

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. Laboratory and Radiation Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado
<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

September 30, 2003

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

NATURE SAVER™ FAX MEMO 01816		Date	9-30-03	# of Pages	5
To	LANE But/En		From	GUNDENCO 4	
Co./Dept.	K-H		Co.	CDPHE	
Phone #			Phone #		
Fax #	966-5180		Fax #		

RE: Conditional Approval, No Further Accelerated Action, IHSS Group 900-3 (904 Pad).

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants conditional approval for No Further Accelerated Action (NFAA) in respect to activities resulting from operation of the 904 Pad. Sampling of earthen materials below the asphalt pad, now considered by Division and RFETS contractor personnel to be emplaced road base, indicate that isolated occurrences of arsenic and lead are not sufficiently elevated to warrant accelerated soil removal.

The sampling of the "road base", instead of native material exclusively, has raised concerns on the sampling adequacy of native materials. Consequently, Division staff located data from 1987 which supported IASAP and HRR reports that soil had been placed on top of radiologically contaminated soils. Subsequently, part or all of that soil was removed followed by confirmation sampling of the excavated/original surface.

The soil confirmation sampling from 1987 indicated that Pu-239 was systematically distributed and found to exceed 50 pCi/g in the northeastern portion of what eventually became the 904 Pad. To illustrate the Division's concerns, Figure 8 from the *Interim Status Closure Plan, Solid Waste Management Unit 15 (Storage Pad 904)*, dated 30 September 1989 as prepared by Rockwell International, is attached. Please note the sampling depth of 12 to 18 inches shown in the map legend. (Data posting errors from Table 3 of the report, also attached, have been corrected for two locations.) The Pu-239 isopleths, despite some inherent uncertainty on data quality, indicate a connection to the wind blown release of radionuclides from the 903 Pad, located a short distance to the east.

As a condition of NFAA approval, the facility must collect soil samples from the affected portion of the 904 Pad site at a depth consistent with the affected surface. This work may be incorporated into 903 Lip Area activities (IHSS Group 900-11). As it is imperative that soil samples be collected from the wind-affected surface to the extent practicable, the consultative process must be utilized in the field on a real-time basis to ensure agreement that sampling is properly conducted. Please arrange the sampling event to accommodate the presence of Division staff.

In the event that plutonium contamination exceeding the action level is encountered in the northeastern portion of the 904 Pad, and even if this area of contamination appears to be isolated from the 903 Pad Lip Area contamination, the Division will make a determination of whether a removal action is warranted.

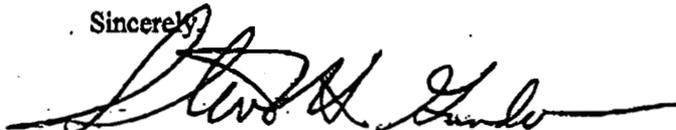
Mr. Joseph Legare
September 30, 2003
Page 2

I am also including the Division's original comments, as previously discussed with contractor personnel, to ensure that the final version of the Data Summary Report, dated August 2003, is properly revised. For example, the revised report must reflect that much of the sampling from 0.0 to 0.5 feet consisted of "road base" materials. The Division, based on its subsequent review of boring logs, believes that some samples did include native material. Accordingly, the facility should attempt to distinguish which samples actually included native material as a prelude to determining, or to minimize, the number of required samples. The final report should reflect such effort as well as any uncertainty.

We look forward to the sampling event, reviewing the revised final report and a determination of the extent, if any, of accelerated soil removal beneath the 904 Pad.

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

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

Attachments (3)

cc: Tim Rehder, EPA
Norma Castaneda, DOE
Lane Butler, KH

Mark Sattelberg, U.S.F&W
Dave Shelton, KH
Administrative Records Building T130G

03-RF-01112

DIST.	LTR	ENC
ETER		
ERJ	W.	
ERK		
NDSAY, D.		
YLE, J.		
ARTINEZ, L. A.		
ARKER, A.		
OWERS, K.		
HELTON, D.C.		
PEARS, M.S.		
RICE, K.D.		
UOR, N. R.		



