

04-RF-00415



DIST.	LTR	ENC
DIETER, T.		
FERRERA, D.W.	X	
LINDSAY, D.		
LYLE, J.		
MARTINEZ, L. A.		
PARKER, A.		
PIZZUTO, V.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N. R.		

BEAN, C.		
BUTLER, J. L.		
DECK, C.		
FRANCIS, M.		
FREIBOTH, C.		
GEIS, A.		
GIBBS, F.	X	
HUME, J.		
HUMISTON, T.		
HUNTER, D.		
KNAPP, S.		
LINSINBIGLER, H.		
MARSCHALL, J.R.		
MYERS, K.		
NESTA, S.	X	X
O'BRIEN, J.J.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
RICHARDELLA, R.		
ROSENMAN, A.	X	X
SNYDER, D.P.		
SWARTZ, J.M.		
WIEMELT, K.	X	X
SELAN, J.		

April 15, 2004

04-RF-00415

Gary P. Morgan, Functional Lead
Cadre Project Management Division
DOE, RFPO

RSOP FOR COMPONENT REMOVAL, SIZE REDUCTION, AND
DECONTAMINATION ACTIVITIES NOTIFICATION LETTER FOR BUILDING 964,
INCLUDING RCRA CLOSURE FOR UNIT 24 - FEG-013-04

Attached is a draft transmittal letter to the Colorado Department of Public Health and Environment for the RSOP Notification for Component Removal, Size Reduction and Decontamination. Also attached is the Closure Description Document (CDD) for closing RCRA Unit 24. 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

CORRES. CONTROL	X	X
ADMIN RECRD/T130G	X	X
TRAFFIC		
PATS/130		

CLASSIFICATION:

UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

Attachment:
As Stated

AUTHORIZED CLASSIFIER

SIGNATURE:

Orig. and 1 cc - Gary Morgan

Date:

IN REPLY TO RFP CC NO.:

cc:
Joe Legare

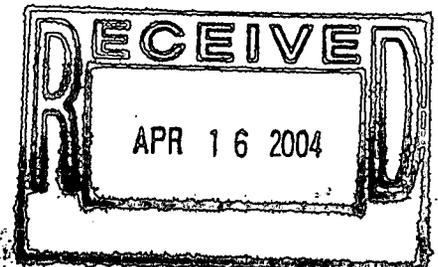
ACTION ITEM STATUS:

PARTIAL/OPEN
 CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

SMN: pvt



ADMIN RECORD

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 BUILDING
964, INCLUDING RCRA CLOSURE FOR UNIT 24**

Mr. Kruchek:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Procedure (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 bring Building 964 to the unrestricted release criteria. This will involve component removal, size reduction, and RCRA unit closure activities utilizing the methods specified in the RSOP. Included, as an attachment, is the Closure Description Document (CDD) for the closure of RCRA unit in Building 964 (Unit 24).

Once the pre-demolition survey is complete, and the facility meets the unrestricted release criteria, an additional notification letter will be prepared to implement the RSOP for Facility Disposition.

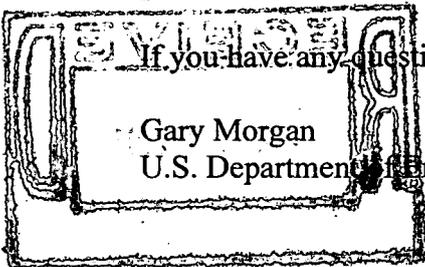
This work will be conducted by Kaiser-Hill or a decommissioning subcontractor. If Kaiser-Hill or the subcontractor proposes to use alternate methods, an additional notification will be made and, in consultation with DOE/LRA, the RFCA process for decision document modification will be used.

The appropriate checklists and 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 or the subcontractor. The exact methods and process selected by Kaiser-Hill or the subcontractor and progress of the activities will be communicated to DOE/LRA through the consultative process, particularly the monthly RISS production meetings.

Because RCRA closure is being conducted, 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.

