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COMPANY

MEMORANDUM

Date: October 31, 2005

To: Hollies Young, Administrative Record

From: David Ward

Subject: RCRA HISTORY AS OF October 31, 2005

Attached is the RCRA History for Site as of October 31, 2005.

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OCT 31 2005

ADMIN RECORD

371/374 Project
WEEKLY STATUS MEETING DOE/LRA for December 8, 2004

1/28

RCRA HISTORY

DATE	DESCRIPTION
Summer 1980	DOE and Rockwell file S3010 "Notification of Hazardous Waste Activity
11/14/1980	Part A Permit Applications are filed by DOE and Rockwell as required for interim status. (Note: Rockwell submitted to DOE a Part A permit application which included mixed waste; however, DOE submitted a Part A Permit Application to the United States Environmental Protection Agency (EPA) without mixed waste included.
11/14/1982-04/13/1984	The Department of Energy (DOE) takes position that its Atomic Energy Administration (AEA) facilities are categorically exempt from RCRA. This position is first articulated by DOE Asst. General Counsel, James Rogers on 11/14/80 and continued until DOE lost the Legal Environmental Assistance Foundation (LEAF) case on 04/13/84.
6/17/1981	EPA notifies DOE that the 11/14/80 Part A Permit Application is incomplete.
7/13/1981	Rockwell provided amended Form 3 to DOE.
7/21/1981	DOE informs EPA that radioactive wastes are excluded from RCRA and that it wished to withdraw its Part A Permit Application but that it wanted to be "included in the RCRA record system as a small quantity generator."
12/4/1981	DOE Albuquerque Operation (ALO) provided definition of "Radioactive Waste" as a means to distinguish mixed waste from pure hazardous waste.
3/23/1982	DOE, ALO distributes DOE, Headquarters (HQ) proposed Order 5480. This proposed Order indicated low-level mixed waste will have both RCRA and radioactive requirements applied.
4/27/1982	DOE, ALO indicates EPA Regional Office not accepting DOE position.
6/7/1982	Proposed AL 5480.2 is in direct conflict with 03/23/82 DOE HQ 5480.
8/22/1983	DOE resubmits a Part A Permit Application since DOE no longer believes it is a "small quantity generator.
2/22/1984	EPA/DOE issues Memorandum of Understanding (MOU) for Hazardous Waste and Radioactive Mixed Waste Management. This MOU established a program comparable to RCRA's technical record keeping and reporting requirements but did not require DOE to comply with RCRA permitting or procedural requirements.
4/11/1984	During meeting at the Rocky Flats Plant (RFP), EPA requests information on RFP waste handling and Part A.
4/13/1984	LEAF case decided. DOE loses: Court holds that DOE is not categorically exempt from RCRA. EPA takes position that LEAF abrogates the MOU.
4/24/1984	Rockwell and DOE provided three waste management documents to EPA.

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5/4/1984	DOE, ALO says "MOU will probably remain in effect."
7/23/1984	Rockwell prepares three Part A Permit Applications for interim status; one for hazardous waste, one for non-process mixed wastes, one for process mixed wastes. Not submitted to EPA or to the Colorado Department of Health (CDH).
9/19/1984	DOE, ALO says submit Part A Permit Application for hazardous wastes only and recommends omitting certain facilities because they have mixed waste involved.
10/8/1984	DOE, ALO distributes DOE opinion that Transuranic (TRU) and by-product material will be excluded from RCRA.
Nov-84	DOE, HQ legal opinion defining by-product waste.
11/2/1984	CDH authorized to implement the basic RCRA program.
12/12/1984	Draft definition of by-product material issued by DOE.
Dec-84	DOE, HQ notified by Rockwell that EPA will require a RCRA Part B Permit Application in fiscal year '86.
3/1/1985	DOE, ALO states that it is permissible to include the mixed waste streams in the Part A Permit Application, as long as they are identified as "candidate mixed waste."
4/18/1985	CDH notified RFP that Part B Permit Application is due on 11/01/85.
5/31/1985	Rockwell and DOE submitted two revised Part A Permit Applications to CDH and EPA, one for hazardous wastes and one for "candidate mixed waste". The Part A Permit Application for candidate mixed waste was submitted unsigned, at the request of DOE.
7/25/1985	DOE, HQ states that only radioactive mixed streams, "clearly subject to RCRA jurisdictions" should be included in RCRA Permit Application.
11/1/1985	Rockwell and DOE submit Part A and Part B Permit Applications to CDH. The applications included certain hazardous wastes, but do not include radioactive mixed waste streams or units.
11/8/1985	Rockwell and DOE submit Part A and Part B Permit Applications to EPA. These applications included certain radioactive mixed wastes.
11/20/1985	CDH sends "Notice of Deficiency (NOD) letter to DOE and Rockwell because 11/01/85 Permit Applications failed to include radioactive mixed waste. Letter gave RFP until 12/3/85 to provide mixed waste data or a "Public Notice of Intent to Deny a Permit (NOID) would be issued.
12/16/1985	CDH issues NOID because 11/1/85 Permit Applications failed to include radioactive

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	mixed waste.
7/31/1986	DOE enters a Compliance Agreement with CDH and EPA for regulation of hazardous and low-level mixed waste. This agreement requires that RFP comply with 6 CCR 1007-3 interim status requirements, and submit a Part B Permit Application for hazardous and low-level mixed waste by 11/28/86. The agreement also required waste stream identification, site characterization and corrective action, closure and post closure care plans, and a specific schedule for closure plans for the solar ponds. This agreement excludes TRU-mixed waste from its coverage.
11/5/1986	Rockwell and DOE submit a request for change to interim status to add two pondcrete storage areas (750 Pad and Building 964). CDH approves this request on 1/29/87 but specifies that they have no intent to permit these additional storage areas.
11/7/1986	EPA pursuant to 42 U.S.C. 6926 authorized CDH to regulate the hazardous waste component of radioactive mixed waste.
11/28/1986	Rockwell and DOE submit Part A and Part B Permit applications (Revision 0) to CDH as required by the 1986 Compliance Agreement. These applications included both hazardous waste and low level mixed waste.
5/1/1987	By final rule (10 C.F.R.. 962) dated 05/01/87 (52 F.R.. 15937-40) DOE interprets the term "by-product material", as defined in the Atomic Energy Act of 1954 as amended and used in RCRA. The effect of this final rule at RFP was to include within the coverage of RCRA those wastes categorized as TRU mixed wastes. These wastes contain greater than 100 nanocuries per gram of transuranic elements as well as hazardous components.
6/9/1987	Rockwell submits revised Part A Permit Application to Doe, at the request of CDH, which removes Building 995 Sewage Treatment Plan (STP) and adds more cargo containers. Not submitted to CDH by DOE until 12/87 (see below) so that additional changes could be included.
7/17/1987	CDH requests DOE submit a Part B Permit Application for TRU mixed wastes by 07/01/88, and indicated that failure to furnish a Part B Permit Application could result in the termination of interim status for those units.
9/28/1987	CDH issues NOD for Hazardous and Low-Level Mixed Waste Permit Application. Areas of deficiency noted were the Waste Analysis Plan, the Contingency Plan, lack of diagrams for container storage areas, and not providing tank information required by new 07/86 tank regulations (particularly secondary containment information).
10/9/1987	DOE and Rockwell submit Part A Application (Revision 0) for TRU-mixed waste to CDH and EPA.

