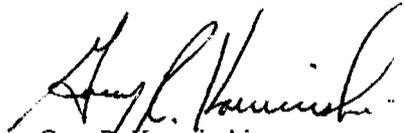


John Wrapp
November 3, 1997
GRK-337-97
Page 2

- Provide an MSDS or other documentation to confirm that the two drums of Asphalt Surfacing & Sealer Compound at the J. A. Jones lay-down yard (near Building 663) are not hazardous waste, as labeled. This is a Kaiser-Hill issue.
- Ensure that all containers in storage in Unit 440.1 that are stacked are banded per RFETS RCRA Permit, condition III.B.17.b. This is a RMRS issue. **Response:** The permit requires that all drums that are on pallets be banded. This requirement is strictly followed in all RMRS facilities.
- Post warning signs at the northeast corner of solar ponds 207B. This is a RMRS issue. **Response:** RMRS installed additional warning signs around the perimeter of the solar ponds during September. The signs were affixed to the ropes that surround the solar ponds. Although RMRS believes that sufficient restraints and warnings exist throughout the entire solar pond area, the northeast corner of the ponds will be posted.
- A 30-gallon drum of oil was identified at the lay-down area north of Building 985. The drum did not have a lid and was half full of oil. Either close the drum or if the contents are used oil, mark the drum (as used oil), close the drum, and disposition as appropriate. This is a RMRS issue. **Response:** Kaiser-Hill is responding to this issue on behalf of the Site.
- Identify the contents of two drums north of Building 985 labeled as non-RCRA; with drum numbers N0446076800068 and N0447096800069. This is a RMRS issue. **Response:** Kaiser-Hill is responding to this issue on behalf of the Site.
- Provide the status of three 15-gallon containers in Building 460 identified as corrosive spent photographic solution. This is a DynCorp issue.

RMRS is pleased to provide this information and requests that you forward it to CDPHE on or before November 4, 1997. If I can be of additional assistance in this effort please contact me at extension 2729.



Gary R. Konwinski
Environmental Manager

Attachment
As Stated

cc:
K. North, KH (w/o attachments)

H Corres. #
Originator Ltr Log #
GRK-33797
7 - RF -



Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2729
Fax: (303) 966-8244

DIST.	LTR	ENC
ARTHUR, J.M.		
BRINSON, C.A.		
BRIMEAN, C.H.		
BRAWFORD, A.C.		
BRAWSON, D.		
BURWARDS, J.D.		
BUNDLEY, M.E.		
BUTZ, R.C.		
CHINN, L.A.		
CHRISTIE, G.L.		
COGHES, F.P.	X	
COERLID, T.W.		
COOPER, K.		
COOPER, A.B.		
COOPER, A.M.		
COOPER, M.J.		
COOPER, M.		

November 3, 1997

John Wrapp
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

RESPONSE TO CDPHE INSPECTION OF OCTOBER 21, 1997 - GRK-337-97

On October 21, 1997, the Colorado Department of Public Health and Environment (CDPHE) conducted an unannounced inspection of various areas of the plant. No Environmental Manager or other Site representative accompanied the CDPHE during this activity. There were nine issues documented on the Notice of Inspection, dated October 21, 1997. The issues, the responsible company, and responses to the RMRS issues follow:

- Ensure that containers are marked or labeled as "used oil" per 6CCR 1007-3, Section 279.22 C at the following locations: 8 drums on the south side and one drum on the east side of Building 460; one drum behind door #14 of Building 883 marked as "oil from pipebender"; one drum north of Building 551 marked as JA Jones Laborers. This is a Manufacturing Sciences Corporation and DynCorp issue.
- Ensure that the staging area in Building 881, Room 267 is posted as a staging area with the date that staging began per the RCRA Permit, condition III.B.17.b. This is a Kaiser-Hill issue. **Response:** The staging area that is referenced is supporting chemical treatment that is taking place in Building 881. RMRS is the owner of the treatment unit and it is currently being used by a subcontractor to Kaiser-Hill in support of the chemical removal effort. It is the users responsibility to ensure that the treatment unit is operated in a fashion that is in compliance with the RCRA Permit and the regulations. In recognition of this, the user of the treatment unit has posted the staging area accordingly.
- Ensure that the staging areas in Building 664 are marked with the date that staging began per the RCRA Permit, condition III.B.17.b. This is a RMRS issue. **Response:** The staging area in Building 664 has been appropriately posted. Furthermore the staging area is in constant use and receives containers on a variety of different dates. Consequently, the container-receipt dates are maintained in a log book. There are also times when the containers reside in the staging area in excess of 15 days. In these instances the container locations are entered into the Waste and Environmental Management System (WEMS).

