

CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER # 4700.1

04-RF-00768



Rocky Flats Environmental Technology Site

AUG - 3 2004

04-RF-00768
04-DOE-00532

DIST.	LTR	ENC
METER, T.		
ERRERA, D.W.	X	
JINDSAY, D.		
YLE, J.		
MARTINEZ, L.A.		
PARKER, A.		
WZZUTO, V.		
SHELTON, D.C.		
SPEARS, M.S.		
FUOR, N. R.		
BEAN, C.		
BUTLER, J. L.		
DECK, C.		
FRANCIS, M.		
FREIBOTH, C.	X	
GEIS, A.		
GIBBS, F.	X	
HUME, J.		
HUMISTON, T.		
HUNTER, D.		
KNAPP, S.		
LINSINBGLER, H.	X	X
MARSCHALL, J.R.		
MYERS, K.	X	X
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	
SELAN, J.		

Ms. Joyce Williams
Permitting and Compliance Unit Leader
Federal Facilities Program
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

CLOSURE DESCRIPTION DOCUMENT FOR CLOSURE OF RCRA PERMITTED CONTAINER STORAGE UNIT 20 IN BUILDING 664 - SMN-031-04

Dear Ms. Williams:

Pursuant to the Rocky Flats RCRA Part B Permit (June 1997), Kaiser-Hill Company, L.L.C. and the United States Department of Energy, Rocky Flats Project Office (DOE, RFPO) are submitting this Closure Description Document for the RCRA Permitted Container Storage Unit 20 in Building 664, which is anticipated to begin in September 2004.

The Closure Description Document contains a description of the system to be closed, the selected method of closure, the types of contamination to be addressed, and the schedule for closure activities. We request approval of the Closure Description Document within 30 days of receipt.

If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation, Industrial D&D, & Site Services (RISS) at 303-966-6386.

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

CLASSIFICATION:	
UCNI	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE:

Stephen Nesta 7/20/2004
Date

Joseph A. Legare 7/26/04
Date

Date:
IN REPLY TO RFP CC NO.:

Stephen Nesta
Environmental Manager
Remediation, Industrial D&D, & Site
Services
Kaiser-Hill Company, L.L.C

Joseph A. Legare
Director
Project Management Division
Rocky Flats Project Office
U.S. Department of Energy

ACTION ITEM STATUS:
 PARTIAL/OPEN
 CLOSED

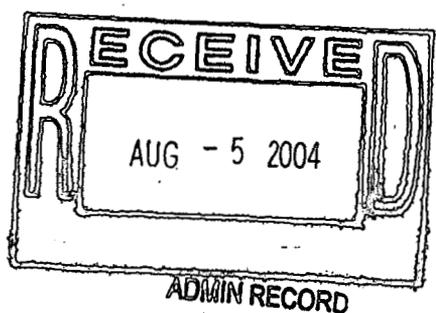
LTR APPROVALS:

ORIG. & TYPIST INITIALS:
KLM:pvt

KLM:pvt

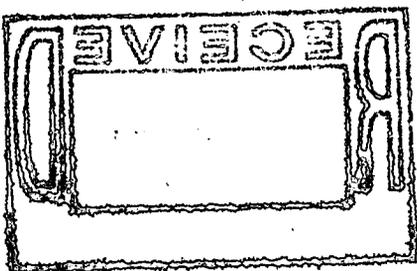
Attachment:
As Stated

cc:
G. Morgan, RFFO
H. Ainscough, CDPHE



**Closure Description Document
For RCRA Permitted Container
Storage Unit 20 in Building 664**

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



1.0 INTRODUCTION

1.1 Purpose and Scope

Part X of the Rocky Flats Environmental Technology Site's (RFETS) RCRA Part B Permit, addresses closure of permitted storage units. Closure of the storage unit is subject to the Closure Plan, as described in Part X, and to a subsequent Closure Description Document (CDD) that identifies the portions or sections of the Closure Plan that are applicable to the specific permitted unit closure.

