

STATE OF COLORADO

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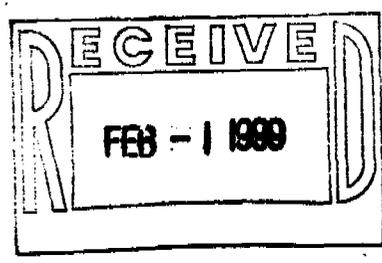
Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
<http://www.cdphe.state.co.us/hm/>

4300 Cherry Creek Dr. S. 222 S. 6th Street, Room 232
Denver, Colorado 80246-1530 Grand Junction, Colorado 81501-2768
Phone (303) 692-3300 Phone (970) 248-7164
Fax (303) 759-5355 Fax (970) 248-7198



**Colorado Department
of Public Health
and Environment**



January 19, 1999

Ted Hopkins
Rocky Mountain Remediation Services, L.L.C
Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, CO 80402-0464

**RE: Close-Out of the December 9, 1998 Inspection of Building 774
EPA Identification Number C07890011526**

Dear Mr. Hopkins:

On December 9, 1998, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a compliance evaluation inspection of hazardous waste management units located within Building 774. The Division has received and reviewed your response to the referenced inspection dated January 12, 1999. Based upon our review of your response, it appears that all issues identified during the inspection have been resolved. Therefore, the Division does not intend to take any further action on this matter, at this time.

Please contact Ed Smith of my staff at (303) 692-3386 if you have any questions regarding this memorandum or the close-out of the inspection.

Sincerely,

Joe Schieffelin, Unit Leader
Federal Facilities Permitting and Compliance
Hazardous Materials & Waste Management Division

cc w/Attach: James Hindman, CDPHE
Cindy Burbach, CDPHE
Nancy Newell, CDPHE
Janice Pearson, EPA
Bob April, DOE
Bob Cathel, K-H
Ted Hopkins, RMRS



EPA I.D. #CO7890010526

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: December 9, 1998

FACILITY: Rocky Flats Environmental Technology Site - US DOE,
Building 774

LOCATION: 16 miles NW of Denver
Golden, CO 80402

FACILITY REP: Karlan Richards, RMRS

TELEPHONE: 303 966-7486

TELEFAX:

NOTIFICATION STATUS: Large Quantity Generator
Land Disposal Facility

TYPE OF INSPECTION: Compliance Evaluation Partial

PARTICIPANTS: James Hindman, CDPHE
Nancy Newell, CDPHE
Edward Smith, CDPHE
Bob Cathel, KH

WEATHER CONDITIONS: Cold and cloudy

TIME IN: 8:30 am

TIME OUT: 11:30 am

US DOE - Rocky Flats Environmental Technology Site Building 774

--- INTRODUCTION ---

On the morning of December 9, 1998 inspectors James Hindman, Nancy Newell, and Edward Smith from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) arrived at the Rocky Flats Environmental Technology Site (RFETS) to conduct a partial compliance evaluation inspection of Building 774. Division inspectors met with Ms. Karlan Richards of RMRS who escorted Division inspectors throughout the building.

Building 774 serves as the waste treatment facility for liquid wastes that cannot be treated at Building 374. The Miscellaneous Waste Handling and Solidification process (i.e., the Bottlebox) is located in Room 210 and is used for the solidification of characteristic, transuranic, laboratory waste. The Organic and Sludge Immobilization System (OASIS) process is also located within Room 210 and was used for the solidification of transuranic mixed waste oils that were stored in Tanks T-13 and T-14. At the time of the inspection neither of these two processes were operating; although the Bottlebox was scheduled to resume operation on the afternoon of December 9, 1998.

In addition to the above treatment processes, the Aqueous Waste Treatment process is located within Building 774 in Rooms 241 and 103. This treatment process is capable of handling either acidic or caustic aqueous waste. Acidic wastes are neutralized prior to chemical precipitation. Caustic wastes are treated in a precipitation process to remove radioactive contaminants. The treatment process is supported by several tanks that are used for treatment and/or storage of wastes. These tanks include Tanks T-201, T-202, T-203, T-204, and T-40.

There are also two permitted storage tanks within Room 220 of Building 774. These tanks are T-102 and T-103 that are used for the storage of polychlorinated biphenyl, mixed waste oils.

--- OPERATIONS INSPECTED ---

Accompanied by facility representatives, Division inspectors observed all areas of Building 774. At the time of the inspection, there were no active 90-day or satellite accumulation areas within the building. The following is a summary of the areas evaluated where potential issues were identified.

- Room 210. Division inspectors observed the Bottlebox and OASIS processes located in Room 210. The only observation noted during inspection of those two units is that

the Bottlebox Mixing Vessel Tank T-7 was not labeled to identify the contents of that tank as required by the RFETS RCRA Part B Permit condition Part IV.B.2. After discussing this issue with Ms. Richards a determination was made that posting the unit specific information sheet on Glovebox 4 was sufficient to meet the intent of the permit condition since the tank and box are integrally connected.

- Room 241. Division inspectors observed all waste management areas associated with the permitted storage unit 774.1. As a result of the inspection, a couple of issues were identified and discussed with facility representatives. The first issue is that one of the containers in that location was not marked with a compatibility code as required by the RFETS RCRA Part B Permit, Part III.B.9. Ms. Richards corrected the label in question at the time of the inspection.