Gary Morgan
U.S. Department of Energy



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

Are there deviations/exceptions to the RSOP for the proposed activity(ies)?											✓	Yes	
Provide an explanation of deviation/exception to the RSOP: Not applicable												No	
F. 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			
										✓		Remediation waste	
TRU	✓	LLW		LLMW		Haz.	✓	Sanitary	✓	Other: recyclable/re-use			
LRA Notification Review Time				14 days, no RCRA unit closure involved									
				✓									30 days, RCRA unit closure involved

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**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION
ACTIVITY CHECKLIST**

Building: RCRA Unit 24 (Building 964)

Closure Project Manager: Karen Wiemelt

COMPONENT REMOVAL/SIZE REDUCTION

Component Type	✓
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	
Walls	✓
Floors	✓
Ceilings	
Roofs	✓
Other structural members	
Other* Exterior metal shell of bldg leaving wood structure	✓

Removal/Size Reduction Technique	✓
Small tools	✓
Paving breaker, jackhammer and/or similar tools used to break up concrete	✓
Excavators, such as backhoes, to excavate underground components, such as tanks and ancillary equipment	✓
Hoists and cranes	
Plasma arc cutter	
Diamond wire saw	✓
Wachs cutter	
Laser cutter	
Oxy-torch cutter	
Hydraulic shears	✓
Shear baler	✓
Water cutter using abrasives	
Arc air slice	
Arbor press	
Non-explosive cracking agent	
Other *	

* Describe "Other" Component Type(s) and/or Removal/Size Reduction Technique(s):

Exterior siding determined to be LLW during radiological surveys will be removed

DECONTAMINATION

Component Type	✓
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	
Walls	✓
Floors	✓
Ceilings	
Roofs	✓
Other structural members	
Other*	

Decontamination Technique	✓
Wiping/scrubbing/washing with water or detergents	✓
Vacuuming	
Strippable Coating	
Grinding	
Scarifying	
Scabbling	
Paving breaker/chipping hammer	
Spalling	
Abrasive/grit blasting	
CO ₂ blasting	
High Pressure Water Spray	✓
Strong mineral acids	
Organic or weak acids	
Additional oxidants, such as cerium and other similar metals	
Other * shown below	✓

* Describe "Other" Component(s) and/or Decontamination Technique(s):

Note: In the event a planned activity falls outside the scope of this RSOP, the closure project manager will consult with DOE and the LRA to determine whether this RSOP should be modified to include the activity, or whether a separate decision document should be written.

Prepared by: _____

Date: _____

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

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 Report for Group Area 2 Group 1b Facilities (to be developed)
- Notification Letter and subsequent CDPHE correspondence

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Building 964 Demolition

Month	April	May	June
Week Ending	8 15 22 29	6 13 20 27	3 10 17 24
Perform PDS	—		
PDSR Approval	—		
Perform MC&A Scan	—		
Demolish 964 Building		—	

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**Closure Description Document for the
Closure of Unit 24
The Mixed Waste Storage Area at B964**

U.S. Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No. CO7890010526

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Attachments:

Attachment 1 Drawing of the PA Decontamination Pad Area

Attachment 2 Site Map

1.0 INTRODUCTION

1.1 Purpose and Scope

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Procedure (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 24. Unit 24 includes the entire B964 facility. Complete closure will be accomplished in accordance with Option 3 of the closure options outlined in the RSOP.

Activities will be designed to achieve the clean 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.

1.2 Facility Contacts

The contacts for this closure activity at RFETS are:

Supervisor
RFPO Project Management
Rocky Flats Field Office
U.S. Department of Energy
10808 Highway 93, Unit A
Golden, CO 80403-8200
(303) 966-4765

Environmental Manager
Remediation, Industrial
D&D, & Site Services
Kaiser-Hill Company L.L.C
10808 Highway 93, Unit B
Golden, CO 80403-8200
(303) 966-6386

2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD

Unit 24 will be closed in accordance with Clean Closure Option #3 as presented in the RFCA Standard Operating Procedure (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities section 5.1.1. Option #3 states that a RCRA-regulated unit may be "clean closed" if a visual inspection of the unit confirms the absence of hazardous or mixed waste stains and/or residues after cleaning by an abrasive method. Radiological surveys must also be presented that verify surfaces are at or below unrestricted release levels.

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

Building 964 was originally constructed in the mid 1960s and was used for general storage by a variety of site construction contractors. In 1986 the structure was modified for use as RCRA permitted Unit 24. These modifications include the installation of a spill containment system and the application of an epoxy concrete sealant. Ramps were installed to allow movement of containers in and out of the secondary containment system.

Unit 24 was permitted to manage Low-level Mixed and Tru Mixed wastes. RCRA codes permitted were D002, D004, D006-D001, D034, F001-F003, F005-F007, and F009. The vast majority of waste materials stored at the unit were solids, and the limited amount of liquid wastes brought to the facility were always stored on metal containment pans. The area has been inspected weekly since inception.

