

Best Available
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STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, 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
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TDD Line (303) 691-7700
Located in Glendale, Colorado

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

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



Colorado Department
of Public Health
and Environment

October 6, 2005

Mr. John J. Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

Mr. Stephen Nesta
Environmental Manager
Kaiser-Hill Company, RISS
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit B
Broomfield, Colorado 80021-2583

RE: Acceptance, Closure Summary Report for Closure of RCRA Container Storage Unit 750.1 (serving as D&D Closeout Report for Tents 2, 3, 4, 5, 6, 12, and 15, with tents 5, 6, & 15 identified as Type 2 Facilities)

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report (CSR) dated August 31, 2005. The Division, in a letter dated March 23, 2005, granted approval, with stipulations, of the Closure Description Document (CDD). The CDD for the unit, as submitted on March 9, 2005 was inclusive of Tents 2 through 6 and 12. As noted in the CDD, Tent 15, the "Barn", was a previously closed sludge processing unit, 750.3B.

The Division has reviewed the stipulations and each has been addressed directly or alternatively. The second stipulation, which pertained to pond sludge that had splashed onto interior tent panels, was addressed through the pre-demolition survey and subsequent disposal of the tent fabric rather than administratively under Clean Closure Option 1.

The Division previously provided comments on the CSR to Mr. Nesta via e-mail. Comments Nos. 1 through 3 were addressed with a single new figure to replace the original two figures. The new figure will be retained in our files along with the CSR. Comment No. 4 noted that the RCRA Facility Closure Certification was premature and unacceptable. We are working with site representatives to produce an acceptable professional engineer and facility owner certification.

Section 2 of the CSR notes that the exterior of Tent 5 and 6 did not meet unrestricted release criteria and were disposed as LLW. Since pond sludge was splashed on the interior tent panels only, and deemed non-RCRA by radionuclide surveys, disposal as LLW rather than as LLMW was appropriate.

ADMIN RECORD

C:\Drive D\rfets\D&D_T2,3,4,5,6,12,15Closeout&CSR Unit 750.1.doc

IA-A-003016

1/20

IVET, Kampe & Mr. Nesta

Page 2 of 2

October 6, 2005

Considering the various factors, the CSR is accepted for the closure of the RCRA unit and approved as the Closeout Report for the D & D of Tents 5, 6 and 15, as well as for Tents 2, 3, 4, and 12 which were determined to be Type 1 Facilities.

If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,



David A. Kruchek
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
David Shelton, KH
Carl Spreng, CDPHE

S. Garcia, City of Broomfield
David Ward, K-H
Karen Wiemelt, KH
Administrative Record, Mountain View

MS001
750.1

Revision 5/01

CORRES CONTROL
OUTGOING LTR #

ORDER #

RF-00829



DIST LTR ENC

CROCKETT, G

FERRERA, D.W.

GILPIN, H.E.

LONG, J.W.

LINDSAY, D. C.

SHELTON, D.C. X

August 31, 2005

05-RF-00829

TUOR, N.R.

SNYDER, D

MCGRORY, M

HADACEK, M

KAISER, M.

Mr. David Kruchek

BEAN, C.

Acting Permitting and Compliance Unit Leader

LINSINBIGLER, H

Federal Facilities Program

NESTA, S. X X

Hazardous Materials and Waste Management Division

~~SMN, D.~~ X X

Colorado Department of Public Health and the Environment

4300 Cherry Creek Drive South

Denver, Colorado 80246-1530

CLOSURE SUMMARY REPORT FOR CLOSURE OF RCRA CONTAINER STORAGE UNIT 750.1 - SMN-058-05

Dear Mr. Kruchek:

Pursuant to the *Rocky Flats RCRA Part B Permit, Part X, Closure* (June 1997), Kaiser-Hill Company, L.L.C. is submitting the attached Closure Summary Report for this unit.

