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

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

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

Colorado Department of Public Health and Environment

October 12, 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 (CSR) for Tank T 207 (T-29)

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 subject report dated March 31, 2004. The Division, in a letter dated February 26, 2002, conditionally approved the Closure Description Document (CDD) for the unit as signed by DOE on February 22, 2001, withdrawn on October 11, 2001 and then re-submitted via e-mail on January 11, 2002. The e-mail re-submittal duplicated the withdrawn version; therefore, the original version signed on February 22, 2001 will be retained as the official document.

The Division's February 26, 2002 established three conditions, which were met as indicated:

- The unit was defined as the tank and associated above ground piping that was disposed at Envirocare. As a result, decontamination and application of the Alternative Treatment Standards for Hazardous Debris was not applicable.
- The integrity of the tank floor was confirmed negating the condition for soil sampling.
- The third condition, relative to organic concentrations in previously collected soil samples, was informational and did not affect closure. Further, soils were routinely evaluated under the environmental restoration program.

The specifications of the CDD and the conditions for its approval have been met. Accordingly, the CSR for the unit is accepted. 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

David A. Kruchek
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

ADMIN RECORD

C:\Documents and Settings\Hainscou\My Documents\RFETS\Unit Closures-Closure pLan\CSR, Tank T207 Acceptance.DOC

ADMIN RECORD

1/21

CORRES. CONTROL
OUTGOING LTR. NO.
DOE ORDER # 4700.1
04-RF-00372

DIST.	LTR	ENC
DIETER, T.		
FER[illegible]W.	X	
LIN[illegible]		
LYLE, [illegible]		
MARTINEZ, L. A.		
PARKER, A.		
PIZZUTO, V.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N. R.		
BEAN, C.		
BUTLER, J. L.		
DECK, C.		
FRANCIS, M.		
FREIBOTH, C.		
GEIS, A.		
GIBBS, F.	X	
HUME, J.		
HUMISTON, T.		
HUNTER, D.		
KNAPP, S.	X	X
LINSINBIGLER, H.		
MARSCHALL, J.R.		
MYERS, K.		
NESTA, S.	X	X
O'BRIEN, J.J.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
RICH[illegible]LA, R.		
ROS[illegible] A.		
SNYL[illegible]P.	X	
SWARTZ, J.M.		
WIEMELT, K.	X	X
SELAN, J.		
Senneau, A	X	X
[illegible]RTH, K	X	X
CORRES.CONTROL	X	X
ADMIN RECRD/T130G	X	X
TRAFFIC		
PATS/130		

CLASSIFICATION:

ICNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE:

Date:

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
☐ PARTIAL/OPEN
☐ CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:
SVK:pvt

F-464 [illegible]94)

KAISER•HILL
COMPANY

March 31, 2004 04-RF-00372

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 TANK T207– SMN-016-04

Dear Mr. Schieffelin:

Kaiser-Hill Company L.L.C. is submitting the attached Closure Summary Report for Tank T207, OU9.

The summary report contains a description of the major closure by removal activities and a declaration that the requirements of the Closure Description Document have been fulfilled.

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

Stephen M. Nesta 3/31/04
Stephen M. Nesta Date
Environmental Manager, K-H RISS

SVK:pvt

Attachment:
As Stated

cc:
J. Hindman - CDPHE
J. Legare - DOE, RFFO
R. Schassburger - DOE, RFFO

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 TANK T207

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

1.0 PURPOSE

This Summary Report pertains to closure activities for Tank T207. Tank 207 (T-29) was installed in 1952 and had not been used since the mid-1980's. Tank 207 was part of the original process waste line (OPWL) system and part of the old Operable Unit 9 (Interim Status/Inter-Agency Agreement). The tank was used to store untreated waste from various buildings on-Site prior to treatment in B774. The wastes consisted of acids, bases, solvents, radionuclides, metals, chlorides, oils and greases. In addition, treated waste would also be stored in Tank 207 prior to discharge to the Solar Ponds, if no other storage option was available. This report contains a description of major closure activities and any deviations from those stated in the Closure Description Document (CDD) and other relevant information.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Closure activities for Tank T207 were conducted under the Closure Description Document for RCRA Closure of Tank T207, approval date, February 26, 2002.

