

RFCA 1.9
NFA Inter General



Colorado Department
of Public Health
and Environment



February 14, 2002

Joe Legare
Assistant Administrator for Environment and Infrastructure
U.S. Department of Energy-RFFO
10808 Highway 93, Unit A
Golden CO 80401-8200

RE: Approval of NFA designation for IHSSs and PACs

Dear Mr. Legare:

Since 1994 the Site has been proposing IHSSs and PACs for No Further Action (NFA) or No Further Remedial Action (NFRA) in the annual and quarterly Updates to the Historic Release Reports (HRR). No formal process was in place for the agencies to disposition the proposed NFA/NFRA sites. This fall an NFA Working Group developed and implemented a systematic approach for reviewing NFA/NFRA proposals in accordance with RFCA Attachment 6 and the Implementation Guidance Document. Using this systematic approach, 79 proposed sites were discussed during November and December 2001. It was agreed that 63 of the 79 sites meet the criteria for NFA/NFRA sites. This letter provides formal approval of these 63 sites listed in the attached table (Table 1). The remaining sixteen sites either require additional information, additional characterization, or limited remediation prior to approval as NFA/NFRA sites. Approved meeting minutes are located in the Site Project File and provide a record of discussions and agreements reached among the NFA Working Group members.

NFA meeting discussions also resulted in several corrections or clarifications to previous HRR Updates and associated correspondence. Some of the items are significant enough that they will be addressed in the 2002 Annual HRR Update. Other items only require documentation here in order to complete the process. Table 2 describes these clarifications and corrections.

If you have any questions please contact Gary Kleeman (EPA), 303-312-6246, Carl Spreng (CDPHE), 303-692-3358 or Reginald Tyler (DOE), 303-966-5927.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator
Colorado Department of Public
Health and Environment



Tim Rehder
Rocky Flats Project Manager
Environmental Protection Agency

Enclosure

cc w/Enc:

L. Butler, KH

M. Broussard, KH

R. Tyler, ERWM, RFFO

G. Kleeman, EPA

C. Spreng, CDPHE

List of Recently Approved NFAs

Table 1

IHSS	OU	PAC	DESCRIPTION	IDENTIFIED	UPDATED	APPROVED	NOTES
2001 Annual HRR Update							
133.3	5	SW-133.3	Ash Pit 3	HRR ¹	Annual 2001	12/5/01	
NA	5	SW-1701	Recently Identified Ash Pit (also referred to as TDEM-1)	Quarterly 9 ¹³	Annual 1997 ³ Annual 2001	12/5/01	
NA	IA	100-603	Building 123 Blossay Waste Spill	HRR ¹	Annual 2001	12/19/01	See edit in Table 2
NA	IA	400-812	Tank T-2 Spill in Building 460	Quarterly 6 ¹⁶	Quarterly 7 ⁹ Quarterly 8 ¹⁵ Annual 2001	12/19/01	
179	15	800-179	Building 865 Drum Storage	HRR ¹	Annual 1996 ² Annual 2001	12/19/01	
180	15	800-180	Building 883 Drum Storage	HRR ¹	Annual 1996 ² Annual 2001	12/19/01	
NA	IA	900-1308	Gasoline Spill Outside of Building 980	Quarterly 6 ¹⁶	Quarterly 8 ¹⁵ Annual 2001	12/19/01	
2000 Annual HRR Update							
NA	BZ	NE-1409	Modular Tanks and 910 Treatment System Spill (formerly 000-503)	Quarterly 5 ¹⁰	Quarterly 7 ⁹ Annual 2000 ²⁶	11/14/01	
156.1	IA	300-156.1	Building 371 Parking Lot (2 locations designated on Plate #2)	HRR ¹	Annual 1997 ³ Annual 2000 ²⁶	11/14/01	

