



KAISER HILL COMPANY

OCT 14 2002

02-RF-02229

DIST.	LTR	ENC
BRALSFORD, M.D.		
FERRERA, D.W.		
FERRI, M.S.		
MARTINEZ, L. A.		
PARKER, A.		
POWERS, K.		
SCOTT, G.K.		
SHELTON, D.C.		
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N. R.		

AGUILAR, P.		
ALBIN, C.		
AUBLE, M.		
BEAN, C.		
BUTLER, J. L.		
CERCLA AR (T130G)	X	X
CLARK, D.		
DIETERLE, S.		
DORR, K.		
FRANCIS, M.		
FREIBOTH, C.		
SEIS, A.		
GIBBS, F.	X	X
SUTHRIE, V.		
HUMSTON, T.		
CEHLER, K.	X	X
MARSCHALL, J.R.		
MARTIN, D.		
MYERS, K.	X	X
NESTA, S.	X	X
NORTH, K.		
OLIVER, R.		
OWAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
ROSENMAN, A.	X	X
RYDER, D.P.	X	X
PENCE, T.		
VIEMELT, K.		
WILLIAMS, L.		
WENSON, P.	X	X
CORRES. CONTROL	X	X
ADMIN RECRD/T130G		
RAFFIC		
ATS/T30		

Steve Tower
D&D Program Lead
DOE, RFFO

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNITS 15 AND 35 CLOSURE
FEG-022-02

Attached is a draft transmittal letter to the Colorado Department of Public Health and Environment for the RSOP notification for RCRA Units 15 and 35 closure. The draft transmittal letter has been prepared from DOE building point of contact to CDPHE building point of contact; however, it could also be addressed from DOE RFCA coordinator to CDPHE RFCA coordinator.

Please contact Steve Nesta x6386 with questions or concerns.

Frank E. Gibbs

Frank E. Gibbs
Deputy Project Manager
Remediation, Industrial D&D, and Site Services

Attachments:
As Stated

CLASSIFICATION:

CNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

KLM:pvt

Orig. and 1 cc: - Steve Tower

AUTHORIZED CLASSIFIER SIGNATURE:

CC:
Joe Legare



site:
REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
 PARTIAL/OPEN
 CLOSED
LTR APPROVALS:

ORIG. & TYPIST INITIALS:
KLM:pvt

1/10

David Kruchek
Colorado Department of Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

**RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITIES NOTIFICATION LETTER FOR RCRA UNITS 15 AND 35 CLOSURE**

Mr. Kruchek:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its attachments is notification for RSOP implementation. This notification is for all activities required to close RCRA Units 15 and 35, as outlined in Section 5 of the RSOP.

Kaiser-Hill Construction or a decommissioning subcontractor will conduct this work. If Kaiser-Hill Construction or the subcontractor would like to use a method or process not included in the RSOPs then they are required to notify Kaiser-Hill. If Kaiser-Hill Construction or the subcontractor proposes to use alternate methods, an additional notification will be made and, in consultation with DOE/LRA, the RFCA process for decision document modification will be used.

The appropriate checklists and RCRA closure information required by the RSOP are attached to this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by Kaiser-Hill Construction or the subcontractor. The exact methods and process selected by Kaiser-Hill construction or the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings.

As indicated in the RSOP, the LRA has 30 days to review the RSOP notification letter and provide feedback, including a definitive reason for not proceeding with the project. If no feedback is received within 30 days, the project will proceed as planned.

If you have any questions regarding this, please contact me at (303) 966-2133.

