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2004 NOV -9 A 10:00

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  
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Located in Glendale, Colorado

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

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Colorado Department  
of Public Health  
and Environment

November 2, 2004

Mr. Joe Legare  
Director, Project Management Division  
U.S. Department of Energy, Rocky Flats Project Office  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

## **RE: Pre-Demolition Survey Report (PDSR) for Building 374 Exterior and East Dock Room 3813 - Approval**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 374 Exterior and East Dock Room 3813; Revision 1 dated October 26, 2004. Your letter (dated November 1, 2004) and this PDSR were provided to us on November 2, 2004. Based on the information contained in this PDSR we are hereby approving the PDSR for Building 374 Exterior and East Dock Room 3813.

Although we are approving this PDSR, it is recognized, as discussed with Randy Leitner (with KH), that the metal in the trenches located in Room 3813 and the piping in the slab going from the trenches to the Room 2804 tank farm will be appropriately protected and removed in a manner to prevent contaminant releases, and properly disposed as mixed waste rather than as SCO waste as described in this PDSR.

In addition, our approval of this PDSR and associated closure of the RCRA Unit 374.1 Room 3813, as discussed in Section 4.3, is based on there being an appropriate continuous Administrative Record to properly document that no releases have occurred, as well as the lack of visible stains. However, if radiological contamination is found on the concrete associated with the metal trenches or piping, then the contaminated concrete will need to be disposed as mixed waste, not just LLW or SCO waste.

It must also be noted that, although this PDSR may be sufficient to properly characterize the East Dock (Room 3813) and exterior surfaces of B374 to allow for demolition of the East Dock, we are not agreeing with the determination regarding "Non-Impacted" interior areas of B374 (attics) as discussed in Section 3 of this PDSR. Further discussion regarding possible "Non-Impacted" areas will need to occur prior to approving the PDSR for B374 or other areas that may have potentially "Non-Impacted" areas.

ADMIN RECORD

1/14

5400

B371-A-000321

These and all additional demolition activities and related issues are expected to be discussed and resolved utilizing the consultative process and appropriately recorded in Contact Records.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, Denise Onyskiw at (303) 692-3371 or (303) 966-6687, or David Kruchek at (303) 692-3328.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven H. Gunderson", with a long horizontal flourish extending to the right.

Steven H. Gunderson  
RFCA Project Coordinator

cc: Warren Seyfert, DOE  
Dave Shelton, KH  
Steve Nesta, KH  
Harlen Ainscough, CDPHE  
Administrative Records Building T130G  
Chris Gilbreath, KH  
Mark Aguilar, EPA  
Sam Garcia, EPA  
Randy Leitner, KH

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2005 JAN 31 P 1:37

# 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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Located in Glendale, Colorado  
<http://www.cdphe.state.co.us>



Colorado Department  
of Public Health  
and Environment

January 26, 2005

Mr. Joe Legare  
Director, Project Management Division  
U.S. Department of Energy, Rocky Flats Project Office  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

## **RE: Pre-Demolition Survey Report (PDSR) for Building 374 (Interior) Area AN Phase I - Approval**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 374 (Interior) Area AN Phase I (Revision 0, dated January 5, 2005). Your letter regarding this PDSR, dated January 21, 2005, was received by fax on January 24, 2005. We have provided comments, agreed on resolutions, and received modifications to the initial PDSR Document. Based on the agreed modifications and information contained in this PDSR, we are hereby approving the PDSR for Building 374 (Interior) Area AN Phase I.

As stated in this PDSR, radiologically contaminated areas remain in B374 Area AN within 6 feet of final grade that must and will be removed. We expect that, as stated, all of the remaining contamination within 6 feet of final grade will be properly identified, protected, segregated, controlled, and removed, and none will be left or incorporated into the recycled concrete (free-releasable) rubble that will be left on site. The actions performed and data generated necessary to achieve and document this complete contamination removal must be properly described and provided in the Closeout Report.

The remaining contaminated portions of B374 Area AN that are below 6 feet of final grade, which will not be removed, must also be properly identified and described in the Closeout Report, to include maps or figures showing the extent of remaining infrastructure (slab, walls, floors, pipe lines, drain lines, etc), as well as nature, levels, and extent of remaining contamination.

It is also our understanding, as discussed in the PDSR, that the remaining asbestos contamination (tar impregnated roofing felt) will be properly protected, segregated, controlled, and removed and none will be left or incorporated into the recycled concrete (free-releasable) rubble that will be left on site.

