



|   | A        | B        | C                      | D   | E   | F            | G                         | H   | I                                     | J                  |
|---|----------|----------|------------------------|---|---|--------------|---------------------------|-----|---------------------------------------|--------------------|
| 1 | Unit No. | Building | Unit Description       | Regulatory Status   | Closure Status  | Closure Date | Closure Document Approval | SET | Closure document submittal            | CDPHE approval     |
| 3 | 2        | 331      | Container Storage Area | INTERIUM STATUS - CLOSED per the 1991 permit and 6 CCR 1007-3. Part 265 | CLOSED in accordance with "RCRA Closure Plan, Drum Storage Area, B331, RCRA Unit 2" (6/10/96); Closure Certification signed 6/27/96 (ref. 96-DOE-07943, 7/23/96). | 6/27/96      | 6/10/96                   |     | CC 7/10/96<br>Building COR<br>9/12/05 | PDSR 6/9/05<br>COR |

RECEIVED

2005-07-28



July 28, 2005

05-RF-00730

Gary Morgan, Director  
Project Support  
DOE, RFPO

TRANSMITTAL OF CLOSE OUT REPORT FOR CARGO STORAGE, BUILDING 331  
- DWF-073-05

Attached is the Closeout Report for the Type 1 facility Cargo Storage, Building 331. Please note that a copy of the report has been submitted to the CERCLA AR by the Kaiser-Hill RISS project.

Please contact Steve Nesta x6386 with questions or concerns.

A handwritten signature in cursive script, appearing to read "Dennis W. Ferrera".

Dennis W. Ferrera  
Vice President and Project Manager  
Remediation, Industrial D&D, and Site Services

Attachment:  
As Stated

SMN:jlh

Orig. and 1 cc - Gary Morgan

cc:  
John Rampe

## Type I Facility Closeout Report

|   |   |
|---|---|
| <b>Section A. Facility Data</b>   |   |
| Facility No.  | 331C  |
| Facility Descriptor:  | Cargo Storage, B331   |
| Project:  | RISS  |
| Date of Demolition:   | 3/1/2005  |
| Additional Information:   |   |
| <i>(Must include information on environmental releases and conditions of site at turnover to Environmental Restoration)</i> |   |
| <b>Section B. Final Characterization Data</b>   |   |
| Reconnaissance Level Characterization Report<br><i>(concurrency received)</i>   | Type 1 Concurrence-Steven Gunderson to Richard DiSalvo,<br>May 29, 2003 |
| In-process Characterization   | NA  |
| Pre-Demolition Survey Report <i>(approval received)</i>   | NA  |
| Post-Demolition Survey Report <i>(as necessary)</i>   | NA  |
| <b>Section C. Waste Data (complete categories as appropriate)</b>   |   |
| <u>Sanitary Disposal</u>  |   |
| Disposal Site:  | BFI Foothills   |
| Waste Volume (yd <sup>3</sup> ):  | 2   |
| Waste Weight (tons):  | 1   |
| Additional Information:   | D debris in "1" covering of two cargos.                                 |
| <u>Hazardous Disposal</u>   |   |
| Disposal Site:  | NA  |
| Waste Volume (yd <sup>3</sup> ):  |   |
| Additional Information:   |   |
| <u>TSCA Waste Disposal</u>  |   |
| Disposal Site:  | NA  |
| Waste Volume (yd <sup>3</sup> ):  |   |
| Additional Information:   |   |
| <u>Asbestos Waste Disposal</u>  |   |
| Disposal Site:  | NA  |
| Waste Volume (yd <sup>3</sup> ):  |   |
| Additional Information:   |   |
| <u>Low-Level Waste Disposal</u>   |   |
| Disposal Site:  | NA  |
| Waste Volume (yd <sup>3</sup> ):  |   |
| Additional Information:   |   |
| <u>Low-Level Mixed Waste Disposal</u>   |   |
| Disposal Site:  | NA  |
| Waste Volume (yd <sup>3</sup> ):  |   |
| Additional Information:   |   |
| <u>Recycled Material</u>  |   |
| Recycle Facility:   | NA  |
| Waste Volume (yd <sup>3</sup> ):  |   |
| Additional Information:   |   |
| <u>Property Disposition</u>   |   |
| Receiver Locations (major items only):  |   |
| Additional Information:   |   |

