

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: August 31, 2004 / 9:00 a.m.
Site Contact(s): David Ward, 371/374 Project
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Regulatory Contact: Harlen Ainscough
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Agency: Colorado Department of Public Health and Environment (CDPHE)

Purpose of Contact: Obtain RCRA stable approval for certain tanks in B374

Discussion

Tanks D-801A, D-847, D-851 and D-852 are currently included in the Rocky Flats Environmental Technology Site RCRA Permit as RCRA Unit 374.3. The following RCRA stable conditions established as Permit Condition X.C.1.a.iii, Tank systems, currently exist for Tanks D-801A, D-847, D-851 and D-852:

1. Emptied to the maximum extent possible.
D-801A and D-852 have been visually verified empty.
D-847 and D-851 are not accessible but are actually vertical 2-foot long 14-inch diameter pipes that connect the B374 process sewer system to D-852 and therefore allow waste to flow to D-852, and have not collected or stored waste. D-847 and D-851 are essentially ancillary equipment to D-852
2. All tanks have less than 1% by volume of holdup.
3. No signification sludge remaining.
4. No signification risk associated with remaining residuals.

Permit Condition X.C.1.b., Future Waste Input, requires the elimination of pathways for re-introducing waste into RCRA stable tanks. D-801A meets this requirement. D-801A is isolated (air gapped) from its piping and is encapsulated.

X.C.1.b also provides for continued use of tanks that have been taken to a RCRA Stable configuration for RFCA activities under an approved RFCA decision document. Project 371/374 has an approved RFCA decision document, which is "Decommissioning Operation Plan" (DOP). The Project still uses tanks D-847, D-851, and D-852 to collect CERCLA waste, draining of water systems, firewater, and etc. in B374. Wastewater from B371 is now isolated from B374. Tanks D-847, D-851, and D-852 will continue to be inspected daily. The wastewater from these tanks will continue to be transferred to AWTS for treatment at an offsite RCRA facility.

Therefore, the Project is requesting that tank D-801A be considered RCRA stable and approved for quarterly inspections and closed under the DOP. The Project is also requesting that tanks D-

847, D-851, and D-852 be considered RCRA stable and approved for continued use as stated above and closure under the DOP.

Additionally, tank D-875 that sits on top of tank D-804A was inadvertently left off the Project's February 27, 2004 "RCRA-stable" request letter. The request was approved by CDPHE on March 17, 2004. Tank D-875 met all the RCRA stable requirements in February and has since been encapsulated. Therefore, the Project also requests that tank D-875 be approved as RCRA stable for quarterly inspections and closure.

Approval: CDPHE, having reviewed the foregoing information and specifically discussed the lack of potential for sludge holdup in Tanks D847 and D851, agree that the requirements for RCRA-stable have been met. Non-RCRA use of Tanks D-847, D-851, and D-852 to collect CERCLA waste, to drain water systems, or collect firewater, etc. may continue with daily inspections and disposition of wastewater to an offsite RCRA facility. Tanks D-801A and D-875 are approved RCRA stable and reduced inspections to quarterly until closed.

Contact Record Prepared By: David Ward

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