5400

In addition, as discussed and agreed, **approval** of this PDSR does not constitute approval of the Building 371/374 Closure Project Characterization Plan provided as Attachment U.

All demolition activities and related issues, including but not limited to the ultimate disposition/disruption of the foundation drains, are expected to be discussed and **resolved utilizing** the consultative process.

If you have any questions **regarding** this correspondence please contact me at (303) 692-3367, Denise Onyskiw at (303) 692-3371 or (303) 966-6687, or David Kruchek at (303) 692-3328.

Sincerely,



Steven H. Gunderson  
RFCA Project Coordinator

cc: Warren Seyfert, DOE  
Dave Shelton, KH  
Steve Nesta, KH  
Bruce Wallen, DOE

**Chris** Gilbreath, KH  
Mark Aguilar, EPA  
**Sam** Garcia, EPA  
Administrative Records Building T130G

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** December 21, 2004 / 9:00 a.m.

**Site Contact(s):** Chris Gilbreath/Randy Leitner  
**Phone:** 303-966-7355/3537

**Regulatory Contact:** Denise Onyskiw, Dave Kruchek, Harlen Ainscough  
**Phone:** 303-966-6687  
**Agency:** CDPHE

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**Purpose of Contact:** Closure of RCRA Units – Building 371

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### **Discussion**

A meeting was held with representatives of the Colorado Department of Public Health and the Environment (CDPHE) to discuss the B371/374 Project's proposed strategy for closure of RCRA units. The paragraphs below document the results of that discussion for the units listed. Additionally, a walkdown of the listed units was conducted by Denise Onyskiw of CDPHE to confirm that conditions described in the paragraphs below accurately reflect the current conditions of those units.

### **B371 Permitted Container Storage Areas (PSA) – Unit 371.1A and C (rooms and vaults)**

PSAs in Building 371 consist of rooms and vaults where containers of hazardous and mixed waste have been staged for assay, stored for recovery, stored for repackaging or stored pending transfer to off-site treatment or disposal facilities. Three of these rooms (2202, 2325, and 3189) were permitted in July 1992 to support container assay. The remainder of these units were permitted in June 1997. The vast majority of containers of hazardous and mixed wastes staged or stored in these areas were solid. Operating records indicate that only 88 containers of waste containing liquid were stored in these areas over their entire permitted history. The containers that did contain liquid were either solid waste found to contain small amounts of free liquid when analyzed by Real Time Radiography, or they were waste chemicals packaged in Lab-Packs for off-site shipment. Operating records including RCRA Contingency Plan Implementation Reports, Inspection logs dating back to 2001, Spill Occurrence Reporting Database dating back to 1990, and ECATS records dating back to 1997 were reviewed to determine the spill history. There have been a total of 4 releases, all of which were cleaned up immediately. All PSAs listed below have been visually inspected to ensure all containerized, RCRA-regulated, hazardous or mixed waste have been removed and there are no signs of staining or residue from hazardous or mixed waste. Therefore, the PSAs listed below meet the clean closure criteria defined in the Building 371/374 Closure Project Decommissioning Operations Plan, Closure Option 6.1.1.1, Historical Knowledge Confirmation. This determination will be referenced in the appropriate PDSR prior to demolition.

The following rooms/vaults are included in this closure determination:

1101, 1103, 1208, 1210, 2010/2011, 2202, 2202A/B/C, 2207, 2217, 2223, 2301, 2306, 2321, 2325, 3189, 3202, 3204, 3206, 3301, 3305, 3315, 3321/3323/3335, 3341, 3408/3412, 3420, 3501, 3513, 3515, 3541, 3602, 3606, 3701, 3709, 3713, and 3717.

**Central Storage Vault (CSV) – RCRA Unit 371.1C (vault)**The CSV was designed to contain high Pu content residues and product Special Nuclear Material (SNM) in maximum two-liter canisters. The CSV was permitted in June 1997. No liquids were allowed in the CSV. Operating records including RCRA Contingency Plan Implementation Reports, Inspection logs dating back to 2001, Spill Occurrence Reporting Database dating back to 1990, and ECATS records dating back to 1997 were reviewed to determine the spill history. There have been no releases of hazardous or mixed waste from containers in the CSV. However, there were 2 instances in the mid-1980s where canisters of SNM were dropped from In/Out (IO) stations to the floor of the CSV resulting in radioactive material releases. These releases were cleaned up to the extent practical shortly after they occurred. Residual radioactive contamination still exists primarily on the floor of the CSV today. At the start of equipment dismantlement activities, the CSV was visually inspected and determined to be free of staining or residue from hazardous or mixed waste. Upon completion of dismantlement activities in the CSV, it will be decontaminated as necessary to meet the radiological criteria established in the B371/374 DOP. Therefore, the CSV currently meets the clean closure criteria defined in the Building 371/374 Closure Project Decommissioning Operations Plan, Closure Option 6.1.1.1, Historical Knowledge Confirmation. This determination will be referenced in the appropriate PDSR prior to demolition.

