

Best Available
Copy

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



Colorado Department
of Public Health
and Environment

October 1, 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 447 - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 447; Revision 0 dated September 21, 2004. This PDSR was received on October 1, 2004. We have provided comments and revisions have been made to this PDSR. Based on the information contained in this PDSR and revisions made, we are hereby approving the PDSR, as revised, for Building 447.

As stated in this PDSR, Building 447 is a Type 2 Facility and has not been completely decontaminated. Uranium contamination above unrestricted release levels remains in areas of Building 447, as well as in the soil, and will be removed as discussed in this PDSR. As also discussed, remaining uranium and beryllium contamination has been covered with a fixative and will be protected from release during demolition activities. However, fixing beryllium contamination is not considered to be the same as actual decontamination (removal). As such, areas with fixed beryllium contamination need to be properly identified, managed, and disposed. Since there are areas of the slab that will be greater than 3 feet below future grade, and will remain (as discussed in this PDSR), the location and level of beryllium contamination above 0.2 ug/100cm² and uranium contamination above unrestricted release levels that may remain and/or have been fixed on the concrete remaining, or remaining in the soil, must be properly documented in the Closeout Report. Neither concrete, nor other potentially recyclable material, with beryllium contamination above 0.2 ug/100cm² prior to application of fixative can be recycled and must be sent offsite for proper disposal.

As previously agreed, close-in air monitoring for possible beryllium releases will be performed during demolition of B447.

It is also our understanding that if process waste lines are exposed during the demolition of B447, they will be removed or filled with grout. These and other possible issues that may arise will be resolved utilizing the consultative process.

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: Gary Morgan, DOE
Dave Shelton, KH
Steve Nesta, KH
Administrative Records Building T130G

Mike Swartz, KH
Mark Aguilar, EPA
Sam Garcia, EPA

1/5-

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

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

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



Colorado Department
of Public Health
and Environment

October 7, 2004

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

RE: B447 Facility Disposition RSOP Notification

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your October 1, 2004 letter (received October 7, 2004) notifying us that the Facility Disposition RSOP and Component Removal RSOP, as well as the ER RSOP, will be utilized during the demolition of Building 447. We hereby agree that Building 447 may be demolished utilizing the Facility Disposition RSOP and Component Removal RSOP.

However, the information provided in the "Description of Planned Activities", Attachment 1 to this Notification does not sufficiently describe the processes or activities to be performed during demolition of B447, or to identify and protect the remaining contamination or prevent releases of contamination during demolition. As such, detailed work plans will need to be provided prior to initiating demolition activities. In addition, the 6-point analysis required in Section 3.8 of the Component Removal RSOP also needs to be provided prior to initiating demolition activities.

Rather than providing another letter, this information and other issues that may arise may be provided and discussed utilizing the consultative process, and resolutions captured in Contact Records.

It is also our understanding, as stated in our PDSR approval letter, that close-in air monitoring for possible beryllium releases will be performed during demolition of B447, as well as appropriate monitoring for possible radiological issues.

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: Gary Morgan, DOB
Mark Aguilar, EPA
Sam Garcia, EPA
Dyan Foss, KH
Administrative Records Building T130G

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nosta, KH
J. Mike Swartz, KH

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

October 4, 2005

Mr. John Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

RE: Closeout Report for Building 444 Cluster - Approval

Dear Mr. Rampe:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your letter, and the Closeout Report for Building 444 Cluster, dated August 8, 2005, and the additional information provided in your letter dated September 29, 2005. As stated in your September 29, 2005 response provided, the Building 444 Cluster includes B444, B445, B447, B448, B450, B451, and B455. Based on the information provided in these two documents, we are approving the Closeout Report for Building 444 Cluster.

Although we are approving this Closeout Report, we would like to clarify the final condition of the remaining B447 and B448 slabs. Although holes were not specifically punched through these slabs to disrupt the continuity of the slab, numerous holes/penetrations were generated during decontamination activities, especially in the B447 slab.

In addition, although the entire B447 slab is shown on the figure provided in your September 29, 2005 letter (Appendix 1 Article 7) to remain, it is stated in the discussion that the western end or basement of B447 has been removed. It is our understanding that the area removed would coincide with the removed process waste line as shown on this figure.

It is also our understanding, though not specifically stated, that all RCRA Units associated with the B444 Cluster have been appropriately dispositioned and closed.

If you have any questions regarding this correspondence please contact me at (303) 692-3328, or Harlen Ainscough at (303) 692-3337.