The summary report contains a description of the major closure activities and a declaration that the requirements of the Closure Description Document (CDD) have been fulfilled. This document also serves as the Closeout Report for Tents 5, 6, and 15, which were typed as Type 2 facilities due to radiological contamination. Please note that activities conducted under the CDD addressed the heated storage units, the tent structures, and the asphalt pad of RCRA Unit 750.1, which served as the secondary containment for the unit. Since RCRA Unit 750.1 is the last permitted unit to be closed, we have also attached the Owner/Operator Certificate of Closure for the Rocky Flats Facility (ref., 6 CCR 1007-3, Section 264.115).

CORRES CONTROL X X

ATS

DMN RECORD

VASTE REC CTR

RAFFIC

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

CLASSIFICATION:

CNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

Stephen M. Nesta
Stephen M. Nesta
Environmental Manager, K-H RISS

9/1/05
Date

AUTHORIZED CLASSIFIER SIGNATURE:

NA

Date:

IN REPLY TO RFP CC #:

KLM:rlm

ACTION ITEM STATUS:

Attachment:
As Stated

PARTIAL/OPEN

CLOSED

cc:

LTR APPROVALS:

H. Ainscough - CDPHE
J. Legare - DOE, RFFO
G. Morgan - DOE, RFFO

Last Name)

Last Name)

OFFICE & TYPIST INITIALS:

KLM:rlm

SMN-058-05

Kaiser-Hill Company, L L C
Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden CO 80403-8200 303-966-7000

Closure Summary Report for RCRA Container Storage Unit 750.1

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

1.0 PURPOSE

This Summary Report pertains to RCRA closure activities for the RCRA Container Storage Unit 750.1, and is a requirement of Section 1.1 of the Closure Description Document (CDD) for this RCRA Unit (05-RF-00218). This report contains a description of major closure activities and any deviations from those stated in the CDD and other relevant information.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Twenty-one heated storage units (HSU) secondary containment pans were washed with a water/detergent mix. A Professional Engineer conducted the visual inspection of the pans against the clean debris surface standard, and certified the units met the standard (see attached certifications). These 21 HSUs were subsequently disposed of as sanitary waste.

Radiological surveys were conducted of Tents 2, 3, 4, 5, 6, 12, and 15. All of the tents except for 5 and 6 meet the unrestricted release criteria as documented in the appropriate Pre-Demolition Survey Report (PDSR). The PDS supported the Clean Closure Option 1 determination for all of the tent structures. Tents 2, 3, 4, 12 and 15, which were disposed of as sanitary waste. Tents 5 and 6 did not meet the unrestricted release criteria for radiological contamination, on the outside of the tent structures. Appropriate work controls were used during demolition to prevent the spread of radiological contamination. The Tent 5 and 6 structures, minus the interior framework were disposed of as LLW. The framework of these tents was disposed of as sanitary waste. Tent 15 contained waste that was LLW. Appropriate work controls were used during demolition to prevent the spread of radiological contamination. The Tent 15 structure was disposed of as sanitary waste.

One deviation from the CDD was the method of closure for the secondary containment asphalt pad. It was determined to be more efficient to conduct closure of the pad by means of physical extraction. The top 0.6 cm to 1.0 cm of the pad was removed (planed) and the removed asphalt was managed as hazardous waste. The surface of the remaining asphalt, after completion of the physical extraction was inspected by a Professional Engineer to ensure that no stains existed (see attached certification). The remainder of the asphalt was disposed of as sanitary waste.

3.0 SUMMARY

The requirements stated in the CDD have been fulfilled.

<u>Sanitary Disposal</u>	
Disposal Site:	BFI Foothills 93, Golden, CO
Waste Volume (m ³):	11514.2
Waste Weight (tons):	8418.14
Additional Information:	Tents, heated storage units, and asphalt
<u>Hazardous Disposal</u>	
Disposal Site:	Kettleman Hills, Kettleman City, CA
Waste Volume (m ³):	168.203
Waste Weight (tons):	83.62
Additional Information:	Asphalt from the secondary containment pad
<u>TSCA Waste Disposal</u>	
Disposal Site:	N/A
Waste Volume (m ³):	
Additional Information:	
<u>Low-Level Waste Disposal</u>	
Disposal Site:	Envirocare, UT
Waste Volume (m ³):	67.394
Additional Information:	Tent material
<u>Recycled Material</u>	
Recycle Facility:	- N/A
Waste Volume (m ³):	
Additional Information:	