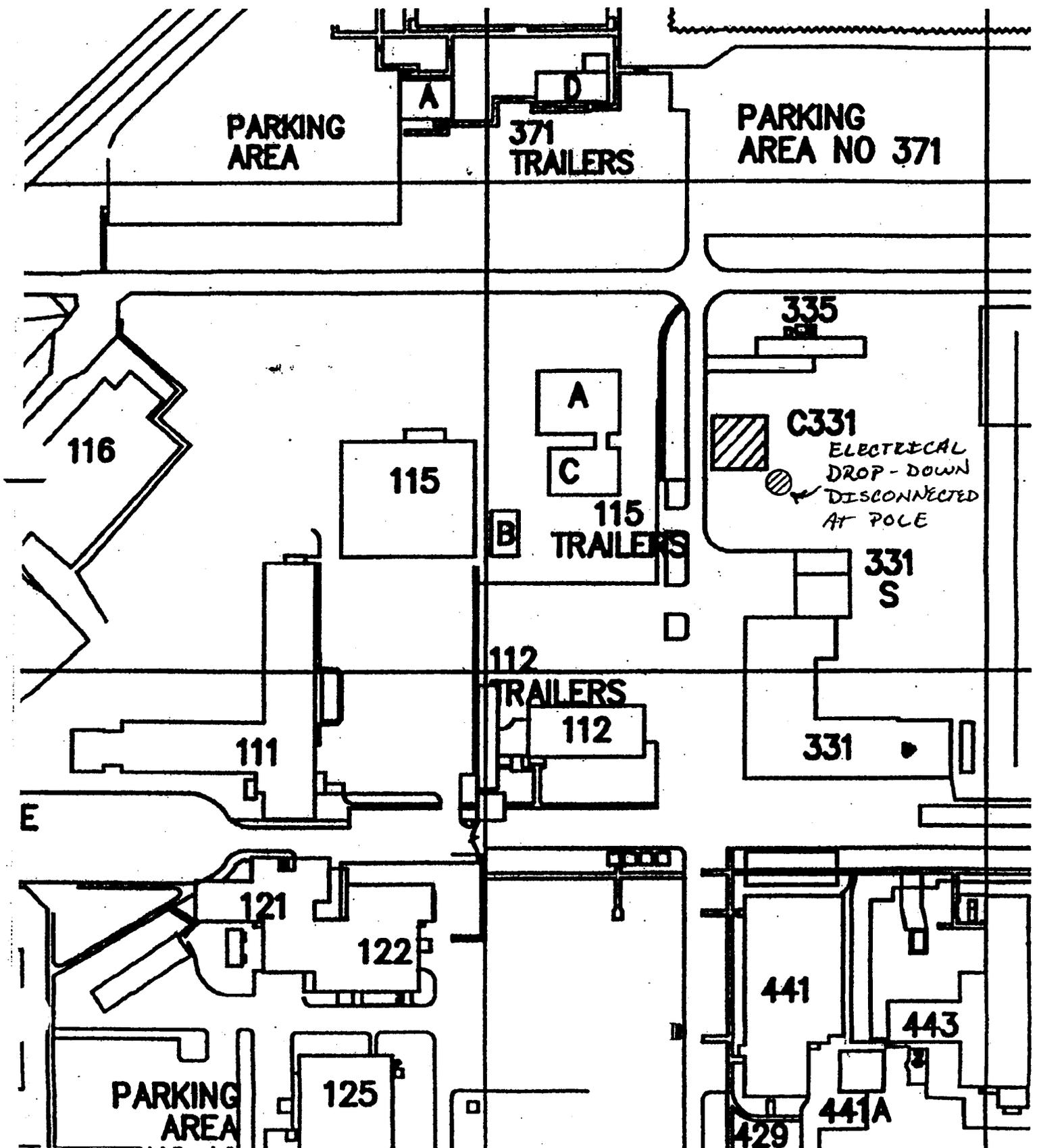
|   |         |
|---|---------|
| <b>Section D. Approvals</b>   |         |
| Kaiser-Hill Project Manager   | 7/27/05 |
| <br>Name/Signature | Date    |

## **Instructions for Completion of Type 1 Facility Closeout Report**

331C was an approximately 800 square foot structure placed into service in 1975. The structure was constructed of two cargo containers placed about 20 feet apart and a roof connecting the two containers. The cargos and the area between them were used to store grounds-keeping equipment and supplies such as lawn tractors, weed-whackers, hand tools, and other supplies and equipment.