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DATE	DESCRIPTION
12/15/1987	DOE and Rockwell submit revised Part A and B Permit Applications (Revision 1) for Hazardous and Low-Level Mixed Waste. These applications included revisions in response to the 09/28/87 NOD from CDH as well as deleting many storage areas and dumpsters (which became 90-day areas) and Building 995 STP, and added more cargo containers.
2/29/1988	DOE and Rockwell request a temporary change to interim status for moving freezing drums from Main Hazardous Waste Storage Area (Unit 1) to Building 664 (Unit 20). CDH approves request (for 90-days only) on 02/29/88.
4/13/1988	DOE and Rockwell submit corrected pages to CDH for Hazardous and Low-Level Mixed Waste Part A and B Permit Application (Revision 2). Changes include additional cargo containers in Unit 1 and deletes reference to the Fluidized Bed Incinerator (FBI).
5/3/1988	CDH issues DOE and Rockwell a Compliance Order Number 88-5-3-1, addressing an inadequate waste analysis plan, and operating record, storage without interim status, misuse of Satellite Accumulation Areas, inadequate aisle space, incorrect accumulation date on containers, and failure to notify the State when the contingency plan was implemented. This compliance order was resolved with issuance of Compliance Order 89-07-10-01.
6/7/1988	DOE and Rockwell submit a Part A Permit Application (Revision 1) for TRU-mixed wastes to CDH. This application included a request for increased storage and treatment capacity and added and deleted several units. DOE sent a letter on 11/18/88 urging CDH to review and approve this submittal. CDH responded on 12/15/88 saying additional information and justification was needed, and that some of the requests were not valid under interim status. A DOE/Rockwell/EPA/CDH meeting followed on 01/10/89 and additional information and justification was provided to CDH on 03/01/89.
6/15/1988	DOE and Rockwell submit letter to CDH requesting change to interim status for Revision 2 of Part A and B Permit Applications submitted 04/13/88.
7/1/1988	DOE and Rockwell submit a revised Part A Permit Application and Part B Permit Application (Revision 0) for TRU-mixed waste.
7/1/1988	DOE and Rockwell submit to CDH documentation proposing Building 774 processes as totally enclosed treatment facilities and thereby exempt from RCRA regulations. CDH never responded and RFP did not pursue further.
8/2/1988	DOE and Rockwell submit a revised Part A Permit Application (Revision 3) for Hazardous and Low-Level Mixed Waste. This submittal followed a 07/25/88 meeting with CDH held to discuss interim status issues. The primary purpose of this submittal was to provide additional justification and explanation for the applications for interim status that had previously been made. CDH responded to this request in a letter dated 10/09/88 and with issuance of Compliance Order 89-07-10-01.

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8/15/1988	CDH issues "Notice of Completeness" (NOC) for Hazardous and Low-Level Mixed Waste Permit Application.
9/23/1988	EPA published a "Clarification Notice" which attempted to clarify requirements for facilities that treat, store, or dispose of radioactive mixed waste regarding the obtaining of "interim status." In states not authorized by EPA to administer the Federal Hazardous Waste Program in lieu of EPA, facilities were given to 03/23/89, to file a Part A Permit Application and qualify for interim status. Further, EPA's clarifying notice acknowledged the substantial "confusion and uncertainty" that has "surrounded the applicability of RCRA to hazardous wastes containing certain radioactive materials."
10/25/1988	Rockwell submitted to DOE a revised Part A Permit Application for TRU- mixed waste requesting interim status for storage in eight A TMX railcars and in two new buildings near 904 Pad. The Permit Application was not submitted to CDH.
Feb-89	Sierra Club sues DOE over alleged violations pertaining to mixed residues (e.g., incineration, storage). The court issued a decision on this suit on 4/12/90.
6/6/1989	Federal Bureau of Investigation (FBI) and EPA execute a search warrant indicating possible plant violations of RCRA and CWA.
6/7/1989	CDH serves DOE with Compliance Order 89-06-07-01 citing violations noted during CDH inspection conducted 06/88 through 01/89. Violations included inadequate groundwater monitoring, storage without interim status (particularly at Building 964 and 904 Pad), and administrative problems.
7/14/1989	DOE, Rockwell, and CDH enter into Settlement Agreement and Compliance Order on Consent, 89-07-10-01 in response to the 06/89 Compliance Order. In this agreement, DOE and Rockwell commit to submit to consolidated Part A Permit Application (to clarify interim status issues), and DOE commits to pay a sum of $95,800.00. Exhibit A of the Settlement Agreement states for which units RFP has interim status and limits TRU-mixed waste capacity to 1,601 cubic yards.
8/9/1989	CDH issues NOV 89-08-09-01 stating that residues possessing hazardous waste characteristics or containing listed hazardous wastes are subject to Colorado Hazardous Waste Regulations if the residues are not in-process secondary materials. The NOV cited RFP for not submitting permit applications for mixed residues and not managing mixed residues in accordance with regulations, and directed RFP to come into compliance.
8/16/1989	DOE and Rockwell submit a consolidated Part A Permit Application which includes hazardous and low-level, and TRU mixed waste. This was done to satisfy the 07/14/89 Settlement Agreement and to clarify what units had interim status for what waste types. (Separate Part A Permit Application for low-level mixed and TRU-mixed waste continued to be used by Rockwell and DOE.)

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DATE	DESCRIPTION
8/24/1989	DOE and Rockwell request a temporary change to interim status to temporarily store hazardous gas cylinders at an alternate location during repairs to Building 952 (Unit 23). CDH approves the request in a letter dated 08/25/89, for the period from 08/28/89 through 09/22/89.
9/19/1989	Federal Facilities Compliance Agreement (FFCA) signed by DOE, EPA, and CDH. The agreement required DOE to take actions to ensure identification, safe storage, and minimization of Land Disposal Restricted (LDR) mixed waste (known as FFCA I).
10/4/1989	Draft Permit for operation of nine hazardous and low-level mixed storage units received from CDH. NOID received for remaining storage units and all treatment units included in Hazardous and Low-Level Mixed Permit Application.
10/20/1989	DOE and Rockwell submit to CDH a revised Part A Permit Application for TRU-mixed waste (Revision 2). Requests movement of Unit 63 from Building 371 to Building 776 to accommodate strip out to occur in Building 371. (Request was withdrawn in 10/90).
10/16/1989	DOE and Rockwell submit to CDH two volumes of information describing the Supercompactor and Size Reduction Facility (SARF) and TRU Waste Shredder (TWS), requesting a change to interim status. (Considered Revision 3 of the Part A Permit Application for TRU-mixed wastes).
10/31/1989	DOE and Rockwell submit to CDH revised Part A Permit Applications. One is for Hazardous and Low-Level Mixed Waste (Revision 4), and the other is for TRU-mixed waste (Revision 4), reflecting change in M&O contractor. Effective date of change is 01-01-90.
11/3/1989	Settlement Agreement and Compliance Order 89-10-30-01 ["Residue Compliance Agreement" (RCA)] signed by DOE, EPA and CDH in response to the 08/09/89 NOV. The agreement defines residues, which residues are RCRA-regulated, and a series of deliverables geared to providing characterization and inventory of residues. The final deliverable is the Mixed Residue Compliance Plan to be delivered 09/28/90.
11/21/1989	DOE and Rockwell request CDH approval to move certain TRU-mixed wastes back to 90-day areas at Non-Destructive Assay (NDA) equipment for re-assaying. (CDH grants approval for six months on 12/11/89. DOE and EG&G Rocky Flats, Inc. request a six-month extension on 07/20/90 which is granted on 09/04/90.)
12/18/1989	DOE and Rockwell submit Facility Comments on CDH Draft Permit for hazardous and low-level mixed waste storage units.
1/1/1990	EG&G Rocky Flats, Inc. assumes role as RFP M&O contractor.

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DATE	DESCRIPTION
1/3/1990	DOE and Rockwell submit revised Part A Permit Application for Hazardous and Low-Level Mixed Waste (Revision 5) to request change to interim status for two new pondcrete/saltcrete reprocessing units (Units 34 and 35). CDH approves request on 04/05/90, but states there is no intention to permit these units and that interim status expires in 11/92. (Revision 5.1 was prepared to include change in operator only, but never submitted because Revision 6 became necessary a few months later.)
3/28/1990	DOE and EG&G Rocky Flats, Inc. submit to CDH revised Part B Permit Application for Hazardous and Low-Level Mixed Waste (Revision 3) to address the 10/04/89 NOID.
3/28/1990	The State of Colorado issues a Notice of Violation (NOV), Number 90-03- 28-01, to address the "Ground-Water Assessment Plan for Rocky Flats" that was submitted in response to Compliance Order 89-06-07-01. The NOV alleged that the Ground-Water Assessment Plan was deficient and not in compliance with the regulations.
4/5/1990	CDH approves the 01/03/90 request for change to interim status.
4/12/1990	U.S. District Court partial judgment on the Sierra Club versus DOE and Rockwell citizen enforcement action concerning RCRA-regulated residues. ;::; The judgment finds that mixed residues are RCRA Subtitle C hazardous wastes and that RFP has burned and is storing RCRA Subtitle C hazardous wastes (mixed residues) without RCRA interim status or permit. The judgment comments that the 11/03/89 Residue Compliance Agreement is commendable, but states that it is indefinite and gives no deadlines for compliance.
6/22/1990	DOE and EG&G Rocky Flats, Inc. submit to CDH revised Part A Permit Application for Hazardous and Low-Level Mixed Waste (Revision 6) requesting a change to interim status for the Building 889 Baler and associated storage area. CDH grants conditional approval on 12/10/90. By mid-1992, the Building 889 Baler project is confirmed as inactive and the need for final approval is withdrawn on 11/6/92 as a part of RCRA Permit Modification Request #12 (see below). Part B permitting of the associated storage area is included in the permit modification request.
8/23/1990	DOE and EG&G Rocky Flats, Inc. request a change to interim status to move Unit 1 drums to Building 664 (Unit 20) for Real Time Radiography (RTR). CDH grants approval on 10/24/90.
8/27/1990	DOE and EG&G Rocky Flats, Inc. request a temporary change to interim status to increase storage capacity of Unit 1 for non-radioactive hazardous waste oils. CDH never responded to request and request became unnecessary in 03/91 when non-radioactive hazardous oils were shipped offsite.
8/29/1990	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status to add blue dye to the solar ponds. (CDH approves request on 12/28/90.)