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IHSS	OU	PAC	DESCRIPTION	IDENTIFIED	UPDATED	APPROVED	NOTES
164.1	IA	600-164.1	Radioactive Slab from Bldg 776	HRR ¹	Annual 1997 ³ Annual 2000 ^{2c}	11/14/01	See edit in Table 2 Will also be updated in 2002 HRR
NA	IA	600-1001(a)	Waste Oil Identified in PAC-1001	Annual 1997 ³	Annual 1997 ³ Annual 2000 ^{2c}	11/14/01	See edit in Table 2
123.1	IA	700-123.1	Valve Vault 7	HRR ¹	Annual 1997 ³ Annual 2000 ²⁶	11/14/01	
108	BZ	900-108	Trench T-1	HRR ¹	Annual 1997 ³ Annual 1998 ⁷ Annual 2000 ²⁶	11/14/01	
NA	IA	900-1311	Septic Tank East of Building 991	Quarterly 7 ⁹	Annual 1999 ²³ Annual 2000 ²⁶	11/14/01	
NA	IA	900-1318	Release of F001 Listed Waste Water to Soil (identified as 900-1307 in Annual 1997; reassigned 900-1318 in Annual 1998)	Annual 1997 ³	Annual 1998 ⁷ Annual 2000 ²⁶	11/14/01	
183	BZ	900-183	Gas Detoxification Area	HRR ¹	Annual 1997 ¹ Annual 2000 ^{2c}	11/14/01	Will be updated in 2002 HRR
110	BZ	NE-110	Trench T-3	HRR ¹	Annual 1996 ² Annual 1997 ³ Annual 2000 ^{2c}	11/14/01	Will be updated in 2002 HRR

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1996 Annual HRR Update							
166.1	6	NE-166.1	Trench A	HRR ¹	Annual 1996 ²	11/14/01	
166.2	6	NE-166.2	Trench B	HRR ¹	Annual 1996 ²	11/14/01	
166.3	6	NE-166.3	Trench C	HRR ¹	Annual 1996 ²	11/14/01	
167.2	7	NE-167.2	Pond Area Spray Field (Center Area)	HRR ¹	Annual 1996 ²	11/14/01	
167.3	7	NE-167.3	South Area Spray Field	HRR ¹	Annual 1996 ²	11/14/01	
216.1	6	NE-216.1	East Spray Fields - North Area	HRR ¹	Annual 1996 ²	11/14/01	
204	15	400-204	Original Uranium Chip Roaster	HRR ¹	Annual 1996 ²	11/14/01	
158	IA	500-909	Release of Spent Photographic Fixer Solution	Annual 1996 ²	-	11/14/01	
Quarterly HRR Update 7							
114	7	NW-1502	Improper Disposal of Diesel-Contaminated Material at Landfill (formerly NW-177)	Quarterly 2 ⁵	Quarterly 3 ⁶ Quarterly 7 ⁹	12/19/01	

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114	7	NW-1503	Improper Disposal of Fuel Contaminated Material at Landfill	Quarterly 1 ²⁴	Quarterly 7 ⁹	12/19/01	
Sites approved by EPA in 1992; awaiting CDPHE concurrence.							
NA	BZ	NE-1400	Tear Gas Powder Release	HRR ¹	-	12/19/01	
NA	BZ	NE-1401	NE Buffer Zone Gas Line Break	HRR ¹	-	11/14/01	
NA	BZ	NE-1402	East Inner Gate PCB Spill	HRR ¹	-	11/14/01	
NA	BZ	NE-1403	Gasoline Spill - Building 920 Guard Post	HRR ¹	-	11/14/01	
NA	BZ	SW-1700	Fuel Spill into Woman Creek Drainage	HRR ¹	-	11/14/01	
NA	BZ	000-501	Roadway Spraying	HRR ¹	-	12/19/01	
NA	IA	100-600	Mercury Spill - Valve Vault 124-B, Building 124	HRR ¹	-	12/19/01	
NA	IA	100-601	Building 123 Phosphoric Acid Spill	HRR ¹	-	11/14/01	
NA	IA	100-604	T130 Complex Sewer Line Leaks	HRR ¹	-	11/14/01	