Only the roof of the structure was demolished and sent off-site for disposal as sanitary waste. The cargo containers were sent to PU&D.

331C had drop-down electrical service, which was removed prior to removal of the cargos.



16-PF-04150

PIST. LTR/ENC

N.S.

J.

ARD, H. G.

LL, J. A.

ANI, V.

ARTINEZ, L.

CKAY, B.

BRIEN, G.

JOR, N.

DORHEIS, G.

*L. North* x x

*Leitner* x x

*Holstew* x x

*Konwinski* x x

*Ticknor* x x

PPRES. CTRL X

AFFIC

MIN. REC.

TS

CLASSIFICATION:

CLASSIFIED X X

CONFIDENTIAL

SECRET

THORIZED CLASSIFIER SIGNATURE

Exempt from Class. per CEX-266-95

REPLY TO RF CC NO:

TON ITEM STATUS

PARTIAL/OPEN

CL

AF .S:

*ML*

IG & TYPIST INITIALS :ses

6469 (REV. 7/95)



KAISER HILL COMPANY

July 10, 1996

96-RF-04150

Steve Tower, Group Leader  
Environmental Assessment Group  
DOE, RFFO

CLOSURE CERTIFICATION FOR RCRA UNIT 2-RML-018-96

Kaiser-Hill Company, L.L.C., is submitting the attached Resource Conservation and Recovery Act (RCRA) Closure Certification for RCRA Unit 2.

A RCRA closure evaluation for RCRA Unit 2 was conducted by an independent, Colorado-registered professional engineer on June 20, 1996, as required by Part VIII of the Permit and the Colorado Code of Regulations, 6 CCR 1007-3, Part 265. Attached is the signed and stamped closure certification, signifying that the closure was performed in accordance with the approved closure plan.

Please transmit this certification to the Colorado Department of Public Health and Environment as soon as possible. If you have any questions, please contact me at extension 3537.

*Randy M. Leitner*  
Randy M. Leitner, Program Manager  
Compliance & Performance Assurance

ses

Orig. and 1 cc - S. Tower

Attachment:  
As Stated

cc:  
D. Maxwell-DOE, RFFO

Kaiser-Hill Company, L.L.C.

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

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

**DRAFT**

**DRAFT**

**DRAFT**

Mr. Joe Scheffelin, Unit Leader  
Colorado Department of Public Health and the Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Dear Mr. Scheffelin:

The United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) is submitting the attached Resource Conservation and Recovery Act (RCRA) Closure Certification for RCRA Unit 2 (Drum Storage Area, Building 331). Attached is the closure certification, which has been signed and stamped by an independent, Colorado-registered professional engineer, as required by Part VIII of the Rocky Flats Part B Permit and the Colorado Code of Regulations, 6 CCR 1007-3. The unit closure was performed in accordance with the approved closure plan; therefore, with this final documentation, RCRA Unit 2 is clean closed. The Part A application for the Site will be modified to reflect deletion of this unit.

If you have any question, please contact David Maxwell, of my staff, at 966-4017.

