

## 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

4300 Cherry Creek Dr. S.  
Denver, Colorado 80246-1530  
Phone (303) 692-2000  
TDD Line (303) 691-7700  
Located in Glendale, Colorado

Laboratory Services Division  
8100 Lowry Blvd.  
Denver, Colorado 80230-6928  
(303) 692-3090

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



Colorado Department  
of Public Health  
and Environment

October 6, 2005

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

Mr. Stephen Nesta  
Environmental Manager  
Kaiser-Hill Company, RISS  
Rocky Flats Environmental Technology Site  
12101 Airport Way, Unit B  
Broomfield, Colorado 80021-2583

**RE: Acceptance, Closure Summary Report for Closure of RCRA Container Storage Unit 750.1 (serving as D&D Closeout Report for Tents 2, 3, 4, 5, 6, 12, and 15, with tents 5, 6, & 15 identified as Type 2 Facilities)**

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report (CSR) dated August 31, 2005. The Division, in a letter dated March 23, 2005, granted approval, with stipulations, of the Closure Description Document (CDD). The CDD for the unit, as submitted on March 9, 2005 was inclusive of Tents 2 through 6 and 12. As noted in the CDD, Tent 15, the "Barn", was a previously closed sludge processing unit, 750.3B.

The Division has reviewed the stipulations and each has been addressed directly or alternatively. The second stipulation, which pertained to pond sludge that had splashed onto interior tent panels, was addressed through the pre-demolition survey and subsequent disposal of the tent fabric rather than administratively under Clean Closure Option 1.

The Division previously provided comments on the CSR to Mr. Nesta via e-mail. Comments Nos. 1 through 3 were addressed with a single new figure to replace the original two figures. The new figure will be retained in our files along with the CSR. Comment No. 4 noted that the RCRA Facility Closure Certification was premature and unacceptable. We are working with site representatives to produce an acceptable professional engineer and facility owner certification.

Section 2 of the CSR notes that the exterior of Tent 5 and 6 did not meet unrestricted release criteria and were disposed as LLW. Since pond sludge was splashed on the interior tent panels only, and deemed non-RCRA by radionuclide surveys, disposal as LLW rather than as LLMW was appropriate.

C:\Drive D\rfets\D&D\_T2,3,4,5,6,12,15Closeout&CSR Unit 750.1.doc

ADMIN RECORD

IA-A-002957

1/15

Mr. Kampe & Mr. Nasta

Page 2 of 2

October 6, 2005

Considering the various factors, the CSR is accepted for the closure of the RCRA unit and approved as the Closeout Report for the D & D of Tents 5, 6 and 15, as well as for Tents 2, 3, 4, and 12 which were determined to be Type 1 Facilities.

If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,



David A. Kruchek  
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII  
D. Miller, AGO  
David Shelton, KH  
Carl Spreng, CDPHE

S. Garcia, City of Broomfield  
David Ward, K-H  
Karen Wiemelt, KH  
Administrative Record, Mountain View

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Denver, Colorado 80230-8928  
(303) 692-3090



Colorado Department  
of Public Health  
and Environment

September 26, 2005

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

Mr. Stephen Nesta  
Environmental Manager  
Kaiser-Hill Company, RISS  
Rocky Flats Environmental Technology Site  
12101 Airport Way, Unit B  
Broomfield, Colorado 80021-2583

**RE: Acceptance, Closure Summary Report for Closure of RCRA Permitted Treatment Unit S002, Oil and/or Aqueous Solidification Process, 750 Pad**

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report transmitted on May 18, 2005. The Division agrees that administrative closure, finalized on May 16, 2005, under Part X-Closure of permit number CO-04-06-23-01, effective July 23, 2004, was applicable. Specific closure activities were described in the unit's Closure Description Document (CDD) as approved by the Division on April 8, 2005.

We therefore accept the Closure Summary Report for Closure of RCRA Permitted Treatment Unit S002, Oil and/or Aqueous Solidification Process, 750 Pad. If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

David A. Krushek  
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII  
D. Miller, AGO  
Administrative Record, Mountain View

S. Garcia, City of Broomfield  
David Ward, K-H

C:\Documents and Settings\Hainacou\My Documents\RFETS\Unit Closures-Closure pLan\CSR, Unit S002, 750 pad  
Acceptance.doc

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** 8/19/05 / 9:00 a.m.  
**Site Contact(s):** David Ward  
**Phone:** 303-996-5938  
**Regulatory Contact:** Harlen Ainscough  
**Phone:** 303-692-3337  
**Agency:** Colorado Department of Public Health and Environment

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**Purpose of Contact:** Documenting the closure of RCRA unit 750.3a

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### **Discussion**

RCRA unit 750.3a was closed by removal per the CDD, which was approved on 7/18/02. During an inspection by the Colorado Department of Public Health and Environment (CDPHE) on 9/16/02, James Hindman, CDPHE, and Karen Laverado, KH, verified that unit 750.3a had been closed by removal. Because of this visual confirmation of closure no additional documents were provided.