Steve Tower
U.S. Department of Energy



RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Project scope: RCRA Unit closure of Units 15 and 35 (Interim Status)			
Facility description: Cargo containers and Tents 8, 9, 10, and 11 (including Permacon inside), located within fenced area on the 904 Pad. Tent 7 (also known as the 902 Pad). located ~250 feet west of the 904 Pad (collectively Unit 15) and the Tent 10 Permacon (Unit 35).			
Description of planned activity(ies): RCRA Unit Closure			
Facility/rooms/sets/areas involved: Unit 15: 23 Cargo Containers, Tents 7 – 11 (including the Tent 11 Permacon). Unit 35: Tent 10 Permacon			
Is RCRA unit closure(s) part of the planned activity?		<input checked="" type="checkbox"/>	Yes
If RCRA units are included, attach unit specific information sheets and drawings			No
Attach checklists from Appendix A of the RSOP. See RCRA Closure Information document attached.		Component Removal/Size Reduction	
		Decontamination	
RLCR Status	<input checked="" type="checkbox"/>	RLCR complete and concurrence received: for Group A Facilities (included Tents 10 and 11), 5/12/2000, and 904 Pad Closure Project (902 Pad and Tent 7, and 904 Pad and Tents 8 and 9), 1/30/2002.	
		RLCR initiated but incomplete; concurrence anticipated:	
		RLC has not been initiated¹ and is scheduled for initiation on:	
If RLCR is not complete or initiated, what data will be used to plan the work activities?			
Activity requires modification to the ARARs listed in the RSOP.			Yes, attach to letter
		<input checked="" type="checkbox"/>	No
Attach Administrative Record file requirements for the activity.			
Point of contact for each facility/activity: Pete Swenson (303) 966-7211			
Duration of work activities: 3 months		Anticipated work start: 11/8/02	
Attach schedule for each facility or activity for information purposes. Attached			
Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls			Yes, LRA consultation and concurrence required
		<input checked="" type="checkbox"/>	No

¹ Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Are there deviations/exceptions to the RSOP for the proposed activity (ies)?										<input type="checkbox"/>	Yes
										<input checked="" type="checkbox"/>	No
Provide an explanation of deviation/exception to the RSOP: Not applicable											
C. Check the appropriate resulting action box below											
Additional RFCA decision document required (PAM – IM/IRA)											
Major modification to RSOP						Field change to RSOP					
Minor modification to RSOP						LRA consultation					
Activity(ies) will result in the following waste types										Process waste	
										<input checked="" type="checkbox"/>	Remediation waste
TRU	<input checked="" type="checkbox"/>	LLW	<input checked="" type="checkbox"/>	LLMW		Haz.	<input checked="" type="checkbox"/>	Sanitary	<input checked="" type="checkbox"/>	Other: recyclable/re-use	
LRA Notification Review Time					14 days, no RCRA unit closure involved						
					<input checked="" type="checkbox"/>	30 days, RCRA unit closure involved					

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Administrative Record Requirements for this Activity

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Reports: Group A Facilities (included Tents 10 and 11), 5/12/2000, and 904 Pad Closure Project (902 Pad and Tent 7, and 904 Pad and Tents 8 and 9), 1/30/2002.
- Notification Letter and subsequent CDPHE correspondence, if appropriate

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INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5.0, Revision 0, February 4, 2001" addresses closure of RCRA regulated units.

This document applies to RCRA Unit 15 which includes Tents 8-11 and 23 cargo containers located on the 904 Pad, Tent 7 located on the 902 Pad, the Interim Status Unit 35 which is a Permacon located in Tent 10, and a Permacon located in Tent 11 that was used for chemical repack operations. Complete closure will be accomplished in accordance with one of the closure options outlined in the RSOP (Sections 5.1.1 – 5.1.3).

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to the start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

SYSTEM HISTORY AND WASTE CHARACTERIZATION

RCRA Unit 15 was originally two units comprised of RCRA Unit 15A - Cargo Containers and 15B the Tents 7 – 11. The unit was combined into Unit 15 and consists of the cargo containers and Tents 7 through 11, all of which are/were used as container storage areas throughout the life of the Unit. The EPA hazardous waste codes that apply to Unit 15 are D001-D043, F001–F009, F027, F039, P001-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066- U099, U101-U103, U105-U138, U140-U174, U176-U194, U196, U197, U200-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, and U404 based on the contact record between Site representatives and CDPHE, dated June 3, 2002.

