

97 - RF -

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CARMEAN, C.H.		
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EDWARDS, J.D.		
FINDLEY, M.E.		
FITZ, R.C.		
GUINN, L.A.		
HUGHES, F.P.		
MCANALLY, J.L.		
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REED, A.B.		
TYSON, A.M.		
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**Rocky Mountain
Remediation Services, L.L.C**
... protecting the environment

Rocky Flats Environmental Technology Site
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Phone: (303) 966-2729
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October 28, 1997

John Wrapp
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

RESPONSE TO CDPHE INSPECTION OF OCTOBER 15, 1997 - GRK-319-97

On October 15, 1997, the Colorado Department of Public Health and Environment (CDPHE) conducted an inspection of Building 865. Building 865 is a RMRS managed facility, with Manufacturing Sciences Corporation (MSC) being the tenant that operates within the building.

There were six issues documented on the Notice of Inspection, dated October 15, 1997. The issues, the responsible company, and responses to the RMRS issues follow:

- The Led Plate No. 250 in Room 145 should be managed as a hazardous waste rather than an excess chemical. Any used oils that are in the same room should not be managed as "waste chemicals." This is a MSC issue.
- Mark containers of used oil per 6CCR 1007-3, Section 279.22 if they will be recycled or provide justification why they can not be recycled. This is a RMRS issue. **Response:** The containers of oil have been marked with the words "used oil." Furthermore, RMRS has researched this issue and is in the process of informing all Unit Custodians of this issue.
- The 2 drums of Ox-Out should be labeled as a hazardous waste, dated with an accumulation start date, and managed at a 90-day area. This is a MSC issue.

RMRS RECORDS	X	X
RF CORRES. CONTROL		
TRAFFIC PATS/T130G		
CLASSIFICATION:		
UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE:

John Wrapp

Date: 10/28/97

IN REPLY TO RF CC NO.:

ACTION ITEM STATUS:

PARTIAL/OPEN

CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

RF-46469(Rev. 1/97)

Best Available Copy

ADMIN RECCRD

IA-A-000451

- Provide an inventory and a hazardous waste determination with supporting justification for items in the permacon. This is a RMRS issue. **Response:** The items that are in the permacon were the subject of a CDPHE inspection that was conducted on October 16, 1996. In response to that inspection an inventory of the contents of the permacon was submitted to the CDPHE. A copy of that letter dated January 31, 1997 (reference GRK-050-97) and the associated inventory are enclosed as a portion of Attachment 1. The inventory lists all of the containers that were in the permacon. As noted on the inventory, all of the beryllium powder has been removed from the permacon. Additionally, a July 18, 1996, CDPHE Contact Record was utilized as supporting information for the hazardous waste determination. The final paragraph on page one of this Contact Record discusses the waste characterization rationale. The Contact Record is enclosed as a portion of Attachment 1. In summary all of the items in the permacon have some amount of beryllium contamination as well as a radiological component. All of the beryllium is in the form of slag; consequently, it is not hazardous.
- Provide a hazardous waste determination for the three drums on the south side of the building. This is a RMRS issue. **Response:** One of the drums contains a coolant that is a product and will be utilized by MSC. The other two containers are vacuum units that are fitted to 55-gallon drums. These units were utilized to remove oil, sludge, and metal turnings from equipment in Building 865. A 90-day area (number 865-2405) has been established for the storage of these units. A representative sample of the materials will be acquired and a hazardous waste determination will be made. This data will be forwarded to you.
- Provide an inventory for the cargo containers on the south side of the building. The Notice of Inspection indicated that this was a Kaiser-Hill issue. To support you in determining the contents of the cargo containers, I acquired the following identification numbers:

Cargo Number 2046380, DOE Property Number 00048141-00
Cargo Number 265084, DOE Property Number 00038303-00

RMRS is pleased to provide this information and requests that you forward it to CDPHE on or before October 30, 1997. If I can be of additional assistance in this effort please contact me at extension 2729.