Enclosure

cc: (w/enclosure)

C. Gilbreath - CDPHE  
D. Grosek - DOE, RFFO  
D. Maxwell - DOE, RFFO  
R. M. Leitner - Kaiser-Hill  
K. A. Holstein - DCI  
D. L. Gorman - SSOC  
K. W. Ticknor - RMRS

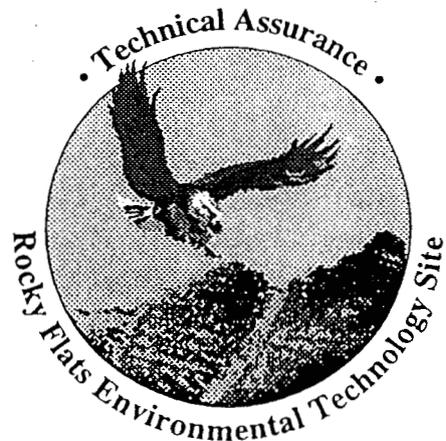
96-RM-TA-0138-KH



## Closure Certification

RCRA Unit 2  
Drum Storage Area: Building 331

EPA ID No. C07890010526



Exempt from Classification  
per CEX-003-95 - RCRA only

### Introduction

The purpose of this report is to certify the closure of Resource Conservation and Recovery Act (RCRA) Unit 2 (Drum Storage Area, Building 331) at the Rocky Flats Environmental Technology Site (RFETS). ERM-Rocky Mountain, Inc. (ERM) has been retained as an independent third party by Rocky Mountain Remediation Services to perform this certification. This report provides the data to support the closure determination by the owner/operator of a facility and an independent, registered Professional Engineer, as required by 6 Colorado Code of Regulation (CCR) 1007-3, Part 265.

### Historical Overview

RCRA Unit 2 is a 20-foot long by 9-foot wide cargo container located near the Building 331 vehicle maintenance facility. Unit 2 was recognized as an interim status unit for storing nonradioactive hazardous wastes generated from vehicle maintenance facility operations. Unit 2 was placed into service in March 1987 and was operated until August 1988. The hazardous wastes stored in the unit included used oil, antifreeze, a non-listed ignitable solvent, and oil-contaminated combustibles. The wastes were stored in 55-gallon drums, with drip pans serving as secondary containment. Unit 2 was used as a storage area for drums that were awaiting transfer to RCRA Unit 1 (Main Hazardous Waste Storage Facility) for offsite shipment. There is no record of spills at the unit.

---

### Waste Characterization

The hazardous wastes that were managed in Unit 2 were are characteristically hazardous for ignitibility (EPA waste code D001) and the following RCRA metals: barium (D005), cadmium (D006), chromium (D007), and lead (D008). This characterization is based on analytical data that was collected during active management of the unit. The secondary containment pans that were used in the unit showed no signs of contamination. The wood floor in Unit 2 was sampled and analyzed for RCRA metals and volatile organic compounds. The concentrations that were detected were below the LDR treatment standards identified in 6 CCR 1007-3, Part 268. Consequently, the wood floor material was characterized as nonhazardous debris.

The approved closure plan for RCRA Unit 2 does not require soil or rinsate sampling since there is no record of spills at the unit.

### RCRA Closure Certification Activities

A detailed description of the closure activities can be found in the approved closure plan for RCRA Unit 2, dated June 10, 1996. Certification of clean closure is based on completion of the following closure activities.

## Closure Certification - RCRA Unit 2

The secondary containment was removed and used in a RCRA 90-day unit. The floor which was determined to be nonhazardous debris was removed and disposed of in the RFETS landfill.

A visual inspection of RCRA Unit 2 was conducted on June 20, 1996 by ERM and RFETS personnel. The walls were clean and dry and there was no visible residual material.

### **Conclusion and Closure Certification**

Based on my observations and investigations as presented in this report, the RCRA closure performance standards have been met for RCRA Unit 2. Required closure records will be kept on file at the Site, and will be managed in accordance with the approved closure plan.

The undersigned hereby certifies that closure of RCRA Unit 2 at the Rocky Flats Environmental Technology Site was performed in accordance with applicable Colorado Hazardous Waste Act (CHWA) regulation for RCRA interim status units as defined within 6 CCR 1007-3 Section 265 and the State approved closure plan for this unit.



Michael M Keller  
Professional Engineer  
Michael M. Keller  
ERM - Rocky Mountain, Inc.