In discussions with Harlen Ainscough, it was decided that CDPHE will note the closure/removal of 750.3a in a forthcoming acceptance letter and specifically associate the unit to the closure of Unit 750.1, the 750 Pad.

This contact record can thus be used by the Professional Engineer certifying the closure of the Rocky Flats Environmental Technology Site's permitted hazardous waste facility that unit 750.3a is closed.

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**Contact Record Prepared By:** David Ward

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### Required Distribution:

M. Aguilar, USEPA  
B. Birk, DOE-RFPO  
C. Deck, K-H Legal  
S. Garcia, USEPA  
S. Johnson, K-H ESS  
D. Kruchek, CDPHE  
D. McCranie, DOE-RFPO

G. Morgan, DOE-RFPO  
S. Nesta, K-H RISS  
M. Roy, DOE-RFPO  
R. Schassburger, DOE-RFPO  
D. Shelton, K-H ESS  
J. Walstrom, K-H RISS  
C. Zahm, K-H Legal

### Additional Distribution:

Harlen Ainscough  
James Hindman  
David Ward  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CORRES CONTROL  
OUTGOING LTR #

DOE ORDER #

05-RF-00829



DIST LTR ENC

CROCKETT, G		
FERRERA, D.W.		
GILPIN, H.E.		
LONG, J.W.		
LINDSAY, D. C.		
SHELTON, D.C.	X	
TUOR, N.R.		
SNYDER, D		
MCGRORY, M		
HADACEK, M		

August 31, 2005

05-RF-00829

KAISER, M. Mr. David Kruchek  
 BEAN, C. Acting Permitting and Compliance Unit Leader  
 LINSINKLER, H. Federal Facilities Program  
 NESTA, S. X X Hazardous Materials and Waste Management Division  
*SAR, D.* X X Colorado Department of Public Health and the Environment  
 4300 Cherry Creek Drive South  
 Denver, Colorado 80246-1530

CLOSURE SUMMARY REPORT FOR CLOSURE OF RCRA CONTAINER STORAGE UNIT 750.1 - SMN-058-05

Dear Mr. Kruchek:

Pursuant to the *Rocky Flats RCRA Part B Permit, Part X, Closure* (June 1997), Kaiser-Hill Company, L.L.C. is submitting the attached Closure Summary Report for this unit.

The summary report contains a description of the major closure activities and a declaration that the requirements of the Closure Description Document (CDD) have been fulfilled. This document also serves as the Closeout Report for Tents 5, 6, and 15, which were typed as Type 2 facilities due to radiological contamination. Please note that activities conducted under the CDD addressed the heated storage units, the tent structures, and the asphalt pad of RCRA Unit 750.1, which served as the secondary containment for the unit. Since RCRA Unit 750.1 is the last permitted unit to be closed, we have also attached the Owner/Operator Certificate of Closure for the Rocky Flats Facility (ref., 6 CCR 1007-3, Section 264.115).

CORRES CONTROL	X	X
ATS		
ADMN. RECORD		
WASTE REC CTR		
TRAFFIC		

If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation Industrial D&D, Site Services (RISS) at 303-966-6386.

CLASSIFICATION:

CONFIDENTIAL	
SECRET	

*Stephen M. Nesta* 9/1/05  
 Stephen M. Nesta Date  
 Environmental Manager, K-H RISS

NA

Date:

IN REPLY TO RFP CC #: KLM:rlm

ACTION ITEM STATUS: Attachment:  
As Stated

- PARTIAL/OPEN
- CLOSED

LTR APPROVALS: cc:  
 H. Ainscough - CDPHE  
 J. Legare - DOE, RFFO  
 G. Morgan - DOE, RFFO

ORIG. & TYPIST INITIALS:  
KLM:rlm

Letter # SMN-058-05

Kaiser-Hill Company, L L C  
Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden CO 80403-8200 303-966-7000

**Closure Summary Report for RCRA Container Storage Unit 750.1**

**U.S. Department of Energy  
Rocky Flats Environmental Technology Site  
EPA ID No. CO7890010526**

## **1.0 PURPOSE**

This Summary Report pertains to RCRA closure activities for the RCRA Container Storage Unit 750.1, and is a requirement of Section 1.1 of the Closure Description Document (CDD) for this RCRA Unit (05-RF-00218). This report contains a description of major closure activities and any deviations from those stated in the CDD and other relevant information.