This Closure Description Document applies to Unit 20 (includes rooms 100, 110, and the Highbay) in Building 664. The majority of RCRA hazardous waste stored was solid; however, secondary containment pans were used for storage of any liquid RCRA hazardous waste packaged in drums. Closure of this unit will be an administrative closure.

1.2 Unit Closure Notification and Schedule

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to conduct closure of the unit identified in Section 4.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this unit are expected to be scheduled to start after September 1, 2004; and are tied to the Site closure baseline. The identified closure activities are expected to be completed within 180 days.

Within 30 days after completion of closure activities a summary report will be submitted to CDPHE containing details about the closure of the unit.

1.2 Facility Contacts

The contacts for closure activities at RFETS in the Remediation, Industrial D&D, & Site Services project are:

Director
Project Management Division
Rocky Flats Project Office
U.S. Department of Energy
10808 Highway 93, Unit A
Golden, CO 80403-8200
(303) 966-2282

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

The RCRA Storage Unit 20 in Building 664, described herein will be closed by the method described in the Permit Part X.D.1.a. Clean Closure Option 1. The performance standard is a review of the RCRA Operating record, building files, and other documentation to demonstrate that hazardous or mixed waste was never spilled in the unit, or that if a release did occur it was adequately cleaned up and decontaminated. Additionally, a visual inspection of the unit confirms the absence of hazardous or mixed waste stains and/or residuals. All secondary containment pans will be closed under the "Clean Debris" rule.

TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	Purpose and Scope	1
1.2	Unit Notification and Schedule	1
1.3	Facility Contacts	1
2.0	METHOD OF CLOSURE AND PERFORMANCE STANDARD	1
3.0	SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION	2
4.0	SPECIFIC CLOSURE ACTIVITIES	2
4.1	Establish of System Boundaries and Scope of Removal	2
4.2	Preparation of Engineering and IWCP Work Packages	3
5.0	DISPOSTION OF CLOSURE WASTES.....	3
6.0	SOIL CONTAMINATION EVALUATION AND POST-CLOSURE CARE	3
7.0	RECORDKEEPING	4
8.0	AMENDMENT OF CLOSURE DESCRIPTION DOCUMENT	4
9.0	REFERENCES	4
	ATTACHMENTS	

inch of surface area." If the "clean debris surface" standard is not achieved, the debris will be managed as hazardous debris; otherwise the debris will be managed as sanitary or Low-level waste, depending on the radiological surveys. The independent professional engineer will certify documentation of the inspection.

Since a review of the Operating Record for the building indicated that there have not been spills and releases, from containers, to the facility floor, the floor will be inspected upon removal of all waste and closed administratively in accordance with Part X.D.1.a. Clean Closure Option 1, of the RCRA Permit.

4.2 Preparation of Engineering and IWCP Work Packages

A specific IWCP/engineering work package will be prepared for the closure activities. The RFETS Health and Safety Practices Manual defines general health and safety measures to be followed at the Site. Closure activities will be conducted in accordance with this manual, incorporating the results of job specific industrial and nuclear safety related evaluations and screens.

The IWCP/engineering work package and Radiological Work Permit will be used to control work, including specification of personal protective equipment, methods removal and size reduction, methods for containing any liquids or preventing releases to the environment, and waste packaging. As Low As Reasonably Achievable (ALARA) principles will be followed regarding personnel exposure to radiation.

5.0 DISPOSITION OF CLOSURE WASTES

It is anticipated that metal and rinse water wastes will be generated during closure activities. It is assumed that the Site waste management systems will be available to receive wastes generated by these closure activities. The liquids generated during the closure activities will be handled as addressed in Section 4.0.

The unit components which may be radioactively contaminated will be managed in accordance with the requirements of the RFETS Radiological Control Manual and Health and Safety Practices Manual, and will be packaged for disposal in accordance with applicable waste acceptance criteria. All debris from this system is expected to be sanitary waste, but if the closure standard is not met the waste will be characterized using this process knowledge and in accordance with applicable regulations.

