



**Rocky Mountain
Remediation Services, L.L.C**
protecting the environment

Rocky Flats Environmental Technology Site
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April 27, 1999

Karan S North, Division Manager
Environmental Systems and Stewardship
Kaiser-Hill Company, L.L.C
Building T130C

**PHASE I SUMMARY REPORT FOR TANK AND ANCILLARY EQUIPMENT
SYSTEMS #1 AND #2 IN BUILDING 771 - TAH-031-99**

Pursuant to the RCRA Closure Plan for Interim Status Units (April 1998) (Closure Plan) and the Closure Description Document for Tank and Ancillary Equipment Systems #1 and #2 (98-RF-03702, Rev. 1), Rocky Mountain Remediation Services is submitted the attached Summary Report of Phase I RCRA Closure Activities for Tank and Ancillary Equipment Systems #1 and #2 in Building 771.

The summary report contains a description of major closure activities and a declaration that the tanks in these systems meet the requirements for the "RCRA Stable" condition

Please transmit this Summary Report to CDPHE at your earliest convenience. A draft letter to CDPHE is attached for your use

If you have questions, please contact me at 303-966-7652 or Tom Baker at 303-966-4329

Ted A Hopkins

Ted A Hopkins, Manager
Environmental Compliance

TCB dlu

Attachments (2)
As Stated

CORRES CONTROL		
LTR NO		
K-H Corres #		
99-RF-		
Originator Ltr Log #		
TAH- 031 -99		
DIST	LTR	ENC
BODEY E.D		
CARMEAN, C.H.		
CRAWFORD A.C.		
FINDLEY M.E.		
FITZ, R.C		
GUNN, L.A.		
HUGHES, F.P		
KASEN J.A.		
KORENKO M.K.		
LAW J.E		
MILLS S.H		
OVERLID T.W		
PATTERSON, J.W		
SUTTON S.R.		
TRICE, K.D.		
WHEELER, M.		
WOLF K.Z.	X	
WOLF H.C	X	
ARNOLD P.S.	X	X
BAKER T.C	X	X
BURKS D.	X	X
CATHEL R.L.	X	
HOPKINS, T.A.	X	
LANGLOIS, L.A.	X	X
MARTINEZ, G.L.	X	
URBAN D.L.	X	X
ADMIN RECORD	X	X
RMRS RECORDS	X	X
TRAFFIC		
PATS/T130G		
CLASSIFICATION		
UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		
AUTHORIZED CLASSIFIER		
SIGNATURE		
<i>Ted A Hopkins</i>		
Date 4/26/99		
IN REPLY TO RF CC NO		
ACTION ITEM STATUS		
q PARTIAL/OPEN		
q CLOSED		
LTR APPROVALS		
ORIG & TYPIST INITIALS		
TCB dlu		
RF-46469(Rev 1/99)		



ADMIN RECCRD
IA-B771-A-00037

DRAFT

DRAFT

DRAFT

99-RF-XXXXX
DOE # xxxxx

Mr Joe Scheffelin, Unit Leader
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

PHASE I SUMMARY REPORT FOR TANK AND ANCILLARY EQUIPMENT SYSTEMS #1 AND #2 IN BUILDING 771 - KSN-XXX-99

Dear Mr Scheffelin

Pursuant to the *RCRA Closure Plan for Interm Status Units (April, 1998) (Closure Plan)* and the *Closure Description Document for Tank and Ancillary Equipment Systems #1 and #2 in Building 771 (98-RF-03702, Rev 1)*, Kaiser-Hill Company, L.L.C is submitting the enclosed *Summary Report of Phase I RCRA Closure Activities for Tank and Ancillary Equipment Systems #1 and #2 in Building 771*

The Summary Report contains a description of major closure activities and a declaration that one of the tanks in this system meets the requirements for the "RCRA Stable" condition

If you have any questions, please contact Tom Baker of Rocky Mountain Remediation Services at 303-966-4329

Karan S North, Division Manager Date
Environmental Systems and Stewardship
Kaiser-Hill Company, L L C

cc
C Gilbreath - CDPHE
D Grosek - DOE, RFFO
T C Baker - RMRS
R L Cathel - RMRS
T A Hopkins - RMRS
R M Leitner - Savant Enterprises
C M Madore - Savant Enterprises
N C T Van Tyne - ICF Kaiser

