

Internal Memorandum

Date: December 10, 2003
To: Building Notification File: 367
From: Steve Nesta
Subject: ADDITIONAL INFORMATION FOR CLOSEOUT REPORTS

CDPHE has provided comments to DOE concerning Type 1 Closeout Reports. To address CDPHE's comments, this memorandum documents the additional information identified by CDPHE for Building 367.

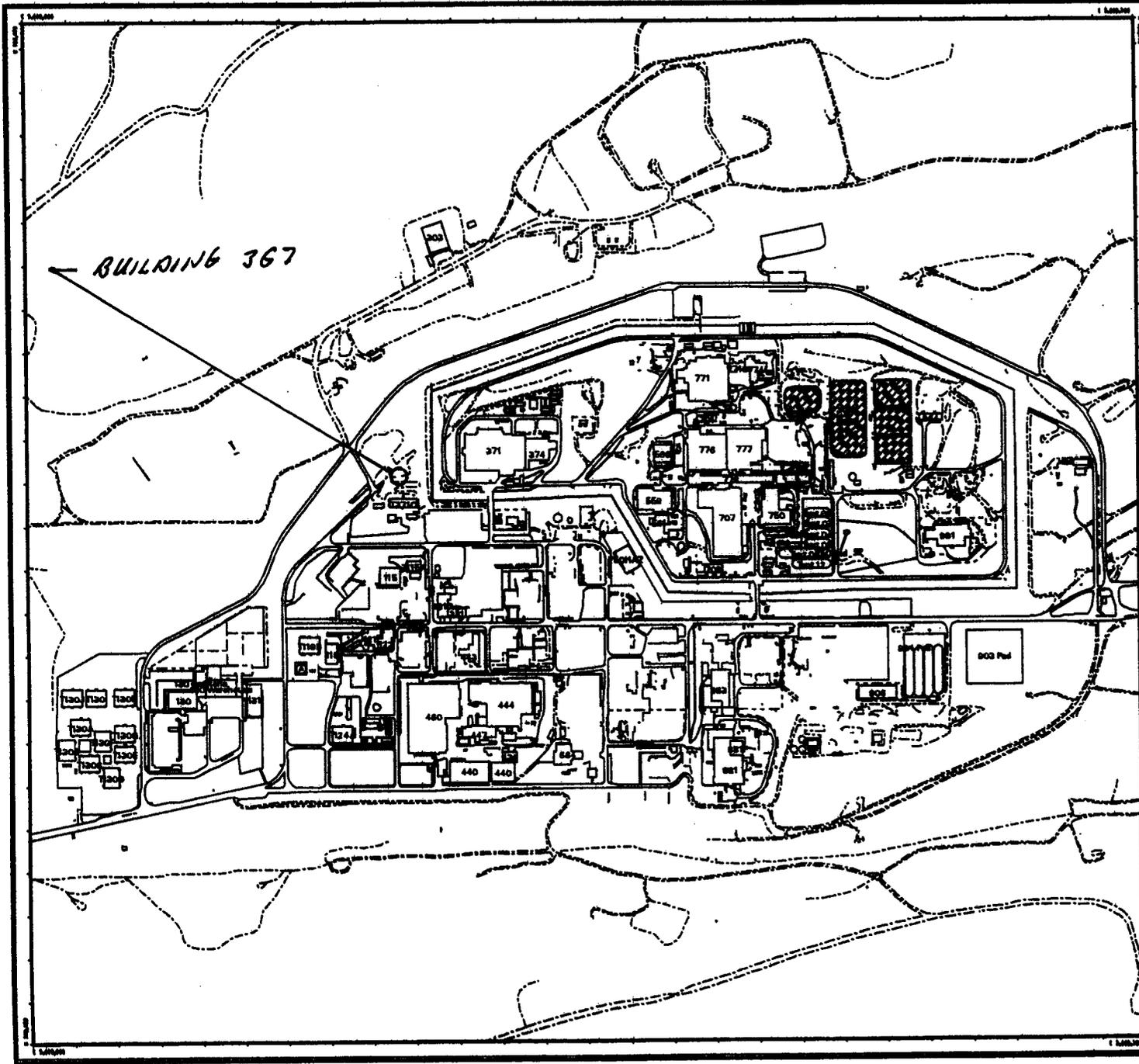
Building 367 (Type 1 Facility)

- Building 367 was a metal structure with concrete floor. This building had no utility connections. The above grade building debris and concrete floor were disposed of as sanitary waste.