3.1 System Boundaries

The boundary of Unit 24 includes the entire interior of Building 964. Please see the attached Figure for the boundaries of the unit, as well as the attached site map for the location of B964.

4.0 CLOSURE OPTIONS

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that spills of hazardous or low-level mixed waste have not occurred in B964. A visual inspection of the facility in its current state verified that there are no stains or residues from hazardous or mixed wastes. However, weekly inspection logs are only available from 1995 forward and it is known that the unit was used to store waste at least as early as 1989. The missing logs make administrative closure unacceptable, therefore, Unit 24 will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, Option #3. Option #3 requires that a RCRA-regulated unit may be "clean closed" if a visual inspection of the unit confirms the absence of hazardous or mixed waste stains and/or residues after cleaning by an abrasive method. In addition, radiological surveys must be presented that verify surfaces are at or below unrestricted release levels. However, Kaiser Hill intends to waste the concrete so "clean closure" is not sought, but rather debris status.

The interior floor of Unit 24 will be abrasively cleaned by high-pressure water spray. One-hundred Percent coverage will be achieved, and all rinsate will be contained and collected. After the floor has thoroughly dried, an inspection by RISS environmental compliance personnel will be performed and documented. A radiological survey performed as part of the Pre-Demolition Survey Report (PDSR), and will be used to support the closure of Unit 24. After closure, the slab of B964 will be managed as non-routine sanitary waste (NRSW) and handled with other non-regulated portions of the building.

5.0 Disposition of Closure Wastes

In addition to the NRSW, the only other waste created during this effort will be the rinsate. The rinsate water will be characterized and dispositioned accordingly.

6.0 RECORDKEEPING

The following closure records will be maintained on Site during closure activities, and at a federal repository for a minimum of 30 years following the report of closure:

- 1) this Closure Description Document;
- 2) documentation that closure was conducted in accordance with the closure plan; and
- 3) unit inspection records

7.0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT

In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

8.0 REFERENCES

- 1) Rocky Flats Environmental Technology Site RCRA Permit, May 5, 1998
- 2) Rocky Flats Cleanup Agreement (RFCA), July 19, 1996.
- 3) Rocky Flats Environmental Technology Site RFCA Standard Operating Procedure for Facility Component Removal, Size Reduction, and Decontamination Activities, February 4, 2001.

ATTACHMENT 1
Drawing of the Unit 24 Boundaries

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Best Available Copy



Permitted Hazardous/Mixed Waste
Storage Areas

Unit MS 001, Sub-Unit 24
Building 964

February 28, 2003

III-24

ATTACHMENT 2

Site Map

**Rocky Flats Environmental
Technology Site
Permitted RCRA Units**

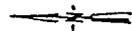
EXPLANATION

- Standard Map Features**
- Buildings and other structures
 - Solar evaporation ponds
 - Fences and other barriers
 - Paved roads
 - Dirt roads

NOTE:

Unit 1	Unit 2	Unit 3	Unit 4	Unit 5	Unit 6	Unit 7	Unit 8	Unit 9	Unit 10	Unit 11	Unit 12	Unit 13	Unit 14	Unit 15	Unit 16	Unit 17	Unit 18	Unit 19	Unit 20	Unit 21	Unit 22	Unit 23	Unit 24	Unit 25	Unit 26	Unit 27	Unit 28	Unit 29	Unit 30	Unit 31	Unit 32	Unit 33	Unit 34	Unit 35	Unit 36	Unit 37	Unit 38	Unit 39	Unit 40	Unit 41	Unit 42	Unit 43	Unit 44	Unit 45	Unit 46	Unit 47	Unit 48	Unit 49	Unit 50	Unit 51	Unit 52	Unit 53	Unit 54	Unit 55	Unit 56	Unit 57	Unit 58	Unit 59	Unit 60	Unit 61	Unit 62	Unit 63	Unit 64	Unit 65	Unit 66	Unit 67	Unit 68	Unit 69	Unit 70	Unit 71	Unit 72	Unit 73	Unit 74	Unit 75	Unit 76	Unit 77	Unit 78	Unit 79	Unit 80	Unit 81	Unit 82	Unit 83	Unit 84	Unit 85	Unit 86	Unit 87	Unit 88	Unit 89	Unit 90	Unit 91	Unit 92	Unit 93	Unit 94	Unit 95	Unit 96	Unit 97	Unit 98	Unit 99	Unit 100
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Scale = 1:7730
1 inch represents approximately 644 feet