03-RF-01112

GUILAR, P.		
LBN, C.		
UBLE, M.		
EAN, C.		
UTLER, J. L.		
ERCLAAR (T130G)		
HECK, C.		
RANCIS, M.		
REIBOTH, C.		
SEIS, A.		
IBBS, F.		
LUMSTON, T.		
NAPP, S.		
YERS, K.	X	X
UESTA, S.	X	X
ININGER, R.		
LMVER, R.		
MA		
LA		
RM		
ROSENMAN, A.	X	X
SNYDER, D.P.		
THOMPSON, J.		
MEMELT, K.	X	
AMERON, A.		
WARSCHALL, JR.	X	

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 RCRA UNITS AND CLOSED IN ACCORDANCE WITH RCRA UNDER THE RSOP FOR FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION ACTIVITIES - SMN-037-03

Dear Mr. Schieffelin:

Pursuant to the *Rocky Flats RCRA Part B Permit, Part X, Closure (June 1997)*, the *RSOP for Component Removal, Size Reduction, and Decontamination Activities Notification Letter (00-RF-02229)*, Kaiser-Hill Company L.L.C. is submitting the attached Closure Summary Report for these units that comprised the 904 Pad.

The summary report contains a description of the major closure activities and a declaration that the requirements of the RSOP 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 7/28/2003
Stephen M. Nesta
Date

Environmental Manager, K-H RISS

KLM:pvt

Attachment:
As Stated

- cc:
- J. Hindman - CDPHE
 - J. Legare - DOE, RFFO
 - S. Tower - DOE, RFFO

CORRES. CONTROL	X	X
ADMIN RECRD/T130G	X	X
TRAFFIC		
STATS/130		
CLASSIFICATION:		
JCNI		
JNCLASSIFIED		
CONFIDENTIAL		
SECRET		
AUTHORIZED CLASSIFIER		
SIGNATURE:		

Date: _____

IN REPLY TO RFP CC NO.: _____

ACTION ITEM STATUS:
 PARTIAL/OPEN
 CLOSED

APPROVALS:
ORIG. & TYPIST INITIALS:
KLM:pvt

**CLOSURE SUMMARY REPORT FOR RCRA UNITS 15 AND 35 CLOSED IN ACCORDANCE
WITH RCRA UNDER THE RSOP FOR FACILITY COMPONENT REMOVAL, SIZE REDUCTION,
AND DECONTAMINATION ACTIVITIES**

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 Units 15 and 35 that comprised the 904 Pad. The 904 Pad included 23 cargo containers, Tents 8-11, the 904 asphalt pad, Tent 7 and the associated 902 asphalt pad, RCRA Unit 35 a permacon inside of Tent 10, and a permacon inside of Tent 11 used for chemical repack operations. This report is a requirement as annotated in the RSOP for Component Removal, Size Reduction, and Decontamination Activities Notification Letter (02-RF-02229) and contains a description of major closure activities and any deviations from those stated in the RSOP and other relevant information.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Closure activities for Tent 7 and the 902 pad were conducted under the *Removal of Tents 7, 8, and 9 Demolition Plan*. As agreed to in a Contact Record dated 10/8/2002, between Steve Nesta, K-H and David Kruchek, CDPHE, Tent 7 and the associated asphalt pad was removed prior to the RSOP being approved since it met Clean Closure Option 1 as defined in Section 5.1.1 of the RSOP for Component Removal, Size Reduction, and Decontamination Activities. The entire tent structure and asphalt pad was disposed of as non-routine sanitary waste. Following are the waste amounts for the tent structure and asphalt pad.

Tent 7 structure = 80 cubic yards (\approx 15 tons) sanitary waste

902 asphalt pad = 580 cubic yards (\approx 532 tons) sanitary waste

After approval of the RSOP Notification letter by CDPHE, on November 22, 2002, the closure of Tents 8 and 9 occurred under the previously mentioned Demolition Plan. Prior to demolition the asphalt pad was rinsed, the rinsate was collected and sampled to confirm the pad was clean and could be released as sanitary waste. All analytical data was supplied to CDPHE for review. After showing the asphalt was clean, demolition of Tent 8 and 9 structures commenced. Following are the waste amounts for the tent structures.

Tent 8 structure = 180 cubic yards (\approx 25.5 tons) sanitary waste

Tent 9 structure = 200 cubic yards (\approx 35.5 tons) sanitary waste

The secondary containment pans and rollers inside of the cargo containers were also rinsed, the rinsate was collected and sampled to confirm the containment pans and rollers were clean and could be released as sanitary waste. All analytical data was supplied to CDPHE for review. The cargo containers, were released through the Waste Release Evaluation process and sold by PU&D. Following are the waste amounts:

Containment pans and rollers = 80 cubic yards (\approx 29 tons) sanitary waste

Both RCRA Unit 35 and the permacon in Tent 11 were closed under IWCP #T0110940. RCRA Unit 35 was disposed of as Low Level Mixed waste. The permacon in Tent 11 was disposed of as Low Level waste. Following are the waste amounts for RCRA Unit 35 and Tent 11 permacon.