Based on a review of the HSARs and facility walkdowns, there was no indication that the facility had been contaminated by RCRA/CERCLA constituents due to past operations or spills; therefore, RCRA/CERCLA constituents sampling was not performed in this facility. The concrete associated with this facility met the criteria for recycling concrete per the RFCA RSOP for Recycling Concrete. However, the Building 367 concrete floor did have a faint odor of pesticides, but there was no visual evidence of remaining product or stains. The decision was made to dispose of the concrete as sanitary waste instead of recycling.

- Building 367 was located directly north of Trailer 371C. Site restoration will be performed during the final land configuration for Rocky Flats.

See Attachment 1, RFETS Area Map, for former location of Building 367.



**Rocky Flats Environmental
Technology Site
Base Map**

Standard Map Features

-  Buildings and other structures
-  Solar Evaporation Ponds (SEPs)
-  Fences and other barriers
-  Rocky Flats Environmental Technology Site boundary
-  Paved roads
-  Dirt roads

DATA SOURCE BASE FEATURES:
Buildings, fences, paved roads, roads and other structures from 1994 aerial photo data acquired by ERDC/CSL, Las Vegas. Highlight from the orthorectified, 10S



Scale = 1 : 12450
1 inch represents approximately 1036 feet



State Plane Coordinate Projection
Colorado Central Zone
Datum: NAD27

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

Prepared by:



Prepared for:



December 10, 2003

NT_Srv_yr/map_catalog/base/base_ie_s-9129.dwg

RECEIVED

2004 JAN -5 P 1:52

STATE OF COLORADO

Revised 12/03

CORRES. CONTROL
INCOMING LTR NO.

00002 RF 03

DUE DATE

ACTION

DIST.	LTR	ENC
BERARDINI, J.H.	X	
BOGNAR, E.S.	X	
BROOKS, L.	X	
BUTLER, L.	X	
CARPENTER, M.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NESTA, S.	X	
NORTH, K.	X	
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WEMELT, K.		
WILLIAMS, J. L.		
ZAHM, C.	X	
Freiboth, C.	X	

Bill Owens, Governor
Douglas H. Benevento, Executive Director
CORRESPONDENCE CONTROL
Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

<http://www.cdphe.state.co.us>

December 30, 2003

Mr. Joe Legare
Acting Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Closeout Reports for Building 367 and Trailer 760A

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has been provided additional information regarding the closure of Building 367 and Trailer 760A as requested in our letter dated November 10, 2003. This information was provided through the consultative process and consists of internal memorandums generated by Steve Nesta with KH. We appreciate being provided this information and expect this information to be placed in the Administrative Record as appropriate.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Steve Nesta, KH
Administrative Records Building T130G

Cameron Freiboth, KH
Dave Shelton, KH
David Abelson, RFCLOG

CORR. CONTROL
ADMIN. RECORD
PATS/130

Reviewed for Addressee
Corres. Control RFP

01/05/04
Date By

Ref. Ltr. #

DOE ORDER #

5400.1



Colorado Department
of Public Health
and Environment

CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER # 4700.1

03-RF-00186



DIST.	LTR	ENC
DIETER, T.		
FERRERA, D.W.		
FERRI, M.S.		
LINDSAY, D.		
LYLE, J.		
MARTINEZ, L. A.		
PARKER, A.		
POWERS, 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.		
FRANCIS, M.		
FREIBOTH, C.		
GIBBS, F.		
GUTHRIE, V.		
HUMSTON, T.		
KEHLER, K.		
MARSHALL, J.R.		
MARTIN, D.		
MYERS, K.	X	X
NESTA, S.	X	X
NORTH, K.		
OLVER, R.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
ROSENMAN, A.		
SNYDER, D.P.		
THOMPSON, J.	X	X
VANDERPOEL, M.		
WIEMELT, K.		
WILLIAMS, L.		

January 30, 2003

03-RF-00186

Steve Tower
D&D Program Lead
DOE, RFFO

TRANSMITTAL OF CLOSE-OUT REPORTS -- FEG-004-03

Attached are the Close-out Reports for the Type 1 facilities B367, T121A, T334B, and T760A. Please note that copies of these reports have been submitted to the CERCLA AR by the Kaiser-Hill RISS project.