## **2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES**

Twenty-one heated storage units (HSU) secondary containment pans were washed with a water/detergent mix. A Professional Engineer conducted the visual inspection of the pans against the clean debris surface standard, and certified the units met the standard (see attached certifications). These 21 HSUs were subsequently disposed of as sanitary waste.

Radiological surveys were conducted of Tents 2, 3, 4, 5, 6, 12, and 15. All of the tents except for 5 and 6 meet the unrestricted release criteria as documented in the appropriate Pre-Demolition Survey Report (PDSR). The PDS supported the Clean Closure Option 1 determination for all of the tent structures. Tents 2, 3, 4, 12 and 15, which were disposed of as sanitary waste. Tents 5 and 6 did not meet the unrestricted release criteria for radiological contamination, on the outside of the tent structures. Appropriate work controls were used during demolition to prevent the spread of radiological contamination. The Tent 5 and 6 structures, minus the interior framework were disposed of as LLW. The framework of these tents was disposed of as sanitary waste. Tent 15 contained waste that was LLW. Appropriate work controls were used during demolition to prevent the spread of radiological contamination. The Tent 15 structure was disposed of as sanitary waste.

One deviation from the CDD was the method of closure for the secondary containment asphalt pad. It was determined to be more efficient to conduct closure of the pad by means of physical extraction. The top 0.6 cm to 1.0 cm of the pad was removed (planed) and the removed asphalt was managed as hazardous waste. The surface of the remaining asphalt, after completion of the physical extraction was inspected by a Professional Engineer to ensure that no stains existed (see attached certification). The remainder of the asphalt was disposed of as sanitary waste.

## **3.0 SUMMARY**

The requirements stated in the CDD have been fulfilled.

<b><u>Sanitary Disposal</u></b>	
Disposal Site:	BFI Foothills 93, Golden, CO
Waste Volume (m <sup>3</sup> ):	11514.2
Waste Weight (tons):	8418.14
Additional Information:	Tents, heated storage units, and asphalt
<b><u>Hazardous Disposal</u></b>	
Disposal Site:	Kettleman Hills, Kettleman City, CA
Waste Volume (m <sup>3</sup> ):	168.203
Waste Weight (tons):	83.62
Additional Information:	Asphalt from the secondary containment pad
<b><u>TSCA Waste Disposal</u></b>	
Disposal Site:	N/A
Waste Volume (m <sup>3</sup> ):	
Additional Information:	
<b><u>Low-Level Waste Disposal</u></b>	
Disposal Site:	Envirocare, UT
Waste Volume (m <sup>3</sup> ):	67.394
Additional Information:	Tent material
<b><u>Recycled Material</u></b>	
Recycle Facility:	N/A
Waste Volume (m <sup>3</sup> ):	
Additional Information:	

**Additional Information:**

The 750 Pad was approximately 100,000 square-foot asphalt pad that was built in 1987 for parking and trailers. Then in 1990 the portion to be used for waste storage had additional asphalt applied for reinforcement, and was bermed and fenced. The 750 Pad is estimated to be 4-inches thick and is sloped to control runoff. In 1990 six large tents (Tents 02, 03, 04, 05, 06, and 12) were added to the pad to enclose the pondcrete and saltcrete waste management activities. In 2002 tent T-750 SPR (i.e., Tent 15) was constructed to house the sludge stabilization equipment. The tents were constructed with fabric panels stretched across an aluminum frame and steel-anchored pins were used to mount the tents to the pad.

The 750 pad has the following utilities: electric and fire protection provided by randomly placed fire extinguishers. All utilities were removed as noted on the following map.

All of the asphalt and facility structures have been removed and the area is being contoured and re-vegetated in accordance with the Land Configuration Design Basis (see attached map).

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that closure via clean debris decontamination of drum rollers and interior surfaces of all secondary containment pans was achieved for the 750 Pad RCRA units listed below. All of these cargo containers were part of the Rocky Flats 750 Pad RCRA Unit. Exterior surfaces of secondary containment pans are not included in this certification, as they did not come into contact with hazardous waste.

**Cargo Container Numbers**

CC12

CC13

CC16

**Professional Engineer seal, signature, and date attesting to closure certification statement:**



**Timothy J. Humiston, P.E.**  
**August 15, 2005**

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that closure via clean debris decontamination of drum rollers and interior surfaces of all secondary containment pans was achieved for the 750 Pad RCRA units listed below. All of these cargo containers were part of Rocky Flats RCRA Unit 750 Pad. Exterior surfaces of secondary containment pans are not included in this certification, as they did not come into contact with hazardous waste.