Although the CDD initially indicated that the tank was thought to be empty of any residual material, upon opening of the manway located on the west side of the tank, it was discovered that the tank, in fact, contained a significant amount of dried "sludge." This material was sampled (RIN #s 02D1294 and MJP-152-2002) for RCRA characterization. Although the data did not indicate hits for any analytes, waste codes F001, F002, F005, F006, F007, and F009 were applied to the "sludge", due to process knowledge of the solvent wastes that were routed into or through the tank, and the fact that the tank had never been clean closed under RCRA. These codes are the same ones that were applied to the low-level mixed (LLM) waste streams, e.g. Surface Contaminated Object (SCO) mixed IDC (IDC 5001) and asbestos gasket waste, as well as to the (IDC 0299) transuranic-mixed (TRM) sludge. Radiological data indicated that the activity level in the sludge was high enough to classify the material as a transuranic-mixed (TRM) waste stream. The "sludge" was resampled per WIPP protocols, stabilized through the application of CCWet® fixative, bagged, and containerized in drums for eventual disposal.

Upon removal of all "sludge" from the tank, the inside of the tank was surveyed for radiological purposes, and was classified as surface contaminated (SCO) waste. The interior was then sprayed with CCFix® to control any potential for airborne beryllium that may have arisen during size reduction activities. The tank was subsequently size reduced, packaged in intermodals, and shipped to Envirocare for disposal. Sampling of metal from the tank showed that the tank would meet the criteria of an LDR compliant waste stream. Personal Protective Equipment (PPE) associated with the closure activities were disposed of as LLM waste.

Inspection of the tank floor prior to size reduction showed no evidence of loss of integrity, therefore soil sampling beneath the tank footprint was not deemed necessary. Due to chipping of exterior paint during size reduction activities, a

limited quantity of soil/gravel was collected and disposed of as LLM waste with an associated D008 waste code.

Waste volumes (cubic meters), by IDC/WFC are as follows:

IDC 0438 (Asbestos gasket) – .21

IDC 0299 (TRM sludge) – 17.183

IDC 5001 (LLM) – 154.813

IDC 5001 (LLW) – 9.007

IDC 0863 (LLW) – .419

IDC 0825 (TRM) – .21

Sludge removal was conducted under work package number T0110687. D&D activities were conducted under work package number T0111420.

3.0 SUMMARY

This Closure Summary Report will serve as notice to update the Site's Master List of RCRA units and submit a permit modification to remove the units from the Site RCRA Permit.

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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

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

Colorado Department of Public Health and Environment

February 26, 2002

Joseph A. Legare, Assistant Manager
Environment & Stewardship
U.S. Department of Energy, RFFO
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

Stephen Nesta, Environmental Manager
Remediation, Industrial D&D, & Site Services
Kaiser-Hill Company, L.L.C.
10808 Highway 93, Unit B, Building 116
Golden, Colorado 80403-8200

RE: Approval of Closure Description Document for Closure of RCRA Tank T-207 (also known as T-29) at the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr. Nesta and Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received your notice of intent to partially close RCRA Tank 207 and has reviewed the *Closure Description Document (CDD) for RCRA Removal of Tank 207*. This CDD was originally received by the Division on or about March 1, 2001 with a cover letter signed on February 22, 2001. On October 19, 2001, the Division received your letter dated October 11, 2001 requesting to withdraw the *Closure Description Document (CDD) for RCRA Removal of Tank 207*. On January 11, 2001, James Hindman of the Division received an e-mail from Mr. Nesta with an electronic revised version of the *Closure Description Document (CDD) for RCRA Removal of Tank 207*. Mr. Nesta's e-mail message requested approval of the revised CDD and stated that the message supercedes the October 11, 2001 letter. This CDD applies to Tank 207, which is a 200,000-gallon carbon-steel above ground storage tank located outside the northeast corner of Building 776/777 and is west of the Solar Ponds. As stated in the CDD, Tank 207 is also known as Tank T-29 and was part of the original process waste line (OPWL) system and part of Operable Unit 9.