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		
TRAFFIC		
PATS/130		

Attachments:
As Stated

CLASSIFICATION:		
UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

KLM:pvt
Orig. and 1 cc - Steve Tower

AUTHORIZED CLASSIFIER
SIGNATURE:

CC:
Richard DiSalvo

Date:
IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
 PARTIAL OPEN
 CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:
KLM:pvt

Type 1 Facility Closeout Report

Section A. Facility Data	
Facility No.	Building 367
Facility Descriptor:	Grounds Maintenance Trailer, 240 square feet
Project:	RISS - Area 5 D&D
Date of Demolition:	December 18, 2002
Additional Information:	Metal storage building with concrete floor demolished and disposed of as sanitary waste. This building had no utility connections.
<i>(Must include information on environmental releases and conditions of site at turnover to Environmental Restoration)</i>	

Section B. Final Characterization Data	
Reconnaissance Level Characterization Report <i>(concurrence received)</i>	Reconnaissance Level Characterization Report - Concurrence, Steven H. Gunderson to Joseph A. Legare, dated January 10, 2003. Contact Record - dated December 4, 2002, documents CDPHE approval to demolish building prior to formal receipt of RL.C.R concurrence. (attached)
In-process Characterization	N/A
Pre-Demolition Survey Report <i>(approval received)</i>	N/A
Post-Demolition Survey Report <i>(as necessary)</i>	N/A

Section C. Waste Data <i>(complete categories as appropriate)</i>	
Sanitary Disposal	
Disposal Site:	Front Range Landfill, Erie, Colorado
Waste Volume (m³):	60 Cubic yards
Waste Weight (tons):	21 tons
Additional Information:	Above grade building debris
Hazardous Disposal	
Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	
TSCA Waste Disposal	
Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	
Asbestos Waste Disposal	
Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	
Low-Level Waste Disposal	
Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	
Low-Level Mixed Waste Disposal	
Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	
Recycled Material	
Recycle Facility:	
Waste Volume (m³):	N/A
Additional Information:	
Property Disposition	
Receiver Locations <i>(major items only):</i>	N/A

Type 1 Facility Closeout Report

Volume (m³):	
Weight (tons):	
Additional Information:	

Section D. Approvals Kaiser-Hill Project Manager	 Name/Signature	4/24/03 Date
--	---	-----------------

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-3000
TDD Line (303) 691-7700
Located in Glendale, Colorado
<http://www.cdpha.state.co.us>

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-4928
(303) 692-3090



Colorado Department
of Public Health
and Environment

January 10, 2003

Mr. Richard DiSalvo
Acting Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10608 Highway 93, Unit A
Golden, CO 80403-8200

RE: Reconnaissance Level Characterization Report (RLCR) for B112, B223, B367, B553, T371A, T371C, T371D, T371E, T371F and T760A - Concurrence

Dear Mr. ^{DiSalvo} Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR for B112, B223, B367, B553, T371A, T371C, T371D, T371E, T371F and T760A, Revision 0 dated October 7, 2002, which was received on November 15, 2002. Based on a review of the information contained in the RLCR, and the additional supplemental information that has been provided, we are hereby concurring with the Type 1 designation for B112, B223, B367, B553, T371A, T371C, T371D, T371E, T371F and T760A.

Previous discussions utilizing the consultative process have provided preliminary concurrence with the Typing of some of these facilities and allowed the implementation of D&D actions in several of these facilities prior to issuance of this concurrence letter.

These facilities are identified as Type 1 Facilities, however, it is recognized that some of them may have been, or currently are, still in use and that it may be necessary to perform additional investigations after closure and prior to demolition or sale. The consultative process should be utilized to acquire and provide the additional information prior to final disposition of these facilities.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Krachok at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Post-It Fax Note	7671	Date	1/13/03
To	S. Tower	From	KRACHOK
On Behalf Of	POE	On	CDPHE
Phone #		Phone #	303 692 3328
Fax #	266 2497	Fax #	

cc: Steve Tower, DOE
Tim Rohder, EPA
Danne Parsons, KH
Administrative Records Building T130G