The 904 Pad was originally used for storage of pondcrete and saltcrete in tri-walled boxes. The tri-walled boxes were designed for transportation and not long-term storage. However after delays in the ability to ship the waste offsite, in January 1990, Tents 7 –11 were constructed for the controlled storage of this low-level mixed and hazardous waste. In recent history the unit has been used for the storage of a variety of containers including drums and wooden and metal crates.

The Tent 10 Permacon, Interim Status Unit 35, was constructed to stabilize the low-level mixed (LLM) pondcrete and saltcrete wastes. Additionally, in approximately 1999, a Permacon in Tent 11 was incorporated into Unit 15 to repackage chemicals from around the Site.

On February 5, 2001, CDPHE approved a Closure Description Document for Partial Closure of RCRA Interim Status Unit 35. In a contact record with CDPHE, dated July 3, 2001, it was agreed that the modified partial closure work scope would include strip out of the pond sludge reprocessing equipment, packaging of the debris for disposal, and general clean out and decontamination of the Permacon. However, in an email from the project manager, dated July 30, 2002, it is stated that the Permacon was not decontaminated.

Cargo containers 1 through 5 and 29 through 34 were previously relocated to Unit 18.03 with verbal authorization from Mr. Joseph Schieffelin, CDPHE HMWMD. These cargoes will ultimately be closed under the closure of Unit 18.03.

A contact record between the RISS project and CDPHE, dated October 7, 2002, documented the clean closure of Tent 7. This portion of Unit 15 was closed in accordance with Section 5 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, which allows closure of a regulated unit prior to submittal of the required unit specific closure information, through the consultative process and concurrence of the LRA. The contact record invoked 5.1.1, Option 1, which requires that two criteria be met, a review of the Operating record to document no spills or releases and a visual inspection to verify the same. The tent and pad will subsequently be dismantled and removed; and will be managed as sanitary waste.

System Boundaries

The boundary of Unit 15 includes the remaining 23 cargo containers, Tents 8 –11, and Tent 7, which is located 250 feet west of the 904 Pad. The boundary of the unit is each tent and the immediate portion of the pad on which the tent is located. The cargo containers are considered weather structures with the secondary containment pans inside of the cargoes the actual boundary of the unit.

The boundary of Interim Status Unit 35 is the Permacon structure located inside of Tent 10, including any piping inside the Permacon and the ventilation system from the Permacon structure out to and including the HEPA filter.

Please see the attached Figure for the boundaries of the unit.

CLOSURE OPTIONS

Unit 15 – Tents (including Permacon in Tent 11)

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste was spilled to either the asphalt, which served as the secondary containment of the tents from 1991 to 1999, or to secondary containment pans used for liquids after 1999. However, the Operating Record also shows that all spills or releases were collected and cleaned up. The only area of Unit 15, that based on historical documents (in the 1988 timeframe), appears to have experienced spills or releases of pondcrete or saltcrete that were not appropriately cleaned up is the eastern edge of the 904 Pad. A visual inspection of the remainder of the unit's asphalt pad, by RISS Environmental compliance personnel, verifies the absence of hazardous or mixed waste stains and/or residuals. A small (5' x 10') area of staining was observed on a tent panel inside Tent 10, immediately north of door 10. A record review and visual inspection was also conducted for the Tent 11 Permacon, used for chemical repackaging, and considered part of Unit 15. There were no records of spills or releases inside the Permacon and the visual inspection verified no stains and/or residuals. Therefore, Unit 15 tents and their associated asphalt pads, and the Tent 11 Permacon structure will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, Option 1, which requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up and a visual inspection to verify the absence of stains and/or residuals. The tent and the Permacon structures will be removed and disposed of as either LL waste, non-routine sanitary waste or sold for reuse depending on if the tent and Permacon

structures meet the free-release criteria for radiological contamination. The asphalt pad will remain in place until Environmental Restoration (ER) conducts soil remediation in this area.