**B371 Permitted Treatment Units (PTU)**

Unit 371.3A - Caustic Waste Treatment System (CWTS) was permitted in June 1997, and consisted of six gloveboxes and six tanks. All of these components have been removed as low-level waste or low-level mixed. Given the CWTS was considered a hazardous waste treatment unit based on the corrosive nature of the process, once the system was adequately drained, the components were no longer considered hazardous. Some gloveboxes, however, were removed as low-level mixed waste due to the presence of lead shielding components. What remains of the unit is the secondary containment rooms. The CWTS treated characteristic waste only. Listed waste was not permitted in the unit. The Permit lists Rooms 1103, 1105, 1113, and 1115 as the location of the unit. Room 1103 housed all of the tanks. Room 1105 provided container staging for CWTS. Room 1113 contained the control panels for CWTS operations. Room 1115 contained the gloveboxes where the treatment equipment was operated. Room 1113 never contained hazardous or mixed waste. Operating records including RCRA Contingency Plan Implementation Reports, Inspection logs dating back to 2001, Spill Occurrence Reporting Database dating back to 1990, and ECATS records dating back to 1997 were reviewed to determine the spill history. There has been one documented spill of less than two ounces of acidic waste solution in Room 1105 which was cleaned up immediately. Room 1115 has had no documented releases of waste to the secondary containment. Room 1103 has had one release of less than one ounce from tank systems during operations. This spill was immediately cleaned up. All of these areas have been visually inspected to confirm there is no staining or residues from hazardous or mixed waste. Unit 371.1A currently meets the clean closure criteria defined in the Building 371/374 Closure Project Decommissioning Operations Plan, Closure Option 6.1.1.1, Historical Knowledge Confirmation. This determination will be referenced in the appropriate PDSR prior to demolition.

### Mixed Residue Units

Building 371 Mixed Residue Units consisted of several mixed residue container storage areas, gloveboxes, tank systems, canyons and secondary containment rooms where mixed residues were managed for plutonium recovery. With the exception of certain gloveboxes used to repack mixed residues for off-site shipment, listed mixed residues were not managed in mixed residue systems. All gloveboxes and tank systems have been removed. The remaining canyons and secondary containment rooms fall into two categories.

Canyons were designed to contain remotely operated tanks and plutonium recovery equipment. Canyons are generally highly contaminated and in the case of some tank system canyons, were subject to repeated releases of mixed residues to the secondary containment floors. Closure of canyon areas will be accomplished in accordance with the 371 DOP (e.g., abrasive mechanical methods or removal) The canyon rooms included in this category are Rooms 3549, 3553, 3559, and 3563. Completion of this closure activity and the associated walkdown(s) will be documented in a separate contact record. There are three canyon areas in the sub-basement. These areas have been decontaminated using an abrasive mechanical method (concrete shaving) in order to meet the standard in the DOP for contaminated structures greater than six feet below final grade. The areas have also been visually inspected to confirm there is no staining or residues from hazardous or mixed waste remaining. A fixative will be applied to protect the surface during demolition. The canyons included in this category are Rooms 1107, 1109, and 1117/1125. Although not considered a canyon, Room 1127 has been decontaminated and visually inspected consistent with the sub-basement canyons listed above. This room contained tanks where several releases occurred over the operating history of the building. This room is therefore closed in accordance with the requirements described in the Building 371/374 Closure Project Decommissioning Operations Plan, Closure Option 6.1.1.2, Decontamination. This determination will be referenced in the appropriate PDSR prior to demolition.