Steve Nestl, KH
Dave Shelton, KH
Cameron Freisboth, KH

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 12/04/02 – 1500 pm

Site Contact(s): D. A. Parsons (D&D) – (DAP-005)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Type 1 RLCR Concurrence for B112 and B367

Meeting Attendance

D. A. Parsons, D&D	D. Kruchek, CDPHE	S. Tower, RFFO
C. Freiboth, K-H	L. Umbaugh, Canberra	E. Kray, CDPHE
J. Hindman, CDPHE		

Discussion

On December 4, 2002, at 1430 pm, D. Parsons presented responses to comments received via email from the State (D. Kruchek) concerning Type 1 Facility Reconnaissance Level Characterization Reports (RLCRs) for facilities 112, 367, 334, T371D, T441A, T121A and 553. Below are the CDPHE comments and K-H responses:

1) B334 - What were all of the various vent lines used for? This includes the ones on the second floor as well as the ones in the high-bay area. Could the ventilation system contain contamination? Contamination being not just rads but metals such as lead, cadmium, chromium, beryllium, etc. This could be a concern not only because of "normal" operations, but because of past operations utilizing the equipment and materials brought from other buildings such as B444 and B881. Just want to make sure this possible concern has been properly addressed prior to removal and demolition.

K-H Response:

The various vent lines, including the second floor vent lines, were utilized for ventilating the work spaces where welding and other metal work operations took place. The vent lines were directed to the outside atmosphere without filtration. The hoses located on the first floor high bay west-side, were connected to woodworking equipment such as a table saws. The hoses ran into a vacuum pump that was then exhausted to a collection hopper located outside of the west wall. The collection hopper collected saw dust and once the hopper was full its contents were then dumped into 55 gallon drums for disposal as sanitary waste. It is unlikely that the ventilation systems would have become contaminated due to past operations, however, additional surveys and samples have recently been collected in the ventilation ducting and collection hopper. The additional Rad and Be survey and sample results were all below the PDSP release criteria and will be provided to you for review. A metals sample was obtained in a vent duct, results will be provided to DOE and CDPHE upon receipt from the offsite lab.

- 2) B334 - Need to determine possible concerns/contamination in the floor trenches.

K-H Response:

There is just one floor trench in 334. The wood covering the trench was removed, revealing a dry trench about 8 inches deep by 8 inches wide by 8 feet long. The trench was surveyed and sampled for rad and Be; based on a visual inspection, chemical metals sampling was not necessary. These additional survey and sample results were all below PDSP release criteria and will be provided to you for review.

- 3) B334 - Could not determine the concerns with the floor in the oil storage room, but based on the info contained in the RLCR can not recycle the oil stained concrete, unless samples show that it does not contain hazardous constituents (VOCs, SVOCs, or metals).

K-H Response:

The concrete floor of the B334 oil storage room will not be utilized for onsite recycle material.

- 4) B334 - Still have a concern with the potential radiological contamination identified in the floor samples.

K-H Response:

This issue will be discussed in detail during a meeting on December 11th, 2002 and the meeting minutes will be documented in a Contact Record. CDPHE radiological concerns will be discussed and should be resolved at this meeting.

5) B112 - Did not see any bricks, neither lead or cadmium bricks were seen, which were indicated in the HSA to have been in this building. As we discussed this should have been properly included in the RLCR, Section 4.3.

K-H Response:

All of the lead and cadmium bricks were recently removed from B112 when the Dosimetry Group was relocated last month (November 2002). Section 4.3 of the RLCR has been revised to include a discussion of the removal of the bricks.

6) B112 - The utility trenches/tunnels need to be properly characterized.

K-H Response:

The B112 utility trenches/tunnels were surveyed and sampled for rad and Be. Based on a visual inspection, chemical sampling was not necessary. The additional rad and Be survey and sample results were all below PDSP release criteria and will be provided to you for review.

7) B367 - The concrete slab may contain hazardous constituents (herbicides, pesticides, metals, etc) from the various chemicals that have been stored and spilled in this building. As such it can not be recycled without appropriate sampling.

K-H Response:

The concrete floor of B367 will not be utilized for onsite recycle material.

8) B553 - What are contained in the drains in the concrete floor?

Appropriate characterization should be performed.

Without proper sampling and characterization the slab can not be recycled.

