

CORRES. CONTROL

OUTGOING LTR. NO.

DOE ORDER # 4700.1

04-RF-00619

DIST.	LTR	ENC
BIETER, T.		
ERRERA, D.W.	X	
INDSAY, D.		
YLE, J.		
MARTINEZ, L. A.		
MARKER, A.		
PIZZUTO, V.		
HELTON, D.C.		
PEARS, M.S.		
UOR, N. R.		



June 9, 2004

04-RF-00619

Joseph A. Legare, Director
Project Management Division
DOE, RFPO

SIX POINT ANALYSES: PLANNING REQUIREMENTS FOR REMOVING PORTIONS OF THE B964 SHELL – FEG-016-04

The six point analyses specified in section 3.8.1 of the RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities has been prepared at the request of the Colorado Department of Public Health and Environment (CDPHE).

B964 was anticipated to be a Type 1 facility, requiring only an RLCR that met the Pre-Demolition Survey Report (PDSR) requirements without the need to invoke the site RSOPS. However, during initial surveys, radiological contamination was discovered that is inconsistent with a Type 1 facility. Based on characterization information provided to CDPHE, via email, citing contamination levels, a Type 2 classification has been concurred with and an RSOP for component removal and RCRA closure was submitted. Developing a separate RLCR at this point would not serve the purpose for typing a building given the agreed upon concurrence. However, the PDSR cannot be completed until the contaminated components are removed. This concurrence by CDPHE supports this six-point analyses and the need to remove some building components to finish the PDSR.

This letter documents the information requested by CDPHE in order to approve beginning RSOP activities at B964 in the absence of an RLCR. Transmittal to CDPHE and Environmental Protection Agency (EPA), in accordance with the Rocky Flats Clean-Up Agreement (RFCA), is requested.

Please contact Steve Nesta at extension 6386 if you have any questions.

Frank Gibbs
Frank Gibbs
Deputy Project Manager
Remediation, Industrial D&D, and Site Services

SMN:pvt
Orig. and 1 cc – Joseph Legare
cc:
Gary Morgan

BEAN, C.		
BUTLER, J. L.		
DECK, C.		
FRANCIS, M.	X	X
REIBOTH, C.		
SEIS, A.		
SIBBS, F.	X	
THOME, J.		
THUMSTON, T.		
HUNTER, D.		
KNAPP, S.		
LINSINBIGLER, H.		
WARSCHALL, J.R.	X	X
MYERS, K.		
NESTA, S.	X	X
O'BRIEN, J.J.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
RICHARDELLA, R.		
ROSENMAN, A.		
SNYDER, D.P.		
SWARTZ, J.M.		
WIEMELT, K.	X	X
SELAN, J.		
CORRES. CONTROL	X	X
ADMIN RECRD/T130G	X	X
TRAFFIC		
PATS/130		

CLASSIFICATION:	
UCNI	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE:

Date:
IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
 PARTIAL/OPEN
 CLOSED

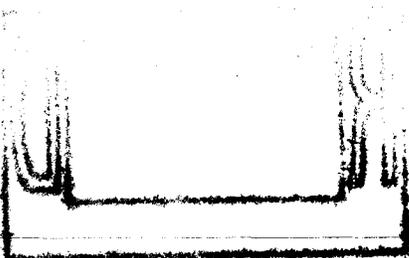
LTR APPROVALS:
ORIG. & TYPIST INITIALS:
SMN:pvt



RF-46469(Rev.9/94)

The following planning requirements for removing contaminated portions of the B964 shell have been prepared in accordance with the six points specified in section 3.8.1 of the RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities.

1. **Relative Costs:** The radiological contamination on the exterior surfaces of B964 is fixed contamination on easily removed corrugated metal siding and rain gutters. Removing the contaminated portions (West and South walls), and disposing of the siding as low-level waste has significant economic advantage relative to attempting to decontaminate the siding. The contaminated slab will be removed at a later date in accordance with the RSOP for Facility Disposition, and is not a part of this effort.
2. **Structural Evaluation:** - The corrugated metal siding and rain gutters are the only building components to be removed. These materials are not structural components and will have no effect on the integrity of the structure. Analysis by a Professional Engineer is not necessary.
3. **Air Emissions:** The site Air Quality SME has evaluated the plan for removing the siding and rain gutters and has no concerns with radionuclides, beryllium, or other hazardous pollutants. The corrugated metal siding (non-asbestos) will be removed with small hand tools, and will not create measurable emissions. An Enhanced Air Monitoring Plan is not necessary.
4. **Dust Generation:** The site Air Quality SME has evaluated the plan for removing the siding and rain gutters and has no concerns with dust generation.
5. **Impacts to Surface Water:** The removal of the siding and rain gutters has no potential to impact surface water systems. Closure of the RCRA unit in B964 (Unit 24) will generate approximately 500 gallons of water, as the entire floor of B964 will be abrasively pressure-washed. Water from this activity will be contained by absorbent booms, and immediately removed by vacuum and placed in a polyethylene tank. The floor of B964 was epoxy sealed prior to becoming a waste storage area. The area was used to store dry waste or limited quantities of liquids in secondary containment. There are no ditches or drainages in the vicinity of B964.
6. **Impacts to Migratory Birds:** Migratory birds may have built nests in portions of B964 that will be impacted by removing the metal corrugated siding and rain gutters. These nests are expected to be empty by the time work can begin. A survey of the facility will be conducted by the site ecologist prior to beginning work to ensure that no work will proceed in violation of the Migratory Bird Treaty Act.



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