Two other issues were shared with facility representatives during the close-out meeting. The first issue deals with containers of waste with a compatibility code of 1B being located next to containers of waste with a compatibility code of 4A. Although this appeared to be an incompatible configuration, facility representatives explained that the waste is stored within 4-liter bottles and over packed within the 55-gallon drum that provides additional containment. This is a situation similar to a lab-pack except that the drum in question did not contain absorbent material. In any case, the configuration was determined to be acceptable after discussions with Mr. Fred Dowsett.

A similar issue to the above was identified for tank waste assigned a compatibility code of 3A which appeared to be incompatible with containerized waste with a compatibility code of 1B. Again, this issue is not considered to be a deficiency because the containerized corrosive waste with a compatibility code of 1B has secondary containment in the form of the 55-gallon outer container.

--- DOCUMENTS REVIEWED ---

Division inspectors reviewed a number of documents as part of this inspection. The documents that were reviewed and any issues associated with that review are discussed in the following paragraphs.

1. Weekly inspection log sheets for the permitted container storage areas were reviewed. No issues were identified as a result of that review.
2. Daily inspection log sheets for the permitted treatment and storage tanks were reviewed. No issues were identified as a result of that review.
3. Training and Scheduling Records (TSR) Reports were evaluated for personnel involved

in hazardous waste management at Building 774 and for supervisors of such persons. No issues were identified as a result of that review.

--- INSPECTION CLOSE-OUT ---

As a result of the inspection, a number of issues were identified and shared with facility representatives during the inspection close-out meeting, which began at approximately 10:45 am on December 9, 1998. The following issues were identified on the Notice of Inspection (NOI) and discussed with facility representatives.

1. Drum D77393 with a compatibility code of 4A is located next to Drum D83042 with a compatibility code of 1B. This appears to be an incompatible situation. As discussed previously this is not an incompatibility issue since the waste in drum D83042 is contained within an inner container.
2. It appears as though the tank waste with compatibility code of 3A is incompatible with containerized waste with a compatibility code of 1B. As discussed previously this is not an incompatibility issue since the corrosive waste with a compatibility code of 1B is contained within an inner container.
3. Containers staged for shipment on the loading dock may only remain in that location for 24 hours according to the RFETS RCRA Part B Permit, Part VII.D.1. The area in question was established as a staging area that would have otherwise allowed such containers to be staged at that location for up to 15-days without triggering additional requirements. This is not a deficiency since the drums were on the dock for one day and were scheduled to be shipped on the date of the inspection.
4. Division inspectors requested TSR reports for review.
5. Division inspectors requested a review of validated analytical data for wastes that have been treated in the Bottlebox.

A written response to the above issues was requested by January 15, 1998.

Ms. Karlan Richards signed the Notice of Inspection (NOI) as facility representatives. Division inspectors left a copy of the NOI with facility representatives and ended the inspection at approximately 11:30 am on December 9, 1998.

--- INSPECTION FINDINGS ---

There were no formal findings identified as a result of this inspection since the issues associated with incompatibility were resolved upon discussion with Mr. Fred Dowsett.

--- SIGNATURE BLOCK ---

Prepared by: Edward H. Smith 12/17/98
Edward Smith Date

Reviewed by: James A. Hindman 12/18/98
James Hindman Date

Reviewed by: Nancy Newell 12/22/98
Nancy Newell Date

Approved by: Joe Schieffelin 12/28/98
Joe Schieffelin Date

--- ATTACHMENTS ---

1. Notice of Inspection

Notice of Inspection

Facility Name Rocky Flats Bldg 774		EPA I.D. # CO 7890010526	Date 12/9/98
Street PO BOX 928		Telephone # 303-966-7000	Seq. # N/A
City Golden	County Jefferson	Zip 80402	Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> Yes () No
Facility Representatives and Titles		Enter By <input checked="" type="checkbox"/> Consent () Warrant	Hour In: 8:30 am
		Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	Hour Out: 11:30 am
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other <small>If Status Changed, Facility Should Revise Notification</small>			

COMMENTS:

1. Drum D77393 with a compatibility code of 4A is next to Drum D83042 with a compatibility code of 1B. These incompatible wastes need to be separated by a dike, berm or ~~other~~ other physical barrier. (Room 241).
2. Tank waste in Room 241 has a compatibility code of 3A which appears to be incompatible with wastes carrying compatibility code of 1B, for drums D83042, D5729, D5738 and D89032.

~~3. Tank 17 should be labeled to identify the contents per RCRA Permit IV, B.2. ENS - Resolved during close-out~~

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. copy of tank diagram	5.
2. 4 copies from inspection log	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged



 Signature of Facility Representative

Lead Inspector: **Ed Smith**
 Assisting Inspector(s) and Multimedia Participant(s):
James Hindman
Nancy Newal

NOTICE OF INSPECTION

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FACILITY: Rocky Flats Bldg 774	EPA ID: CO7890010526	DATE: 12/9/98
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N.O.I. COMMENTS (continued):

- 4. Containers stored on the loading dock may only be at that location for 24 hours per VII, D.1. This area cannot be a staging area.
 - 5. Submit requested TSRs for review.
 - 6. Submit verification data for treated bottle box waste when validated.
- and response
- submit above data except for TSRs + #6 by January 15.