Wipes, other combustibles used to immobilize free liquids and PPE will be managed as non-routine sanitary waste. All waste containers will be stored in an appropriate onsite storage area prior to offsite disposal.

6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE

Historical information shows no releases occurred to the soil, from the RCRA Storage Unit 20, nor is an IHSS or PAC associated with this unit. Closure activities for this unit is not expected to impact the soils surrounding Unit 20. Therefore, soil contamination will be evaluated as part of remediation activities under RFCA, and post closure care activities are not necessary as part of the closure of this unit.

3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION

This unit was originally permitted in 1996 (Permit Modification 48) to include rooms 100, 110, and the High Bay Area that would be used for storage of hazardous, low-level mixed (LLM) and true mixed (TRM) waste. This CDD will serve as an administrative closure for Unit 20.

The storage unit consisted of the above-mentioned areas in Building 664, for storage of hazardous, LLM and TRM waste in drums and crates. The storage areas had secondary containment pans for the storage of any containers with liquid wastes (only in rooms 100 and 110). The EPA codes this unit was permitted to store include: D001-D011, D016-D019, D021, D022, D024-D030, D034-D041, D043, F001-F003, F005-F009, F027, F039, P002, P003, P005, P010-P012, P014-P016, P018, P022, P024, P027-P030, P045, P048, P051, P059, P062, P074, P076, P077, P087, P092, P093, P098, P101, P104-P106, P108, P113, P116, P119-P121, P123, U002-U004, U007-U009, U012, U018, U019, U022, U027, U028, U030, U031, U034, U036, U037, U041-U044, U047, U048, U050, U052, U053, U055-U057, U063, U067-U075, U077-U084, U088, U098, U101-U103, U105-U108, U112, U113, U116-U118, U120-U123, U127-U131, U133, U134, U137, U138, U140, U144, U147, U148, U151, U154, U158, U159, U161, U162, U165-U167, U169, U170, U173, U179, U188, U190, U191, U196, U197, U201, U202, U204, U207-U211, U213-U220, U222, U225-U228, U235, U236, U238-U240, U246, U328, U353, and U359. A review of inspection records, spill response records, ECATS, and other site records indicate that there have not been spills and releases, from containers, to the facility floor.