The components of the RCRA unit described by this CDD will be closed by the method described as "Unit Removal" in Section X (Closure Plan) of the RFETS RCRA Permit No. CO-97-05-30-01. In accordance with Permit Condition X.B.3 of the RFETS RCRA Permit No. CO-97-05-30-01, the Division hereby approves this CDD (as revised via the January 11, 2002 e-mail) for RCRA Tank 207 as described therein, with the following conditions:

- For clarification purposes in response to language in Section 4.1 of the CDD, portions of the unit that have come into contact with listed hazardous/mixed wastes must continue to carry the listed hazardous waste codes unless appropriately decontaminated. Appropriate decontamination may be conducted according to the clean closure performance standard in the approved closure plan or the waste debris may be treated according to the Alternative Treatment Standards for Hazardous Debris per Section 268.45 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). For Tank 207, the results of radiological surveys do not affect the hazardous waste portion of the characterization of the waste.

- During the closure process, the bottom of the tank must be visually inspected for the presence of any holes. If holes are found, then the soil beneath the hole must be sampled and analyzed for the suite of hazardous constituents that were managed in Tank 207.

- Section 6.0, "Soil Contamination Evaluation and Post Closure Care" appears to incorrectly summarize analytical data collected from OU 9 Phase I RFI/RI surface soil samples and borehole soil samples collected around the tank. For the surface soil samples, Section 6.0 states, "Methylene Chloride was the only organic detected above 1.0 microgram per kilogram (µg/kg)." This statement should be revised since several other organic compounds were detected above 1 µg/kg in the two surface soil samples.

Additionally, because the CDD refers to the Integrated Work Control Package (IWCP)/engineering work package for significant details regarding the dismantlement and size reduction activities for Tank 207, the Division requests that the IWCP/engineering package be provided to the Division for review at least seven calendar days prior to the start of work covered by the CDD. In accordance with 6 CCR 1007-3, Section 264.113(b) and Permit Condition X.B.4.b, RFETS must complete the required closure activities identified in the approved CDD for Tank 207 within 180 days after the approval date of February 26, 2002. If you have any questions concerning these matters, please contact James Hindman at (303) 692-3345.

Sincerely,

Joe Schieffelin, Unit Leader
Hazardous Waste Compliance Unit

cc: S. MacLeod, DOE-RFFO
S. Tower, DOE-RFFO
D. Shelton, Kaiser-Hill
M. Aguilar, USEPA Region VIII
T. Rehder, USEPA Region VIII
D. Miller, AGO
S. Gunderson, CDPHE-HMWMD
D. Kruchek, CDPHE-HMWMD
S. Tarlton, CDPHE-HMWMD
Administrative Records, RFETS Bldg. 850

Nesta, Stephen

From: Nesta, Stephen
Sent: Friday, January 11, 2002 2:29 PM
To: 'Hindman, James'
Cc: Guthrie, Vern
Subject: T207 CDD

The attached CDD for Tank 207 reflects the results of the recent visual inspection of the tank. Please put this item back to the forefront of your reviews since the Site has renewed interest in getting the tank removed. The crew to remove the tank will be ready around February 1 so your approval in this time frame would be greatly appreciated. This request supercedes the letter previously sent withdrawing the CDD.

Thank you for your assistance.

Steve Nesta
Environmental Manager, RISS Project
Kaiser-Hill Co., LLC
X6386, P: 212-3186

Closure Description Document T...

Closure Description Document for RCRA Removal of Tank 207

U.S. Department of Energy

Rocky Flats Environmental Technology Site

EPA ID No. CO7890010526

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FIGURES 5-6

1.0 INTRODUCTION

1.1 Purpose and Scope

Part X of the Rocky Flats Environmental Technology Site's (RFETS) RCRA Part B Permit, addresses closure of permitted storage units. Removal of the storage unit is subject to the Closure Plan, as described in Part X, and to a subsequent Closure Description Document that identifies the portions or sections of the Closure Plan that are applicable to the specific permitted unit closure

This Closure Description Document applies only to Tank 207 located in the 700 Area to the northwest of Building 776 and to the east of the cooling tower. Closure of the tank will be accomplished by removal of the tank.

1.2 Unit Closure Notification and Schedule

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to close the tank identified in Section 4.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this tank are expected to commence prior to March 1, 2002. The identified closure activities are expected to be completed within 180 days. If closure activities cannot be completed within 180 days, a request for extension will be submitted to the Division at least 30 days prior to the end of the 180 days.

Within 30 days of completion of closure activities a summary report will be submitted to CDPHE containing details about the removal of the tank.