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8/29/1990	DOE and EG&G Rocky Flats, Inc. request temporary change to interim status for storage of Building 884 (Unit 13) wastes in Tent #7 to allow for Unit 13 repairs (CDH approves request on 09/12/90).
9/28/1990	DOE and EG&G Rocky Flats, Inc. submit Residue Compliance Plan to CDH as the last deliverable of the RCA. This plan outlines how and when mixed residues at RFP will be brought into compliance with physical and administrative requirements of RCRA.
10/26/1990	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status to allow operation of aerators and heater/soaker pipe at the solar ponds (CDH approves requests on 12/28/90, however, only conditionally for aerators. EG&G Rocky Flats, Inc/DOE withdraw request for aerators on 08/06/91).
11/1/1990	EG&G Rocky Flats, Inc. submits to DOE Permit Modification documentation for the Centralized Waste Storage Facility (CWSF). Permit Modification could not be submitted to CDH because Permit had not yet been issued. An updated permit modification request was submitted to DOE on 1/31/92. The CWSF project subsequently experienced a change of scope and the permit modification request was not submitted to CDH. Another revision was initiated 2/3/93 but was later put on hold as the project scope remained undefined.
11/6/1990	EG&G Rocky Flats, Inc. submits revised Pan B Permit Application for TRU-mixed waste (Revision 1) to DOE. Includes Supercompactor and general updates. Never submitted to CDH.
12/21/1990	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status to allow operation of portable evaporators at the solar ponds. CDH requests Interim Measure/Interim Remedial Action (IM/IRA) documentation instead of a change to interim status on 06/24/91. IM/IRA was submitted 7/3/91 and revised and resubmitted 8/20/91.
1/22/1991	DOE, EPA, and CDH sign the Environmental Restoration Interagency Agreement (IAG) to provide a procedural framework and schedule to address the investigation and remediation of environmental impacts resulting from past and present activities at RFP. The IAG incorporates the requirements of RCRA, CERCLA and the Colorado Hazardous Waste Act.
2/12/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH a closure plan for Building 771 Incinerator as required by the Residue Compliance Plan.
5/3/1991	Sierra Club seeks an injunction against resumption of plutonium operations because of continuing residue non-compliances. The court issued a decision on this motion on 8/13/91.
5/10/1991	FFCA II signed by DOE and EPA to extend and expand original 09/19/89 FFCA I. FFCA requires DOE to identity, provide safe storage, develop and implement treatment technologies, and minimize LDR waste with the goal to achieve compliance with LDR portions of RCRA. Requires development of CTMP.

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6/11/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH revised Pan A Permit Applications; Revision 7, for Hazardous and Low-Level Mixed Waste and Revision 5, TRU-mixed waste. The revised applications request change to interim status to operate certain NDA areas, add Unit 6, and correct several EPA codes.
7/5/1991	DOE and EG&G Rocky Flats, Inc. submit to EPA and CDH revised Pan A Permit Applications; Revision 8 for Hazardous and Low-Level Mixed Waste and Revision 6 , for TRU-mixed waste. The revised applications add the new Toxicity Characteristic Leaching Procedure (TCLP) EPA codes, and add the Size Reduction Facilities (Units 61 and 62) to the low-level application. 07/25/91 DOE and EG&G Rocky Flats, Inc. submit to CDH the Preliminary Tank and Treatment Unit Report, as required by the Residue Compliance Plan. A revision to the Residue Compliance Plan was also submitted with this document.
7/31/1991	CDH issues Compliance Order 91-07-31-01, the "Residue Compliance Order". The Order is based on the Residue Compliance Plan and establishes due dates for physical and administrative compliance for all mixed residues. It also required all mixed residues to be removed from Rocky Flats by 1/1/99.
8/1/1991	CDH files suit against DOE alleging violations of 1989 Order regarding mixed residue management.
8/1/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status to allow super compaction of low-level mixed waste at the SARF (Unit 74). The request identifies changes to the 11/16/89 TRU-mixed waste SARF Pan A Permit Application necessary in order to super compact low-level mixed waste.
8/13/1991	DOE and EG&G Rocky Flats, Inc. submit to C DH a revised consolidated Part A Permit Application (Revision 1). The Hazardous and Low-Level Mixed Waste and TRU-mixed Waste Part A Permit Applications were consolidated as a result of continual findings of low-level mixed wastes being stored/treated in TRU-mixed waste units. CDH informally agreed with EG&G Rocky Flats, Inc. that a consolidated Part A Permit Application would simplify many interim status problems. This revision of the consolidated Part A Permit Application combined Revision 8 of the Hazardous and Low-Level Mixed Waste Part A Permit Application and Revision 6 of the TRU-mixed Part A Permit Application, and requested additional changes. These changes include the treatment of low-level mixed waste in Building 774, additional EPA codes for liquid waste treatment units, four new ER waste storage and treatment units, Building 776 Baler, two oil/water separation units and several other clarifications.
8/13/1991	U .S. District Court orders Rocky Flats to obtain a Part B Permit for Mixed Residues within 2 years or shutdown of all operations that generate hazardous wastes.
8/22/1991	Amendment to 08/13/91 U.S. District Court Order. The amendment supersedes the 08/13/91 Order but still requires mixed residues to be permitted within 2 years.

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8/30/1991	CDH approves the 8/13/91 request for changes to interim status for four ---new ER waste storage and treatment units.
9/12/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status for the soaker hose at the solar ponds. CDH approves change on 9/12/91.
9/12/1991	DOE, EG&G Rocky Flats, Inc. and CDH hold a meeting to discuss status of various permitting actions. CDH requests additional information and justification for all previous requests for change to interim status. CDH also said that interim status for new TCLP codes was self implementing and stated that RFP must submit permit modifications for any new units, versus changes to interim status.
9/27/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH standardized closure plans for mixed residue storage areas as required by the Residue Compliance Order.
9/30/1991	CDH issues Part B Operating Permit for nine hazardous and low-level mixed waste storage units. Permit becomes effective on 10/30/91. Permit incorporates IAG milestones in the Corrective Action section. EG&G Rocky Flats, Inc. requests permission from DOE to appeal permit based on the incorporation of IAG milestones. DOE denies request.
10/28/1991	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #1 to CDH, a Class II modification which included 12 separate changes needed to ensure RFP compliance with the permit. Modification included changes to the contingency plan, waste analysis plan, and unit descriptions. Temporary authorization was requested and granted 10/31/91. Public comment meeting held 12/05/91. The Modification was approved by CDH on 04/30/92.
10/29/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH mixed residues "Waste Analysis Plan" as required by the Residue Compliance Order.
10/30/1991	Date that Rocky Flats' RCRA Part B Permit becomes effective.
11/6/1991	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #2 to CDH, a Class I modification which "cleaned up" many administrative errors in the permit.
11/26/1991	DOE and EG&G Rocky Flats, Inc. submit to CDH standardized closure plans for mixed residue tanks, as required by the Residue Compliance Order.
12/10/1991	DOE and EG&G Rocky Flats, Inc. submit a temporary authorization request to CDH, requesting additional waste codes for certain units. Temporary authorization was granted on 12/12/91 and granted through 06/08/92. These additional codes are included in Modification #4 (see below).
12/23/1991	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #3 to CDH, a Class I modification which removed an interim compliance date from the training section.