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NA	IA	100-605	Building 115 Hydraulic Oil Spill	HRR ¹	-	11/14/01	
NA	IA	100-606	Building 125 TCE Spill	HRR ¹	-	11/14/01	
NA	IA	100-610	Asbestos Release – Building 123	HRR ¹	-	11/14/01	
NA	IA	100-612	Battery Solution Spill - Building 119	HRR ¹	-	11/14/01	
NA	IA	300-700	Scrap Roofing Disposal	HRR ¹	-	11/14/01	
NA	IA	300-701	Sulfuric Acid Spill – Building 371	HRR ¹	-	11/14/01	
NA	IA	300-703	Building 331 North Area	HRR ¹	-	11/14/01	
NA	IA	300-704	Roof Fire, Building 381	HRR ¹	-	11/14/01	
NA	IA	300-705	Potassium Hydroxide Spill North of Building 374	HRR ¹	-	11/14/01	
NA	IA	300-706	Evaporator Tanks North of Building 374	HRR ¹	-	11/14/01	

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NA	IA	300-707	Sanitizer Spill	HRR ¹	-	12/19/01	
NA	IA	300-710	Gasoline Spill North of Building 331	HRR ¹	-	11/14/01	
NA	IA	400-805	Building 443 Tank #9 Leak	HRR ¹	-	12/5/01	
NA	IA	400-806	Catalyst Spill, Building 440	HRR ¹	-	11/14/01	
NA	IA	400-808	Vacuum Pump Leak - Building 442	HRR ¹	-	11/14/01	
NA	IA	400-809	Oil Leak - 446 Guard Post	HRR ¹	-	11/14/01	
NA	IA	500-903	RCRA Storage Unit #1	HRR ¹	-	11/14/01	
NA	IA	700-1107	Compressor Waste Oil Spill - Building 776	HRR ¹	-	11/14/01	
NA	IA	700-1109	Uranium Incident - Building 778	HRR ¹	-	11/14/01	
NA	IA	800-1202	Sulfuric Acid Spill, Building 883	HRR ¹	-	11/14/01	

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NA	IA	800-1203	Sanitary Sewer Line Break Between Buildings 865 and 886	HRR ¹	-	11/14/01	
NA	IA	800-1206	Fire, Building 883	HRR ¹	-	11/14/01	
NA	IA	800-1211	Capacitor Leak, Building 883	HRR ¹	-	11/14/01	
NA	IA	900-1302	Gasoline Spill	HRR ¹	-	11/14/01	
NA	IA	900-1303	Natural Gas Leak	HRR ¹	-	11/14/01	
NA	IA	900-1304	Chromic Acid Spill - Building 991	HRR ¹	-	11/14/01	
NA	IA	900-1305	Building 991 Roof	HRR ¹	-	11/14/01	

TABLE 2 Clarifications to documentation associated with recently approved NFA/NHRA sites

YEAR	PAC	TITLE	CORRECTION / CLARIFICATION
2000	600-164 I	B771 Radioactive Slab	Appendix 1, pg 124 The correct title should read <i>Radioactive Slab from Building 771</i>
2000	600-1001(a)	Waste Oil in PAC 1001	Page 47 As stated, PAC 600-1001 will be investigated It is only the waste oil spill identified as 600-1001(a) which was cleaned up upon discovery that is agreed to as NFA
2000	100-607	B111 Transformer PCB Leak	As way of clarification to a statement in the October 2, 2001 CDPHE letter stating that the Site had not proposed this PAC as a potential NFA, This PAC was not proposed in the 2001 Annual Update to the HRR because PAC 600-607 was approved NFA via separate letter dated April 12, 2001, and required no further evaluation.
2001	100-603	B123 Bioassay Waste Spill	Clarification is required due to confusion over the write-up provided under <u>Description of Operation or Occurrence and Physical/Chemical Description Constituent Released</u> in the 2001 HRR. The release was contained with-in the trench and 8 feet of the building with berms as confirmed by sampling. Based on this, rainwater being pumped from the trench at the time of the release at locations greater than 8 feet from the building and both south and southeast of the building was not contaminated by the release. The contaminated rainwater contained with-in the bermed area of the trench totaled approximately 100 gallons and was neutralized, pumped and treated at 374

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