Scale = 1:7730
1 inch represents approximately 644 feet



Site Name Coordinates Projection
Control Chart Zone
Datum: NAD83

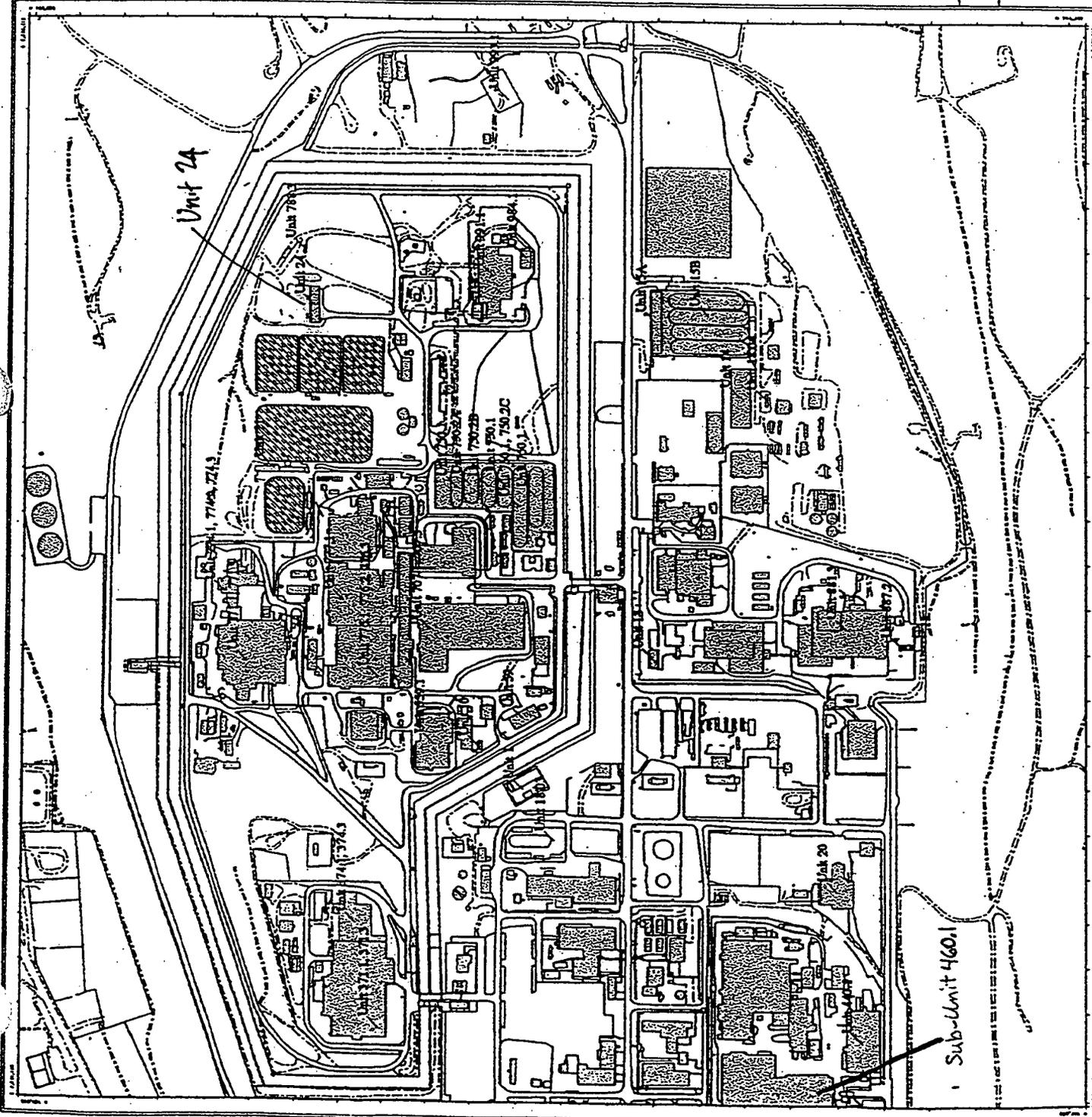
U.S. Department of Energy
Rocky Flats Environmental Technology Site



Rocky Mountain
Remediation Services, LLC
10000 Industrial Center Drive
Boulder, Colorado 80504
Tel: 303.440.1000

MAP ID: 04-0768

February 21, 1996



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