6/27/96  
Date

File Closure Unit

15 JUN 96 9 30

# STATE OF COLORADO

Roy Romer, Governor  
Patti Shwayder, Acting Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

## HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

|   |  |
|---|--|
| 4300 Cherry Creek Dr. S.<br>Denver, Colorado 80222-1530<br>Phone (303) 692-3300<br>Fax (303) 759-5355 | 222 S. 6th Street, Room 232<br>Grand Junction, Colorado 81501-2768<br>Phone (303) 248-7164<br>Fax (303) 248-7198 |
|---|--|



Colorado Department  
of Public Health  
and Environment

June 10, 1996

Mr. Bob April  
Environmental Liaison Group  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

**RE: Unit 2 Closure Plan Approval**

Dear Mr. April:

The Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Division), has reviewed the closure plan (hereafter called the Plan) for RCRA Unit 2 submitted by the United States Department of Energy (DOE) for the Rocky Flats Environmental Technology Site (RFETS). The Division received three written comments on the Plan during the public comment period. A response to comments has been included as Attachment 1 and the revised Plan has been included as Attachment 2. The approved Plan is being issued by the Division in accordance with its authority under the Colorado Hazardous Waste Act, Sections 25-15-301 through 316, C.R.S. and the regulations thereunder. In accordance with 6 CCR 1007-3, Section 265.113(b), DOE and its integrating management contractors must complete the required closure activities identified in the enclosed Plan within 180 days after receipt of this approval.

In addition, as an appropriate response to a comment received on the Plan, the Division is requesting a revised Part A application which accurately identifies all applicable EPA hazardous waste codes for units included in the RFETS Part A application. The Division requests the revised Part A application within 30 days of receiving this letter. If you have any questions regarding this matter, please contact Chris Gilbreath at (303) 692-3371.

Sincerely,  
  
Joe Schieffelin  
Permitting and Compliance Unit Leader  
Federal Facilities Program

cc w/Attachment 1&2:  
T. Rehder, EPA  
R. Leitner, Kaiser-Hill, T-130C  
K. Ticknor, RMRS, T-130C  
Jefferson County Health Department

cc w/Attachment 1:  
L. Perrault, AGO  
S. Tarlton, CDPHE-OE

5420  
02571

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division

**ATTACHMENT 1**

**Response to Comments**

June 10, 1996

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
HAZARDOUS MATERIALS & WASTE MANAGEMENT DIVISION  
UNIT 2 CLOSURE PLAN RESPONSE TO COMMENTS

Summary of Comment 1: The regulations addressing certification of closure for "regulated units" is clear that the owner or operator must also sign the certification statement. It is not clear from reading this language as to whether the owner or operator's signature will accompany the signature of the professional engineer or when the certification of closure will be accomplished (i.e., when Unit 2 is closed or when RFETS closes).

Response: Part 265.115 of the Colorado Hazardous Waste Regulations (CHWR) states, "...and within 60 days of the completion of final closure, the owner or operator must submit to the Department, by registered mail, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification must be signed by the owner or operator and by an independent registered professional engineer." The regulations do not clearly specify whether the owner or operator must sign the certification for a partial closure. However, it is the Division's policy to require the signature of the owner or operator for all closure certifications.

Change: The closure plan has been revised to include the owner or operator's signature as part of the closure certification. The certification must be submitted to the Division within 60 days of completion of final closure for Unit 2.

Summary of Comment 2: The closure plan should clearly specify the types of wastes that were managed in this unit. DOE should state whether these wastes were managed at the unit or not. In addition, there are no waste codes specified for this unit on the Part A Permit as required in 6 CCR 107-3, Section 100.40(a)(9).

Response: Process knowledge and the operating record indicate the wastes stored in Unit 2 were characterized for the following EPA hazardous waste codes: D001, D004, D006, D007, and D008. Supporting documentation indicates the ignitable solvent previously stored at Unit 2 was stoddard solvent. The solvent was characterized for ignitability (D001) but was not considered a listed hazardous waste. Although the closure plan identifies wastes that were potentially stored at Unit 2, a complete metals and volatile organic compound analysis will be performed on the plywood floor in accordance with Laboratory Procedure L-4153 and L-4165, respectively.