RCRA Unit 750 Pad Cargo #
CC03
CC04
CC05
CC06
CC07
CC08

Professional Engineer seal, signature, and date attesting to closure certification statement:



- Michael Tylon Vess, P.E.  
Colorado P.E. Number 36144  
April 26, 2005

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that closure via clean debris decontamination of drum rollers and interior surfaces of all secondary containment pans was achieved for the 750 Pad RCRA units listed below. All of these cargo containers were part of the Rocky Flats 750 Pad RCRA Unit. Exterior surfaces of secondary containment pans are not included in this certification, as they did not come into contact with hazardous waste.

750 Pad RCRA Cargo #	750 Pad RCRA Cargo #	750 Pad RCRA Cargo #
CC09	CC15	CC20
CC10	CC17	CC21
CC11	CC18	CC22
CC14	CC19	CC23

Professional Engineer seal, signature, and date attesting to closure certification statement:



Michael Tylon Vess, P.E  
Colorado P.E. Number 36144  
July 12, 2005

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that the closure of the RCRA Unit 750.1 asphalt pad secondary containment was achieved by means of physical extraction. The top 0.6 cm to 1.0 cm of the pad was removed (planed) and the removed asphalt was managed as hazardous waste. The surface of the remaining asphalt, after completion of the physical extraction was inspected to ensure that no stains existed.

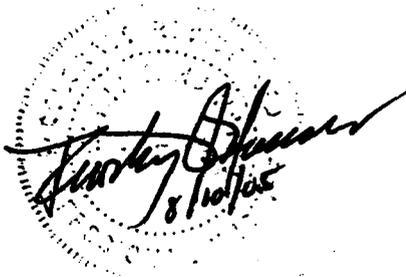
I performed inspections of RCRA Unit 750.1 to certify the above as follows:

Area under what used to be the Barn Tent, and Tents 2, 3, and 4 on July 27, 2005

Area under what used to be the Tents 5 and 6 on July 28, 2005

Area under what used to be the Tent 12 on August 1, 2005

Professional Engineer seal, signature, and date attesting to closure certification statement:

A circular professional engineer seal for the State of Colorado is partially visible, overlaid with a handwritten signature in black ink. The signature reads "Timothy J. Humiston" and "8/10/05".