Derschold
Sauer
Dean
Albin
Early
Cathel

RECORDS	X	X
CORRESPONDENCE CONTROL	X	X
OFFICE		
ST/130G		

CLASSIFICATION:

UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE:

REPLY TO RF CC NO.:

OPTION ITEM STATUS:
 PARTIAL/OPEN
 CLOSED

APPROVALS:

DATE & TYPIST INITIALS:

*Did the permit to see if
it's consistent = BFO*

- Provide an MSDS or other documentation to confirm that the two drums of Asphalt Surfacing & Sealer Compound at the J. A. Jones lay-down yard (near Building 663) are not hazardous waste, as labeled. This is a Kaiser-Hill issue.
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RMRS is pleased to provide this information and requests that you forward it to CDPHE on or before November 4, 1997. If I can be of additional assistance in this effort please contact me at extension 2729.

[Signature]
Gary R. Konwinski
Environmental Manager

Attachment
As Stated

cc:
K. North, KH (w/o attachments)

*11/15/97
Gary Konwinski
I checked this Reference
in my permit and it says
nothing about banding - what's
the requirement? We do
band all drums
Not band only 4th tier
(eg. band only 4th tier)
Rich D.*

*Vern:
Please find this reference in
the permit. For help call
Mary Duscholz*

- 5
- RCPA Permit
III.B.14.C
- b. **Crate stacking:** Full-size crates (typically 4 feet high x 4 feet wide x 8 feet long) will be stacked no more than four high. Half-size crates (typically 2 feet high x 4 feet wide x 8 feet long) will be stacked no more than five high. In combination, stacked crates will not exceed 18 feet in height.
 - c. **Drum stacking:** Drums may be stacked no more than four high. Drums may be stacked on pallets, plywood or within pans. In order to minimize hazards during stacking and storage activities, containers stacked on pallets will be banded together. Unit specific conditions may identify more restrictive stacking requirements (e.g., in Unit 776.1, Rooms 134, 154 and 159, drums may be stacked no more than two high).

In Unit 1, 10 and 15A, a 5- or 10-gallon container may be stacked on the top of each 55- or 85-gallon container provided the 55- or 85-gallon container is blocked to prevent inadvertent movement and the 5- or 10-gallon container is placed on blocks to elevate it above the top of the 55- or 85-gallon drum.

- d. **Racks:** Drums stored in racks will be stored horizontally and will be stacked no more than three high. The total weight of the drums stored in a rack will not exceed the structural design capacity of the rack.
- e. **Shelves:** Containers on shelves will be stored in a planar configuration, fixed positions, or stacked in an array similar to the arrangement provided at the end of this Part.

15. Secondary Containment

Liquid hazardous or mixed wastes will be stored in areas providing secondary containment.

Except for storage within gloveboxes, containers storing liquids within a secondary containment area without a slope to remove liquids will be elevated off the floor in a stable manner, and the containers will not extend onto or over the edge of any berms which are present.

Secondary containment areas will be designed and maintained to prevent run-on and run-off of liquids into the containment system. Liquids accumulated within secondary containment areas will be removed in a timely manner as is necessary to prevent overflow of the collection system using the appropriate means necessary. The collected liquids will be transferred to a container of adequate integrity and managed appropriately based on the waste characterization.