Additional Information:

The 750 Pad was approximately 100,000 square-foot asphalt pad that was built in 1987 for parking and trailers. Then in 1990 the portion to be used for waste storage had additional asphalt applied for reinforcement, and was bermed and fenced. The 750 Pad is estimated to be 4-inches thick and is sloped to control runoff. In 1990 six large tents (Tents 02, 03, 04, 05, 06, and 12) were added to the pad to enclose the pondcrete and saltcrete waste management activities. In 2002 tent T-750 SPR (i.e., Tent 15) was constructed to house the sludge stabilization equipment. The tents were constructed with fabric panels stretched across an aluminum frame and steel-anchored pins were used to mount the tents to the pad.

The 750 pad has the following utilities: electric and fire protection provided by randomly placed fire extinguishers. All utilities were removed as noted on the following map.

All of the asphalt and facility structures have been removed and the area is being contoured and re-vegetated in accordance with the Land Configuration Design Basis (see attached map).

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that closure via clean debris decontamination of drum rollers and interior surfaces of all secondary containment pans was achieved for the 750 Pad RCRA units listed below. All of these cargo containers were part of the Rocky Flats 750 Pad RCRA Unit. Exterior surfaces of secondary containment pans are not included in this certification, as they did not come into contact with hazardous waste.

Cargo Container Numbers

CC12

CC13

CC16

Professional Engineer seal, signature, and date attesting to closure certification statement:

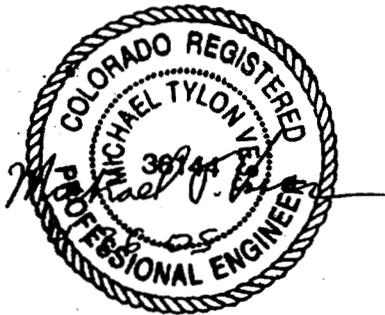


Timothy J. Humiston, P.E.
August 15, 2005

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that closure via clean debris decontamination of drum rollers and interior surfaces of all secondary containment pans was achieved for the 750 Pad RCRA units listed below. All of these cargo containers were part of Rocky Flats RCRA Unit 750 Pad. Exterior surfaces of secondary containment pans are not included in this certification, as they did not come into contact with hazardous waste.

RCRA Unit 750 Pad Cargo #
CC03
CC04
CC05
CC06
CC07
CC08

Professional Engineer seal, signature, and date attesting to closure certification statement:



Michael Tylon Vess, P.E.
Colorado P.E. Number 36144
April 26, 2005

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that closure via clean debris decontamination of drum rollers and interior surfaces of all secondary containment pans was achieved for the 750 Pad RCRA units listed below. All of these cargo containers were part of the Rocky Flats 750 Pad RCRA Unit. Exterior surfaces of secondary containment pans are not included in this certification, as they did not come into contact with hazardous waste.

750 Pad RCRA Cargo #	750 Pad RCRA Cargo #	750 Pad RCRA Cargo #
CC09	CC15	CC20
CC10	CC17	CC21
CC11	CC18	CC22
CC14	CC19	CC23

Professional Engineer seal, signature, and date attesting to closure certification statement:



Michael Tylon Vess, P.E
Colorado P.E. Number 36144
July 12, 2005

I, the undersigned, a State of Colorado Registered Professional Engineer, hereby certify that the closure of the RCRA Unit 750.1 asphalt pad secondary containment was achieved by means of physical extraction. The top 0.6 cm to 1.0 cm of the pad was removed (planed) and the removed asphalt was managed as hazardous waste. The surface of the remaining asphalt, after completion of the physical extraction was inspected to ensure that no stains existed.