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1/15/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #4 to CDH, a Class II modification which added NDA counters and waste codes (see 12/10/91). Revision 3 of the combined Part A Permit Application is attached to this modification. Temporary authorization for the counters was requested and granted 04/16/92. Public comment meeting held 02/13/92.
1/28/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #5 to CDH, a Class III modification which rewrote the training section. Temporary authorization was requested and but not approved. Public comment meeting held 02/13/92. Training permit modification becomes a Class II (Permit Modification #20) on 08-16-94.
2/3/1992	DOE and EG&G Rocky Flats, Inc. submit Combined Part A Application (Revision 2) to CDH. This application requests interim status for 38 new container storage areas and 35 new storage tanks for newly generated ,mixed residues.
2/3/1992	EG&G submits to DOE Permit Modification #19 which address the construction of the Central Waste Storage Facility (additional storage of low level mixed waste; Permit Modification #19 was originally known as Permit Modification #7).
2/7/1995	CDH approves changes to interim status to allow storage of low-level mixed waste in Units 61. 62, 69. 55, 56 and 57.
2/10/1992	DOE submits initial Site Characterization notification to CDH regarding the suspected release from the underground storage tank, north of Building 331.
2/25/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #6 to CDH, a Class I modification which reformatted Part III, Treatment and Storage Units, of the RCRA Permit.
2/25/1992	DOE and EG&G Rocky Flats, Inc. submit the Backlog Residue Hazardous Waste Determination Status Report.
2/27/1992	DOE and EG&G Rocky Flats, Inc. submit to EPA a RCRA Part B Permit Application supplement to address organic air emissions regulations. The program is fully implemented in late 1992.
2/28/1992	DOE and EG&G submit the Mixed Residues Reduction Report, which provided a plan for removing mixed residues from Rocky Flats.
Mar-92	Rockwell pays $18.5 million to settle four alleged RCRA violations (and six alleged CWA A violations) arising from 1987 through 1989 activities.
3/6/1992	DOE and EG&G Rocky Flats, Inc. submit notification letter to CDH regarding the closure of the underground storage tank which is north of Building 776.
3/20/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #7 to CDH, a Class I modification which reformatted the remaining parts of the RCRA Permit.

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3/31/1992	DOE and EG&G Rocky Flats, Inc. submit Revision 0 of the Mixed Residues Tank Systems Management Plan.
3/31/1992	DOE and EG&G efforts to obtain a treatment permit for a plutonium oxidation process are initiated after a process knowledge mixed waste characterization. This effort became Permit Modification Request #11. A subsequent analytical study found the material to be non-hazardous and the permit modification was canceled 07/24/93.
4/10/1992	EG&G Rocky Flats, Inc. requests to DOE to withdraw Revision 2 to the Combined Part A Application. DOE did not forward this proposed withdrawal to CDH.
5/11/1992	DOE revises 03/06/92 notification letter to CDH regarding the closure of the underground storage tank which is north of Building 776.
5/22/1992	CDH issues DOE and EG&G a NOV, Number 92-05-22-01, regarding the "Draft Final Phase I RFI/RI Work Plan for Operable Unit-8 (700 Area)". The Plan did not adequately identity the nature and extent of contamination in the Operable Unit.
6/4/1992	CDH approves change to interim status to allow treatment of TRU mixed waste in SARF and TWS. This request was submitted by DOE on 11/02/89.
6/9/1992	CDH approves Permit Modification Request #4.
6/17/1992	CDH issues a NOV, Number 92-06-17-01, to EG&G Rocky Flats, Inc. The NOV included 56 alleged violations the majority of which appeared to be attributable to inadequate RCRA training and failure to prioritize and complete corrective actions.
6/30/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #8 to CDH, a Class III modification which added Mixed Residues Units. Public comment meeting was held 08/18/92.
7/8/1992	EG&G Rocky Flats, Inc. submits the revised Interim Status Contingency Plan to DOE. The Contingency Plan is placed in effect.
7/20/1992	DOE and EG&G Rocky Flats, Inc. submit a request for temporary change to interim status for temporary storage of Unit 10 waste in Tent 1 (Unit 18.03) to allow pavement to be placed on Unit 10. CDH approves request 07/22/92. Waste is returned to Unit 10 in January, 1993.
7/22/1992	CDH approves change to interim status to allow treatment of low level mixed waste in SARF and TWS.
8/10/1992	DOE and EG&G Rocky Flats, Inc. submit a change to interim status (Combined Part A, Rev 7) for a new pondcrete process. This process was to be operated by Halliburton-NUS as the final Solar Pond sludge cleanout project. The project was subsequently shutdown and the change to interim status was put on hold.

RCRA HISTORY

DATE	DESCRIPTION
8/17/1992	Revision 1 of the Mixed Residue Tank Systems Management Plan is sent to CDH. The revision informed CDH of changes in the status and management of mixed residue tank systems.
8/26/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #9 to CDH, a Class III modification for Phase I of the Building 374 Evaporator Upgrades. The upgrades include installing thin film evaporators to replace the existing salt cementation process.
9/11/1992	The Building 371 Tank Systems Interim Status Closure Plan is sent to CDH. This plan describes how out-of-service mixed residue tank systems in Building 371 will be closed in accordance with RCRA.
11/6/1992	DOE and EG&G Rocky Flats, Inc. submit Permit Modification Request #12 to CDH, a Class III modification for several interim status units. This request included the Supercompactor, TRU Waste Shredder, Pondcrete/Saltcrete storage and treatment facilities as well as storage and treatment facilities related to Environmental Restoration activities.
11/13/1992	DOE and EG&G Rocky Flats, Inc. send a justification letter to CDH as a part of a request for change to interim status (Combined Part A, Rev. 4) to add various EPA waste codes. This justification addresses changes originally requested in LL Mixed Waste Part A Permit Applications Revision 7 and 8, TRU Mixed Waste Part A Permit Applications revisions 5 and 6, and the Combined Part A Permit Application Revision 1. CDH grants a partial change to interim status on 03/04/93. Remaining changes were approved on 12/06/93.
11/13/1992	The annual update to the Mixed Residue Reduction Report is sent to CDH. This update informed CDH of changes in the status of removing mixed residues from Rocky Flats.
11/18/1992	DOE and EG&G Rocky Flats, Inc. submit a revision to Permit Modification Request #5 to CDH.
12/11/1992	The Building 771 Tank Systems Interim Status Closure Plan is sent to CDH. This plan describes how out-of-service mixed residue tank systems in Building 771 will be closed in accordance with RCRA.
12/23/1992	A letter offering assistance in reviewing the Mixed Residues Permit Modification Request is sent to CDH. The letter documented DOE's concern that CDH is not able to issue a Part B permit for mixed residues by August 1993 as required in the 07/31/91 Residues Compliance Order.
12/23/1992	EG&G Rocky Flats, Inc. submits Permit Modification Request #13 to DOE, a Class III modification for Phase II of the Building 374 Evaporator Upgrades. DOE submittal to CDH is on hold pending a decision on the Phase II changes.
1/29/1993	EG&G Rocky Flats, Inc. submits a proposal for the management of out-of-service RCRA Units to DOE. DOE submittal to CDH is TBD.

