

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

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Colorado Department
of Public Health
and Environment

February 25, 2003

Mr. Richard DiSalvo
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

03 MAR - 4 AM 10:19
000TH

RE: Building 428 Pre-Demolition Survey Report (PDSR) – Approval

Dear Mr. DiSalvo:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 428, Revision 0 dated January 22, 2003, received on February 7, 2003. The Division has also reviewed the information contained in the Group 13 Reconnaissance Level Characterization Report (RLCR), Revision 0 dated April 3, 2002. Although, the Group 13 RLCR was never officially provided to the Division for our review and concurrence, we were provided a copy through the consultative process. Based on the information contained in this PDSR, and the unofficial RLCR, we are hereby approving the PDSR for B428 with the following condition:

The RCRA Unit will be closed prior to initiation of demolition activities.

In addition, although the unofficial RLCR does not provide sufficient information for the Division to concur with the determination that B428 is a Type 1 Facility, based on the additional information provided with the PDSR the Division does concur with the Type 1 designation of B428. However, we would like to point out that this does not follow the established procedure for characterizing facilities as identified in the D&D Characterization Protocol. We would appreciate RFETS adhering to the previously established facility characterization procedures. For buildings such as B428, that are identified as possible Type 2 facilities, the RLCR should have been performed and submitted for our concurrence to properly Type the facility. Then the PDSR is to be conducted appropriate with the building Type and provided for our approval.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Lane Butler, KH

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records Building T130G

ADMIN RECORD

IA-A-002990

5400

4/13

STATE OF COLORADO

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Colorado Department
of Public Health
and Environment

October 4, 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 Reports (CSR) for Partial Closure of RCRA Unit 374.3 - 400 Area
 and Closure of RCRA Unit 374.3 - 700-800 Area Process Waste Transfer System**

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") previously received the CSR for the 400 Area, dated June 26, 2003, and received an additional CSR for the 700-800 Area, dated August 23, 2005. The 400 Area report, a partial closure of Unit 374.3, has now been reviewed in conjunction with the 700-800 Area report. Both reported were found to be acceptable with the following notations.

The Division received a Closure Description Document (CDD) for the 400 Area, dated April 22, 2002, and granted conditional approval of the CDD on May 24, 2002. The Division also received a CDD for the 700-800 Area, dated January 23, 2003, and granted conditional approval of that CDD on June 13, 2003. The Division reviewed both CDDs, and the conditions of approval, to determine the acceptability of the CSRs.

The 700-800 Area CSR inadvertently included all of the 300-500 Area previously include in the 100-400 Area CSR. The greater portion of the 300-500 Area portion of the transfer system, inclusive of Valve Vaults (VV) 10 through 13, and associated piping from the 700-800 Area to Building 374, were incorporated into the 700-800 Area CDD. However, the lesser portion of the 300-500 Area transfer system, from VV 13 through VV14 into the 100-400 Area, were incorporated into the 100-400 Area CDD. While minor, the Division's acceptance of the CSRs is based on the partitioning of the transfer system as provided in the approved CDDs.

After reviewing the reports individually, the Division has determined that the conditions of approval have been met. For the 100-400 Area, noteworthy conditions were addressed as follows:

Mr. Rampe & Mr. Nesta

Page 2 of 2

October 4, 2005

- Portions of primary lines that previously leaked, or leaked during contamination efforts, were removed along with their secondary lines rather than being clean-closed.
- Relative to beryllium, the line originating from Building 460 was removed. Analytical data included beryllium for clean closed lines along the route to B374.
- The Division accepts the PE certification for the closure of the waste transfer system as sufficient. DOE certification, as owner, for closure of the entire RCRA facility, currently in preparation and upon acceptance by the Division, is expected to meet the condition of the CDD approval.

The PE certification for the 100-400 Area states closure activities were conducted consistent with the approved CDD. However, planned actions by the Environmental Restoration Group to remove four sections of the transfer system were outstanding on the date of certification. Therefore, the Division accepts the certification as related to the clean closure of the portions of the transfer system left in place. Certification is not required for the portions that were removed and disposed as waste.