Timothy J. Humiston, P.E.  
August 10, 2005

**Rocky Flats Environmental Technology Site  
(EPA ID No. CO7890010526)**

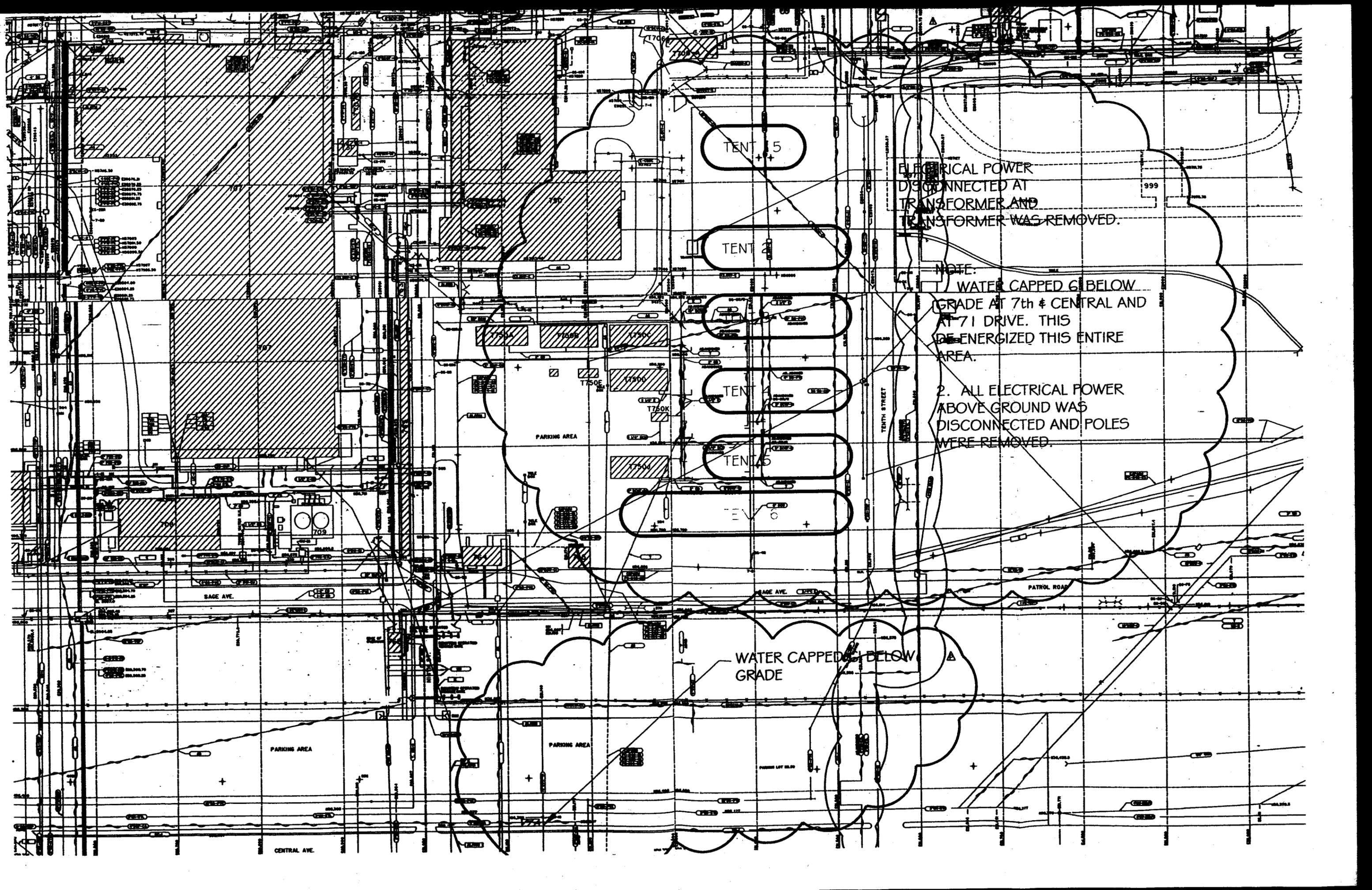
**Kaiser-Hill Company, L.L.C.**

**Resource Conservation and Recovery Act  
Facility Closure Certification**

"I certify under penalty of law that all of the permitted hazardous waste and mixed waste units at the Rocky Flats Environmental Technology Site have been closed in accordance with the specifications of the approved closure plan, Part X of the permit dated June 23, 2004. All the closures were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly performed the required closure activities and that, based upon my inquiry of those individuals immediately responsible for closing the permitted areas of the facility, I believe the closure documents to be true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines and imprisonment."

By David C. Shelton  
Co-Operator Authorized Signature  
David C. Shelton, Vice President  
Environmental Systems & Stewardship