RCRA HISTORY

DATE	DESCRIPTION
3/4/1993	CDH approves Revision 4 of the Combined Part A.
4/8/1993	DOE and EG&G Rocky Flats, Inc. submit a draft revised RCRA permit to CDH which incorporates mods 1, 2, 3, 4, 6 and 7. This draft is an effort to expedite updating the RCRA permit. CDH subsequently responded with comments on 5/27193.
4/13/1993	The Building 777 Tank Systems Interim Status Closure Plan is sent to CDH. This plan describes how out-of-service mixed residue tank systems in Building 777 will be closed in accordance with RCRA.
4/13/1993	The Mixed Residues Container Storage Areas Interim Status Closure Plan is sent to CDH. This plan describes how out-of-service mixed residue container storage areas will be closed in accordance with RCRA.
4/23/1993	CDH issues Settlement Agreement and Compliance Order on Consent 93-Q4-23-Q1. The Agreement superseded Compliance Order 91-Q7-31-01 and included CDH's comments on the Mixed Residue Reduction Report as well as an inventory of backlog mixed residues at Rocky Flats. The Agreement becomes effective on 6/17193.
5/18/1993	DOE and EG&G Rocky Flats, Inc. submit a change to interim status (Combined Part A, Rev. 11) to CDH requesting designation of the pondcrete and saltcrete "triwalls" in the 904 Pad container storage area as waste pile storage. This request was withdrawn on 03/23/94.
5/27/1993	CDH response to the draft which revises the RCRA permit incorporating mods 1, 2, 3, 4, 6 and 7. In response, DOE submits Permit Modification #14 on 6/16/93.
6/16/1993	DOE and EG&G Rocky Flats, Inc. submit a revised RCRA permit to CDH which incorporates mods 1, 2, 3, 4, 6, 7, and Permit Modification #14. This draft is an effor1 to expedite updating the RCRA permit. This revised RCRA Permit was issued by CDH on 01/24/94.
6/17/1993	DOE submits characterization and RTR exemption proposal to CDH for the heat exchangers removed from Building 374 evaporator system (Unit 42, E-808 and E-809).
7/13/1993	CDH issues Notice of Deficiency regarding Permit Modification Request #8 (mixed residues).
7/23/1993	DOE and EG&G Rocky Flats, Inc. submit a claim for the wastewater treatment exclusion to CDH. This exclusion would remove cer1ain units from regulation under RCRA, including Units 39, 40, 42, 43 and 55. CDH concurrence was requested 08/20/93.
7/30/1993	DOE and EG&G Rocky Flats, Inc. submit Revision 2 of the Mixed Residue Tank Systems Management Plan to CDH. The revision informs CDH of changes in the status and management of mixed residue tank systems.

RCRA HISTORY

DATE	DESCRIPTION
8/2/1993	CDH approves RTR proposal for the heat exchangers removed from Building 374 evaporator system (Unit 42, E-808 and E-809).
8/4/1993	EG&G Rocky Flats, Inc. submits a draft Permit Modification Request to DOE, a Class III modification for TRU waste units and units from the 10/04/89 NOID. The mod includes Units 19, 20, 39, 40, 41, 42, 43, 55, 56, 57, 59, 61, 62 and 73. This Permit Modification Request was not submitted to CDH.
8/6/1993	DOE and EG&G Rocky Flats, Inc. submit to CDH Permit Modification #15 request to incorporate the storage of mixed residue units into the permit. The modification requests changes for mixed residues in Buildings 371, 707,771,776, and 779.
10/8/1993	DOE and EG&G Rocky Flats, Inc. submit revised Permit Modification #5 to CDH. This permit modification is the second revision to the training chapter.
10/22/1993	CDH issues NOD pertaining to the Tank Management sections of the Residue Permit Modification Request #8 (mixed residues).
11/10/1993	CDH issues NOD pertaining to the Container Storage sections of the Permit Modification Request #8 (mixed residues).
11/15/1993	EG&G Rocky Flats, Inc. submits to DOE a Permit Modification #16 requesting additional toxicity characteristic wastes codes to the permitted storage units.
11/30/1993	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status regarding additional tank storage and additional waste streams to Unit 25 (Revision 13 Combined Part A).
12/3/1993	CDH responded to the revised Permit Modification #5 -revisions to the training chapter.
12/6/1993	CDH approves remaining changes that were requested in Combined Part A Revision 4.
12/10/1993	DOE and EG&G Rocky Flats, Inc. submit to CDH Permit Modification #18 requesting changes to the IAG milestone schedules in the Corrective Action Requirements Section of the State RCRA Permit for RFP.
12/20/1993	CDH issues NOD pertaining to Tank Closure sections of Permit Modification Request #8 (mixed residues).
12/21/1993	DOE and EG&G Rocky Flats, Inc. submit to CDH the Permit Modification #10, Class II, regarding changes to the Contingency Plan and the addition of several EPA codes.
12/22/1993	CDH approves the 11/30/93 request for change to interim status.

RCRA HISTORY

DATE	DESCRIPTION
12/28/1993	CDH issues Completeness Notice of Deficiency pertaining to Permit Modification Request #8 (mixed residues).
1/18/1994	DOE and EG&G Rocky Flats, Inc. submits response to CDH in regards to the training chapter.
1/24/1994	CDH issues a revised permit with the approval of Permit Modification #14 and Permit Modification #18.
2/17/1994	U.S. District Court Judge Babcock issues an order which provides a schedule for expediting permitting of mixed residues. The order requires DOE to submit revisions to container storage drawings and other information in response to CDH's Notices of Deficiency.
3/23/1994	CDH approves Permit Modification #10, Class II modifying the ~contingency Plan and approval of additional EPA codes.
4/4/1994	DOE and EG&G Rocky Flats, Inc. seek concurrence from CDH on the approach to characterize trivalent chrome.
4/15/1994	DOE and EG&G Rocky Flats, Inc. submit to CDH the revision of Permit Modification #19 which addresses the construction of the CWSF (additional storage of low level mixed waste) and a reduction in capacity of Unit 23.
4/22/1994	DOE and EG&G Rocky Flats, Inc. submit to CDH a request for change to interim status regarding the withdrawal of the Remedial Action Decontamination Pad tanks Unit 18.01 and to add waste codes to Units 18.03 and 18.04, Revision 14, Combined Part A.
4/26/1994	DOE and EG&G Rocky Flats, Inc. submit an approval request to DOE for temporary storage of mixed residue solution within Building 771. These solutions are backlog mixed residues and are subject to the Settlement Agreement and Compliance Order on Consent No. 93-04-23-01.
5/12/1994	DOE and EG&G Rocky Flats, Inc. submit to CDH Permit Modification #17 requesting an expansion to Unit 1.
5/27/1994	Temporary authorization is granted by CDH to DOE to begin construction activities on the CWSF.
6/2/1994	DOE and EG&G Rocky Flats, Inc. submit Revision #17, consolidation of the Combined Part A Application to CDH.
6/15/1994	CDH provided concurrence to DOE and EG&G Rocky Flats, Inc. regarding 04/26/94 request for temporary storage of mixed residue solution within Building 771.
7/14/1994	DOE and EG&G Rocky Flats, Inc. request approval for temporary storage of mixed residues in glovebox MT -4.

RCRA HISTORY

DATE	DESCRIPTION
7/25/1994	DOE and EG&G Rocky Flats, Inc. receive concurrence from Colorado Department of Public Health and Environment (CDPH&E) on the approach to characterize trivalent chrome.
7/25/1994	DOE and EG&G Rocky Flats, Inc. submit Revision 3 of the Mixed Residue Tank Systems Management Plan to CDPH&E. The revision is submitted pursuant to CDPH&E comments on the plan dated 4/13/94.
8/10/1994	CDPH&E approves Permit Modification #17 requesting an expansion to Unit 1.
8/5/1994	CDPH&E issues DOE and EG&G a Warning Letter regarding the release of approximately 1800 gallons of process waste water from tank Unit 40.15, Building 460. Waste was originally characterized as non- hazardous; however, analytical results reveal cadmium above the regulatory limits.
8/15/1994	CDPH&E approves Permit Modification #19 which addresses the construction of the CWSF (additional storage of low level mixed waste) and a reduction in capacity of Unit 23.
8/22/1994	EG&G Rocky Flats, Inc. and DOE receive approval from CDPH&E for temporary storage of mixed residue solution in glovebox MT -4, Building 771.
8/25/1994	U.S. District Court Judge Babcock issues an order which provides a schedule for continuing the permitting process for backlog mixed residues. The order requires DOE to submit to CDPH&E information pertaining to vaults and gloveboxes. The order also requires CDPH&E to issue a draft permit for drum storage.
9/8/1994	EG&G Rocky Flats, Inc. directs waste generators and custodians to begin management of spent fluorescent light tubes as RCRA regulated hazardous waste based on analytical data.
9/30/1994	CDPH&E issues a draft permit for storage of mixed residues in 21 drum storage areas.
10/26/1994	DOE withdraws 46 mixed residue container storage units from Permit Modifications 8 and 15.
10/31/1994	DOE and EG&G Rocky Flats, Inc. submit a Class I, Permit Modification #21 to CDPH&E regarding changes to the contingency plan, Pan VI of the permit.
11/7/1994	DOE and EG&G Rocky Flats, Inc. submit a Class I, Permit Modification #22 to CDPH&E regarding changes to the Procedures to Prevent Hazards, Part V of the permit. The proposed changes reflect minor revisions to security procedures and equipment.