The remaining units consist of three former secondary containment rooms for tank systems (which never were assigned a unit number) and seven former container storage rooms. The tank rooms are 3517, 3571, and 3573. Operating records including RCRA Contingency Plan Implementation Reports, Inspection logs dating back to 2001, Spill Occurrence Reporting Database dating back to 1990, and ECATS records dating back to 1997 were reviewed to determine the spill history. There have been 4 documented spills that were cleaned up immediately. Although these systems operated prior to 1990, radiological management practices required immediate cleanup in order to mitigate the spread of contamination. Given the material was considered hazardous mainly due to its corrosive nature, once the spills were cleaned up, no residual hazardous material would be expected. These areas have been visually inspected to confirm there is no staining or residues from hazardous or mixed waste. Rooms 1111 (unit 90.14), 1115 (unit 90.19), 3327 (unit 90.95), 3331 (unit 90.94), 3511 (unit 90.71), 3543 (unit 90.4), and 3567A (unit 90.8) were mixed residue container storage rooms. Operating records including Inspection logs dating back to 2001, Spill Occurrence Reporting Database dating back to 1990, and ECATS records dating back to 1997 were reviewed to determine the spill history for these rooms. Based on this review, there have been no spills from mixed residue containers stored in these rooms. All of these areas have been visually inspected to confirm there is no staining or residues from hazardous or mixed waste. The former mixed residue units listed above currently meet the clean closure criteria defined in the Building 371/374 Closure Project Decommissioning Operations Plan, Closure Option 6.1.1.1, Historical Knowledge Confirmation. This determination will be referenced in the appropriate PDSR prior to demolition.

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** 10-28-04 / 11:00

**Site Contact(s):** Chris Gilbreath, Randy Leitner, David Ward  
**Phone:** 303-966-7355

**Regulatory Contact:** Steve Gunderson, Denise Onyskiw, David Kruchek, Harlan Ainscough  
**Phone:** 303-692-3367

**Agency:** CDPHE

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**Purpose of Contact:** Closure of RCRA Unit 374.3, Room 3813

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## Discussion

Part X of the Rocky Flats Environmental Technology Site's RCRA Part B Permit, addresses closure of permitted storage units. As stated in section X.A INTRODUCTION "Closure of permitted RCRA units will be completed on accordance with this permit or the RCRA unit will be closed pursuant to RFCA". The "Building 371/374 Closure Project Decommissioning Operations Plan" (DOP) is the RFCA decision document governing the closure of Unit 374.1 Room 3813. The DOP refers to the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities, a RFCA decision document, for closure options.

The RCRA storage unit 374.1 includes Room 3813 (East dock) which is described in the 371/374 DOP appendix B on page B-4. The unit will be closed by the method described in the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities 5.1.1 Clean Closure Option #1. The performance standard includes a review of the RCRA Operating record, building files, and other documentation to demonstrate that hazardous or mixed waste was never spilled in the unit, or that if a release did occur it was adequately cleaned up and decontaminated. Additionally, a visual inspection of the units confirms the absence of hazardous or mixed waste stains and/or residuals.

Unit 374.1, Room 3813 was originally permitted in 1997 to be used for storage of hazardous, low-level mixed (LLM), and transuranic mixed (TRM) waste. The EPA codes stored in this unit included: D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D022, D028, D029, D034, D035, D043, F001, F002, F003, F005, F006, F007, F009, P030, P098, P098, P099, P103, P106, P109, U003, U008, U103, U108, U154, U226, U239. Although this area historically managed liquid waste, secondary containment pans were required for storage of all containers managing liquid waste. As a conservative measure, all of the secondary containment pans were disposed of as mixed waste. Building 371 personnel's review of the unit's inspection records dating back to 2001, and the Site Spill Occurrence DataBase and ECATS dating back to 1997, indicate that there were never any spills and/or releases within this unit. These records will be made available for your review at the facility upon request. In addition, a visual inspection of Room 3813 by Building 371 personnel verified the absence of hazardous or mixed waste stains and/or residues. As a result, this unit is considered "clean closed" in accordance with Section 5.1.1 of the RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities.

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**Contact Record Prepared By:** Randy Leitner

Contact Record 4/10/00  
Rev. 5/24/04

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Required Distribution:

M. Aguilar, USEPA  
S. Bell, DOE-RFPO  
B. Birk, DOE-RFPO  
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D. Foss, K-H 707/776/777  
S. Garcia, USEPA  
C. Gilbreath, K-H 771/774  
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Additional Distribution:

H. Ainscough, CDPHE  
D. Onyskiw, CDPHE  
D. Kruchek, CDPHE  
D. Ward, B371/374

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	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										
17	18.02	374	Granular Activated Carbon Treatment Unit	WITHDRAWN - Never installed	WITHDRAWN from Permit Modification #12 (12/7/94) - Proposed, but never existed; never subject to RCRA regulation	NA	NA		Mod #23 12/7/94	NA
20	18.05	374	GAC System Influent Storage Tank	WITHDRAWN - Never installed	WITHDRAWN from Permit Modification #23 (12/7/94) - Proposed, but never existed; never subject to RCRA regulation	NA	NA		Mod #23 12/7/94	NA
21	18.06	374								
97	42.15	374	Heat Exchanger Descaling Tank D-845							
98	42.23	374	Product Water Storage Tank T-808A	WITHDRAWN - Never used for haz. waste	WITHDRAWN 8/17/95 (ref. 95-DOE-08498).	NA	NA		ltr 8/17/95	NA
99	42.24	374	Product Water Storage Tank T-808B							
100	42.88	374	Tank D-155A							
101	42.89	374	Tank D-155B							
501	374.1	374	Container Storage, Rms. 3809 and 3810	PERMITTED - CLOSED per a RFCA decision document	RCRA stable 10/12/04. CLOSED per the 371/374 DOP by Decontamination. Contact record dated 12/21/04 with CDPHE approved closure.	12/21/04	DOP 3/26/01 last mod 12/8/04	AN	COR 8/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
502	374.1	374	Container Storage, Rm. 3813 (19)	PERMITTED - CLOSED per a RFCA decision document	RCRA stable 10/12/04. CLOSED per the 371/374 DOP by Administrative Closure. Contact record dated 10/28/04 with CDPHE approved closure.	10/28/04	DOP 3/26/01 last mod 12/8/04	AN	COR 8/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
503	374.3	374	Vacuum Filler & Sludge Solidification Process, Rms. 2804, 3803, 4805: Tank T-807 (42.87), Vent Scrubber	WITHDRAWN - Reclassified as a non-hazardous waste treatment unit	Not subject to RCRA regulation (vent scrubber gases not considered a solid waste)	NA	NA	58/19	NA	NA
504	374.3	374	Valve Vault 1 (40.50)							
505	374.3	374	Valve Vault 10 (40.59)	PERMITTED - CLOSED per the 1997 permit	Closed by removal on or before 7/28/05. CDD For Partial Closure Of Unit 374.3 (700 and 800 Area Process Waste Transfer System) submitted to CDPHE on 01/23/03 (03-RF-00038/03-DOE-00029) includes valve vaults 1 through 13 and the associated pipelines to the buildings (new process waste lines).	CSR 8/31/05	CDD 6/13/03		CSR 8/31/05	CSR 10/4/05
506	374.3	374	Valve Vault 11 (40.60)							
507	374.3	374	Valve Vault 12 (40.61)	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL on or before 7/28/05. Process Lines from VV-12 to VV-13 RCRA Stable per contact record between Steve Nesta and Harlen Ainscough dated 07/19/04. CDD For Partial E500/Closure Of Unit 374.3 (700 and 800 Area Process Waste Transfer System) submitted to CDPHE on 01/23/03 (03-RF-00038/03-DOE-00029) includes valve vaults 1 through 13 and the associated pipelines to the buildings (new process waste lines).	CSR 8/31/05	CDD 6/13/03		CSR 8/31/05	CSR 10/4/05
508	374.3	374	Valve Vault 13 (40.62)	PERMITTED - CLOSED per the 1997 permit	Process Lines from VV-12 to VV-13 RCRA Stable per contact record between Steve Nesta and Harlen Ainscough dated 07/19/04. PARTIAL CLOSURE. Closure Summary Report submitted on 06/26/03 (03-RF-00967). CDD For Partial Closure Of Unit 374.3 (700 and 800 Area Process Waste Transfer System) submitted to CDPHE on 01/23/03 (03-RF-00038/03-DOE-00029) includes valve vaults 1 through 13 and the associated pipelines to the buildings (new process waste lines). PARTIAL CLOSURE. CDD for partial closure of Unit 374.3 400 Area Process Waste System (02-RF-00783) signed by Steve Nesta and Joe Legare was submitted to CDPHE on 04/02/02. The 400 Area Process Waste Transfer System included in the CDD consists of the process waste line connecting VV 13 to VV 14, VV 14 through VV20, all process waste lines between VV14 and VV20, and all process waste lines originating from B122, B428, B443, B444, B447, and B460.	6/26/03	CDD 6/13/03		CSR 8/31/05	CSR 10/4/05