1.3 Facility Contacts

The contacts for this closure activity at RFETS are

Assistant Manager
For Environment and Stewardship
Rocky Flats Field Office
U.S. Department of Energy
10808 Highway 93, Unit A
Golden, CO 80403-8200
(303) 966-4298

Environmental Manager
Remediation, Industrial
D&D, & Site Services
Kaiser-Hill Company L.L.C
10808 Highway 93, Unit B
Golden, CO 80403-8200
(303) 966-6386

2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD

The components of the storage system described herein will be closed by the method described as "Unit Removal" in the Closure Plan, Section X, of the

RCRA Part B Permit. The performance standard is size reduction and waste packaging of the tank and associated piping.

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

Tank 207 (T-29) was installed in 1952 and has not been used since the mid-1980's. Tank 207 was part of the original process waste line (OPWL) system and part of the old Operable Unit 9. The tank was used to store untreated waste from various buildings on-Site prior to treatment in B774. The wastes consisted of acids, bases, solvents, radionuclides, metals, chlorides, oils and greases. In addition, treated waste would also be stored in Tank 207 prior to discharge to the Solar Ponds, if no other storage option was available. There are 5 valve vaults located in the vicinity of this tank which transferred the waste from Tank 207 to the Solar Ponds or received waste from on-Site buildings. The valve vaults were a part of the OPWL system and are identified here for descriptive purposes only and are not part of this CDD. There are no reported releases known for this tank system. Low-levels of radioactive contamination are expected in the tank system.

Waste treated in this process was required to be in an aqueous form.

Based on available information interviews with past employees, this tank has been RCRA empty and locked and tagged out since 1988. A confirmatory visual inspection of the interior of the tank revealed no residues, sludges or liquids in the tank (inspection completed on January 2, 2002). If residues, sludges, or liquids are encountered during removal of ancillary piping, they will be containerized and sampled and sampling results will be used to characterize the residual waste from the system. Because this tank contained radioactive liquids with various levels of contamination, prevention of release and minimization of worker exposure will be addressed in the preparation of the Integrated Work Control Program (IWCP) work package.

4.0 SPECIFIC CLOSURE ACTIVITIES

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures. Closure activities are summarized as follows:

4.1 Establishment of System Boundaries and Scope of Removal

The boundaries for Tank 207 consist of the 200,000-gallon carbon steel above ground storage tank (AST) and associated above ground piping, and define the extent of closure activities for this closure description document. The tank will be isolated from the valve vault directly connected to the tank. The valve vault will be labeled as OPWL-OU9, IHSS 121, (see Figure 1). The valve vault is located within five feet of the tank to the north. The entire tank will be removed including all above

ground ancillary piping consisting of the fill and overflow piping. The tank will be characterized and managed as low-level mixed waste, unless the waste can be surveyed and free released. Based on the types of waste identified in Section 3.0 that were stored in Tank 207, the following waste codes are assigned: F001, F002, F003, F005, F006, F007, F008.

The valve vaults (Figure 1) will be left in place and addressed during the Industrial Area OU remediation phase.

4.2 Preparation of Engineering and IWCP Work Packages

A unit specific IWCP/engineering work package will be prepared for the removal of Tank 207. The RFETS Health and Safety Practices Manual defines general health and safety measures to be followed at the Site. Closure activities will be conducted in accordance with this manual, incorporating the results of job specific industrial and nuclear safety related evaluations and screens.

The IWCP/engineering work package will be used to control work, including specification of personal protective equipment, methods of pipe and tank removal and size reduction, methods for containing any liquids or preventing releases to the environment, and waste packaging. As Low As Reasonably Achievable (ALARA) principles will be followed regarding personnel exposure to radiation.

5.0 DISPOSITION OF CLOSURE WASTES

It is anticipated that scrap metal and combustible wastes will be generated during closure activities. It is assumed that the Site waste management systems will be available to receive wastes generated by these closure activities. Any liquids encountered or generated during the closure activities will be handled as outlined in section 3.0.

The tank is radioactively contaminated and will be managed in accordance with the requirements of the RFETS Radiological Control Manual, Occupational Safety and Industrial Hygiene Program Manual, and the Health and Safety Practices Manual. Due to the size of the tank, it is anticipated that the tank will be taken down in sections, size reduced to fit Site standard packaging for disposal in accordance with applicable waste acceptance criteria. If necessary, the removed sections could be temporarily staged on the concrete pad from B779 and then sized reduced for proper packaging. All waste from inside this tank is expected to be low-level mixed waste and the waste will be characterized in accordance with applicable regulations.

