILLIAMS, J. L.		

<http://www.cdphe.state.co.us>

December 30, 2002

Mr Joseph A Legare, Assistant Manager  
Environment and Stewardship  
U S Department of Energy, RFFO  
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 Permitted RCRA Container Storage Unit 13 in Building 884

Dear Mr. Legare.

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has reviewed your November 21, 2002 letter and the accompanying notification package received on November 29, 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 permitted Container Storage Unit 13 located in Building 884. The notification stated that RFETS intended to close Unit 13 in Building 884 by application of "Clean Closure Option 1" from Section 5 0 of the Component RSOP. "Clean Closure Option 1" refers to a closure method described in Section 5 1 1 of the Component RSOP whereby a RCRA unit is closed by documenting the absence of RCRA contamination. However, as stated in Section 5 1 1, "Clean Closure Option 1" can only be applied to container storage units having a complete operating history. On December 13 and 20, 2002, the Division reviewed portions of the operating record for RCRA Unit 13, primarily weekly inspection records prepared by the facility. Based on this review, the Division determined that the operating record for RCRA Unit 13 was not complete since inspection records for approximately three years (from 1989 through February 1992) were not available. Thus, the Division determined that "Clean Closure Option 1" could not be applied to RCRA Unit 13 in Building 884.

As stated in a December 17, 2002 RFETS Regulatory Contact Record prepared by Kaiser-Hill (see attachment) the question of how to close Unit 13 was resolved by a verbal agreement that the concrete pad in Building 884 would be washed in accordance with an appropriate method described in Table 1 - "Alternative Treatment Standards for Hazardous Debris" of Section 268 45 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The concrete pad will subsequently be visually inspected in

COR. CONTROL	X	X
ADMN. RECORD	X	X
PATS/130		

Reviewed for Addressee  
Corres Control RFP

1/6/03  
Date By

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DOE ORDER #  
54001

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ADMIN RECORD  
IA-A-001233

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accordance with 6 CCR 1007-3, Section 268 45 and if it meets the "Clean Debris Surface" criteria described therein, then the concrete pad will be removed and disposed of as solid waste at an appropriate off-site disposal facility. Otherwise, the concrete pad will be disposed of as hazardous waste at a permitted off-site hazardous waste disposal facility. The spent wash solution must be adequately characterized and disposed of properly. The Division has determined that this approach to close Unit 13 is appropriate since primarily non-liquid wastes have been stored in the unit, and an impermeable coating has been maintained on the surface of the concrete pad in Building 884 throughout the period that the unit has been RCRA-regulated, as stated in the Component RSOP notification. If you have any questions regarding this matter please contact James Hindman at (303) 692-3345

Sincerely,



Steven H Gunderson  
RFCA Project Coordinator

Attachment

cc S MacLeod, DOE-RFFO  
S Tower, DOE-RFFO  
S Nesta, K-H RISS  
D Shelton, Kaiser-Hill  
T Rehder, EPA Region VIII  
D Miller, AGO  
D Kruchek, CDPHE  
J Schieffeln, CDPHE  
RFETS Administrative Records, Building T130G



**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE  
REGULATORY CONTACT RECORD**

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**Date/Time:** 12/17/2002/ 10 00 am  
**Site Contact(s):** Steve Nesta/ Kim Myers  
**Phone:** 303-966-6386/ 303-966-7106  
**Regulatory Contact:** James Hindman  
**Phone:** 303-692-3345  
**Agency:** CDPHE

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**Purpose of Contact:** Discuss closure option for RCRA Unit 13 (B884) and the results of rinsates from Unit 15 (Tent 8 & 9 and the secondary containment pans of the cargoes)

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**Discussion**

**Unit 13**

James Hindman requested the records for RCRA Unit 13 for his review and concurrence on RISS project's approach for clean closing the RCRA Unit 13. On 12/17/02 Mr Hindman was provided the inspection records for RCRA Unit 13 from March of 1992 through October of 2002. Three years of records (1989 through February 1992) were not in the RCRA operating record for review. Later on 12/17/02, in a conversation between Mr Hindman and Kim Myers, James indicated that he did not feel comfortable approving the clean closure option, as outlined in the RSOP Notification Letter submitted by the RISS project, with three years of missing records. As resolution, James agreed to a "modified debris treatment" of the floor of Unit 13. RISS will rinse the floor with Mariko and water and the RISS Environmental Compliance group will conduct a visual inspection to confirm and document a clean surface. The concrete floor will then be disposed of as solid waste at a municipal waste landfill.

**Unit 15**

On 12/17/02, the analytical results from the rinsing of the Tents 8 and 9 floors and the secondary containment pans for the cargo containers were provided to James Hindman for review. After reviewing the results, James agreed that the pad under Tents 8 and 9 was not contaminated, that the tent structures could be removed, with the pad remaining in place until ER can perform the required soil sampling. When ER has performed the required sampling and determined any remediation needs, the pad will be removed and managed as solid waste at a municipal waste landfill. The secondary containment pans from the cargo containers, based on the radiological release, will be disposed of as solid waste at a municipal waste landfill.

Contact Record 4/10/00  
Rev 10/11/00

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Contact Record Prepared By. Kim Myers

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