RCRA Unit 35 = 88 cubic yards (\approx 14.5 tons) low level mixed waste

Tent 11 Permacon = 132 cubic yards (\approx 18 tons) low level waste

After the permacons were removed from Tents 10 and 11 the asphalt pad was rinsed, the rinsate was collected and sampled to confirm the pad was clean and could be released as sanitary waste.

All analytical data was supplied to CDPHE for review. After showing the asphalt was clean, demolition of Tents 10 and 11 was completed under Removal of Tents 10 and 11 Demolition Plan. Following are the waste amounts for the tents.

Tent 10 and 11 = 770 cubic yards (\approx 142 tons) sanitary waste

Once the tent structures were removed the asphalt pad was turned over to Environmental Remediation for removal. This removal action was completed under the RISS-ER Field Implementation Plan (14393-FIP-01) and the ER Health and Safety Plan (14393-HASP-01). The majority of the 904 pad was removed and disposed of as non-routine sanitary waste. The five-foot wide length along the easternmost edge of the pad was removed and disposed of as hazardous waste. Following are the waste amounts for the 904-asphalt pad.

Non-hazardous asphalt = 2720 cubic yards (\approx 2511 tons) sanitary waste

Hazardous asphalt = 100 cubic yards (\approx 99.4 tons) hazardous waste

3.0

SUMMARY

Additionally, it should be noted that the propane system in Tents 10 and 11 were closed and appropriately removed. The electrical system was disconnected at the nearest utility pole. The requirements stated in the RSOP notification letter for RCRA closure have been fulfilled. 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 RCRA Part A and Part B Permit.

RECEIVED

STATE OF COLORADO

7001 MAR -4 A 10 40

Revised 02/03

CORRES. CONTROL
INCOMING LTR NO.

00196 RF03

DUE DATE
ACTION

Bill Owens, Governor
Douglas H. Benevento, Executive Director
CORRESPONDENCE CONTROL
Dedicated to protecting and improving the health and environment of the people of Colorado
4300 Cherry Creek Dr. S. Laboratory and Radiation Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado
<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.		
POWERS, K. P.		
RODGERS, A. D.		
SHLTON, D. C.	X	
SPRS, M. S.		
SE, K. D.		
TUOR, N. R.		
WILLIAMS, J. L.		

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

RE: Tents 10 & 11 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 Tents 10 and 11, Revision 0 dated February 4, 2003, received on February 20, 2003. Based on the information contained in this PDSR, we are hereby approving the PDSR for Tents 10 and 11 with the following condition:

The RCRA Units associated with these tents must be properly closed or otherwise managed to prevent release of hazardous wastes or constituents.

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
~~Administrative Records Building T130G~~

Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

PARSONS, D.	X	
WIEMELT, K.	X	
NESTA, S.	X	
BROOKS, L.	X	
LEITNER, R.	X	
ROSSMANA, A.	X	
ARNOLD, P.	X	
LAUORATO, K.	X	

COB CONTROL	X	
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP.

3/4/03
Date By

Ref. Ltr. #

ORDER #
5400-1

CORRES. CONTROL

OUTGOING LTR. NO.

DOE ORDER # , 4700.1

02-RF-02229



DIST.	LTR	ENC
BRAILS FORD, M.D.		
FERRELL, D.W.		
FERRELL, L.A.		
PARKER, A.		
POWERS, K.		
SCOTT, G.K.		
SHELTON, D.C.		
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N. R.		

OCT 14 2002

02-RF-02229

VGUILAR, P.		
VLBIN, C.		
VUBLE, M.		
VEAN, C.		
VUTLER, J. L.		
VERCLAAR (T130G)	X	X
VLARK, D.		
VETERLE, S.		
VORR, K.		
VFRANCIS, M.		
VREIBOTH, C.		
VIEIS, A.		
VIBBS, F.	X	X
VUTHRIE, V.		
VUMSTON, T.		
VHELER, K.	X	X
VARSCHALL, J.R.		
VARTIN, D.		
VYERS, K.	X	X
VES	X	X
VOR		
VIVER, L.		
VMAN, K.		
VAPPERT, R.		
VIMROSE, A.		
VISENMAN, A.	X	X
VYDER, D.P.	X	X
VENCE, T.		
VEMELT, K.		
VILLIAMS, L.		
VJENSON, P.	X	X
VORRES CONTROL	X	X

Steve Tower
D&D Program Lead
DOE, RFFO

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNITS 15 AND 35 CLOSURE
FEG-022-02

Attached is a draft transmittal letter to the Colorado Department of Public Health and Environment for the RSOP notification for RCRA Units 15 and 35 closure. The draft transmittal letter has been prepared from DOE building point of contact to CDPHE building point of contact; however, it could also be addressed from DOE RFCA coordinator to CDPHE RFCA coordinator.