Date: 8/31/05

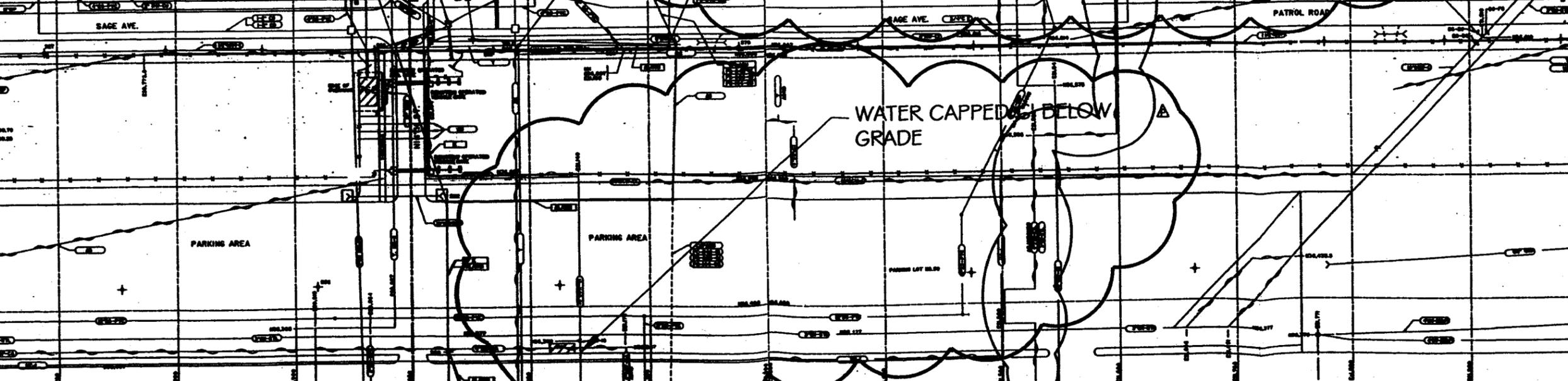
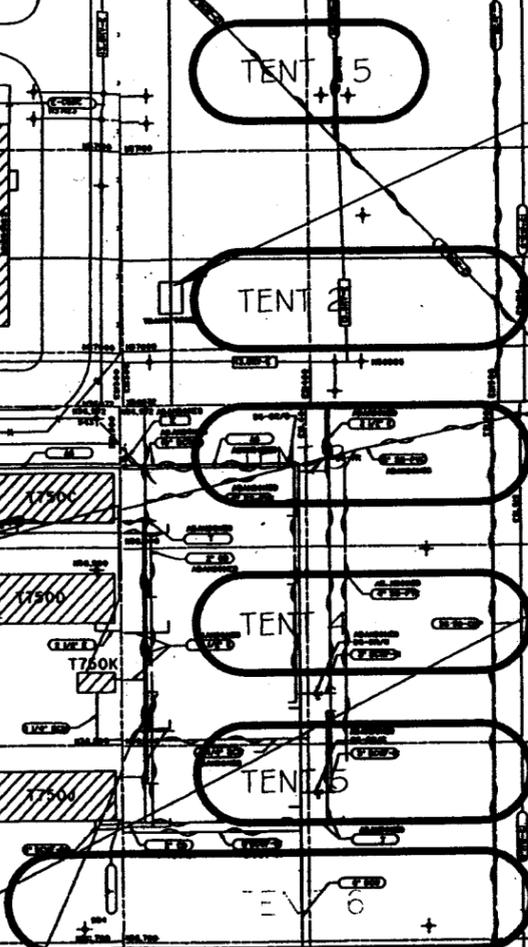
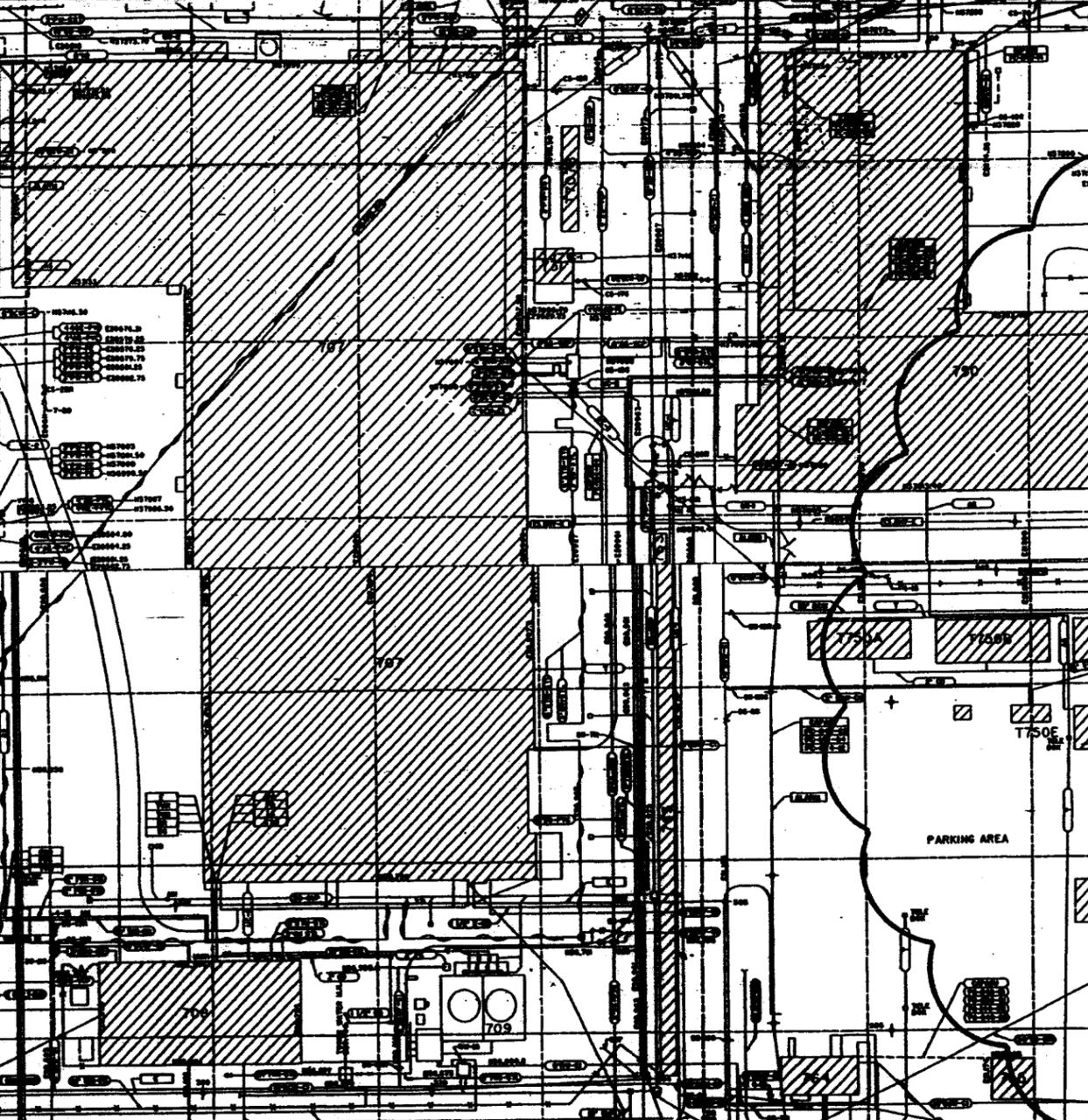