Gary R. Konwinski
Environmental Manager

Attachment
As Stated

cc:
K. North, KH (w/o attachments)

ATTACHMENT 1



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

Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2729
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January 31, 1997

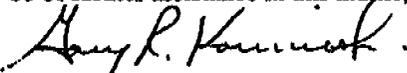
John Wrapp
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

Subject: INFORMATION FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT (CDPHE)-GRK-050-97

The CDPHE requested information associated with the method that was utilized to determine the waste characterization of painted masonry surfaces, the inventory of the Building 865 Permacon, and characterization data for the C&C lathe located in Building 444. The waste characterization method, associated with painted masonry surfaces, has been transmitted to your Mr. Shelton by way of RMRS cover letter dated January 30, 1997 (reference GRK-047-97). Consequently, that issue will not be further discussed.

The inventory for the Building 865 Permacon is attached to this letter. Additionally, the characterization of the oil residue that was observed to be in the C&C lathe catch pan, designated by sample number 97J1045, is attached. This piece of equipment has an idle equipment number of 444-0222. Additional information associated with the lathe is attached, on page 13 of the October 25, 1996 idle equipment print out. The analytical results indicate that the listed constituents of cadmium and lead were found to be present in this oil.

Please forward this information to CDPHE. Thank you for your prompt assistance in this matter. If I can be of further assistance in this matter, please contact me at extension 2729.


Gary R. Konwinski
RMRS, Environmental Manager

Attachments (3)
As stated

cc:
Asa Reed
Graeme Rankin
Bill McAndrew
RMRS Records
File

REVIEWED FOR CLASSIFICATION/UCNI

By B. M. Hoffmann (u/NU)
Date 1-31-97

Inventory of Room 172 in Building 865

The contents of the Building 865 Permacon (Room 172) were evaluated. An inventory of the contents of the room is shown below. It should also be noted that RMRS is in the planning phases of a program to remove all of the contents from Room 172.

Four containers that were transferred for the beryllium cell to Room 172. They are described as follows:

- 1) A plastic container containing a minimal amount of beryllium processing residue slag.
- 2) Three containers with approximately 40 kilograms of beryllium chips, each. Approximately half of the volume is a beryllium/salt slag mixture. The other half is a beryllium, salt, and uranium slag mixture.

Additional containers in Room 172 are as follows:

- 1) Blue cut-off drum, containing micron-master measuring equipment. Individual DOE property numbers are: 38245-00 and 38244-00.
- 2) Small gray can, which is empty.
- 3) Silver bucket, containing 2% beryllium oxide and trash.
- 4) Trash can, containing beryllium specification 65, a small gray container, beryllium contaminated tooling, white mold wash, and foil. The beryllium 65 has been removed from the room.
- 5) 30 gallon fiber-board drum, containing approximately 10 pounds of beryllium oxide powder.
- 6) 14 gallon fiber-board drum, containing approximately 10 pounds of beryllium crumbs.
- 7) Gray drum, containing a plastic bottle with approximately 20 pounds of 325-mesh beryllium powder. The beryllium powder has been removed from the room.
- 8) 30-gallon drum, containing approximately 25 pounds of beryllium fuel powder. Order number 58-2422, lot number R8212. This drum has been removed from the room.
- 9) Several small containers of beryllium chunks and beryllium flakes.
- 10) Several carbon molds. Former area employees indicated that these are unused molds.

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT/
ENVIRONMENTAL PROTECTION AGENCY CONTACT RECORD**

JFR-087-96

DATE: July 18, 1996

Site Contact(s): John Ross Jr., SSOC/LATA EXTENSION: 6150
 CDPH&E/EPA Contact: Cathy Alstatt, 692-3349 *J. Ross*
 AGENCY: Hazardous Material Compliance CDPH&E Division

REPORT ON BUILDING 865/NCPP ISSUES MEETING

Purpose of Contact: On July 18, 1996, a meeting was held with Cathy Alstatt, CDPH&E, in Building 865 to discuss issues related to building deactivation in support of the National Conversion Pilot Program (NCPP). Three important agreements were reached with the state:

- 1.) Safe Sites of Colorado (SSOC) personnel and the State came to a final agreement on characterization of wastes from the beryllium chloride (BeCl) Cell and planned the strip out as non-RCRA regulated.
- 2.) CDPH&E agreed that debris treatment for Building 865 and 883 tank system closure could be written into the closure plan.
- 3.) CDPH&E requested that closure plans for RCRA tank systems in Buildings 865 and 883 be submitted to the State with a commitment to complete closure by April, 1997.