PPE and other combustibles used will be managed as low-level mixed waste and will be characterized in accordance with applicable regulations. All waste containers will be stored in an appropriate on-Site storage area prior to offsite disposal.

6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

As part of the OU 9 Phase I RFI/RI surface and borehole soil sampling was conducted. See Figure 2 for the locations of the soil sampling. Two surface soil samples were collected and analyzed. Am-241, gross alpha, Pu-239/240, copper, and silver were detected above background. Methylene Chloride was the only organic detected above 1.0 microgram per kilogram (µg/kg).

Four borehole soil samples were also collected at ground surface (0-6 inches), mid-depth between the ground surface and bedrock (4.0 to 7.2 feet), and above the bedrock/alluvial contact (10.0 to 13.0 feet). None of the contaminants encountered above background were above the PRG.

Soil surrounding the tank will be left in place and addressed during the Industrial Area OU cleanup phase.

7.0 RECORDKEEPING

The following closure records will be maintained on Site during closure activities and at a federal repository for a minimum of 30 years following the report of closure:

- Record of sampling activities including type, number and date of samples;
- Analytical results;
- Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the RCRA Permit and this Closure Description Document;
- Records of the volume of hazardous waste generated during closure.

8.0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT

In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

9.0 REFERENCES

1. Rocky Flats Environmental Technology Site RCRA Part B Permit, February 1999
2. Code of Colorado Regulations, Volume 6, No. 1007-3
3. Rocky Flats Environmental Technology Site Operable Unit No. 9 Outside Tanks, RFP/ERM-95-000, October 12, 1995
4. Rocky Flats Environmental Technology Site, Regulatory Contact Record, to Joe Schieffelin, January 3, 2001

CORRES. CONTROL
OUTGOING LTR. NO.
DOE ORDER # 4700.1
01-RF-00236

DIST.	LTR	ENC
BACA, T.		
BR[illegible]RD, M.D.		
CA[illegible]		
FER[illegible]S.		
FULTON, J.C.		
MARTINEZ, L. A.		
POWERS, K.		
SCOTT, G.K.		
SHELTON, D.C.		
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N. R.		
BEAN, C.		
BUTLER, J. L.		
CARLSON, R		
CHRITTON, M.		
CLARK, D		
DANIELS, K.W.	X	X
DIETERLE, S.		
DORR, K.		
FERRERA, D.		
GIBBS, F.	X	X
GUTHRIE, V.	X	X
HUMISTON, T.		
JENKINS, K.		
KOMWINSKI, G.		
MYERS, K.		
NESTA, S.	X	X
WIEMELT, K.		
KNAPP, S.	X	X
ROSENMAN, A.	X	X
CORRES.CONTROL	X	X
ADMIN RECRD/060		
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:
SK:pvt

RF-4[illegible] (94)

KAISER•HILL COMPANY

Rocky Flats Environmental Technology Site

01-RF-00236
01-DOE-00204

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 DESCRIPTION DOCUMENT FOR RCRA CLOSURE OF TANK 207 - SMN-001-01

Dear Mr.Schieffelin:

Pursuant to the Rocky Flats RCRA Part B Permit (June 1997), Kaiser-Hill Company, L.L.C. and the United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) are submitting this Closure Description Document for Closure of Tank 207, which will begin in April 2001.

The Closure Description Document contains a description of the system to be closed, the selected method of closure, the types of contamination to be addressed and the schedule for closure activities. We request approval of this Closure Description Document within 30 days of receipt.

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

SM Nesta 1/31/2001
Stephen Nesta, Date
Environmental Safety Manager
Remediation, Industrial D&D, & Site Services
Kaiser-Hill Company, L.L.C

Joseph A. Legare 2-22-01
Joseph A. Legare Date
Assistant Manager
for Environment and Infrastructure
U.S. Department of Energy

SK:pvt

cc:
J. Hindman - CDPHE
D. Grosek - DOE, RFFO

Closure Description Document for RCRA Removal of Tank 207

U.S. Department of Energy

Rocky Flats Environmental Technology Site

EPA ID No. CO7890010526

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Closure Description Document for RCRA Removal of Tank 207

U.S. Department of Energy

Rocky Flats Environmental Technology Site

EPA ID No. CO7890010526

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

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Waste treated in this process was required to be in an aqueous form.