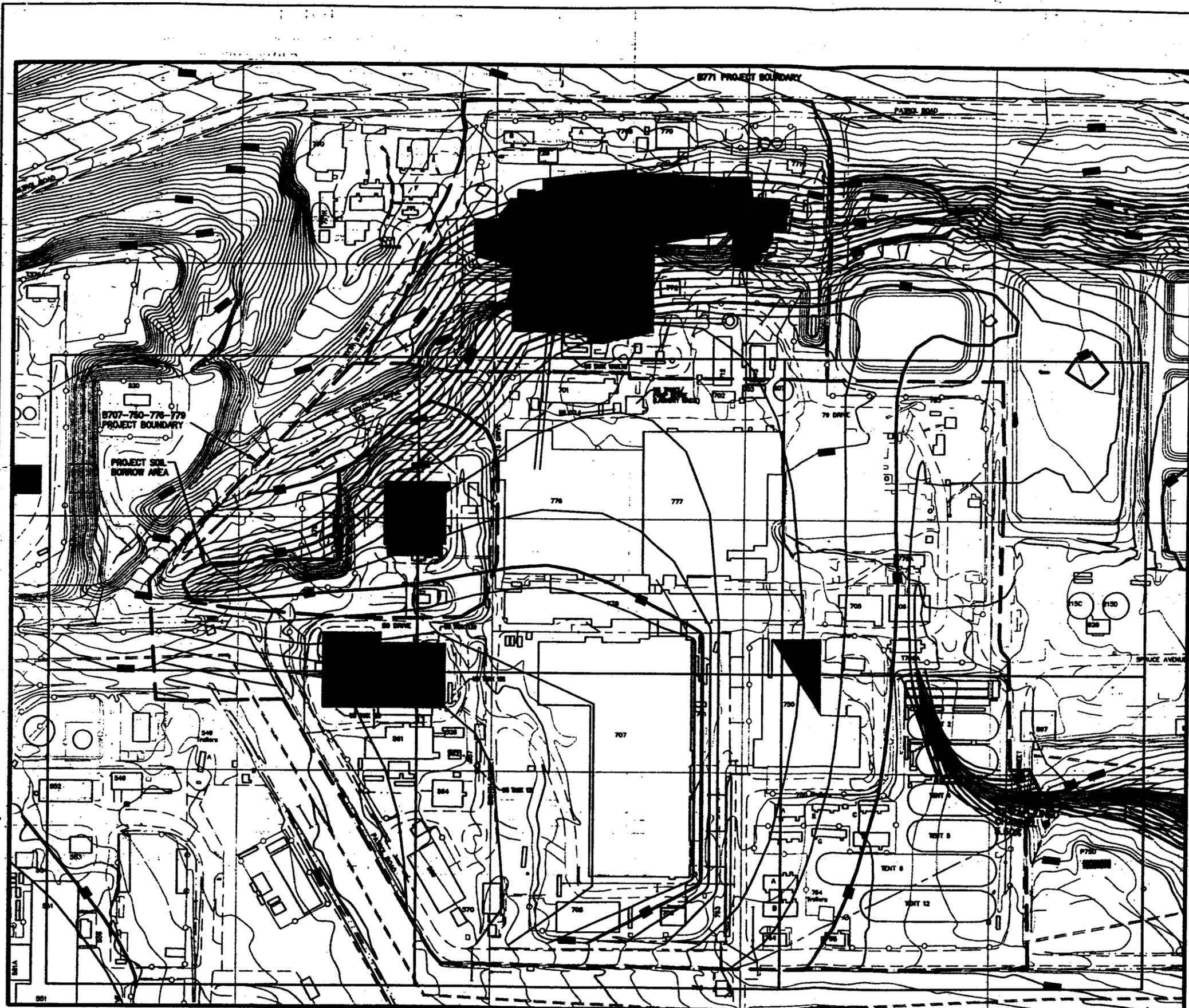
ELECTRICAL POWER  
DISCONNECTED AT  
TRANSFORMER AND  
TRANSFORMER WAS REMOVED.

