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# STATE OF COLORADO

## COLORADO DEPARTMENT OF HEALTH

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

4300 Cherry Creek Dr. S. Laboratory Building  
Denver, Colorado 80222-1530 4210 E. 11th Avenue  
Phone (303) 692-2000 Denver, Colorado 80220-3716  
(303) 691-4700



Roy Romer  
Governor

Patricia A. Nolan, MD, MPH  
Executive Director

May 9, 1994

Mr. Mark A. Silverman  
Manager, Rocky Flats Office  
U.S. Department of Energy  
P.O. Box 928  
Golden, Colorado 80402-0928

**RE: Conditional Approval for a Change to Interim Status Tank Storage on the 750 Pad (RCRA Unit 25) for 207 C-Pond and the Clarifier**

Dear Mr. Silverman:

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the Department of Energy's (DOE) request dated November 29, 1993, along with several submittals of additional information for a change to Interim Status the 750 Pad (Unit 25) for the Rocky Flats Plant (RFP). In a letter dated December 22, 1993, the Division granted a conditional approval for the storage of 207 B-Pond sludge in tanks. The management of the 207 C-Pond sludges depended on resolving the issues concerning specific gravity, and the Clarifier waste characterization. From the information requested, which included the Options Analysis Report for the Accelerated Sludge Removal Project, and the Haliburton data, the Division hereby conditionally approves the change to interim status for the storage of 207 C-Pond and Clarifier sludge in tanks on the 750 Pad (Unit 25). Conditions for the approval are as follows:

- 1) A written Standard Operating Procedure (SOP) must be prepared for conducting tank inspections at the 750 Pad (Unit 25). The SOP should describe, in detail, the operation and management of the tanks filled with 207 C-Pond and Clarifier sludge.
- 2) Professional Engineer Certification for tank system installation, integrity, and as-built drawings must be submitted to the Division prior to sludge transfer from 207 C-Pond and the Clarifier into the tank system. The Division reserves the right to inspect the tank systems prior to placing the tanks in service for hazardous waste storage, in accordance with 6 CCR 1007-3 Section 100.42(h)(i-ii).

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- 3) The tank coupon plan dated March 8, 1994, Rev. 2 has been approved. This plan includes installing coupons in six tanks that represent B pond sludge, C pond sludge, and Clarifier sludge. Coupons are to be installed at the time the tanks are filled with Solar Pond sludge in order to adequately assess the long-term integrity of the tanks.
- 4) The Division requires that the contents of a representative number of the tanks be sampled after the tanks are placed into service for hazardous waste storage. RFP will submit a sampling and analysis plan to the Division for prior approval within 30 days of receipt of this letter. The sampling and analysis will include, at a minimum, gross alpha, gross beta, and gamma radiation levels, specific gravity, pH, and hazardous constituent quantities. In the event of unexpected characterization results, that may affect the storage of wastes in the tanks, additional sampling and a determination of compatibility with tank construction materials must be made as necessary to ensure the waste is adequately characterized according to 6 CCR 1007-3 Part 265.13 (a) (1). The Division will be notified of the unexpected results and a determination of compatibility with the tank materials will be made within 15 days.
- 5) In addition to the tanks storing Solar Pond sludge, the investigation derived material (IDM) that will be stored in containers on the 750 Pad must comply with Colorado Hazardous Waste Regulations.

If you have any questions concerning this letter, please contact either Chris Gilbreath at 693-3371 or Lisa Weers at (303) 692-3451.

Sincerely,



Gary W. Baughman, Section Chief  
Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc: S. Tarlton, Rocky Flats Program Unit  
M. Johnson, Jefferson County Health Department  
D. Miller, AGO  
K. Peter, EG&G  
M. Hesmark, EPA  
D. Ruscitto, DOE