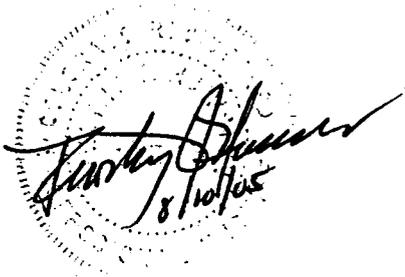
I performed inspections of RCRA Unit 750.1 to certify the above as follows:

Area under what used to be the Barn Tent, and Tents 2, 3, and 4 on July 27, 2005

Area under what used to be the Tents 5 and 6 on July 28, 2005

Area under what used to be the Tent 12 on August 1, 2005

Professional Engineer seal, signature, and date attesting to closure certification statement:

A circular professional engineer seal for the State of Colorado is partially visible, overlaid with a handwritten signature in black ink. The signature appears to read "Timothy J. Humiston" and "8/10/05".

Timothy J. Humiston, P.E.
August 10, 2005

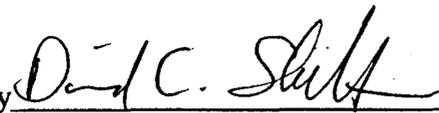
**Rocky Flats Environmental Technology Site
(EPA ID No. CO7890010526)**

Kaiser-Hill Company, L.L.C.

**Resource Conservation and Recovery Act
Facility Closure Certification**

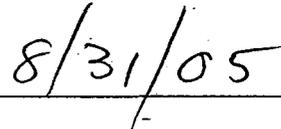
"I certify under penalty of law that all of the permitted hazardous waste and mixed waste units at the Rocky Flats Environmental Technology Site have been closed in accordance with the specifications of the approved closure plan, Part X of the permit dated June 23, 2004. All the closures were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly performed the required closure activities and that, based upon my inquiry of those individuals immediately responsible for closing the permitted areas of the facility, I believe the closure documents to be true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines and imprisonment."

By



Co-Operator Authorized Signature
David C. Shelton, Vice President
Environmental Systems & Stewardship

Date:



ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 8/19/05 / 9:00 a.m.

Site Contact(s): David Ward
Phone: 303-996-5938

Regulatory Contact: Harlen Ainscough
Phone: 303-692-3337

Agency: Colorado Department of Public Health and Environment

Purpose of Contact: Documenting the closure of RCRA unit 750.3a

Discussion

RCRA unit 750.3a was closed by removal per the CDD, which was approved on 7/18/02. During an inspection by the Colorado Department of Public Health and Environment (CDPHE) on 9/16/02, James Hindman, CDPHE, and Karen Laverado, KH, verified that unit 750.3a had been closed by removal. Because of this visual confirmation of closure no additional documents were provided.

In discussions with Harlen Ainscough, it was decided that CDPHE will note the closure/removal of 750.3a in a forthcoming acceptance letter and specifically associate the unit to the closure of Unit 750.1, the 750 Pad.

This contact record can thus be used by the Professional Engineer certifying the closure of the Rocky Flats Environmental Technology Site's permitted hazardous waste facility that unit 750.3a is closed.

Contact Record Prepared By: David Ward

Required Distribution:

M. Aguilar, USEPA
B. Birk, DOE-RFPO
C. Deck, K-H Legal
S. Garcia, USEPA
S. Johnson, K-H ESS
D. Kruchek, CDPHE
D. McCranie, DOE-RFPO

G. Morgan, DOE-RFPO
S. Nesta, K-H RISS
M. Roy, DOE-RFPO
R. Schassburger, DOE-RFPO
D. Shelton, K-H ESS
J. Walstrom, K-H RISS
C. Zahm, K-H Legal

Additional Distribution:

Harlen Ainscough
James Hindman
David Ward

002 750.3B
Acceptance
of CSL

STATE OF COLORADO

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Douglas H. Bennetto, Executive Director

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4300 Cherry Creek Dr. E.
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<http://www.cdphs.state.co.us>



Colorado Department
of Public Health
and Environment

November 8, 2004.

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, RFPO
10808 Highway 93, Unit A
Golden, CO 80403-8200

Ms. Karan North
Environmental Manager, K-H Material Stewardship
Kaiser-Hill Company, L.L.C.
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B
Golden, CO 80403-8200

RE: Acceptance, Closure Summary Report for Closure of RCRA Unit 750.3B

Dear Mr. Legare and Ms. North:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report transmitted on September 1, 2004. The Division agrees that closure activities were to be performed under Part X-Closure of the Site's State RCRA Permit, specifically permit number CO-04-06-23-01, effective July 23, 2004. We hereby accept the Closure Summary Report for RCRA Unit 750.3B considering the following clarification.