The most recent Part A Application submitted by RFETS does not specify the waste codes for Unit 2. The last version of the RFETS Part A to specify the allowable waste codes for storage was not unit specific (Revision 3 - August 2, 1988). Units that were inactive prior to Revision 3 currently do not have EPA hazardous waste codes identified in the latest revision to the Part A (Revision 23). DOE is currently undergoing efforts to identify the specific waste codes for each interim status unit.

Change: The closure plan has been modified to include all applicable EPA waste codes for Unit 2. In addition, as stated in the approval letter, DOE shall within 30 days submit a revised Part A Application which clearly identifies the applicable waste codes for all units included in the Part A.

Summary of Comment 3: The closure plan does not address sampling and analysis of the floor, the constituents that will be analyzed for, or decontamination of the drip pans and the cargo container. The sampling and analysis plan is inadequate to meet the regulatory requirements for a complete closure plan.

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
HAZARDOUS MATERIALS & WASTE MANAGEMENT DIVISION  
UNIT 2 CLOSURE PLAN RESPONSE TO COMMENTS

Section 265.112(b)(4) of the CHWR require a detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils.

Response: Prior to removing the plywood floor from the unit, a full metals and VOC analysis will be performed to determine the appropriate management and disposition of the plywood floor. The drip pans will be visually inspected to verify the absence of residuals. Following the removal of the drip pans and the floor, the cargo container walls will be visually inspected for signs of contamination. If contamination is observed during the visual inspections, RFETS shall either decontaminate the drip pans and/or walls or manage them as hazardous waste.

Change: The closure plan has been revised to clarify the sampling and analysis procedures for the floor and the constituents which will be analyzed. For the drip pans and walls, it is anticipated that no additional decontamination will be needed. However, in the event that contamination is observed, RFETS shall either decontaminate the cargo walls and/or drip pans using one of the decontamination methods identified in Part IX of the RFETS permit or manage them as hazardous waste.

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division

**ATTACHMENT 2**

**Rocky Flats Environmental Technology Site  
Unit 2 RCRA Closure Plan**

June 10, 1996

# RCRA Closure Plan

**Drum Storage Area: Building 331  
RCRA Unit 2**

EPA ID No. CO7890010526

U. S. Department of Energy  
Rocky Flats Environmental Technology Site

June 10, 1996

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## 1.0 Introduction

This plan addresses closure of Resource Conservation and Recovery Act (RCRA) Unit 2, an interim status drum storage unit at the Rocky Flats Environmental Technology Site (RFETS). This closure constitutes partial closure of the Rocky Flats facility. Unit 2 is a 20-foot long by 9-foot wide cargo container located near the Building 331 vehicle maintenance facility; the cargo container temporarily stored hazardous wastes. Unit 2 has been identified for future use as a nonhazardous equipment storage facility, and will not be released from the Site. Unit 2 will not be used until a closure plan has been approved by the Colorado Department of Public Health and the Environment (CDPHE) and certification of closure has been received by a Colorado-registered professional engineer.

## 2.0 Facility Contact

The RFETS contact for closure activities is the following:

Manager, Rocky Flats Field Office  
U. S. Department of Energy  
P. O. Box 928  
Golden, Colorado 80402-0928  
Telephone: (303) 966-2025

## 3.0 Unit Closure Notification and Certification

The closure of RCRA Unit 2 constitutes partial closure of RFETS. Within 60 days after completion of RCRA closure of this unit, the facility will submit to the Colorado Department of Public Health and the Environment certification that the unit has been closed in accordance with the approved closure plan. The certification will be signed by the Department of Energy and by an independent, Colorado-registered professional engineer.

## 4.0 Regulatory Requirements

An approved closure plan for closure of interim status RCRA units at the RFETS is required pursuant to 6 Colorado Code of Regulations (CCR) 1007-3, Part 265 of the Colorado Hazardous Waste Regulations.

No demonstration of financial responsibility is required, because under current regulations compliance with Part 266 Subpart A "Financial Requirements" is not required for government-owned facilities.

## 5.0 Unit Description and Waste Characterization

Unit 2 was placed into service in March 1987 and was operated until August 1988. It was used for management of hazardous waste generated from vehicle maintenance facility operations.