K-H Response:

During the 1950's and 1960's building 553 used for storage of chemicals in drums and other liquids such as nitrogen (e.g., a chemical dispensary). B553 contains three trenches in the floor that are approximately 4 inches deep, by 12 inches wide by 16 feet long. The three trenches were aligned under the front edges of the drum storage racks. The drums were on their sides in the drum racks for dispensing their contents. There was a drain in the bottom of each the trenches. There were also two cleanout ports in the B553 slab that connected to the trenches. The trenches drained into a retention basin located approximately 50 east of B553 through a pipe that exited the building to the east. The area where the retention basin once existed is now covered

over with asphalt and connex boxes. The three B553 trenches were filled in with concrete (except for the drain openings) during the late 1960's. Additional surveys and samples have recently been collected in the B553 trenches, drains and cleanout ports. The additional rad and Be survey and sample results were all below the PDSP release criteria and will be provided to you for review.

Six chemical samples, and one duplicate, were obtained in the 553 trenches, results will be provided to DOE and CDPHE upon receipt from the offsite lab. The concrete floor of B553 will not be utilized for onsite recycle material if the chemical samples are above the PDSP release criteria.

9) T371D - Need to resolve the high levels of radiological detections found from the roof coupon, see the RLCR.

K-H Response:

A gamma spectroscopy analysis was performed on sample numbers 03S006-001.001 (metal coupon from T371D roof) and 03S0013-005.001 (composite sample of four metal coupons from T441A and T121A roofs). CDPHE expressed concerns with the reported value for Ra-226 in these samples. The initial reported values for Ra-226 were conservative such that the values were not manually interference corrected (i.e., the initial Ra-226 values consisted of Ra-226 activity plus composite U-235 activity), thus the Ra-226 values were overly conservative. The Ra-226 component of these samples were reanalyzed and the interference corrected values were determined (Ra-226 activity only). These reanalyzed values will be reflected in the RLCRs for these buildings.

The reanalysis performed of RIN# 03S006-001.001 revised the initially reported Ra-226 value from $2.56E+001$ pCi/g with a 2-sigma of $1.13E+001$ and an MDA of $1.86E+001$ to a revised value of $0.00E+000$ pCi/g with a 2-sigma of $0.00E+000$ and an MDA of $6.15E+000$.

The reanalysis performed of RIN# 03S0013-005.001 revised the initially reported Ra-226 value from $9.60E+000$ with a 2-sigma of $2.10E+000$ and an MDA of $3.20E+000$ to a revised value of $5.32E+000$ pCi/g with a 2-sigma of $3.02E+000$ and an MDA of $3.20E+000$.

Since Ra-226 is naturally occurring and not a DOE added isotope of concern at RFETS, it is not an isotope that is normally manually interference corrected and has been reported as qualitative and semi-quantitative information only.

A review of similar, previously analyzed metal coupon samples collected since August 2002 was performed. Other data from paint, concrete, and transite samples have also been reviewed to check for similar issues with the analysis. It has been determined that this anomaly was restricted to the metal coupon geometries of these two samples only. No further investigations or actions are required.

8/8

Based on the K-H responses, verbal Type 1 Facility RLCR concurrence for facilities 112 and 367 was obtained from D. Kruchek. B112 and 367 can be demolished upon asbestos abatement, as necessary. RLCR data issues with facilities T371D, T441A, T121A, 334 and 553 still need to be resolved with CDPHE and concurrence obtained prior to demolition. These additional issues are anticipated to be resolved during the next Weekly Area Status meeting scheduled for Dec 11th, 2002.

Contact Record Prepared By: D. A. Parsons

Required Distribution:

P. Arnold, K-H

C. Deck, K-H

R. DiSalvo, RFFO

C. Gilbreath, K-H

S. Gunderson, CDPHE

T. Rehder, USEPA

L. Kilpatrick, K-H

J. Legare, RFFO

R. Leitner, K-H

J. Mead, K-H

S. Nesta, K-H

K. North, K-H

W. Prymak, DOE

T. Humiston, K-H

D. Shelton, K-H

S. Gianti, K-H

Additional Distribution:

C. J. Freiboth, K-H

J. Hindman, CDPHE

D. Kruchek, CDPHE

S. Tower, RFFO

T. Hopkins, K-H

E. Kray, CDPHE

F. Gibbs, K-H