

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, 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

May 28, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of RCRA Tank Unit 887.2 in Buildings 881 and 887

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed your February 27, 2002 letter and the accompanying notification package received on March 1, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of the remaining portions of permitted RCRA Tank Unit 887.2 located in Buildings 881 and 887. RCRA Tank Unit 887.2 includes the following tanks: Tank T-183 (Unit 887.2A), Tank T-184 (Unit 887.2B), T-185 (Unit 887.2C), T-802A (Unit 887.2D), T-802B (Unit 887.2E), T-802C (Unit 887.2F), and T-802D (Unit 887.2G). RCRA Tank Unit 887.2 also includes secondary containment structures, ancillary equipment, and piping located in, and connecting the system between Buildings 887 and 881. We hereby formally agree that the appropriate activities described in the notification may proceed utilizing the Component RSOP, with the following conditions:

1. Section 2.1 within the notification documentation titled, "System Boundaries," states, "The boundary for this RCRA tank unit and ancillary equipment removal will be Valve Vault #1. It is assumed that the valve vault itself and the piping and equipment therein are not included within the scope of the RCRA closure activities described in this notification since the valve vault is not described further. Thus, closure and decontamination/demolition activities planned for the valve vault will be conducted under a separate closure description document or RSOP notification.
2. Unless it can be demonstrated that an impermeable coating was maintained in good condition on the concrete secondary containment in Building 887 throughout the life of the unit, the application of Clean Closure Option #3 under Section 5.1.1 of the Component RSOP will require verification sampling and analysis of the remaining concrete for hazardous waste constituents that were managed within Unit 887.2.

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3. It will be necessary to thoroughly evaluate the secondary containment in Building 887 for potential pathways (e.g., cracks, seams, etc.) for migration of contamination to the underlying soils. The results of this evaluation and the closure verification analysis of the remaining concrete (see condition #2 above) will need to be considered in determining whether or not additional soil sampling will be necessary.
4. It is stated in your letter that, "This work will be conducted in accordance with the work control documentation prepared by the subcontractor." The utilization of the approved Component RSOP includes the implementation of the work control process as provided therein. As such, the subcontractor's work control process must adhere to that described in the Component RSOP, or it must be shown to be equivalent. Any variation from the work control process as described and approved in the Component RSOP must be identified and appropriate rationale provided for our approval.
5. In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division. The certification of closure will need to be signed by the facility and by an independent Colorado registered professional engineer (P.E.) in accordance with the requirements of the approved Closure Plan and Section 264.115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed. Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P.E. will be involved in the closure process to the extent necessary to adequately certify closure.

As indicated in your letter, the consultative process must be utilized to keep us informed of the decommissioning strategy, planning, and activities for this project. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or James Hindman at (303) 692-3345.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: S. MacLeod, DOE-RFFO
S. Tower, DOE-RFFO
T. Rehder, EPA
K. Dorr, K-H
D. Foss, K-H RISS
F. Gibbs, K-H RISS
K. Kehler, K-H RISS
S. Nesta, K-H RISS
A. Rosenman, K-H
D. Shelton, K-H
D. Miller, AGO
Administrative Record, Building T-130G



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