

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: February 4, 2004/ 3:00 p.m.

Site Contact(s): Carolyn Hicks
Phone: (303) 966-5773

Regulatory Contact: James Hindman
Phone: (303) 692-3345

Agency: CDPHE

Purpose of Contact: Approval of rinsate standard results for contingent closure of floors in Building 777 Rooms 437, 452, 462, and 483.

Discussion:

Building 776/777 personnel washed and rinsed floors in Building 777 Rooms 437, 452, 462, and 483. Rooms 462 and 483 were container storage areas that were part of RCRA Unit 777.1. Rooms 437 and 452 provided secondary containment for mixed residue piping and equipment. Rinsate samples were analyzed and compared to the closure performance standard in Section 4.5.1.1 of the B776/777 Decommissioning Operations Plan (DOP).

Four metals (antimony, cadmium, chromium, and lead) had levels above the RFCA Tier II action level but well below the RCRA Universal Treatment Standard for one or more rooms. The DOP states, "In the event the standard is not met, the LRA will be consulted to determine whether the results are protective of human health and the environment." A summary of the rinsate results was provided to Mr. Hindman on December 23, 2003 via email, with a request to evaluate if the results were adequately protective, given that the concrete will go to Nevada Test Site for disposal. On January 27, 2004, Mr. Hindman responded with two questions, which are addressed below.

1. Question: For rooms 462 and 483, why was the rinsate not analyzed for mercury or cyanide? These constituents are associated with waste codes D009, F006, F007, and F009, which were permitted for storage in these rooms. Perhaps these waste codes were not actually managed in these rooms?
Answer: A WEMS query showed that these codes have historically been stored in these two rooms. Mercury was omitted from the rinsate sample request by mistake, but all other RCRA floor rinsate samples run by the project have shown mercury at non-detect, and it is not expected to be a constituent of concern. Cyanide wastes were never generated in Building

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776/777, and stored waste from other buildings would have carried these codes based on the derived-from rule only (e.g., B374 bypass sludge). Further, Rooms 462 and 483 were not permitted to store liquids and the risk of a spill from stored solids is low.

2. Question: What were the hazardous waste codes associated with the mixed residue piping in Rooms 437 and 452?

Answer: F001 and F002. The piping is described in the 776 DOP, Appendix H, closure plans for sets 29, 34, 35, and 36.

On February 4, 2004, Mr. Hindman concurred that the areas in question have been closed, contingent on final disposition of the building by removal, as is required in the approved Demolition Plan for the facility. The waste will be managed as non-hazardous low-level debris for disposal.

Closure of these rooms completes closure of all RCRA units in Building 776/777 Areas 1 and 2, which are areas used for final survey purposes.

Contact Record Prepared by: Carolyn Hicks

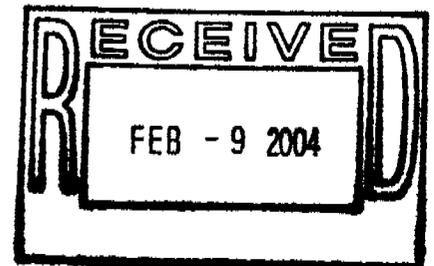
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