

Cotter Corp. Schwartzwalder Water Treatment Project
Observations and Recommendations from Radiologic Site Inspection
August 27, 2010

1. Cotter's Restricted Area in Water Treatment Building (WTB)
 - Dock Area + the curbed, gray-painted area + floor sump.
 - This is Cotter's designation, evidently from past work. WRT's water treatment license did not require, nor did it designate a Restricted Area.
 - WRT is working on getting Cotter to remove the dock area from their Restricted Area.

2. Radioactive Check of Used Filter Bags
 - The exposure rate (counts/min, using the Ludlum Model 19 microR meter) was slightly elevated over background on the bags used earlier in August (measurements of up to ~ 48 counts/min vs. a background of 38 counts/min). This measurement is still essentially background however (well below the customary threshold of 2 x background).
 - All of the bags from the last half of August measured at background (measurements of 35 to 38 counts/min vs. background at 35 counts/min).
 - D. Bollig to notify CO DPHE of the results of monitoring and that we will be discarding used filter bags in common trash.
 - We may have to continue to hold and check used bags – D. Bollig to advise.

3. Trash Minimizing and Segregating
 - **No Eating and Drinking** in Cotter's Restricted Area (posted at entrance of WTB)
→ Therefore, there shouldn't be any food/drink trash in the area of the treatment system.
 - Should not have common trash containers in the treatment system area → if you find them there, move them to the dock area.
 - WRT common trash container will be in the control room/entrance area – when full, pack our trash down to the office.
 - The trash container near the treatment system will be used for only possibly contaminated PPE and other radioactive contaminated trash. I recommend a trash container with a hinged lid, and we'll make up a label for it.
 - Waste Minimizing – this is a different situation from WRT's normal media exchanges. We hope to send the spent media off for processing and recovery of the contained uranium; therefore we can't simply pitch used PPE in with the spent media.

- Take the time to frisk gloves, booties, Tyvex coats;
- If they aren't contaminated, throw them away in the common trash.

4. Contaminated PPE/Trash

- PPE from media exchanges, spilled media cleanup (vacuum bags, tape, etc.), possible contaminated floor sweepings.
- Currently placed in plastic bags, then in 55-gal drum(s) – this is OK.
- D.Bollig is checking on local disposal of this possibly-contaminated material (Waste Management, Clean Harbors)

5. General Housekeeping – Need to Improve

- 1st problem – we don't have complete control over what goes on in the WTB – need to just deal with that.
- Loose radioactive contamination was found on the 8/27/2010 visit → resin beads on top of two of the three plastic totes.
 - Cleaned up by picking them up with the sticky side of duct tape.
 - This was also a contaminated PPE example – just because you don't see resin beads on your gloves, doesn't mean they aren't contaminated. In this case, they were.
- Spilled resin might be clean/un-used, but a regulator doesn't know that.
- Housekeeping Items:
 - 1.) Trash Containers – see discussion above.
 - 2.) Organize the storage totes – also, don't use the top of the totes as storage shelves.
 - 3.) Minimize the non-essential equipment/items in the Cotter Restricted Area. Example on the 8/27 site visit – discarded wooden pallets.
 - 4.) Remove the folding tables, which were used as work benches during the system installation, from the west side of the WTB.
 - 5.) Periodic sweeping of the gray-area floor – both the treatment system area and the spent media storage area. If we perform a media exchange correctly, this debris can go in the common trash.