	A	B	C	D	E	F	G	H	I	J
1	Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
509	374.3	374	Valve Vault 14 (40.63)	PERMITTED - CLOSED per the 1997 permit	PARTIAL CLOSURE. Closure Summary Report submitted on 06/26/03 (03-RF-00967). CDD for partial closure of Unit 374.3 400 Area Process Waste System (02-RF-00783) signed by Steve Nesta and Joe Legare was submitted to CDPHE on 04/02/02. The 400 Area Process Waste Transfer System included in the CDD consists of the process waste line connecting VV 13 to VV 14, VV 14 through VV20, all process waste lines between VV14 and VV20, and all process waste lines originating from B122, B428, B443, B444, B447, and B460	6/26/03	CDD 5/24/02		CSR 6/26/03	CSR 10/4/05
510	374.3	374	Valve Vault 15 (40.64)			6/26/03				
511	374.3	374	Valve Vault 16 (40.65)			4/2/02				
512	374.3	374	Valve Vault 17 (40.66)			6/26/03				
513	374.3	374	Valve Vault 18 (40.67)			6/26/03				
514	374.3	374	Valve Vault 19 (40.68)			6/26/03				
515	374.3	374	Valve Vault 2 (40.51)	PERMITTED - CLOSED per the 1997 permit	Contact Record dated 08/14/04 between C.J. Friebth and David Kruchek (CDPHE) notes VV2 was RCRA clean closed however ground water intrusion is difficult. Debris would be removed and the bottom portion of the vault would be flow-filled too fix contamination. After flow-filling, the vault would be removed to the flow-fill. CDD For Partial Closure Of Unit 374.3 (700 and 800 Area Process Waste Transfer System) submitted to CDPHE on 01/23/03 (03-RF-00038/03-DOE-00029) includes valve vaults 1 through 13 and the associated pipelines to the buildings (new process waste lines).	CSR 8/31/05	CDD 6/13/03		CSR 8/13/05	CSR 10/4/05
516	374.3	374	Valve Vault 20 (40.69)	PERMITTED - CLOSED per the 1997 permit	PARTIAL CLOSURE. Closure Summary Report submitted on 06/26/03 (03-RF-00967). CDD for partial closure of Unit 374.3 400 Area Process Waste System (02-RF-00783) signed by Steve Nesta and Joe Legare was submitted to CDPHE on 04/02/02. The 400 Area Process Waste Transfer System included in the CDD consists of the process waste line connecting VV 13 to VV 14, VV 14 through VV20, all process waste lines between VV14 and VV20, and all process waste lines originating from B122, B428, B443, B444, B447, and B460	6/26/03	CDD 5/24/02		CSR 6/26/03	CSR 10/4/05
517	374.3	374	Valve Vault 3 (40.52)	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL on or before 7/28/05. CDD For Partial Closure Of Unit 374.3 (700 and 800 Area Process Waste Transfer System) submitted to CDPHE on 01/23/03 (03-RF-00038/03-DOE-00029) includes valve vaults 1 through 13 and the associated pipelines to the buildings (new process waste lines).	CSR 8/31/05	CDD 6/13/03		CSR 8/13/05	CSR 10/4/05
518	374.3	374	Valve Vault 4 (40.53)							
519	374.3	374	Valve Vault 5 (40.54)							
520	374.3	374	Valve Vault 6 (40.55)							
521	374.3	374	Valve Vault 7 (40.56)							
522	374.3	374	Valve Vault 8 (40.57)							
523	374.3	374	Valve Vault 9 (40.58)							
635	374.3A1	374	Waste Receiving & Neutralization Process, Rm. 2804: Tanks D-802 A (42.04), D-802 B (42.05), D-802 C (42.06), D804 A (42.50), D804 B (42.51), D-804 C (42.52), D-804 D (42.53), D-811 A (42.54), D-811 B (42.55), D-852 (42.69), D-875 (42.70), D-847, and D-851	PERMITTED - CLOSED per a RFCA decision document	Secondary containment CLOSED per 371/374 DOP by Decontamination, CDPHE approved in contact record dated 12/21/04. The following tanks have been CLOSED by removal when indicated: D-802A (9/27/04), D-802B (9/30/04), D0802C (9/29/04) D-804A (9/21/04) D-804B (9/30/04), D804C (9/30/04), D-804D (10/6/04), RCRA STABLE for tanks D-802 A/B/C, D-804 A/B/C/D, and D-811A/B per 03/17/04 CDPHE letter and email from David Ward dated 08/31/04. RCRA STABLE and quarterly inspections for Tank D-802A, D-802B, D-802C, D-804A, D-804B, D-804C, D-804D, D-811A and D-811B, CDPHE letter dated 3/17/04.	D-802A (9/27/04), D-802B (9/30/04), D-802C (9/29/04), D-804A (9/21/04), D-804B (9/30/04), D-804C (9/30/04) Containment 12/21/04	DOP 3/26/01 last mod 12/8/04	19	COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05

