

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE  
REGULATORY CONTACT RECORD**

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**Date/Time:** April 7, 2003

**Site Contact(s):** Steve Nesta  
**Phone:** 303-966-6386

**Regulatory Contact:** James Hindman  
**Phone:** 303-692-3345

**Agency:** CDPHE

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**Purpose of Contact:** Answers to Mr. Hindman's questions concerning the Closure Description Document (CDD) that RISS submitted for closure of the 700 and 800 area RCRA Unit 374.3 valve vaults.

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**Discussion**

In the latter part of March 2003, Mr. Hindman sent an email with several questions concerning the CDD that RISS had submitted to CDPHE addressing the closure of RCRA Unit 374.3, Area 700 and 800 Valve Vaults. Following are his questions (bolded) and the project's responses to those questions.

**Here are my comments/questions on the Closure Description Document (CDD) for Partial Closure of Unit 374.3, the 700 and 800 Area Process Waste Transfer System:**

**1. The RISS decommissioning and demolition (D&D) schedule referenced in Section 1.2 of the CDD needs to be provided to the Division. The Division must be updated when changes in the RISS D&D schedule result in delays to the closure of the 700 and 800 Area Process Waste Transfer System.**



Valve Vault  
Schedule.pdf

Current Schedule is Attached.

**2. At the end of section 2.0 of the CDD, it states that pipeline segments will be excavated if their secondary containment has leaked resulted in contaminated soil. How will it be known as to whether or not secondary containment of underground pipes has leaked? How will these excavations be coordinated with ER since remediation of the surrounding soil may be necessary?**

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Leaks of secondary containment will be based on process knowledge, namely the operating record. The excavations will be coordinated with ER to ensure that soil is sampled and managed in accordance with site procedures. Specifically, pipes will be removed first and contaminated soil will be removed either simultaneously or later since it may be more efficient for ER to remove soil in a large IHSS after removal of the process piping and any structures that may still be in place (The 231 Tanks for example).

**3. Other hazardous wastes have been managed in the 700/800 Process Waste Transfer System, including several P-listed and U-listed waste chemicals that entered the system in Building 881. Additionally, it seems that there should be additional underlying hazardous constituents added to Table 3-1 (e.g., nickel). At a minimum this list needs to include all hazardous constituents that have been detected or are otherwise suspected to exist in the wastes that have been received at the wastewater treatment facility in Building 374 (Unit 374.3).**

Discussions with the Environmental groups from other facilities and specifically with Building 374 (letter 00-RF-02497, from Kaiser-Hill to CDPHE, dated August 31, 2000), confirm that less than 5 liters of wastes and wastewater with the following EPA waste codes were introduced into the 374.3 treatment unit: **P030, P098, P099, P106**, U002, **U003, U103, U108**, U117, U154, U161, and U213. Of these wastes, U002 (acetone), U117 (ethyl ether), U154 (methanol), U161 (methyl isobutyl ketone) and U213 (tetrahydrofuran) are listed solely for the characteristic of ignitability. As such, the rinsate will be sampled for the characteristic of ignitability to demonstrate clean closure for these constituents. For the remaining bolded P and U codes, analyses will be performed on the rinsate specific to these constituents or their surrogates to determine if clean closure has been obtained.

As for additional underlying hazardous constituents (e.g., nickel), Table 3 footnote states that for the "F" codes, the analytical results will be compared to the components applicable. That is why all of the potential underlying hazardous constituents were not listed on Table 3.

**4. Specify which portions of the Process Waste Transfer System are currently planned to be excavated without attempting decontamination. Based on records documenting the history of the Process Waste Transfer System, it appears that at least the following segments may not be amenable to in-situ decontamination since they have had releases and it appears they were taken out of service without being repaired: High Level Line between VV 8 and 9; and High Level Line between VV10 and VV11.**

The lines that will not be decontaminated include:

- The process waste lines between B887 and B881
- The high level line between VV10 and VV11. August 18, 1991, the primary line cracked and was never repaired.

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The data indicates that the secondary line between VV8 and 9 leaked groundwater in 1992 but there is no evidence that the primary lines leaked. Our plan is to jet the primary lines between VV8 and 9, the risk of the jetting process causing a leak in the primary line is minimal based on the successful jetting of 17 lines in the 400 area without breaching the stainless pipe.

**5. Based on records documenting the history of the Process Waste Transfer System, it appears that the secondary containment casing for the lines between several valve vaults and between VV-13 and Building 374 became contaminated due to breaches of the system or to the filling of a valve vault with waste water which then entered the secondary containment pipe. However, the records available do not indicate that these secondary containment lines were decontaminated. How will these segments, including their respective secondary containment, be closed?**

Based on the spill history (from the operating logs), the secondary containment pipes that are suspected of being contaminated in the 700/800 area are:

- the high level line between valve vaults 10 and 11 due to the August 18, 1991 high level line leak between Valve Vaults 10 and 11,
- The secondary containment for all four lines between valve vaults 11, 12, and 13 due to the reverse flow line leak in Valve Vault 12 (October 1989) that flowed between Valve Vault 12 and Valve Vault 11 and 12 and 13 via the secondary containment (either the pipes or the pipe chase).

For those secondary containment lines suspected of being contaminated the following options will be used for closure:

- dig it up (per conditions of 2 above), or
- introduce and sample rinsate to determine whether or not the secondary containment is contaminated.

If the secondary line is contaminated we have no way of cleaning the line with the current technology so we will dig the line up and dispose of as LLMW.

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**Contact Record Prepared By: Kim Myers**

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