

8/2/04

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 09/13/04 – 0724
09/09/04 – 1400 & 1545

Site Contact(s): C. J. Freiboth (KH) – (CJF-081)
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Agency: CDPHE

Meeting Attendance:	C. J. Freiboth, KH PM	Sam Garcia, USEPA
	David Kruchek, CDPHE	Mark Lutz, Gash
	R. Mentel, RFCSS	Karl Shuler, RFCSS
	G. Dreith, DOC	D. McCranie, DOE

Discussion

Building 447 (B447) is a structural steel building with an exterior skin of transite panels. These panels are non-friable, Category 2 asbestos containing materials (ACM) that must be removed prior to demolition of the facility. The overall plan is to remediate the friable ACM, beryllium and radiological contaminants in the building's rooms so that the exterior transite panels can be removed which supports demolition of the building structure.

On September 9, 2004, at 1400, during a Building 444 Complex focus meeting, a discussion was held with the State (Kruchek) regarding removing the transite panels from the Mezzanine (located in B447). Friable ACM has been removed from the room and the room has passed the final ACM air clearance sampling. Radiological surveys confirm that any removable radiological (rad) contamination is less than action levels. Beryllium sampling results were provided showing levels after pressure washing, after fixatives had been applied, and for post-fixative remediation.

On September 9, 2004, at 1545, following a walkdown of the Mezzanine, the State concurred that removing the panels exterior to the Mezzanine of B447 prior to structure demolition was the appropriate measure to be taken and could be initiated. This was based on the area being fixed so that there was no loose rad or beryllium contamination, and the beryllium and rad survey data indicating the contaminants of concern are below action levels. This concurrence is also based upon the facility taking appropriate measures to prevent release of beryllium and rad contamination to the environment while conducting all work activities, including:

- Sealing the northeast door and duct pass-through.
- Sealing the NW floor grating.

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- Sealing all perimeter (i.e., near the exterior walls) pipe passthroughs
- Applying fixative to structural frame surfaces that are exposed as the transite panels are removed.

On September 13, 2004, at 0724, during a telephone conversation with the State (Kruchek), the latest rad survey for removable contamination was provided, showing that the levels were below action levels.

The conversation included discussions related to ensuring that Section 3.8.1 of the RSOP for Component Removal, Size Reduction, & Decontamination Activities were addressed:

- (1) Relative Cost – N/A. The non-friable Category 2 transite must be removed before the structure can be demolished.
- (2) Structural Evaluation – Removal of the exterior transite panels from B447 poses no loss of integrity to the structural steel frame of the building.
- (3) Air Emissions – The areas of the Mezzanine that the CDPHE requested to be sealed were sealed. The area was cleared of friable ACM, and then fixed with Residlock, so that there is no removable radiological contamination. The elevated areas of beryllium contamination were fixed, so there are no beryllium emission concerns. The removal of the exterior transite panels should not result in the generation of additional dust, however, appropriate measures will be taken to prevent or minimize the potential for releases of contamination during this activity. These measures are discussed in the work package and include water spray in the work area to control dust. Personnel monitoring will be conducted during transite removal for asbestos. Radiological Control Technicians (RCT's) will monitor for rad contamination between the structural steel frame and the transite panels when they are removed.
- (4) Dust Generation – Transite removal should not result in the generation of additional dust, however, appropriate measures will be taken to prevent or minimize the potential for releases of contamination during this activity. These measures are discussed in the work package and include water spray in the work area to control dust. The potential for dust generation is low. Loose material has been removed, the area has been pressure washed. Panel removal is not expected to create any dust as the panels are unbolted during removal, instead of crushed or demolished.
- (5) Impacts to Surface Water – This activity will not impact surface or ground water, as large volumes of dust suppression (water) will not be used.
- (6) Impacts to Migratory Bird – A survey was conducted and the removal of these panels will not impact migratory birds or their nests.

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