	A	B	C	D	E	F	G	H	I	J
1	Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
636	374.3A2	374	Acid Waste Neutralization Process, Rms. 3801, 2804, and 3805; Tanks D-843 (42.74), D-806 (42.73), D-807 A (42.71), D-807 B (42.72), D-808 (42.75), and D-942	PERMITTED - CLOSED per a RFCA decision document	Secondary containment CLOSED per 371/374 DOP by Decontamination, CDPHE approved in contact recorded dated 12/21/04. All the tanks and equipment in 374.3A2 have been CLOSED BY REMOVAL D-806(2/26/04), D-807A/B(3/4/04), D-808(3/1/04), and D942 (6/3/04). Tank D-843 went RCRA STABLE per 98-DOE-17097 (10/22/98); no approval ltr received from CDPHE, however, the tank was designated as RCRA Stable in Permit Mod #99-3, which was approved by CDPHE on 8/17/99; subject to quarterly inspections.	D-804D (CLOSED 10/06/04), D-806 (CLOSED 2/26/04), D-807 A/B (CLOSED 3/4/04), D-808 (CLOSED 3/1/04), D-942 (CLOSED 06/03/04) Containment 12/21/04	DOP 3/26/01 last mod 12/8/04	56 19 18	COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
637	374.3A3	374	Precipitation Process, Rm. 3801: D-813 (42.57), D-814 (42.58), D-815 (42.59), D-816 (42.60), D-817 (42.61), D-818 (42.62), D-819 (42.63), D-820 (42.64), D-821 (42.65), D-822 (42.66), D-823 (42.67), D-826 A (42.07), D-826 B (42.08), and Polishing Filter FL-831 (42.68).	PERMITTED - CLOSED per a RFCA decision document	Secondary containment CLOSED per 371/374 DOP by Decontamination, CDPHE approved in contact recorded dated 12/21/04. All tanks and equipment in 374.3A3 have been CLOSED by removal when indicated: D-813 (7/13/04), D-814 (7/13/04), D-815 (9/9/04), D-816 (9/9/04), D-817 (7/28/04), D-818 (7/28/04), D-819 (9/9/04), D-820 (9/9/04), D-821 (7/22/04), D-822 (9/9/04), D-819 (9/9/04), D-820 (9/9/04), D-821 (7/22/04), D-822 (9/9/04), D-822 (9/9/04), D-826A/B (9/7/04).	D-813 (7/13/04), D-814 (7/13/04), D-815 (9/9/04), D-816 (9/9/04), D-817 (7/28/04), D-818 (7/28/04), D-819 (9/9/04), D-820 (9/9/04), D-821 (7/22/04), D-822 (9/9/04), D-823 (9/9/04), D-826A/B (9/7/04), FL-831 (07/16/03), Containment 12/21/04.	DOP 3/26/01 last mod 12/8/04	18	COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
638	374.3A4	374	D-830 (42.11), D-832 (42.12), D-834 (42.13), D-876(42.16),	PERMITTED - CLOSED per a RFCA decision document	ADMINISTRATIVELY CLOSED. Equipment originally permitted but did no handle hazardous waste. See contract record between David Ward and James Hindman dated 10/17/03.	1/28/04	DOP 3/26/01 last mod 12/8/04		COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
639	374.3A4	374	Evaporation Process, Rms. 3810, 4814, and outside B374 Tanks D-827 (42.10), D-879 (42.18), T-802 (42.19), T-803 (42.20), T-804 (42.21), and T-805 (42.22)	PERMITTED - CLOSED per a RFCA decision document	Secondary containment CLOSED per 371/374 DOP by Decontamination, CDPHE approved in contact recorded dated 12/21/04. All tanks and equipment in 374.3A4 have been CLOSED by removal when indicated: The following tanks have been CLOSED BY REMOVAL: T-802(4/6/04); T-803(4/6/04); T-804(4/7/04); T-805(4/5/04) per update 5/29/04 by David Ward. NOTE: Tank D-879 Not subject to RCRA (see Contact record between David Ward and James Hindman dated 06/23/04).NOTE: Tanks D-827not subject to RCRA (see Contact record between David Ward and James Hindman dated 10/17/03). RCRA STABLE Tank D-827 RCRA Stable and subject to quarterly inspections per 11/07/02 letter from CDPHE to Randall Leitner. Tanks D-834, and D-876 are RCRA Stable per 05/29/02 contact record between David Ward and James Hindman.	D-879 and D-827 (Not Subject to RCRA); T-803 (CLOSED 4/6/04); T-804 (CLOSED 04/07/04); T-805 (CLOSED 04/05/04); Containment 12/21/04	DOP 3/26/01 last mod 12/8/04	57	COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05

