

776
8-8

From: Hopkins, Ted
Sent: Tuesday, October 31, 2000 10 37 AM
To: Farler, David, Blush, Ed, Casias, Lonnie, Chandler, Gary, Crocker, Mark, Cronin, Robert, Dahlgren, Steven, Ferrari, Mike, Hall, Patti, Holmes, Nancy, Johnson, Michael, Kerridge, Jeffrey, Meadows, Susan, Smiley, Cathy, Smith, Kerry, Sproles, Wayne, Uetrecht, Greg, Vaughn, Terry, Waggoner, Cory, Walker, Randy, Zachary, Mark
Cc: Zachary, Mark, McGinn, Dick, Sproles, Norman, Nininger, Robert, Cathel, Bob, Hicks, Carolyn, Lesser, Richard, Trice, Conrad
Subject: FW Contact Record regarding beryllium monitoring during D&D

CDPHE's CAA group is pulling the string on Be monitoring of D&D waste B776/777 will need to address this type of air monitoring in conjunction with the site's CAA personnel I will work with Karan North and Bob Nininger to determine a path forward

-----Original Message-----

Sent: Monday, October 30, 2000 12 44 PM
To: Grosek, Dave, 'Cindy Burbach@state co us', 'Steve Gunderson@state co us', DiSalvo, Richard, Legare, Joe, 'Rehder Timothy@epa gov', Arnold, Patrick, Berardini, Jacqueline, Gilbreath, Chris, Hopkins, Ted, Lavorato, Karen, Nesta, Stephen, Scott, Gregory, Shelton, Dave, North, Karan, Rosenman, Andrew, Wierzbicki, William, Dischinger, Joe, 'jspaanstra@saegre com', Scott, Tom, Stevens, Jeffrey, 'Archie Crouse@state co us'
Subject: Contact Record regarding beryllium monitoring during D&D



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CEX-105-01

ADMIN RECORD

SW-A-004734

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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: October 26, 2000/ approx 1 30 PM

Site Contact(s): Bob Nininger
Phone: 303-966-4663

Regulatory Contact: Archie Crouse (CDPHE)
Phone: 303-692-3156

Agency: CDPHE

Purpose of Contact: Informal notification that CDPHE is examining the monitoring requirements regarding building demolition when the building may be contaminated with beryllium

Discussion

Arch Crouse called to let me know that the CDPHE is requesting an interpretation from their internal legal resources regarding requirements for monitoring of D&D processes under the Beryllium NESHAP regulations. I noted that we had fallen out of the monitoring requirements in approximately 1994 when foundry and machine shop operations ceased, and inquired what would be the probable triggering category. The issue seems to be whether the NESHAP captures building demolition as a waste process when the building may contain beryllium contamination. From our discussion, I gathered it was not an issue of beryllium contaminated equipment inside the building but the potentially beryllium-contaminated building materials.

In addition, I was told that the appropriate monitoring technique would be the alternative ambient monitoring as specified in the regulations, and not the continuous effluent monitoring as practiced previously or periodic stack testing as called out in the regulation. Our existing ambient monitoring locations at the fence line would not satisfy the requirements of the regulation, either, according to Mr. Crouse.

Contact Record Prepared By: Bob Nininger

Required Distribution

R. DiSalvo, RFFO
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J. Legare, RFFO
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Tom Scott, TRUTC
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A. Crouse, CDPHE

Contact Record 4/10/00
Rev 10/11/00

S Gunderson, CDPHE
T Rehder, USEPA
P Arnold, K-H 371
J Berardini, K-H MS
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