Please contact Steve Nesta x6386 with questions or concerns.

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

Attachments:
As Stated

CLASSIFICATION:
KLM:pvt
Orig. and 1 cc: - Steve Tower
CC:
Joe Legare

REPLY TO RFP CO. NO.:

ACTION ITEM STATUS:
 PARTIAL/OPEN
 CLOSED

LTR APPROVALS:

RIC: []
LIST INITIALS:
KLM:pvt

David Kruchek
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNITS 15 AND 35 CLOSURE**

Mr. Kruchek:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for all activities required to close RCRA Units 15 and 35, as outlined in Section 5 of the RSOP.

Kaiser-Hill Construction or a decommissioning subcontractor will conduct this work. If Kaiser-Hill Construction or the subcontractor would like to use a method or process not included in the RSOPs then they are required to notify Kaiser-Hill. If Kaiser-Hill Construction or the subcontractor proposes to use alternate methods, an additional notification will be made and, in consultation with DOE/LRA, the RFCA process for decision document modification will be used.

The appropriate checklists and RCRA closure information required by the RSOP are attached to this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by Kaiser-Hill Construction or the subcontractor. The exact methods and process selected by Kaiser-Hill construction or the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings.

As indicated in the RSOP, the LRA has 30 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 30 days, the project will proceed as planned.

If you have any questions regarding this, please contact me at (303) 966-2133.

Steve Tower
U.S. Department of Energy

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Project scope: RCRA Unit closure of Units 15 and 35 (Interim Status)			
Facility description: Cargo containers and Tents 8, 9, 10, and 11 (including Permacon inside), located within fenced area on the 904 Pad. Tent 7 (also known as the 902 Pad), located ~250 feet west of the 904 Pad (collectively Unit 15) and the Tent 10 Permacon (Unit 35).			
Description of planned activity(ies): RCRA Unit Closure			
Facility/rooms/sets/areas involved: Unit 15: 23 Cargo Containers, Tents 7 – 11 (including the Tent 11 Permacon). Unit 35: Tent 10 Permacon			
Is RCRA unit closure(s) part of the planned activity?		<input checked="" type="checkbox"/>	Yes
If RCRA units are included, attach unit specific information sheets and drawings		<input type="checkbox"/>	No
Attach checklists from Appendix A of the RSOP. See RCRA Closure Information document attached.		<input type="checkbox"/>	Component Removal/Size Reduction
		<input type="checkbox"/>	Decontamination
RLCR Status	<input checked="" type="checkbox"/>	RLCR complete and concurrence received: for Group A Facilities (included Tents 10 and 11), 5/12/2000, and 904 Pad Closure Project (902 Pad and Tent 7, and 904 Pad and Tents 8 and 9), 1/30/2002.	
	<input type="checkbox"/>	RLCR initiated but incomplete; concurrence anticipated:	
	<input type="checkbox"/>	RLC has not been initiated¹ and is scheduled for initiation on:	
If RLCR is not complete or initiated, what data will be used to plan the work activities?			
Activity requires modification to the ARARs listed in the RSOP.		<input type="checkbox"/>	Yes, attach to letter
		<input checked="" type="checkbox"/>	No
Attach Administrative Record file requirements for the activity.			
Point of contact for each facility/activity: Pete Swenson (303) 966-7211			
Duration of work activities: 3 months		Anticipated work start: 11/8/02	
Attach schedule for each facility or activity for information purposes. Attached			
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls		<input type="checkbox"/>	Yes, LRA consultation and concurrence required
		<input checked="" type="checkbox"/>	No