For the 700-800 Area, noteworthy conditions were addressed as follows:

- Portions of primary lines that previously leaked, or leaked during contamination efforts, were removed along with their secondary lines rather than being clean-closed.
- Analytical data supporting clean closure included hazardous waste constituents for the specified P and U hazardous waste codes as agreed in a contact record (S. Nesta to J. Hindman) dated April 7, 2003.
- The Division accepts the PE certification for the closure of the waste transfer system as sufficient. DOE certification, as owner, for closure of the entire RCRA facility, currently in preparation and upon acceptance by the Division, is expected to meet the condition of the CDD approval.

Figure 1 indicates that the line from Building 559 was not part of Unit 374.3 and was left in place. We agree that that portion of the transfer system line was not part of the system but was removed for practical reasons after specific RCRA closure activities had been completed. The line from Building 566 is correctly represented as non-RCRA and was left in place.

Lastly, discrepancies between Figure 1 and Attachment 2 of the 700-800 Area CDD were resolved. Figure 1 correctly excludes an OPWL line from B779 to B776. Further, it correctly shows lines originating in B881, becoming a single line in B887 and extending back through the west side of B881 to Valve Vault 1.

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. Kruczek
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 Team



Welcome to the RFETS Regulatory Contact Record Database

Please enter any of the information specific to the record(s) being queried in the fields below and press the "Submit" key. You may enter single or multiple search criteria by utilizing the fields below. Subsequent criteria may be added to refine your search. To create a new search, press the "Clear Form". The query will search the database using "and" statements. Records meeting the criteria specified will be displayed below. Please scroll through the record output using the arrow keys to locate the record of choice.

Building:

Author:

Regulatory Contact:

Date Range: From To

Keyword:

◀◀ ◀ ▶ ▶▶ (4 of 9)

Number 851
 Date and Time 1/22/2003 2:00:00 PM

Primary Site Contact Alec Cameron Primary Reg Contact James Hindman
 Secondary Site Contact Secondary Reg Contact

Unit Building Site Phone Agency
 B428 CDPHE

Purpose
 RCRA Closure of B428

Discussion

The purpose of the meeting was to request permission to Demolish Building 428 prior to the formal RCRA closure report (pending an approved PDS report) History Process equipment internal to Building 428 (piping, pumps, and the tank) was removed and disposed of as Low Level Mixed waste. The berm area, secondary containment for the RCRA equipment, was then washed with soap and high pressure water per the approved 400 Area CDD. Two pieces of the tank that are attached to the tank foundation were also washed with soap and high pressure water per the approved CDD (see attached pictures). Both the berm area and the remaining "ribs" of the tank were rinsed following the criteria

specified in the CDD. The resultant rinseate met the criteria specified in the approved 400 Area CDD and therefore Building 428 meets clean closure under RCRA. The formal report, signed by a Professional Engineer, will be submitted at a later date when the remainder of the 400 area is completed, and incorporated into the closure summary report. Plan The PDS report, demolition plan, environmental checklist will be completed and run through their normal process prior to demolition of B428. Results The attached table summarizes the results from the rinseate for the floor, walls, and remaining tank ribs. All results are below the limits in the approved 400 Area CDD. Agreement Mr. Hindman agreed with the following: - Building 428 is RCRA closed and may be demolished pending an approved PDS, demolition permit, and environmental checklist. - Kaiser Hill will submit the final closure report for Building 428, signed by a Professional Engineer, at a later date along with the closure report for the remainder of the 400 area.

Follow-Up

Please contact Doug Schlagel at extension 4175 for assistance with this page.



June 26, 2003

03-RF-00967

Mr. Joe Schieffelin
Permitting and Compliance Unit Leader
Federal Facilities Program
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

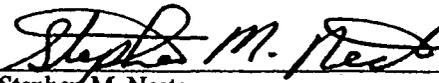
**CLOSURE SUMMARY REPORT FOR PARTIAL CLOSURE OF RCRA UNIT 374.3 – 400 AREA
PROCESS WASTE TRANSFER SYSTEM – SMN-031-03**

Dear Mr.Schieffelin:

Pursuant to the *Rocky Flats RCRA Part B Permit, Part X, Closure (June 1997)*, and the *Closure Description Document for Partial Closure of Hazardous Waste Unit 374.3 – the 400 Area Process Waste Transfer System (02-RF-00783)*, Kaiser-Hill Company L.L.C. is submitting the attached Closure Summary Report for this portion of the unit in the 400 Area.