The Division accepts your declaration that the requirements of the approved Closure Description Document have been fulfilled. However, we must clarify your application of the clean debris surface standard as stated in Section 3.0 of the report. The report indicates that contaminated cold side equipment (equipment that was not intended to be in contact with RCRA hazardous waste) was decontaminated using a debris rule treatment technology to meet the "clean debris surface" standard.

We received a clarifying e-mail on November 3, 2004, attached, stating that cold side equipment "...did not come into contact with the waste and [was] returned to the vendor for reuse." We concur that decontamination was unnecessary and that the "...inspection to verify the equipment never came into contact with the waste" was not a "clean debris surface" inspection. Any washing or spraying of the equipment, if any, following the "inspection" is irrelevant in respect to RCRA requirements.

If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
Administrative Record, RFETS Bldg. T-130G

S. Garcia, City of Broomfield
K. Lavarato, K-H
S. Nesta, K-H

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**Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division**

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80246-1530
(303) 692-3300

Notice of Inspection

Facility Name <i>Rocky flats - TSD Pad Tank Closure</i>			EPA I.D. # <i>C07890010526</i>	Date <i>9/16/02</i>
Street <i>PO Box 928</i>			Telephone # <i>(303) 966-7000</i>	Seq. #
City <i>Golden</i>	County <i>Jefferson</i>	Zip <i>80402</i>	Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> Yes () No	Hour In: <i>9:15</i>
Facility Representatives and Titles <i>Karen Lavarato</i>			Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour Out:
			Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input checked="" type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other _____ If Status Changed, Facility Should Revise Notification				

COMMENTS:

An inspection of 750.3B + 750.2 + 750.3A

was conducted - no issues were identified,

James Hindman inspected 750.3A and confirmed all the tanks have been removed

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and / or Photos Collected	4.
1.	5.
2.	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: *El Smith*

Assisting Inspector(s) and Multimedia Participant(s):
Nancy Newell

Karen Lavarato

Signature of Facility Representative

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: April 20, 2001

Site Contact(s): Catherine M. Alstatt
Phone: 303-966-3173

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

Agency: Colorado Department of Public Health and Environment

Purpose of Contact: Walkdown of Unit 750.3, Sludge Treatment Unit

Discussion

Based on a walkdown and discussions held with James Hindman, CDPHE, on Friday, April 20, 2001 the Sludge Treatment Unit, RCRA Unit 750.3, can now be considered to be in "stable" configuration. Based on this determination and concurrence from Mr. Hindman, daily inspections of this unit are no longer required. Quarterly inspections will be required. Mr. Hindman also concurred with the draft letter requesting an extension to the one-year time period for closure of this unit. A letter will be submitted to CDPHE requesting this extension.

Contact Record Prepared By: Catherine M. Alstatt

Required Distribution:

R. DiSalvo, RFFO
D. Grosek, RFFO
J. Legare, RFFO
J. Schieffelin, CDPHE
S. Gunderson, CDPHE
J. Hindman, CDPHE
N. Newell, CDPHE
T. Rehder, USEPA
P. Arnold, K-H 371
J. Berardini, K-H MS

T. Hopkins, K-H 776
K. Lavorato, K-H 707
S. Nesta, K-H RISS
G. Scott, K-H
C. Deck, K-H
D. Shelton, K-H
J. Dischinger, RFCSS
J. Spaanstra, Faegre & Benson LLP (jspaanstra@faegre.com)
K. North, K-H ESS
A. Rosenman, K-H ESS

Additional Distribution:

E. Larsen, MS 991/750 Pad
Scott Kranker, MS 750 Pad
Karlin Richards, MS 750 Pad
Janet Fox, MS 750 Pad
Gene Balsmeier, MS

STATE OF COLORADO

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(303) 692-3090

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



Colorado Department
of Public Health
and Environment

September 26, 2005

John J. Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

Mr. Stephen Nesta
Environmental Manager
Kaiser-Hill Company, RISS
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit B
Broomfield, Colorado 80021-2583