¹ Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Are there deviations/exceptions to the RSOP for the proposed activity (ies)?											<input type="checkbox"/>	Yes
											<input checked="" type="checkbox"/>	No
Provide an explanation of deviation/exception to the RSOP: Not applicable												
C. Check the appropriate resulting action box below												
Additional RFCA decision document required (PAM – IM/IRA)												
Major modification to RSOP						Field change to RSOP						
Minor modification to RSOP						LRA consultation						
Activity(ies) will result in the following waste types											Process waste	
										<input checked="" type="checkbox"/>	Remediation waste	
TRU	<input checked="" type="checkbox"/>	LLW	<input checked="" type="checkbox"/>	LLMW		Haz	<input checked="" type="checkbox"/>	Sanitary	<input checked="" type="checkbox"/>	Other: recyclable/re-use		
LRA Notification Review Time								14 days, no RCRA unit closure involved				
				<input checked="" type="checkbox"/>				30 days, RCRA unit closure involved				

Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Reports: Group A Facilities (included Tents 10 and 11), 5/12/2000, and 904 Pad Closure Project (902 Pad and Tent 7, and 904 Pad and Tents 8 and 9), 1/30/2002.
- Notification Letter and subsequent CDPHE correspondence, if appropriate

INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5.0, Revision 0, February 4, 2001" addresses closure of RCRA regulated units.

This document applies to RCRA Unit 15 which includes Tents 8-11 and 23 cargo containers located on the 904 Pad, Tent 7 located on the 902 Pad, the Interim Status Unit 35 which is a Permacon located in Tent 10, and a Permacon located in Tent 11 that was used for chemical repack operations. Complete closure will be accomplished in accordance with one of the closure options outlined in the RSOP (Sections 5.1.1 – 5.1.3).

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 the start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

RCRA Unit 15 was originally two units comprised of RCRA Unit 15A - Cargo Containers and 15B the Tents 7 – 11. The unit was combined into Unit 15 and consists of the cargo containers and Tents 7 through 11, all of which are/were used as container storage areas throughout the life of the Unit. The EPA hazardous waste codes that apply to Unit 15 are D001-D043, F001–F009, F027, F039, P001-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066- U099, U101-U103, U105-U138, U140-U174, U176-U194, U196, U197, U200-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, and U404 based on the contact record between Site representatives and CDPHE, dated June 3, 2002.

The 904 Pad was originally used for storage of pondcrete and saltcrete in tri-walled boxes. The tri-walled boxes were designed for transportation and not long-term storage. However after delays in the ability to ship the waste offsite, in January 1990, Tents 7 –11 were constructed for the controlled storage of this low-level mixed and hazardous waste. In recent history the unit has been used for the storage of a variety of containers including drums and wooden and metal crates.

The Tent 10 Permacon, Interim Status Unit 35, was constructed to stabilize the low-level mixed (LLM) pondcrete and saltcrete wastes. Additionally, in approximately 1999, a Permacon in Tent 11 was incorporated into Unit 15 to repackage chemicals from around the Site.

On February 5, 2001, CDPHE approved a Closure Description Document for Partial Closure of RCRA Interim Status Unit 35. In a contact record with CDPHE, dated July 3, 2001, it was agreed that the modified partial closure work scope would include strip out of the pond sludge reprocessing equipment, packaging of the debris for disposal, and general clean out and decontamination of the Permacon. However, in an email from the project manager, dated July 30, 2002, it is stated that the Permacon was not decontaminated.

Cargo containers 1 through 5 and 29 through 34 were previously relocated to Unit 18.03 with verbal authorization from Mr. Joseph Schieffelin, CDPHE HMWMD. These cargoes will ultimately be closed under the closure of Unit 18.03.

A contact record between the RISS project and CDPHE, dated October 7, 2002, documented the clean closure of Tent 7. This portion of Unit 15 was closed in accordance with Section 5 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, which allows closure of a regulated unit prior to submittal of the required unit specific closure information, through the consultative process and concurrence of the LRA. The contact record invoked 5.1.1, Option 1, which requires that two criteria be met, a review of the Operating record to document no spills or releases and a visual inspection to verify the same. The tent and pad will subsequently be dismantled and removed; and will be managed as sanitary waste.

System Boundaries

The boundary of Unit 15 includes the remaining 23 cargo containers, Tents 8 –11, and Tent 7, which is located 250 feet west of the 904 Pad. The boundary of the unit is each tent and the immediate portion of the pad on which the tent is located. The cargo containers are considered weather structures with the secondary containment pans inside of the cargoes the actual boundary of the unit.

The boundary of Interim Status Unit 35 is the Permacon structure located inside of Tent 10, including any piping inside the Permacon and the ventilation system from the Permacon structure out to and including the HEPA filter.

Please see the attached Figure for the boundaries of the unit.