The summary report contains a description of the major closure activities and a declaration that the requirements of the Closure Description Documents have been fulfilled. Additionally, this document serves as the Closeout Report for the Type I facility 428 that was demolished in association with the closure of the 400 area valve vaults.

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

 6/27/03

Stephen M. Nesta Date
Environmental Manager, K-H RISS

KLM:pvt

Attachment:
As Stated

cc:

J. Hindman - CDPHE
D. Kruchek - CDPHE
R. DiSalvo - RFFO

Summary Report for Partial Closure of RCRA Unit 374.3 -
The 400 Area Process Waste Transfer System

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

1.0 PURPOSE

This Summary Report pertains to partial RCRA closure activities for the 400 Area Process Waste Transfer System, part of RCRA Unit 374.3, and is a requirement of Section 1.2 of the Closure Description Document (CDD) for this RCRA Unit (02-RF-00783). 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

Closure activities were conducted under IWCP Work Packages TO108157, TO109927, TO109571, and TO110360. There were no unanticipated circumstances or events to cause a deviation from the descriptions in the CDD.

All but the following process waste lines were cleaned in accordance with the Closure Description Document and met the clean closure standard. The lines that were not cleaned are the following:

- The line from B460 to Valve Vault (VV) 18 is suspected to have leaked so it was not jetted or sampled.
- The line from B122 to VV18 was too long with too many elbows for the jetting process.
- The line from B123 to VV18 was partially removed during the environmental restoration B123 slab removal project. Approximately 20 feet of line still remains attached to VV18.
- The aboveground line from B444 to VV19 has too many elbows for the jetting process.

These will be left in place and will be removed when the Environmental Restoration group remediates the area. RSOP notification will be submitted under the ER RSOP for these areas. The process waste lines that met clean closure had the openings sealed or capped at the points where they entered the valve vaults. All valve vault structures met clean closure and those portions of the vaults that are more than four feet below current grade remain.

All water generated during the closure activities was managed through the Aqueous Waste Treatment System. The total volume was 1800 gallons.

Following are the number of containers and weights of the LLMW that was generated during closure activities:

- 10 IP2 crates with a total volume of 1060 cubic feet of waste
- 11 IP1 crates with a total volume of 990 cubic feet of waste.

It should be noted that for the valve vaults the top four feet of concrete, the associated sheds, and Building 428 were released under a PRE and disposed of as sanitary waste. This miscellaneous building/valve vault material, such as

sheet metal and concrete, equaling 50 cubic yards or 7.29 tons of sanitary waste was removed.

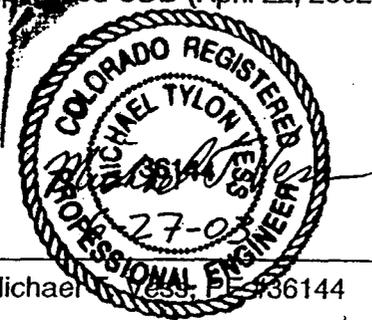
The only utility associated with Building 428 was electrical that the project disconnected from the facility at the utility pole approximately 50 west of the building.

3.0 SUMMARY

The requirements for clean closure of the process waste lines and valve vaults, as stated in the CDD, except as identified above, have been fulfilled.

4.0 CERTIFICATION

I certify that the closure activities for partial closure of RCRA Unit 374.3, 400 Area Process Waste Transfer System, were conducted consistent with the approved CDD (April 22, 2002, 02-RF-00783) as stated above.



Michael Tylon, P.E. #36144



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Building:

Author:

Regulatory Contact:

Date Range: From To

Keyword:

< >> (1 of 9)

Number 724
 Date and Time 7/11/2002 3:00:00 PM

Primary Site Contact Alec Cameron, 4787 Primary Reg Contact James Hindman
 Secondary Site Contact Secondary Reg Contact

Unit Building Site Phone Agency
 B428 CDPHE

Purpose

Alarm and Inspection Requirements for 400 Area Process Waste System and Valve Vaults. Addition of B428 to the 400 area Closure Description Document.