RE: Acceptance, Closure Summary Report for Closure of RCRA Permitted Treatment Unit S002, Oil and/or Aqueous Solidification Process, 750 Pad

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report transmitted on May 18, 2005. The Division agrees that administrative closure, finalized on May 16, 2005, under Part X-Closure of permit number CO-04-06-23-01, effective July 23, 2004, was applicable. Specific closure activities were described in the unit's Closure Description Document (CDD) as approved by the Division on April 8, 2005.

We therefore accept the Closure Summary Report for Closure of RCRA Permitted Treatment Unit S002, Oil and/or Aqueous Solidification Process, 750 Pad. If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

David A. Kruczek
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
Administrative Record, Mountain View

S. Garcia, City of Broomfield
David Ward, K-H

C:\Documents and Settings\Hainscou\My Documents\RFETS\Unit Closures-Closure pLan\CSR, Unit S002, 750 pad
Acceptance.doc

RECEIVED

2004 NOV -9 A 9:47

STATE OF COLORADO

CORRESPONDENCE CONTROL

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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

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



Colorado Department
of Public Health
and Environment

November 2, 2004

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, RFFO
10808 Highway 93, Unit A
Golden, CO 80403-8200

Ms. Karan North
Environmental Manager, K-H Material Stewardship
Kaiser-Hill Company, L.L.C.
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B
Golden, CO 80403-8200

RE: Acceptance, Closure Summary Report for Closure of RCRA Unit 750.2A, 750.2B and 750.2C

Dear Mr. Legare and Ms. North:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report transmitted on August 19, 2004. The Division agrees that closure activities were to be performed under Part X-Closure of the Site's State RCRA Permit, specifically permit number CO-04-06-23-01, effective July 23, 2004.

The Division accepts your declaration that the requirements of the approved Closure Description Document have been fulfilled. We have been advised that the certification referenced in Section 3.0 was not a Colorado Registered Professional Engineer certification. We agree that the approved Closure Description Document did not require a formal certification, nor is such certification of "clean debris surfaces" required by state RCRA regulations. In addition, the tanks were closed by removal and disposed at an offsite facility; a P.E. certification of closure is not required per the approved closure description document.

Furthermore, we accept the declaration that tank pieces were decontaminated and that "verification" and "certified" in Section 3 of the report are equivalent to an inspection of tank surfaces fully consistent with, and meeting the performance standards of, 6 CCR 268.45, Table 1 - Alternative Treatment Standards for Hazardous Debris, Footnote 3. For future consideration, please note the inadvertent phrase "clean surface debris" in the bullets of Section 3.

If you have any questions, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Karen Lavorato, K-H
S. Garcia, City of Broomfield
Administrative Record, RFETS Bldg. T-130G