The only exception will be the easternmost edge of the 904 Pad including the asphalt berm, removed along its length (running south to north) for a width of about 5 feet to the west, and the lower section of the tent panel, approximately 5'x10' in Tent 10, at door 10. This portion of the pad and the tent panel will be closed by removal, with the EPA codes for pondcrete and saltcrete applied (F001, F002, F003, F005, F006, F007, and F009). The section of pad that is removed will be replaced by clean asphalt to ensure that any contaminated soil is not exposed to the environment.

Unit 15 – Cargo Containers

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste were spilled to the secondary containment of cargoes 9, 10, 11, and 21 from 1991 to the present. However, the Operating Record also shows that all spills or releases were collected and cleaned up. A visual inspection of the secondary containment pans, by RISS Environmental compliance personnel, verifies the absence of hazardous or mixed waste stains and/or residuals. Therefore, Unit 15 cargo containers secondary containment pans will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, Option 1, which requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up and a visual inspection to verify the absence of stains and/or residuals.

Interim Status Unit 35 (Inside Tent 10)

The Permacon will be closed by unit removal in accordance with section 5.1.3, and will include the Permacon structure and metal flooring, any interior piping and or structures that remain, and the ventilation system exterior to the Permacon up to and including the HEPA filter. The EPA codes for pondcrete and saltcrete will be applied to the waste generated (F001, F002, F003, F005, F006, F007, and F009), and the waste will be disposed of as LL mixed waste. All other exterior structures, including power, heat, and ventilation beyond the HEPA filter, are not considered part of the unit and will be removed using Site procedures for property disposition.

SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

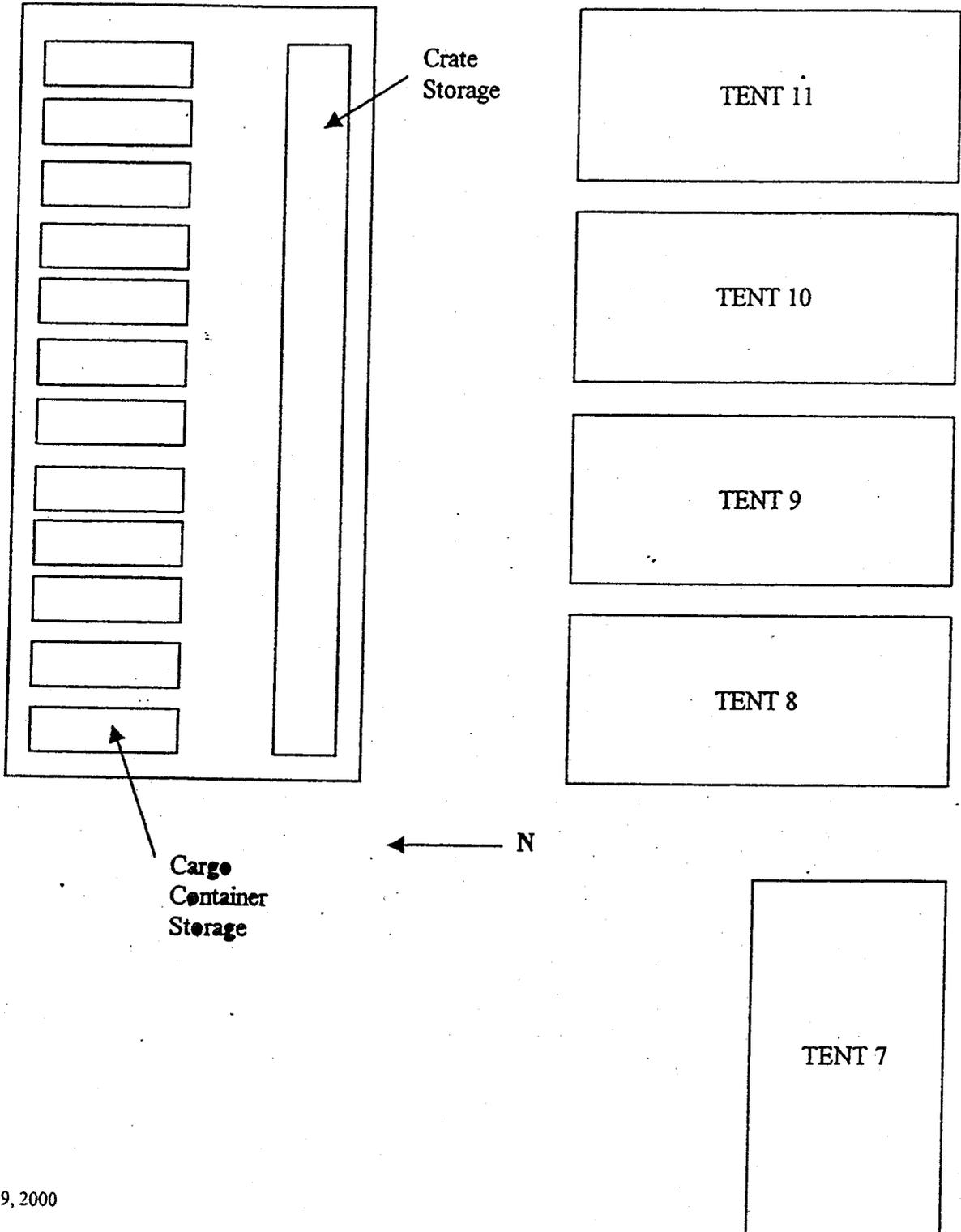
The Historical Release Report indicates radiological contamination of the soil exists due to possible activities conducted prior to the unit's construction. Soil sampling is not planned for activities conducted under this RSOP notification. ER will characterize the area after the 904 Pad tents are removed. Remediation of this site will depend on the characterization results. ER will perform any soil remediation under the *ER RSOP for Routine Soil Remediation*, however it is assumed that this will be a NFA site.