Based on available information and interviews with past employees, this tank has been RCRA empty and locked and tagged out since 1988. If residues are encountered, they will be containerized and sampled to characterize the waste from the system. Because this tank contained radioactive liquids with various levels of contamination, prevention of release and minimization of worker exposure will be addressed in the preparation of the Integrated Work Control Program (IWCP) work package.

4.0 SPECIFIC CLOSURE ACTIVITIES

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures. Closure activities are summarized as follows:

4.1 Establishment of System Boundaries and Scope of Removal

The boundaries for Tank 207 consist of the 200,000-gallon carbon steel above ground storage tank (AST) and associated above ground piping, and define the extent of closure activities for this closure description document. The tank will be isolated from the valve vault directly connected to the tank. The valve vault will be labeled as OPWL-OU9, IHSS 121, (see Figure 1). The valve vault is located within five feet of the tank to the north. The entire tank will be removed including all above ground ancillary piping consisting of the fill and overflow piping. The tank will be characterized and managed as low-level mixed waste, unless the waste can be surveyed and free released. Based on the types of waste identified in Section 3.0 that were stored in Tank 207, the following waste codes are assigned: F001, F002, F003, F005, F007.

The valve vaults (Figure 1) will be left in place and addressed during the Industrial Area OU remediation phase.

4.2 Preparation of Engineering and IWCP Work Packages

A unit specific IWCP/engineering work package will be prepared for the removal of Tank 207. The RFETS Health and Safety Practices Manual defines general health and safety measures to be followed at the Site. Closure activities will be conducted in accordance with this manual, incorporating the results of job specific industrial and nuclear safety related evaluations and screens.

The IWCP/engineering work package will be used to control work, including specification of personal protective equipment, methods of pipe and tank removal and size reduction, methods for containing any liquids or preventing releases to the environment, and waste packaging. As Low As Reasonably Achievable (ALARA) principles will be followed regarding personnel exposure to radiation.

5.0 DISPOSITION OF CLOSURE WASTES

It is anticipated that scrap metal and combustible wastes will be generated during closure activities. It is assumed that the Site's waste management systems will be available to receive wastes generated by these closure activities. Any liquids encountered or generated during the closure activities will be handled as outlined in section 3.0.

The tank is radioactively contaminated and will be managed in accordance with the requirements of the RFETS Radiological Control Manual, Occupational Safety and Industrial Hygiene Program Manual, and the Health and Safety Practices Manual. Due to the size of the tank, it is anticipated that the tank will be taken down in sections, size reduced to fit Site standard packaging for disposal in accordance with applicable waste acceptance criteria. If necessary, the removed sections could be temporarily staged on the concrete pad from B779 and then sized reduced for proper packaging. All waste from inside this tank is expected to be low-level mixed waste and the waste will be characterized in accordance with applicable regulations.

PPE and other combustibles used will be managed as low-level mixed waste and will be characterized in accordance with applicable regulations. All waste containers will be stored in an appropriate on-Site storage area prior to offsite disposal.

6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

As part of the OU 9 Phase I RFI/RI surface and borehole soil sampling was conducted. See Figure 2 for the locations of the soil sampling. Two surface soil samples were collected and analyzed. Am-241, gross alpha, Pu-239/240, copper, and silver were detected above background. Methylene Chloride was the only organic detected above 1.0 microgram per kilogram (µg/kg).

Four borehole soil samples were also collected at ground surface (0-6 inches), mid-depth between the ground surface and bedrock (4.0 to 7.2 feet), and above the bedrock/alluvial contact (10.0 to 13.0 feet). None of the contaminants encountered above background were above the PRG.

	A	B	C	D	E	F	G	H	I	J
1										
891	NA	Tank 207	Tank 207	Newly identified unit - CLOSED per the permit	CLOSED BY REMOVAL in accordance with the CDD for RCRA Closure of Tank207. Closure Summary Report dated 03/31/04 (04-RF-00372).	3/31/04	CDD submitted 10/11/01		CSR 3/31/04	
912										
913										