4.0 SPECIFIC CLOSURE ACTIVITIES

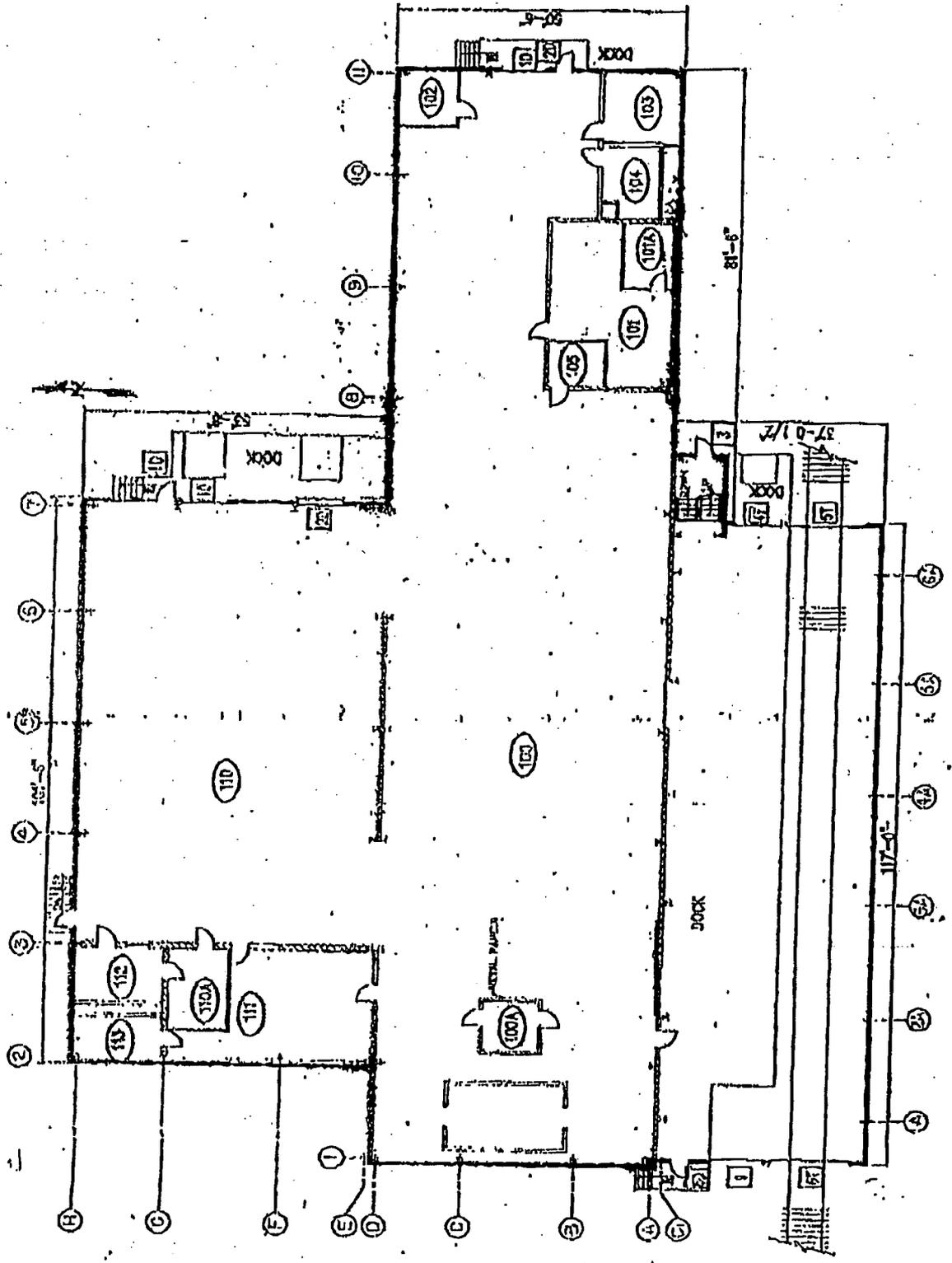
Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to start of closure activities. These instructions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

4.1 Establishment of System Boundaries

The boundaries for the RCRA unit includes rooms 100, 110, and the High Bay Area that were used for storage of hazardous, low-level mixed (LLM) and true mixed (TRM) waste. Any secondary containment pans will be rinsed with water and surfactant and the rinse will be collected and managed at one of the water treatment units available for wastewater management. After the rinsing of the containment pans is completed, vacuuming, wiping or other comparable physical means will remove any remaining residuals that may be generated during the decontamination effort.

After these steps have been completed, a Professional Engineer will perform a visual inspection against the "clean debris surface" standard, defined as "a surface that, when viewed without magnification, shall be free of all visible contaminated soil or hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discoloration, and soil and waste in cracks, crevices, and pits may be present provided that such staining and soil and waste in cracks, crevices, and pits is limited to no more than 5% of each square

Figure 2B-2 Building 664 Floor Plan



8/8

7.0 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:

- Record of sampling activities including type, number and date of samples;
- Analytical results;
- Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the RCRA Permit and this Closure Description Document;
- Records of the volume of waste generated during closure.

8.0 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.

9.0 REFERENCES

1. Code of Colorado Regulations, Vol. 6, No. 1007-3.
2. Rocky Flats Environmental Technology Site RCRA Permit, Part X: Closure, effective 6/30/1997.
3. Rocky Flats Cleanup Agreement, effective July 1996.

7