RCRA HISTORY

DATE	DESCRIPTION
12/7/1994	DOE and EG&G Rocky Flats, Inc. submit a Class I, Permit Modification #23 to CDPH&E requesting permitted storage for Unit 18.04 , and construction of a metal building at Unit 18.04. Also, this modification withdraws Permit Modification number 12 in its entirety.
12/13/1994	EG&G Rocky Flats, Inc. submits to DOE a revised Permit Modification #16 requesting additional toxicity characteristic wastes codes to the permitted storage units.
12/20/1994	DOE and EG&G Rocky Flats, Inc. submit Final Site Characterization and Corrective Action Plant to CDPH&E regarding the suspected release from the underground storage tank, north of Building 331.
12/20/1994	DOE and EG&G Rocky Flats, Inc. submit Final Closure letter to CDPH&E for Building 776 Underground Storage Tank.
12/22/1994	EG&G Rocky Flats, Inc. submits to DOE a Class II, Permit Modification #27 requesting changes to Pan IV, Waste Analysis Plan of the permit.
12/22/1994	DOE and EG&G Rocky Flats, Inc. submits to CDPH&E a request for change to interim status consolidating previous requests (Revision 21, Combined Part A.)
1/6/1995	CDPH&E issues a Pan B permit modification for storage of mixed residues in 21 drum storage areas. The permit becomes effective on 02/06/95.
1/6/1995	CDPH&E approves Permit Modification Request #20, requesting modifications to the RCRA Training section of the permit.
1/23/1995	DOE and EG&G Rocky Flats, Inc. submit to CDPH&E a Class III, Permit Modification Request #28 adding tanks on 750 Pad, Unit 25A.
2/3/1995	DOE and EG&G Rocky Flats, Inc. submit to CDPH&E a Class II, Permit Modification Request #29 requesting EPA Hazardous Waste Codes for mixed residues.
2/10/1995	DOE and EG&G Rocky Flats, Inc. submit to CDPH&E a Class III, Permit Modification Request #34, which includes OU4 1M/IRA Decision Document (CAMU) in Corrective Action Section of permit.
2/10/1995	DOE and EG&G Rocky Flats, Inc. withdraw RCRA Units 8 and 9 from the Part A Application.
2/21/1995	DOE and EG&G Rocky Flats, Inc. withdraw 22 mixed residue units from Permit Modifications #8 and #15.
3/10/1995	CDPH&E approves the Class I Permit Modification #23 granting permitted storage for Unit 18.04 , and construction of a metal building at Unit 18.04.

RCRA HISTORY

DATE	DESCRIPTION
3/24/1995	U.S. District Court Judge Babcock issues an order which provides a schedule for continuing the permitting process for backlog mixed residues. The draft permit for vault/glovebox storage and requires closure plans for 43 out-of-service residue units.
4/10/1995	DOE and EG&G Rocky Flats, Inc. submit to CDPH&E a Class I, Permit Modification Request #24 requesting approval to perform hydroxide precipitation.
4/10/1995	DOE and EG&G Rocky Flats, Inc. submit to CDPH&E a Class II, Permit Modification Request #25 requesting authorization to store liquid wastes at Unit 17.
4/12/1995	DOE and EG&G Rocky Flats, Inc. withdraw Units 28, 34, 36, 37, and 40.47 from the Part A Application.
4/14/1995	DOE and EG&G Rocky Flats, Inc. submit to CDPH&E a Class II, Permit Modification Request #32 requesting to permit 904 Pad.
4/14/1995	CDPH&E approves Permit Modification Request #29.
4/18/1995	DOE and EG&G Rocky Flats, Inc. withdraw mixed residue Tank D-189 from Permit Modifications #8 and #15.
EGG HISTORY RECORD ENDS	DATA GAP
NA	Revision 22, Combined Hazardous, Low-Level Mixed, TRU Mixed and Mixed Residues Part A was not submitted.
6/1/1995	Revision 23, Combined Hazardous, Low-Level Mixed, TRU Mixed and Mixed Residues Part A was a revision to reformat the Combined Part A Application and reflect a change in operator.
7/1/1996	Revision 24, Combined Hazardous, Low-Level Mixed, TRU Mixed and Mixed Residues Part A is a revision to reflect closure of units and approval of modifications to the Part B Permit. It also reflects the addition of previously approved codes for Units 3,4,49, and 53. (Note Toxicity characteristic waste codes that were added in Revision 17 but not approved by CDPHE have subsequently been approved through modifications to the Part B Permit or deleted from this revision to the Part A Application.)
6/2/1997	CDPHE issues Part B RCRA permit for mixed waste activities.
6/30/1997	Part B Permit effective date.

RCRA HISTORY

DATE	DESCRIPTION
10/1/1996	Part A Permit Reapplication is a Part A Application which reflects the unit designations in the Part B Permit Reapplication. It includes all unit-specific changes to permitted and interim status units since Revision 24, and reflects closure of certain units under interim status regulations.
2/1/1997	Part A Permit Reapplication, Revision 1, is a Part A Application which reflects modifications proposed to unit designations in the Part B Permit Reapplication since October 1996.
6/30/1997	Modification No. 97-2 Effective Date June 30. 1997 Changes which more accurately reflect current conditions for mixed waste management and storage, some of which had been included in Permit No. 91-09-30-01 but were inadvertently omitted from Permit No. 97-05-30-01.
12/16/1997	Modification No. 97-4 Effective Date December 16, 1997 - Clarifications to general and unit-specific conditions; drum staging provision; special unit specific condition for accumulation start dates for pondcrete and saltcrete; revised container storage layout for Unit 440.1; revised inspection log sheet for Building 774, Unit 776.3 and the container storage area weekly inspection log sheet; and revised unit-specific conditions for Unit 771.1
11/4/1997	Modification No. 97-6 Effective Date November 4. 1997 - Addition of a Waste Characterization Module to Unit 440.1 to be used for headspace gas sampling and analysis; Nondestructive Assay, Real Time Radiography and container packaging; modification to allow storage of low level mixed waste in rooms located in Unit '776. 1 and 777.1 ;addition of waste codes for Unit 881.3B (cementation and hydrolysis); addition of process tank D-942) in Unit 374.3; modification to Unit 24 inspection requirements; and a modification to Unit 374.1 which allows for the storage of hazardous waste.
12/17/1997	Modification No. 97-1 Effective Date December 17.1997-Addition of Ash Residue Stabilization (Unit 707.3b) and Dry Residue Repackaging (Unit 707.3c) treatment units in Building 707.
12/17/1997	Modification No. 97-7 Effective Date December 17, 1997 - Addition of Room 130A in Module G of Building 707; revised drawings for Unit 14, 371.1, 374.1 and 374.3; modification to inspection requirements for vaults; provision to use egress arrows in lieu of egress maps; and modification to Closure Description Document language.
12/17/1997	Modification No. 97-10 Effective Date December 17, 1997-Clarification of "typical" container storage layouts; provision for containers with different staging periods within the same staging area; and revised drawings for Rooms 2207,2223,2325, and 3420 in Unit 371.1.
12/17/1997	Modification No. 97-11 Effective Date December 17, 1997. Addition of waste codes for Unit 1.
12/17/1997	Modification No. 97-12 Effective Date December 17, 1997. Addition of nine gloveboxes to container storage Unit 707.7 located in Modules A, J and K and revised drawing for Unit 707.3B.