Sincerely,

David A. Kruchek
Acting Rocky Flats Oversight Unit Leader

cc: Richard Schassburger, DOE
Mark Aguilar, EPA
Steve Nesta, KH
Sam Garcia, EPA
Administrative Records - Mountain View

Karen Wiernelt, KH
Dave Shelton, KH
David Abelson, RFCLOG
Carl Spreng, CDPHE

ADMIN RECORD

115

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
7	6	447	Chip Drum Storage	INTERIM STATUS - CLOSED per 6 CCR 1007 3, Part 265	CLOSED in accordance with "RCRA Closure Plan, B447 Chip Cementation Storage Area (Unit 6) and Chip Cementation Treatment Unit (Unit 30). (9/27/96). Closure Certification signed 8/28/96 (ref. 96-DOE-07998).	CC 8/28/1996	5/3/96	CC 9/27/96 COR 8/8/05	PDSR 10/1/04 COR 10/4/05
29	30	447	Chip Cementation Treatment	INTERIM STATUS - CLOSED per 6 CCR 1007 3, Part 265	CLOSED in accordance with "RCRA Closure Plan, B447 Chip Cementation Storage Area (Unit 6) and Chip Cementation Treatment Unit (Unit 30). (9/27/96). Closure Certification signed 8/28/96 (ref. 96-DOE-07998).	CC 8/28/1996	5/3/96	CC 9/27/96 COR 8/8/05	PDSR 10/1/04 COR 10/4/05
30	31	447	Uranium Oxide Immobilization	WITHDRAWN - Never installed	WITHDRAWN 12/15/87 (see Section A of the 12/15/87 Part B Application).	CC 8/28/1996	5/3/96	CC 9/27/96 COR 8/8/05	PDSR 10/1/04 COR 10/4/05
39	02	447	Fabric Filtration Unit	INTERIM STATUS - CLOSED per a RFCA decision document	NOTE: RSOP Notification for Component Removal, Size Reduction and Decontamination Activities For RCRA Unit 39 and 40 Final Closure in Building 444/447 dated 01/14/03 (03-RF-00057) includes Unit 39.02 as an interim status unit to be closed under the RSOP. CLOSED BY REMOVAL (ref. GRK-270-97).	NA	NA	NA	NA
58						9/25/97	RSOP 2/8/05	COR 8/8/05	PDSR 10/1/04 COR 10/4/05
40	37	447	Holding Tank T-6	INTERIM STATUS - CLOSED per a RFCA decision document	CLOSED BY REMOVAL under Work Package T011828-117, and was packaged as low level mixed waste under waste stream number 444-31-102 into box number B06954. This IP-1 crate is in the process of being prepared for shipment to Material Stewardship for offsite disposal via Envirocare. Closure of Unit 40.37 will be deferred until the final closeout report for the 444 Complex. At that time, Unit 40 will be closed in its entirety.	tank - 3/2/05 COR 7/28/05	RSOP 10/7/04	COR 8/8/05	PDSR 10/1/04 COR 10/4/05
106	45	447	Original Uranium Chip Roaster, Rms. 32 & 502	IM/IRA - CLOSED per Work Plan for OU 15	CLOSED in accordance with "Final Phase I RFI/RI Work Plan for Operable Unit (OU) 15" (DOE 1993); Closure Certification signed 4/6/95 (ref. 01331-RF-95_4/28/95)	4/6/95	RSOP 10/7/04	CC 4/28/95	PDSR 10/1/04 COR 10/4/05
107	46	447	New Uranium Chip Roaster	WITHDRAWN - Never used for haz. waste	WITHDRAWN 12/15/87 (see Section A of the 12/15/87 Part B Application).	NA	NA	NA	NA

5/5

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	
40 Series 642	447	Sinks, sumps and ancillary equipment in rooms 31, 31A, 36, 401, 401A, 403, 405, 405B, 406B, 407, 420A, 420B, and 501	INTERIM STATUS - CLOSED per a RFCA decision document	CONDITIONAL APPROVAL OF CDD dated 09/25/02 (Joe Schieffelin) contains four conditions: 1) IWCP/engineering package to be provided to Division seven days prior to work; 2) Residual liquids are process liquids and not to be sent to B891; 3) non-RCRA decommissioning must be coordinated with Division; 4) Waiver of 180 day time limit for unit closure but a unit specific closure schedule must be submitted at least seven days prior to work. CDD submitted 01/09/02 (01-RF-02892)	Building COR submitted 7/28/05	CDD 9/25/02 RSOP 10/7/0405	COR 8/8/05	PDSR 10/1/04 COR 10/4/05	

5/5