CLOSURE OPTIONS

Unit 15 – Tents (including Permacon in Tent 11)

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste was spilled to either the asphalt, which served as the secondary containment of the tents from 1991 to 1999, or to secondary containment pans used for liquids after 1999. However, the Operating Record also shows that all spills or releases were collected and cleaned up. The only area of Unit 15, that based on historical documents (in the 1988 timeframe), appears to have experienced spills or releases of pondcrete or saltcrete that were not appropriately cleaned up is the eastern edge of the 904 Pad. A visual inspection of the remainder of the unit's asphalt pad, by RISS Environmental compliance personnel, verifies the absence of hazardous or mixed waste stains and/or residuals. A small (5' x 10') area of staining was observed on a tent panel inside Tent 10, immediately north of door 10. A record review and visual inspection was also conducted for the Tent 11 Permacon, used for chemical repackaging, and considered part of Unit 15. There were no records of spills or releases inside the Permacon and the visual inspection verified no stains and/or residuals. Therefore, Unit 15 tents and their associated asphalt pads, and the Tent 11 Permacon structure will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, Option 1, which requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up and a visual inspection to verify the absence of stains and/or residuals. The tent and the Permacon structures will be removed and disposed of as either LL waste, non-routine sanitary waste or sold for reuse depending on if the tent and Permacon

structures meet the free-release criteria for radiological contamination. The asphalt pad will remain in place until Environmental Restoration (ER) conducts soil remediation in this area.

The only exception will be the easternmost edge of the 904 Pad including the asphalt berm, removed along its length (running south to north) for a width of about 5 feet to the west, and the lower section of the tent panel, approximately 5'x10' in Tent 10, at door 10. This portion of the pad and the tent panel will be closed by removal, with the EPA codes for pondcrete and saltcrete applied (F001, F002, F003, F005, F006, F007, and F009). The section of pad that is removed will be replaced by clean asphalt to ensure that any contaminated soil is not exposed to the environment.

Unit 15 – Cargo Containers

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste were spilled to the secondary containment of cargoes 9, 10, 11, and 21 from 1991 to the present. However, the Operating Record also shows that all spills or releases were collected and cleaned up. A visual inspection of the secondary containment pans, by RISS Environmental compliance personnel, verifies the absence of hazardous or mixed waste stains and/or residuals. Therefore, Unit 15 cargo containers secondary containment pans will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities, Option 1*, which requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up and a visual inspection to verify the absence of stains and/or residuals.

Interim Status Unit 35 (Inside Tent 10)

The Permacon will be closed by unit removal in accordance with section 5.1.3, and will include the Permacon structure and metal flooring, any interior piping and or structures that remain, and the ventilation system exterior to the Permacon up to and including the HEPA filter. The EPA codes for pondcrete and saltcrete will be applied to the waste generated (F001, F002, F003, F005, F006, F007, and F009), and the waste will be disposed of as LL mixed waste. All other exterior structures, including power, heat, and ventilation beyond the HEPA filter, are not considered part of the unit and will be removed using Site procedures for property disposition.