Phase I Summary Report of
RCRA Closure Activities for
Tank and Ancillary Equipment Systems #1 and #2
in Building 771

U.S. Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No. CO7890010526

Confirmed and Approved by:



T C Baker, Environmental Compliance, RMRS

4/27/99
Date

Prepared by:



N C T Van Tyne, P E , Engineer/Scientist IV, IT Corp

4/27/99
Date

1.0 PURPOSE

This Summary Report for Phase I activities in the RCRA closure of Tank and Ancillary Equipment Systems #1 and #2 is a requirement of Section 1.2 of the Closure Description Document (CDD) for this system (98-RF-03702, Rev 1). The major features of this report include a declaration that the piping described in the document was removed as planned, a description of major closure activities and any deviations from those stated in the document, a copy of any newly-generated drawings and relevant analytical results, and a statement regarding whether the tanks included in this system have met the requirements of the "RCRA Stable" condition.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

All sections of process piping for Systems #1 and #2 indicated in the CDD, Figures 2-4, were removed under IWCP work package number T0097251 for System #1 and T0097310 for System #2. This removal was confirmed through pre-job and post-job walkdowns of the system. Approximately 230 feet of pipe and nine valves were removed from System #1 and approximately 108 feet of pipe and seven valves were removed from System #2.

Piping removal was accomplished by using a 4-wheel cutter inside a sleeve or T-sleeve to cut the pipe wall until separation was almost achieved. The cutter was then removed, the sleeve was taped, the pipe was manually separated, and the sleeve was closed in a pigtail formation to secure all pipe ends. Blind flanges were left at all Termination Points (TPs).

During piping removal, a dark-colored, wet sludge was discovered in a short section of pipe in the vicinity of tank T-44. The sludge was solidified in place using Absorbet™. The small amount of sludge present precluded analyses. The pipe waste stream, including the pipe section containing sludge, was characterized as non-hazardous, primarily because the amount of sludge present was de minimis relative to the mass of the pipe.

Other pipe sections were inspected visually by looking through them from one end while they were in the size reduction glovebox. No blockages were found in any of these sections and the pipe interiors appeared to be dry. All pipe sections were characterized as non-hazardous low-level waste and were placed into 55-gallon waste drums. Two drums were filled completely with piping sections from System #1 and one drum was filled partially with piping sections from System #2. All drums were transferred to approved storage areas.

During the tap and drain activity for System #1, nine 4-liter bottles were generated, for a total volume of 28.12 liters. The liquid was characterized with EPA codes D002 (corrosivity), D004 (arsenic) and D010 (selenium), based on analytical results for the liquid. Plutonium content reached a maximum of 0.0004 grams/liter, and uranium content was 0.03 grams/liter. The bottles were batched for processing in the Miscellaneous Waste Handling and Solidification Unit 774.3A (Bottle Box).

The tap and drain activity for System #2 yielded three 4-liter bottles for a total volume of 2.84 liters. The liquid was characterized with EPA code D002, based on analytical results. Plutonium content reached a maximum of 0.0018 grams/liter, while uranium content was approximately 0.0006 grams/liter. These bottles were also batched for processing into Unit 774.3A.

3.0 TANK STATUS WITH RESPECT TO THE "RCRA STABLE" CONDITION

Tanks T-35, T-36 and T-44 are currently included in the Idle Equipment Inventory with ID numbers 771-0018, 771-0017 and 771-0019, respectively. All three tanks now meet the requirements for the "RCRA Stable" condition as follows:

1. Each tank is empty of liquids and mobile sludges in that no additional liquid could be extracted from the tap on the drain line at the bottom of the tank during a period of five minutes of continuous pumping. There was no visual indication of additional residual material inside any of the tanks.
2. All process piping connected to the tanks has been removed, only the vent line remains connected.
3. The TP at the tanks have been sealed, so that no liquid can be re-introduced via piping.

These tanks will continue to be maintained per the requirements of the Idle Equipment Program. Current conditions for each tank will be recorded in the Idle Equipment Inventory as appropriate.

4.0 SUMMARY

The requirements of the CDD for Phase I activities in the RCRA closure of Systems #1 and #2 in Building 771 have been fulfilled as stated in the document. In addition, tanks T-35, T-36 and T-44 meet the requirements for the "RCRA Stable" condition, but will remain in the Idle Equipment Inventory and will follow its inspection requirements.