The specific wastes stored in the unit included used oil, antifreeze, a non-listed ignitable solvent as well as oil-contaminated combustibles. The used oils were contaminated with the following RCRA-regulated heavy metals: barium (D005), cadmium (D006), chromium (D007), and lead (D008) as defined in 6 CCR 1007-3, Part 261. These wastes were stored in Department of Transportation approved drums, with drip pans serving as secondary containment. These wastes were temporarily stored in Unit 2 and were routinely transferred to RCRA Unit 1 (Main Hazardous Waste Storage Area), where they were staged for pickup by a vendor for off site treatment and/or disposal.

## 6.0 Closure Performance Standards

RCRA Unit 2 will be clean closed by removing all hazardous wastes and hazardous waste residues. Since there is no history of spills at the Unit, and considering the management practices associated with the hazardous waste stored in this unit, clean closure performance will be confirmed by the following process.

- A core sample of the wood floor will be taken and analyzed for metals and volatile organic compounds. The wood floor will then be removed and disposed of as hazardous or non-hazardous debris.
- The drip pans will be visually inspected for signs of contamination. Provided there are no signs of contamination, the drip pans will be removed and used in another RCRA-regulated unit at the Site.
- The certifying engineer will perform a visual inspection of the empty cargo container to verify the absence of spill residuals. Provided there are no signs of contamination, the cargo container may be reused for storage at the Site. If contamination is present, RFETS may either decontaminate the cargo container using the decontamination methods identified in Part IX of the RFETS RCRA Permit or dispose of the cargo container as a hazardous waste.

Closure activities will be performed to achieve the objectives of the closure performance standard. All closure activities will be implemented emphasizing the protection of human health and the environment and waste minimization

## 7.0 Sampling and Analysis

Sampling methods shall follow those listed in Part IV of the Rocky Flats RCRA Permit. RFETS laboratories will analyze the floor samples unless unforeseen circumstances prevent it. If an off site laboratory is tasked with the analytical work, an RFETS approved laboratory will be used. A metals analysis will be performed in accordance with L-Procedure 4153 (Trace Metals in Solids and Liquids by ICP Spectroscopy) and a volatile organic compounds analysis will be performed in accordance with L-Procedure 4165 (GC/MS Determination for Volatile Organic Compounds).

*Closure Plan - RCRA Unit 2 (Drum Storage Area)***8.0 Closure Schedule**

Closure of the unit will begin at least 45 days after notification of closure. The time required for closure is proposed at 180 days from the time closure begins. If the total time necessary for closure will exceed 180 days, the facility will notify the director within 30 days of knowing that closure will take longer than 180 days (Part 265.113(b)) and at least 30 days prior to the expiration of the 180-day closure period as required in Part 265.113(c).

**9.0 Estimated Waste Volumes and Disposition of Waste**

The amount of solid waste expected to be generated is approximately 18 cubic feet. The only type of solid waste expected to be generated during this closure is the wood floor. If the floor sample results indicate the presence of hazardous waste residuals, the waste will be handled as hazardous waste and managed accordingly. If the floor is determined to be nonhazardous, the waste will be placed in the Rocky Flats landfill.

If contamination is observed on the walls of the cargo container or the drip pans, RFETS shall either dispose of the cargo container and drip pans as hazardous waste or attempt to decontaminate them. Decontamination may involve triple rinsing the cargo container walls, in which case the maximum volume of water generated should be less than 30 gallons. Manual decontamination may also be used to clean the walls and drip pans, if necessary.

**10.0 Record Keeping**

RFETS shall maintain the following closure records until final closure of the facility is completed and certified:

- Record of sampling activities (date, number, and type)
- Analytical results
- Record of actions taken to decontaminate equipment or structures
- Work control documents governing the closure activity
- Other documentation verifying that RFETS followed the approved closure plan

**11.0 Amendment of the Plan**

Unexpected events that occur during closure activities may require an amendment of the existing closure plan. Any request for modification of the closure plan will be made within 30 days of identification of the event that causes modification to be necessary.