Discussion

The purpose of this contact record is to document the agreement with CDPHE regarding the future requirements for the 400 area process waste system. Two walkdowns were completed to verify the status of the 400 area process waste lines. Based on the condition of the process waste lines, (empty, no sludge, locks on sources for new process waste entering the system) inspection requirements for the 400 area process waste system are reduced as outlined in this contact record. The agreement made during the March 28, 2002 meeting with CDPHE, is reiterated below along with the status of the 400

area system. The March 28, 2002 contact record is attached. 400 Area Valve Vaults (VV14-20 and B428) Plan The 400 Area process lines associated with valve vaults 14-20 will be blown down from Building 460, Building 444, and Building 443 to Building 374. Following the blowdown, the process lines in each valve vault will be tapped and drained to remove the liquid from the system and the system will be locked out at Building 460, Building 444, Building 428 (if required), and Building 443 to prevent additional water from being added to the system. After the tap and drain is completed, a spool piece will be removed from Valve Vault 16 for examination to determine the amount of sludge holdup in the system. Status The 400 area process lines were blown down and drained (at the low points in each of the valve vaults and Building 428) during May, June, and July of 2002. A spool piece was removed from VV14 (the low point of the system) and examined by Mr. Hindman on June 6, 2002. There wasn't any evidence of sludge in the pipe spool and all of the water drained from the pipes showed no evidence of solids or sludge. Attached below are pictures of the pipe spool removed from VV14. Agreement CDPHE examined the spool piece and verified the lockouts in Building 460, 444, 122 and 443 on July 11, 2002. The lockout in B428 is not required since the sources for inlet water were isolated prior to draining the liquid in B428. This contact record provides written documentation that Mr. Hindman verified the lockouts in Buildings 460, 444, 122, 443, and examined the spool piece in VV14. Mr. Hindman agrees that the following changes to the 400 area valve vault system are effective as of today: ? The 400 Area Process Waste system is RCRA Stable (VV13-20, B428 and all new process waste lines connecting the vaults to B444, B460, B443, B122/123). Note: The process waste line connecting B123 and VV18 was partially removed during the B123 Slab removal project. The remaining 10-15 feet of pipe between the B123 slab and VV18 was grouted shut. ? The 400 area Valve Vault alarm system may be disabled. ? Kaiser Hill will verify that there is no free standing water in the valve vaults on a weekly basis, or after a significant precipitation event, by looking down from above the valve vault. Any free standing water will be pumped out within 24 hours of the weekly inspection and managed as incidental water. ? KH will complete quarterly RCRA inspections on the 400 area valve vault system using the same criteria and inspection form as the current monthly valve vault inspections. Mr. Hindman also agreed to amend the approved 400 area Closure Description Document to include Building 428 by this contact record.

Follow-Up

Please contact Doug Schlagel at extension 4175 for assistance with this page.

	A	B	C	D	E	F	G	H	I	J
	Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
1										
60	40.01	428	Storage Tank D-853	INTERIM STATUS - CLOSED per 400 area CDD	Tank was removed and disposed as LLM waste and the berm and secondary containment was washed per the 400 Area CDD and the rinsate met clean closure standards. The formal closure report will be submitted at a later date when the remainder of the 400 Area is complete (01/22/03 Contact Record between Alec Cameron and James Hindman).	6/23/03	CDD 5/24/02		CSR for 374.a 400 area 6/23/03	CR 1/22/03 PDSR 2/25/03 374.3a 400 area CSR 10/4/05

ADMIN RECORD

	A	B	C	D	E	F	G	H	I	J
	Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
1										
524	MS001 subunit 440.1	440	Container Storage, Repackaging, and Staging	PERMITTED - CLOSED per the 2004 permit	CDPHE approved Closure Summary Report Itr dated 5/31/05; 4/19/05; CDD approved 3/29/05; to be closed in accordance with RCRA Part B 1997 permit No. CO-97-05-30-01, Part X (6/30/97).	CSR 5/24/05	CDD 3/29/05 RSOP		CSR 5/24/05 COR 8/23/05	CSR 5/31/05 PDSR 5/19/05 & 6/19/05 COR 10/4/05
894	S002	440	Oil and/or Aqueous Solidification Treatment Process (Room 123A & B)	PERMITTED - CLOSED per the 2004 permit	CDPHE approved CSR, Itr dated 4/15/05; CSR submitted 3/28/05; CDPHE approved CDD, Itr dated 12/23/04; S002 in rooms 123A and 123B per contact record notification between James Hindman and Karen Lavorato dated 08/22/03.	CSR 3/28/05	CDD 12/23/04		CSR 4/05/05 COR 8/23/05	CSR 4/15/05 PDSR 5/13/05 & 6/19/05 COR 10/4/05

3/13