5400

M. Aguilar, USEPA Region VIII
D. Miller, AGO

A	B	C	D	E	F	G	H	I	J
Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submittal	CDPHE approval
33	34	750 Pad Pondcrete/Saltcrete Reprocessing	WITHDRAWN - Never used for haz waste	WITHDRAWN 4/12/95 (ref 95-DOE-09335).	NA	NA		ltr 4/12/95	NA
96	42.14	750 Pad Hazardous Waste Tanker D-836	WITHDRAWN - 90-day unit	This is a 90-day unit that was mistakenly included in the original version of the Master List. The Master List is used to track permitted, interim status, and Mixed Residue Units only.	NA	NA		NA	NA
544	750.1	750 Pad Container Staging Transport Vehicles	PERMITTED - CLOSED per the 1997 permit	ADMINISTRATIVELY CLOSED. Approval of Administrative Closure signed by Steven H. Gunderson, dated 10/15/04.	10/15/04	10/15/04		CDD 10/14/04	Admin Closure 10/15/04
545	750.1	750 Pad Container Storage Tent 12	PERMITTED - CLOSED per the 2004 permit	CLOSED BY REMOVAL on or before 7/28/05. RCRA STABLE e-mail from Karen Laverado 6/22/05; CDD approved by CDPHE with minor modification, letter dated 3/23/05. to be closed in accordance with RCRA Part B 1997 permit No. CO-97-05-30-01, Part X (6/30/97).	CSR 8/31/05	3/23/05		CSR 8/31/2005	CSR 10/6/05 CSR 11/2/04
546	750.1	750 Pad Container Storage Tent 2							
547	750.1	750 Pad Container Storage Tent 3							
548	750.1	750 Pad Container Storage Tent 4							
549	750.1	750 Pad Container Storage Tent 5							
550	750.1	750 Pad Container Storage Tent 6							
647	750.2A	750 Pad Tank D-8, 25-008, T01073	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL see Closure Summary Report for RCRA Units 7250.2A/B/C (04-RF-00847).	10/29/02	CDD 4/2/02		CSR 8/19/04	CSR 11/2/04
	750.2B Tent 4	750 Pad Tank D-19, 25-039, T01105	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL see Closure Summary Report for RCRA Units 7250.2A/B/C (04-RF-00847). Closure covers tanks and not pad/tents.	4/1/03	CDD 4/2/02		CSR 8/19/04	CSR 11/2/04
688	750.2C Tent 6	750 Pad Tank D-22	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL see Closure Summary Report for RCRA Units 7250.2A/B/C (04-RF-00847). Closure covers tanks and not pad/tents.	5/8/03	CDD 4/2/02		CSR 8/19/04	CSR 11/2/04
691									
729	750.3.a	750 Pad Sludge De-Watering and Stabilization Process	PERMITTED - CLOSED per the 1997 permit	Closure (removal) has been completed with verbal approval received from James Hindman on 9/16/02. Removal and closure of the asphalt pad deferred to decommissioning and environmental restoration.	9/16/2002 Asphalt pad Closed	CDD 7/28/02		CSR 8/31/05	CR 8/19/05
730	750.3b	750 Pad Second Sludge De-Watering and Stabilization Process	PERMITTED - CLOSED per the 1997 permit	Closure (removal) of equipment has been completed. Asphalt pad (secondary containment) has been closed 11/8/04.	Unit 12/31/03 Asphalt pad deferred to ER	CDD 7/28/02		CSR 9/1/04	CSR 11/8/04
896	S002	750 Pad Oil and/or Aqueous Solidification Treatment Process (East and West Perma-cons)	PERMITTED - CLOSED per the 2004 permit	Closure Summary Report submitted 5/18/05(KML-006-05); CDPHE approved CDD, ltr dated 4/8/05; to be closed in accordance with the RCRA 1997 permit. S002 in rooms 750 East and West Permacons per contact record notification between James Hindman and Karen Lavorato dated 08/22/03.	CSR 5/18/05	CDD 4/8/05		CSR 5/18/05	CSR 9/26/05
907	750.2	750 PAD Asphalt Pad and Tent for 750.2A, 2B, and 2C	PERMITTED - CLOSED per the 1997 permit	CLOSED by clean Debris rule. CDPHE approval ltr 11/2/04	CSR 8/19/04	CDD 4/2/02		CSR 8/31/05	CSR 11/2/04
912									
913									