NOTE:  
1. WATER CAPPED 6' BELOW  
GRADE AT 7th & CENTRAL AND  
AT 71 DRIVE. THIS  
DE-ENERGIZED THIS ENTIRE  
AREA.

2. ALL ELECTRICAL POWER  
ABOVE GROUND WAS  
DISCONNECTED AND POLES  
WERE REMOVED.

WATER CAPPED 6' BELOW  
GRADE



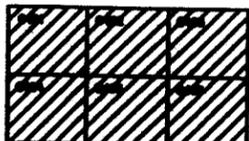


**GENERAL NOTES:**

1. EXISTING CONTOURS BASED ON 1984 AERIAL TOPOGRAPHICAL SURVEY.
2. COORDINATE GRADING WITH BUILDING 771 PROJECT PER KAISER-HILL DIRECTION.
3. COORDINATE PROTECTION, RE-ROUTING, AND ABANDONMENT OF UTILITIES WITH KAISER-HILL ELECTRICAL SERVICE DISCONNECTION AND RELOCATION TO BE PERFORMED BY KAISER-HILL.
4. DRAWINGS DO NOT PURPORT TO SHOW ALL EXISTING UTILITIES AND THOSE SHOWN ARE APPROXIMATE BASED UPON AVAILABLE INFORMATION. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING AND COORDINATING REQUIRED UTILITY LOCATION SERVICES, PERMITTING, AND OPERATIONAL CLEARANCES FROM WFETS UTILITY DEPARTMENT PRIOR TO DIGGING.
5. COORDINATE PROTECTION AND/OR ABANDONMENT OF MONITORING WELLS WITH KAISER-HILL.
6. ESTIMATED EARTHWORK REQUIRED WITHIN 8707-750-776-779 PROJECT BOUNDARY.  
 DISTURBED AREA: 40 ACRES  
 ESTIMATED CUT: 72,000 CY  
 ESTIMATED FILL: 92,000 CY  
 TOTAL EARTHWORK: 164,000 CY  
 SOIL SHORTAGE: 20,000 CY
- SOIL VOLUME ESTIMATES INCLUDE FILLING SUBSURFACE FEATURES AND REPLACEMENT FILL FOR IDENTIFIED REMOVAL OF FOUNDATION COMPONENTS FOR BUILDINGS 707, 750, 776/777, AND 778. FILL THAT MAY BE NEEDED FOR OTHER BUILDINGS WITHIN THE PROJECT AREA OR TO REPLACE UNDER BUILDING CONTAMINATED SOILS IS NOT INCLUDED. SOIL TO FILL TUNNEL BETWEEN BUILDINGS 771 AND 776 IS NOT INCLUDED.
7. OBTAIN GENERAL FILL MATERIAL AS SHOWN ON THIS DRAWING. OBTAINED ADDITIONAL SOIL FROM DESIGNATED ONSITE AREAS AS DIRECTED BY KAISER-HILL.
8. AT THE COMPLETION OF EACH PHASE, DISTURBED AREAS SHALL BE REVEGETATED PER KAISER-HILL STANDARDS.
9. PROVIDE EROSION AND SEDIMENT CONTROLS PER DRAWING C410. SUGGESTED LOCATION OF SILT FENCE SHOWN ON THIS DRAWING.

**LEGEND:**

- 5000 — EXISTING INDEX CONTOUR
- — — — — EXISTING INTERMEDIATE CONTOUR
- — — — — PAVED ROAD
- — — — — UNPAVED ROAD
- — — — — FENCE
- — — — — EXISTING CULVERT
- — — — — PROPOSED LCDS INDEX GRADE
- — — — — PROPOSED LCDS INTERMEDIATE GRADE
- — — — — PROPOSED LCDS SPOT ELEVATION
- — — — — DRAINAGE DITCH/CREEK CENTER LINE
- — — — — ENGINEERED CHANNEL BANK
- — — — — PROPOSED SILT FENCE



**DRAFT Figure 8**

<b>ISSUED FOR REVIEW</b>		<b>ISSUING OFFICE</b>	
<b>KEYWORDS</b>	8707-750-776-779 BUILDING 771 GRADING DRAINAGE EROSION CONTROL SITE N/A N/A	U.S. DEPARTMENT OF ENERGY Rocky Flats Environmental Technology Site GOLDEN, COLORADO LAND CONFORMATION DESIGN BASIS (A) GRADING AND DRAINAGE PLANS BUILDINGS 707, 750, 776/777, AND 778 OVERALL PLAN	D XXXXX-C400

15/15