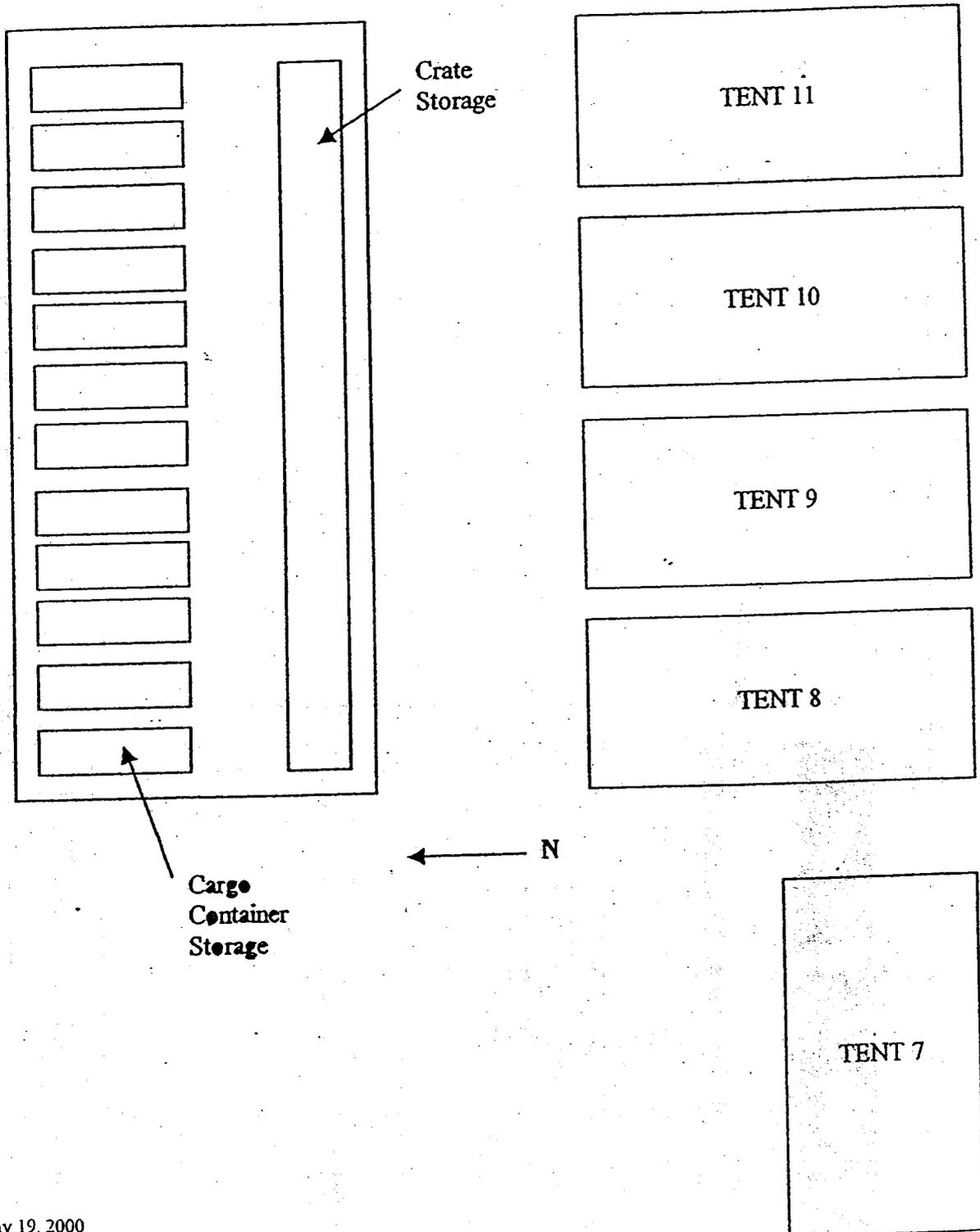
SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

The Historical Release Report indicates radiological contamination of the soil exists due to possible activities conducted prior to the unit's construction. Soil sampling is not planned for activities conducted under this RSOP notification. ER will characterize the area after the 904 Pad tents are removed. Remediation of this site will depend on the characterization results. ER will perform any soil remediation under the *ER RSOP for Routine Soil Remediation*, however it is assumed that this will be a NFA site.