Background: This meeting was a continuation of previous discussions regarding the BeCl Cell and risk reduction in support of NCPP. Alstatt requested a work breakdown and schedule by which the Cell could be remediated. Michael Klein prepared the requested information for this meeting.

Personnel Present:

Cathy Alstatt, CDPH&E
 Lou Eng, SSOC/LATA
 Karen Lavorato, Kaiser Hill
 Michael Klein, SSOC
 Ted Karas, SSOC/LATA
 Jim Newlan, SSOC

Michael Plankington, SSOC
 Michael Riendeau, Kaiser Hill
 John Ross, SSOC/LATA
 Mike Simmons, MSC
 Randy Walker, Kaiser Hill

Discussion: 400/800 Risk Reduction personnel provided Alstatt a status on activities related to the BeCl Cell including information on the recently revised operations order. Alstatt asked several questions about the operations order. Jim Newlan provided the necessary clarifications.

Michael Klein explained the work breakdown to Alstatt noting that dates had not been designated for specific activities; however, the duration of remediation could last up to eighteen months. Alstatt seemed concerned, indicating that drivers under the NCPP are requiring liabilities to be eliminated or reduced by April, 1997; the same time the phase three of NCPP is scheduled to begin. Alstatt indicated that such an extended schedule should be reviewed with the NCPP steering committee.

Alstatt and building personnel discussed the difficulties regarding remediation of the cell and obstacles preventing compression of the eighteen month schedule, including funding and characterization.

Alstatt questioned the current characterization of materials in the Cell as non-RCRA regulated. She was particularly interested in the characterization of the Be produced by the Cell. She indicated that this material may meet the definition of a Be commercial chemical product. Jim Newlan provided two containers on Be flake generated by the BeCl Cell and explained the difference between these samples and the powders purchased commercially for other operations in the building. Alstatt acknowledged this difference and indicated that she was not sure if regulations specified a particle size for Be powder being regulated as a P015 waste. After much discussion, Alstatt agreed that the wastes generated for remediation of the flake/product section of the Cell would not be RCRA regulated.

CDPH&E/EPA Contact Record

July 25, 1996

JFR-087-96

Page 2

Closure of the RCRA tank systems in Buildings 865 and 883 was also discussed. Alstatt indicated that the State is calling in the closure plans for these systems. She requested that John Ross determine a reasonable date by which the plans could be revised and to contact her by July 22, 1996 in order to commit to said date.

Mike Simmons, MSC, asked for clarification of closure and permitting requirements. He needed to know if the Carbon Dioxide Cleaning Cell would need to be permitted as a RCRA treatment unit. Alstatt stated that a treatment permit will not be required since CO₂ cleaning can be written into the closure plan as a Permit-By-Rule.

Actions: Determine a revision and transmittal date for the closure plans, and contact Cathy Alstatt by July 22, 1996. (John Ross)

It is also recommended that Kaiser Hill, Economic Conversion representatives, start working on funding for FY97, to ensure ability to fund closure of the tank systems and Cell remediation, and ensure communication of potential delays to the NCPP steering committee.

Please contact me at extension 6150 if you have any questions.

REQUIRED DISTRIBUTION**FOR ENVIRONMENTAL CONTACTS:**

Fax	Name	Company	Building
2865	T. R. Benton	WSI	T119B
3744	K. A. Holstein	DynCorp	T130D
8244	C. C. Jierree	RMRS	T130C
5001	K. North	K-H	T130F
7559	W.M. Wierzbicki	SSOC	T130A
3710	R. April	DOE, RFFO	116

ADDITIONAL DISTRIBUTION (Below are additional recipients of this contact record)

FAX:	Name:	Company:	Bldg.:
4016	R. H. Essig	SSOC	881
7326	T. M. Karas	SSOC	886A
2982	M. D. Klein	SSOC	779
6001	K. M. Lavorato	KH	130C
7326	L. A. Pasquini	SSOC	886
4016	H. B. Padron	SSOC	881
7326	S. C. Raish	SSOC	886
5713	M. S. Simmons	MSC	883
4845	P. W. Swenson	SSOC	117
5001	K. W. Ticknor	RMRS	130C
5001	J. K. Wrapp	KH	130C