	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										
640	374.3A5	374	Spray Dryer & Saltcrete Process, Rms. 2804, 3801, 3809, 4802, 4812; Tanks D-801 A (42.01), D-801 B (42.02), D-801 C (42.03), D-826 C (42.09), D-878 (42.17), D-883 A (42.27), D-883 B (42.28), D-884 (42.29); Spray Chamber W-803 (42.25); and Spray Dryer Bag house FL-803 (42.26)	PERMITTED - CLOSED per a RFCA decision document	Secondary containment CLOSED per 371/374 DOP by Decontamination, CDPHE approved in contact record dated 12/21/04. All tanks and equipment in 374.3A5 have been CLOSED by removal when indicated: D-801A (9/22/04), D-801B (9/23/04), D-801C (9/23/04), D-826C (9/2/04), D-878 (6/23/04), FI-803 (7/8/04); CDD submitted for unit on 10/16/00 (ref. ltr. 00-RF-02904 signed by Pam Arnold and Ty Vess. Closure Summary Report for Process Tank D-884 submitted on 01/26/01 (01-RF-00191), D-884 removed 12/00. Tanks D883 A&B CLOSED by removal 5/02; W-803 CLOSED by removal 5/16/04 per update 5/29/04 by David Ward. Request for RCRA STABLE and quarterly inspections for Tank D-801B,C & D sent to CDPHE 02/27/04 (04-RF-00256), approved letter date 3/17/04. Tank D-878, FL-803, and W-803	D-801A (9/22/04), D-801B (9/23/04), D-801C (9/23/04), D-826C (9/2/04), D-878 (6/23/04), FI-803 (7/8/04), Tanks D-844 (1/26/0); Tanks D883 A&B (May 12/21/04	DOP 3/26/01 last mod 12/8/04	18 19 21	COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
641	374.3A6	374	Vacuum Filter & Sludge Solidification Process, Rms. 2804, 4805, and 4807; Tanks D-812 (42.56), D-824 A (42.76), D-824 B (42.77), D-825 A (42.81), D-825 B (42.82), D-844 A (42.84), D-844 B (42.85), and D-848 (42.83); Drum Filter Basins FL-802 A (42.78) and FL-802 B (42.79); Sludge Dryer W-801 (42.80); Dry Sludge Hopper H-3; and Dry Sludge Conveyors CV-813A/B	PERMITTED - CLOSED per a RFCA decision document	Secondary containment CLOSED per 371/374 DOP by Decontamination, CDPHE approved in contact record dated 12/21/04. CLOSED by removal the following: H-3 (3/3/04), CV-813A/B (4/14/04), FL-802A/B (5/20/04), W-803 (6/24/04) RCRA STABLE for D-824A/B per CDPHE letter dated 03/17/04 and email from David Ward dated 08/31/04. The following tanks were CLOSED BY REMOVAL 5/29/04 Tanks D-825A/B(12/02/03) per email from David Ward; D-844A/B(11/12/03) per email from David Ward on 11/12/03; D-812(3/8/04) and D-848(3/29/04) per update 5/29/04 by David Ward.	Tanks D-844A and D-844B (11/12/03), Tanks D-825A and D-825B (12/02/03), CV-813 A/B (4/14/04), FL-802A/B (5/20/04), W-803 (6/24/04) Containment 12/21/04	371/374	58/19	COR 9/29/05	CR 12/21/04 PDSR 11/204 & 1/26/05
906	374.1	374	Container Storage Room 2804	Mixed Residue - CLOSED per a RFCA decision document	Activated on 5/27/04. RCRA stable on 10/12/04 and Closed by Decontamination, Option 6.1.1.2. (contact record 12/21/04)	12/21/04	371/374		COR 9/29/05	CR 5/9/05 PDSR 5/13/05