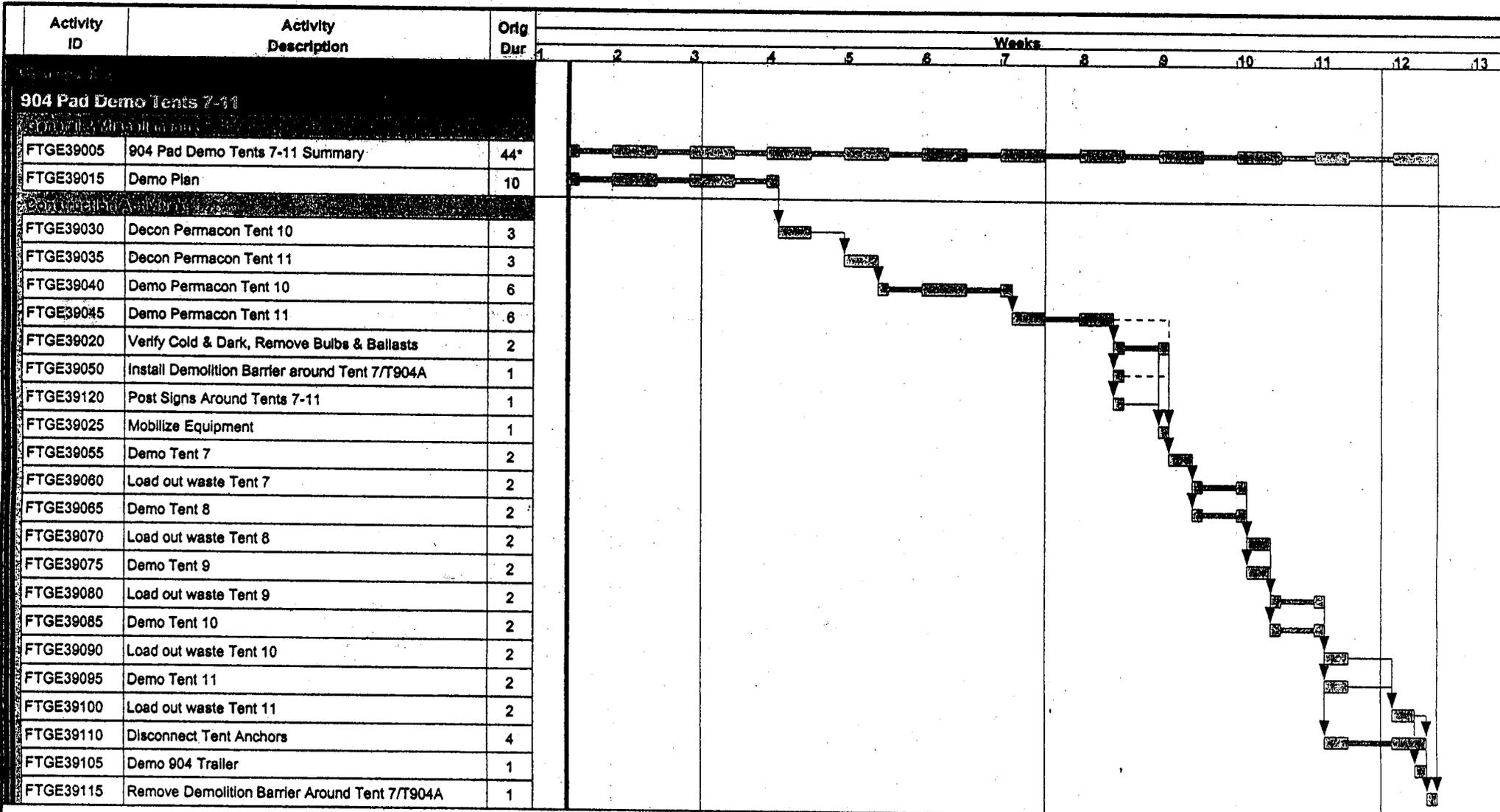
RECORDKEEPING

RCRA unit closure activities will be documented in the Decommissioning Final Closeout Report as opposed to the Pre-Demolition Survey Report (PDSR) which will be completed prior to demolition of the units. When final closure of units 15 and 35 is completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A and Part B Permit.

RCRA Unit 15
(904 Pad)
Container Storage



May 19, 2000



Start Date 08AUG02
Data Date 19SEP02
Run Date 24SEP02 14:57

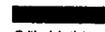
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Early Bar
 Progress Bar
 Critical Activity

KHCP - FUTR Sheet 1 of 1

Kaiser Hill Construction
Estimates in Progress
Status as of 09/19/02

Issue:  Rev. 40

Legend:  Critical Activity



	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
16	18.01	903 Pad	Remedial Action Decontamination Pad (RADP) Tanks	INTERIM STATUS - CLOSED per Closure Plan for Interim Status Units	CLOSED, see summary report dated 10/19/04 (04-RF-01039) signed by Stephen Nesta	10/19/04	4/28/04		CSR 10/19/04	COR 10/5/05
912										
913										

13/13

	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										
14	15	904 Pad	Container Storage in multiple cargo containers located south of Central Avenue on the 904 Pad. Note Unit 15 A and 15B were recombined into Unit 15. Unit 15 B was previously delineated as Container Storage in Tents 8, 9, 10, and 11 on the 904 Pad; and Tent 7 located to the west of the 904 Pad.	PERMITTED - CLOSED per a RFCA decision document	CLOSED. Closure Summary Report (03-RF-01112) submitted 07/28/03. All of the analytical data was submitted and reviewed by CDPHE for rinsing of the 904 Pad. James Hindman agrees that the pad can be considered sanitary waste, except for the five foot length along the east boundary.	7/28/03	RSOP submitted 10/14/02		CSR 7/28/03	
34	35	904 Pad	Pondcrete/Saltcrete Reprocessing Facility	INTERIM STATUS - CLOSED per a RFCA decision document	CLOSED BY REMOVAL. Closure Summary Report Submitted 07/28/03 (03-RF-01112). Unit has been closed, removed and disposed of under RSOP Notification for Closure of RCRA Units 15 and 35. Once the pad is disposed of a closure summary report will be written and submitted to CDPHE.	7/28/03	RSOP submitted 10/14/02		CSR 7/28/03	
912										
913										