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Unit No.	Building	Unit Description	Regulatory Status	Closure Status	Closure Date	Closure Document Approval	SET	Closure document submitted	CDPHE approval
648	750.2A Tent 3	Tank D-1, 25-001, T01066	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL see Closure Summary Report for RCRA Units 7250.2A/B/C (04-RF-00847). Closure covers tanks and not pad/tents.	2/18/03	CDD 4/2/02		CSR 8/19/04	CSR 11/2/04
649		Tank D-10, 25-010, T01075			10/29/02				
650		Tank D-11, 25-011, T01076			10/29/02				
651		Tank D-12, 25-012, T01077			10/29/02				
652		Tank D-13			3/3/03				
653		Tank D-14, 25-014, T01079			2/13/03				
654		Tank D-15, 25-015, D15, T01080			2/13/03				
655		Tank D-16			2/13/03				
656		Tank D-17			2/24/03				
657		Tank D-18			2/21/03				
658		Tank D-19, D-25-019			2/11/03				
659		Tank D-2, 25-002, T01067			10/29/02				
660		Tank D-20, 25-020, T01085			10/29/02				
661		Tank D-21, 25-072, D21, T01086			2/18/03				
662		Tank D-3, 25-003, T01068			10/29/02				
663		Tank D-4, 25-004, T01069			10/29/02				
664		Tank D-5, 25-005, T01070			10/29/02				
665		Tank D-7, 25-007, T01072			10/29/02				
666	Tank D-9, 25-009, T01074	10/29/02							
667	Tank D-6, 25-006, T01071	10/29/02							
669	750.2B Tent 4	Tank D-20, 25-040, T01106	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL see Closure Summary Report for RCRA Units 7250.2A/B/C (04-RF-00847). Closure covers tanks and not pad/tents.	3/17/03	CDD 4/2/02		CSR 8/19/04	CSR 11/2/04
670		Tank D-12, 25-032, T01098			10/29/02				
671		Tank D-7, 25-027, T01093			4/4/03				
672		Tank D-1, 25-021, T01087			4/1/03				
673		Tank D-10, 25-030, T01096			10/29/02				
674		Tank D-11, 25-031, T01097			10/29/02				
675		Tank D-13, 25-033, T01099			10/29/02				
676		Tank D-14, 25-034, T01100			10/29/02				
677		Tank D-15, 25-035, T01101			10/29/02				
678		Tank D-16, 25-036, T01102			10/29/02				
679		Tank D-17, 25-037, T01103			10/29/02				
680		Tank D-18, 25-038, T01104			4/2/03				
681		Tank D-2, 25-022, T01088			10/29/02				
682		Tank D-21, 25-041, T01108			3/17/03				
683		Tank D-22, 25-042, T01108			3/11/03				
684		Tank D-23, 25-073, T01087			4/1/03				
685		Tank D-3, 25-023, T01089			10/29/02				
686		Tank D-4, 25-024, T01090			10/29/02				
687	Tank D-5, 25-025, T01091	10/29/02							
688	Tank D-6, 25-026, T01092	10/29/02							
689	Tank D-8, 25-028, T01094	10/29/02							
690	Tank D-9, 25-029, T01095	10/29/02							
692	750.2C Tent 6	Tank D-9	PERMITTED - CLOSED per the 1997 permit	CLOSED BY REMOVAL see Closure Summary Report for RCRA Units 7250.2A/B/C (04-RF-00847). Closure covers tanks and not pad/tents.	9/4/03	CDD 4/2/02		CSR 8/19/04	CSR 11/2/04
693		Tank D-15			12/9/03				
694		Tank D-1			9/11/03				
695		Tank D-10			8/25/03				
696		Tank D-11			9/16/03				
697		Tank D-12			2/20/03				
698		Tank D-13			8/21/03				
699		Tank D-14			9/15/03				
700		Tank D-16			7/2/03				
701		Tank D-17			12/8/03				
702		Tank D-18			9/15/03				
703		Tank D-19			9/15/03				
704		Tank D-2			9/15/03				
705		Tank D-20			9/9/03				
706		Tank D-21			9/15/03				
707		Tank D-23			9/15/03				
708		Tank D-24			9/15/03				
709		Tank D-25			9/15/03				
710		Tank D-26			9/15/03				
711		Tank D-27			9/15/03				
712		Tank D-28			9/15/03				
713		Tank D-29			6/19/03				
714	Tank D-30	12/18/03							
715	Tank D-33	9/15/03							
716	Tank D-34	9/15/03							
717	Tank D-35	9/15/03							
718	Tank D-36	9/15/03							
719	Tank D-37	9/15/03							
720	Tank D-38	2/20/03							
721	Tank D-39	7/29/03							
722	Tank D-4	9/11/03							

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723		Tank D-40			8/18/03				
724		Tank D-5			8/26/03				
725		Tank D-6			9/10/03				
726		Tank D-7			8/26/03				
727		Tank D-8			8/25/03				
728		Tank D-3			9/9/03				
912									
913									