RCRA HISTORY

DATE	DESCRIPTION
2/5/1998	Modification No. 98-1 Effective Date February 5, 1998-Revised drawings for Units 18.04, 440.1 and 776.2; addition of hazardous waste codes for Unit 1 and Unit 881.3b; a revised Container Storage Area Weekly Inspection Log Sheet; and minor modifications to Units 18.04, 21, 887.2.
3/18/1998	Modification No. 98-3 Effective Date March 18, 1998- Modification to the description of Types of Storage Containers; addition of "P" and "U" waste codes in Unit 1 and 10; revision to storage of peroxide forming compounds in Unit1; and revised drawings for Unit 59 and 374.1.
4/17/1998	Modification No. 97-3 Effective Date April 17, 1998 - Addition of the Combustible Residues Stabilization Process (Unit 371 .3b) in Building 371.
5/5/1998	Modification No. 98-4 Effective Date May 5, 1998 - Modification to container configurations in Units 371.1 and 777. I to accommodate new' nuclear material safeguards requirements; addition of waste code in Unit 1; revised drawings for rooms in Unit 371.1, 440.1, and Unit 777.1; and addition of vault in Unit 777.1.
7/17/1998	Modification No 97-8 Effective Date July 17, 1998-Addition of treatment Unit 865.3 Macroencapsulation of Low-level Debris Waste.
8/19/1998	Modification No. 98-5 Effective Date August 19, 1998-Minor changes to secondary containment requirements, Unit Specific Condition changes for Unit1 and Unit 374.3, and revisions to container configurations and container types in Unit 776.1.
8/26/1998	Modification No. 98-7 Effective Date August 26, 1998-Addition of Unit 774.3C - Organic and Sludge Immobilization System in Building 774. Additional storage areas within Unit 371.1.
9/21/1998	Modification No. 97-9 Effective Date September 21, 1998-Addition of Unit 788.3-Mixed Waste Debris Treatment Process.
9/25/1998	Modification No. 98-8 Effective Date September 25, 1998-Replacement of Dyncorp of Colorado with Rocky Flats Closure Site Services L.L.C. for Site operations.
12/18/1998	Modification No. 98-2 Effective Date December 18, 1998- Modification to the inspection frequency for Unit371. 1- Stacker Retriever, addition of new waste codes to Unit 750.1, and staging of wooden waste crates in Tent 5 of Unit 750.1 beyond September 30, 1998.
12/22/1998	Modification No. 98-9 Effective Date December 22, 1998-Addition of EPA Waste Codes to Unit 14, clarification of the requirements concerning non-RCRA regulated storage and newly constructed and modified facilities, addition of stacking requirements to the Unit Specific Conditions for Unit 15B, addition of organic air emissions :monitoring requirements to the Unit Specific Conditions for Unit 774.2, revisions to the drawings for Units 24 and 776.1, and revisions to the training requirements for Environmental Professionals.

RCRA HISTORY

DATE	DESCRIPTION
1/13/1999	Modification No. 98-11 Effective Date January 13, 1999-Addition of room 1208 in Unit 371.1, elimination of the remote monitoring requirements for vault type areas in Unit 771.1., and a revision to Unit 15B allowing crate staging in tents 10 & 11.
1/29/1999	Modification No. 99-2 Effective Date January 29, 1999-Establishment of staging areas in Units 371.1 and 777.1 to support headspace gas generation testing and residue sampling and repackaging activities.
4/21/1999	Modification No. 98-12 Effective Date April 21, 1999-Addition of 97,680 gallons of drum storage capacity to Unit 440.1.
5/13/1999	Modification No. 99-8 Effective Date May 13, 1999-Addition of EPA Waste Codes to Unit 1
5/20/1999	Modification No. 99-5 Effective Date May 20, 1999-Modification to special unit conditions to the unit specific conditions for container storage units15B, 374.1,707 .1,776.1 and 777.1, to the ash stabilization process in unit 707.3B, to Part VII (Procedures to Prevent Hazards), and to Part X (Closure Plan).
6/21/1999	Modification No. 99-9 Effective Date June 21, 1999-Changes to the unit specific inspection conditions for Unit371. 1, changes to tank integrity testing requirements in Part VII and minor corrections and changes that more accurately reflect current conditions for hazardous and mixed waste management activities at the Site.
7/19/1999	Modification No. 99-11 Effective Date July 19, 1999-Addition of EPA waste code U 134 to glovebox 187A in Unit771. 1 and the addition of Glovebox355 and the microwave glovebox in Unit 774.1
8/2/1999	Modification No. 99-4 Effective Date August 2, 1999-Addition of container storage units 984.1 and991. 1, which will be used for the staging and interim storage of mixed waste containers awaiting non-destructive assay and/or headspace gas sampling and analysis in Buildings 984 and 991.
8/5/1999	Modification No. 99-6 Effective Date August 5, 1999-Addition of treatment Unit 37 1.3C - Fluoride Residue Treatment Process
8/17/1999	Modification No. 99-3 Effective Date August 17, 1999-Revisions to process descriptions and unit specific conditions for Unit 374.3.
8/23/1999	Modification No. 99-10 Effective Date August 23, 1999-Changes to the container storage area standard conditions governing incidental waste management activities, unit specific conditions for Container Storage Units 371.1 and 707.1 and to Treatment Units 371 .3B (Combustible Residues Stabilization Process) and 776.3 (Advanced Size Reduction Facility).
9/14/1999	Modification No. 99-7 Effective Date September 14, 1999 Revisions to allow four-high stacking of TRU and TRM waste in pipe overpack component (POC) drums in Unit 750.1.

RCRA HISTORY

DATE	DESCRIPTION
10/27/1999	Modification No. 99-12 Effective Date October 27, 1999-Changes to unit specific conditions for container storage units 15B, 371.1,776.1,777.1,984.1, 991.1, and to the drawing for Unit 440.1. In addition, changes to the unit specific conditions for treatment units 371 .3B and 707.3B, and to the inspection log sheets for treatment units 774.3A, B and C, and 776.3.
4/11/1999	Modification No. 99-1 Effective Date November 11, 1999-Addition of Unit 750.3-Sludge De-Watering and Stabilization Process.
1/20/2000	Modification No. 99-14 Effective Date January 20, 2000-Addition of waste codes to Unit 774.1 and 771.3A, transfer of capacity in Unit 77 1.1 and revised drawings for Room 181A and 188 in Building 771 and revised log sheets for Units 774.3 A, B and C.
1/25/2000	Modification No. 00-02 Effective Date January 25, 2000-Addition of six new container storage areas within Unit 777.1
3/10/2000	Modification No. 99-13 Effective Date March 10, 2000-Addition of container storage capacity to Units 37 1.1 and 707.1, and revision to inspection frequency for the valve vaults associated with the aqueous waste collection transfer system (ancillary equipment to Unit 374.3)
4/17/2000	Modification No. 00-01 Effective Date April 17, 2000-Changes to the design and layout information for the TRUPACT II shipping module located in Unit 440.1, and changes to clarify the requirements for container staging areas
5/19/2000	Modification No. 00-03 Effective Date May 19, 2000-Miscellaneous changes and corrections including the combination of Units 15A and 15B into Unit 15; minor changes to the container configurations shown on the drawings of Units 14,20, and 371.1; transfer of storage capacity between areas within Unit 707.1; addition of EPA waste code DO29 to the list of approved waste codes for permitted glovebox storage areas in Unit 771.1; minor changes/clarifications to general inspection requirements; correction of release notification language in the Contingency Plan; and a revision to the list of decontamination equipment in the Contingency Plan
7/5/2000	Modification No. 00-04 Effective Date July 5, 2000-Transfer of container storage capacity between areas within Unit 707.1; replacement of weekly inspection log sheet for Unit 707.3B Staging Areas with list of inspection criteria
7/31/2000	Modification No. 00-06 Effective Date July 31, 2000-Minor corrections and changes to unit specific conditions for Units 37 1.1 (container storage in Building 371) and 88 1.3B (bench-scale waste chemical treatment unit)