RECORDKEEPING

RCRA unit closure activities will be documented in the Decommissioning Final Closeout Report as opposed to the Pre-Demolition Survey Report (PDSR) which will be completed prior to demolition of the units. When final closure of units 15 and 35 is completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A and Part B Permit.

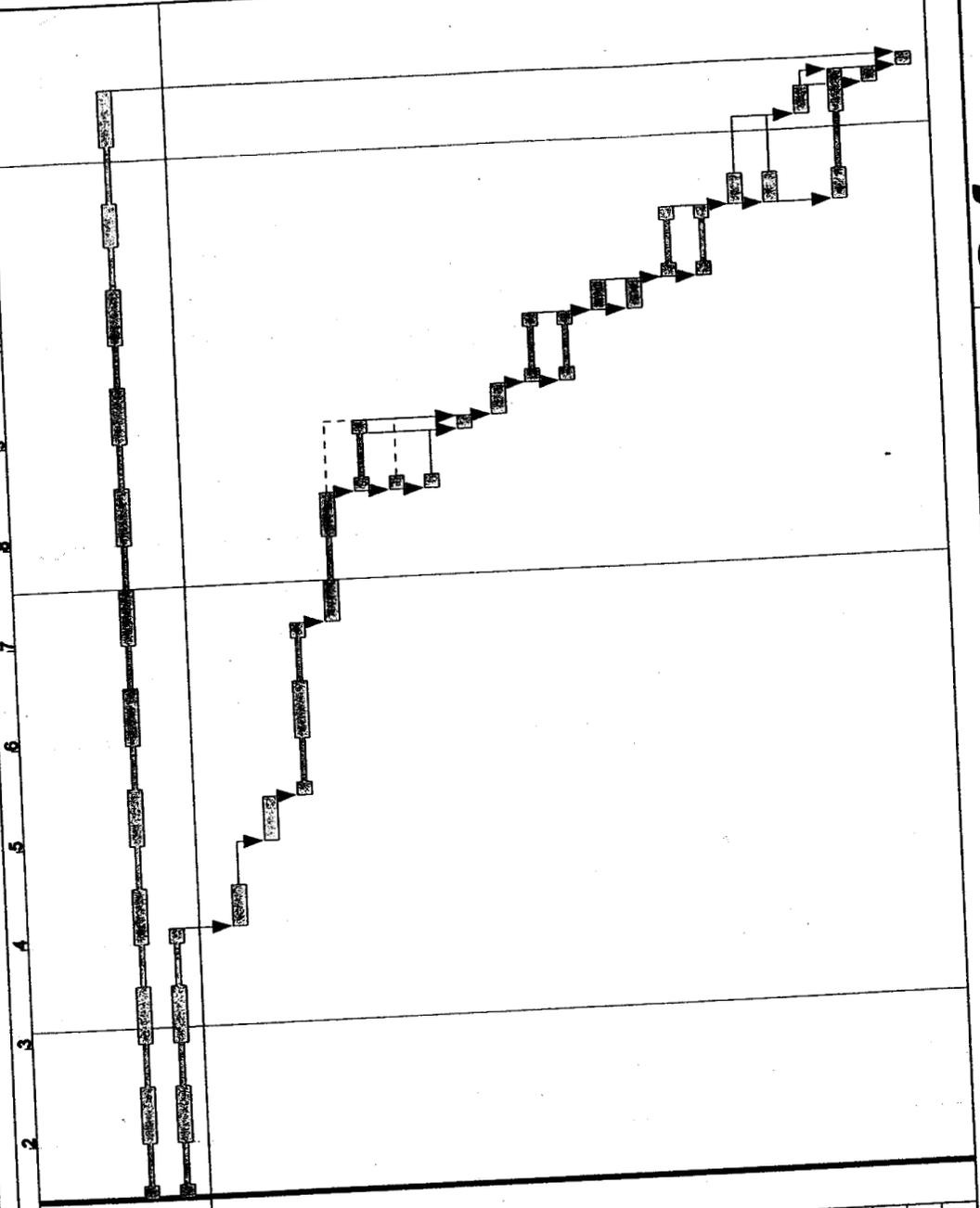
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RCRA Unit 15
(904 Pad)
Container Storage



May 19, 2000

Weeks 1 2 3 4 5 6 7 8 9 10 11 12 13



Activity ID	Activity Description	Orig Dur
904 Pad Demo Tents 7-11		
FTGE39005	904 Pad Demo Tents 7-11 Summary	44*
FTGE39015	Demo Plan	10
FTGE39030	Decon Permacon Tent 10	3
FTGE39035	Decon Permacon Tent 11	3
FTGE39040	Demo Permacon Tent 10	6
FTGE39045	Demo Permacon Tent 11	6
FTGE39020	Verify Cold & Dark, Remove Bulbs & Ballasts	2
FTGE39050	Install Demolition Barrier around Tent 7/T904A	1
FTGE39120	Post Signs Around Tents 7-11	1
FTGE39025	Mobilize Equipment	1
FTGE39055	Demo Tent 7	2
FTGE39060	Load out waste Tent 7	2
FTGE39065	Demo Tent 8	2
FTGE39070	Load out waste Tent 8	2
FTGE39075	Demo Tent 9	2
FTGE39080	Load out waste Tent 9	2
FTGE39085	Demo Tent 10	2
FTGE39090	Load out waste Tent 10	2
FTGE39095	Demo Tent 11	2
FTGE39100	Load out waste Tent 11	2
FTGE39110	Disconnect Tent Anchors	4
FTGE39105	Demo 904 Trailer	1
FTGE39115	Remove Demolition Barrier Around Tent 7/T904A	1

Safe PROGRESS
Safe PROGRESS
PLATE CLOSURE PROJECT
Kaiser-Hill

Issue: Rev. 40

Legend: Critical Activity

Sheet 1 of 1

**Kaiser Hill Construction
Estimates in Progress
Status as of 09/19/02**

© Primavera: .ems, Inc.

Start Date: 08AUG02
Data Date: 19SEP02
Run Date: 24SEP02 14:57

Legend:
 Early Bar
 Progress Bar
 Critical Activity

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