RCRA HISTORY

DATE	DESCRIPTION
10/27/2000	Modification No. 00-07 Effective Date October 27, 2000-Minor corrections and changes to unit specific conditions for Container Storage Units 10, 13, 14, 15, 18.03, 18.04, 20,24, 59, 371.1,440.1, 559.1,707.1, 750.1, 984.1,991.1,993.1; and Treatment Units 371.3B, 371.3C, and 707.3B; and minor corrections and changes to language in the Waste Analysis Plan (Part VI) and in the Personnel Training Plan (Part IX)
11/3/2000	Modification No. 00-08 Effective Date November 3, 2000-Changes in operational control of the Site, including the removal of Safe Sites of Colorado, L.L.C.; Rocky Mountain Remediation Services, L.L.C.; and Rocky Flats Closure Site Services from the Permit. Kaiser-Hill Company, L.L.C. is the sole operating contractor and the U.S. Department of Energy (DOE) remains as owner and co-operator of the Site.
11/21/2000	Modification No. 00-09 Effective Date November 21, 2000-Minor corrections and changes to unit specific conditions for Container Storage Units 15, 371.1,440.1, and 776.1, Tank Storage Unit 776.2, and Treatment Units 371.3A and 865.3.
11/22/2000	Modification No. 00-1 Effective Date November 22, 2000-Minor changes within Container Storage Unit 37 1.1 including the addition of a new container storage area and the transfer of container storage capacity between areas
11/29/2000	Modification No. 00-11 Effective Date November 29, 2000-Minor corrections and changes to update the Waste Analysis Plan (Part VI).
12/29/2000	Modification No. 00-12 Effective Date December 29, 2000-Minor changes to update the process description for the Spray Dryer Process-in Unit 374.3
1/12/2001	Modification No. 00-05 Effective Date January 12, 2001 (Issuance Date: December 28,2000) Corrections and changes to update the process descriptions, unit specific conditions, and unit drawings for Treatment Unit 374.3. (Note: the issuance date of December 28,2000 is shown on the pages revised as a result of Modification No. 00-05).
1/31/2001	Modification No. 00-13 Effective Date January 31, 2001-Minor changes including the conversion of permitted Treatment Unit 37 1.3B to a permitted container storage area under Unit 37 1.1, the addition of gloveboxes to Container Storage Unit 37 1.1, the addition of language to allow the repackaging of wastes in gloveboxes permitted for storage, and the correction of a heading on the inspection schedule for Unit 707.3B
2/16/2001	Modification No. 01-01 Effective Date February 16, 2001-Minor changes within Container Storage Unit 77 1.1 including the addition of a new glovebox container storage area and the transfer of container storage capacity between areas
4/13/2001	Modification No. 01-02 Effective Date April 13, 2001-Minor corrections and changes to specific conditions for Container Storage Unit 37 1.1 and Treatment Unit 371.3a (including the transfer of storage capacities within Unit 371.1; the addition of EPA waste codes D038, D039, and D043 to Unit 371.1; updates to drawings; minor changes to waste analysis

RCRA HISTORY

DATE	DESCRIPTION
6/5/2001	Modification No. 01-09A Effective Date June 5, 2001-Addition of container storage areas within Unit 991.1 without increasing the permitted storage capacity of the unit per Permit Condition III.B. 19
8/23/2001	Modification No. 01-08 Effective Date August 23, 2001-Minor changes including changes to the general container staging requirements, changes to the container storage standard conditions governing incidental waste management activities, changes to the unit specific conditions for Container Storage Unit 37 1.1 (including the transfer of storage capacities within Unit 37 1.1 and updates to drawings), and the conversion of permitted Treatment Unit 37 1.3C to a permitted container storage area under Unit 371.1.
9/20/2001	Modification No. 01-13 Effective Date September 20, 2001-Addition of Unit S002 - Oil Solidification Process in Containers
12/15/2001	Modification No. 01-03 Effective Date October 15, 2001-Addition of Unit 100.1 - Macroencapsulation Process for Debris Waste in Containers
11/26/2001	Modification No. 01-04 Effective Date November 26, 2001-Deletion of closed Treatment Unit 881.3A - Electrochemical Chlorination Process, and deletion of the~ closed Ultraviolet Oxidation Treatment Process from Treatment Unit 88 1.3B
11/27/2001	Modification No. 01-06 Effective Date November 27, 2001-Addition of container storage areas within Unit 776.1 without increasing the permitted storage capacity of the unit per Permit Condition III.B. 19
12/20/2001	KH-DOE RFFO submit Part A and Part B Renewal Application
12/27/2001	Modification No. 01-11 Effective Date December 27, 2001-Addition of hazardous waste codes U002, U003, U103, U106, UI08, U117, U154, U161, U213, P030, P098, PO99, and PI06 to Tank Storage Unit 887.2
1/11/2002	Modification No. 01-17 Effective Date January 11, 2002- Addition of hazardous waste codes U001, U021, U032, U039, U043, U045, U048, U051, U066, U068, U117, U129, U135, U140, U145, U183, U202, U208, U221, U222, U226, and U243 to Container Storage Unit 371.1; addition of hazardous waste codes P029 and P104 to Treatment Unit 881.3B (Alkaline Chlorination Process); addition of hazardous waste code D002 to Treatment Unit S002 (Oil Solidification Process in Containers); updates to drawings for Container Storage Unit 440.1; and addition of Secondary Sludge Stabilization Process (Treatment Unit 750.3B)
2/11/2002	Modification No. 01-09 Effective Date February 11, 2002-Addition of container storage capacity and areas to Unit 991.1 ; reduction of container storage capacity at Unit 440.1; change to unit specific permit conditions for Container Storage Unit 99 1.1 to allow a minimum 18-inch aisle space between pallets of Pipe Overpack Containers (POCs)

RCRA HISTORY

DATE	DESCRIPTION
3/26/2002	Modification No. 02-03 Effective Date March 26, 2002-Addition of container storage area to Unit 750.1 (without increasing the permitted storage capacity of the unit) for storage for no longer than ten (10) days for transport vehicles, roll-off containers, or intermodal containers loaded for shipment off-site
4/17/2002	Modification No. 01-14 Effective Date April 17, 2002-Addition of mercury amalgamation process to Treatment Unit 88 1.3B
4/22/2002	Modification No. 02-04 Effective Date April 22, 2002-Addition of hazardous waste codes D004, D005, and D007 to Treatment Unit 371.3B (Caustic Waste Treatment System)
6/20/2002	Modification No. 02-02 Effective Date June 20, 2002-Addition of aqueous hazardous/mixed waste streams to the types of waste that may be treated in Treatment Unit SO02 ("Oil and/or Aqueous Solidification Process", formerly known as the "Oil Solidification Process")
6/30/2002	Existing Part B Permit expiration Date. (Note: Permit still valid since reapplication submitted 180 days prior to expiration)
3/14/2003	Modification No. 03-01 Effective Date March 14, 2003-Addition of hazardous waste codes and sludge waste streams other than pond sludge to Tank Storage Unit 750.2C and Treatment Unit 750.3b. 'The additional sludge waste streams and hazardous waste codes do not require additional or different management practices than for pond sludge
3/25/2003	Modification No. 03-02 ' Effective Date March 25, 2003-Addition of general container storage permit condition IKB.14.g to allow a minimum 24-inch aisle space between rows of containers stored within permitted cargo containers.
3/31/2003	Modification No. 02-01 Effective Date March 31, 2003 (Issuance Date: February 28, 2003) Addition of Building 460 as Container Storage Sub-unit 460.1; rewrite of the Container Storage Requirements (Part III) and the Preparedness and Prevention Requirements (Part VII). (Note: the issuance date of February 28, 2003 is shown on the pages revised as a result of Modification No. 02-01).
5/14/2003	Modification No. 03-03 Effective May 14, 2003 updates phone numbers for emergency response contacts which have changed in the Contingency Plan
Incorporated in new permit below:	Modification 03-04 Modification to add size reduction capabilities within Unit 440.1 750.1, update the training matrix, and contingency plan.
Incorporated in new permit below:	Modification 03-05 updates the Contingency Plan to reflect changes to Site
06/23/04	Part B Permit Issued
07/23/04	RCRA Part B Permit Effective

RCRA HISTORY

DATE	DESCRIPTION
08/18/04	Modification 04-01 to revise the Contingency Pan submitted in accordance with the compliance schedule II.O. contained in the RCRA permit No. CO-04-06-23-01.
09/07/04	Modification 04-01 to revise the Contingency Pan approved by CDPHE.
10/15/04	Errata changes to correct Contingency Plan EC names Modification 04-01 issued by CDPHE.
03/15/05	Modification #05-01 to revise the Contingency Plan. Change the Coordinator List from specific people to the Fire Dispatch.
03/29/05	Modification #05-01 approved by CDPHE
106/05	Modification #05-02 to remove Kaiser-Hill LLC from the permit on 10/12/05, declaration of physical completion.
10/12/05	Submittal of the Certification of Rocky Flats Environmental Technology Site for RCRA unit closures. PE and Operator certification
10/12/05	Kaiser-Hill declares physical completion of Site clean up and removal of all buildings
	Modification #05-02 approved by CDPHE
	CDPED approval of Certification of closure
	Termination of Permit

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