Secondary containment will be adequate to contain at least 10% of the volume of the liquid hazardous or mixed waste containers stored in the area or the entire volume of the largest container, whichever is greater. For hazardous or mixed waste containers with known and documented volumes of incidental free liquid, secondary containment will be provided based on the actual amount of incidental free liquid present within the container(s) located within the secondary containment structure. "Incidental free liquid" is defined as small amounts of liquid resulting from condensation within the waste container or liquid which was entrained in the waste matrix when packaged, but has since separated from it. Secondary containment will be provided by one of the following types:

- a. **Coated concrete:** The area will be surrounded by a berm or wall which meets the minimum berm height necessary to provide adequate secondary containment. The concrete will be coated with epoxy, or other coating offering similar protection. The coating will cover the

reactive waste, documentation identifying special management requirements will also be maintained. Specific recordkeeping requirements are identified in the following documents:

- a. Completed inspection forms/logs will be maintained in the inspection log for the unit.
- b. The operating record will specify each hazardous or mixed waste container within the unit. The location of each container within the unit will also be present in a "locator system" to allow for locating the container in a timely manner to minimize unnecessary exposure to personnel. The locator system must be capable of providing sufficient information to determine the location of individual containers in a reasonable amount of time. In addition, general information concerning the unit (i.e., storage areas within the unit, description(s) of the area, approved waste codes, and any area-specific information) will be present.

17. Special Provisions for Container Staging Areas

For the purposes of this Permit, a staging area is recognized as an area within a container storage unit/area in which containers are placed for a short period of time (not to exceed 15 calendar days) while being prepared for or awaiting transfer; while being received; while awaiting sampling, analysis, and/or analytical results; or while awaiting nuclear or safety related activities such as drum venting. While in the staging area, container configurations may not mirror those depicted in the container layouts for the unit/area in Part III.C. If containers are stored in a staging area for more than 15 days, the 26 inch aisle space requirement must be met. Staging areas and containers temporarily located within them are subject to the following requirements.

- a. Staged containers may be grouped together in arrays of up to three containers wide by ten containers long. Staged containers placed along walls in a unit/area shall not exceed two containers wide.
- b. Each container group will be clearly marked with signs indicating that the area is designated for staging and the date the staging area was initiated.
- c. Staged containers shall be placed with sufficient space between double rows of containers (at least 4 to 6 inches) to identify any leaks or releases which may occur while the containers are in the staging area.

A minimum 26 inch aisle will be maintained around groups of containers located within a staging area.

- d. Staged containers will be identified by a roped area, a painted boundary on the floor of the area, or other physical means to identify the status of the containers. The staging area will also be identified in the unit's operating record.
- e. Staged containers will be subject to locator system requirements if staged for more than 15 days. Otherwise, the locator system need not be maintained for containers while in a staging area.
- f. Containers located within staging areas must not impede the ability of facility personnel to respond to incidents in the area.
- g. Containers will be configured to ensure adequate inspections.

*KCRA Permit
III.B.17.b*

6

CONTAINER AUDIT REPORT

CNTNR	CNTNR	CNTNR	LAST		OLD	NEW	
NBR	PREFIX	SERIAL	UPDATE	UPDATED_BY	CHANGED FIELD	VALUE	VALUE_ID
N04460			30-APR-96	R516246	container_nbr		N04460
			30-APR-96	R516246	container_status		A
			30-APR-96	R516246	waste_type		EMT
			30-APR-96	R516246	idc_wfc_code		0888
N04470			30-APR-96	R516246	container_nbr		N04470
			30-APR-96	R516246	container_status		A
			30-APR-96	R516246	waste_type		EMT
			30-APR-96	R516246	idc_wfc_code		0888
			15-MAY-96	R515818	filter_type		N
			15-MAY-96	R515818	waste_type	EMT	HAZ
			15-MAY-96	R515818	ldr		Y
			15-MAY-96	R515818	accumulation_start_date		14-MAY-96
			15-MAY-96	R515818	compat_code		NA
			15-MAY-96	R515818	idc_wfc_code	0888	1325
			15-MAY-96	R515818	solid_liquid		S
			15-MAY-96	R515818	haz		Y
			15-MAY-96	R515818	epa_code		D006
			15-MAY-96	R515818	fill_date		14-MAY-96
			15-MAY-96	R515818	container_prefix		0123
			15-MAY-96	R515818	container_serial		00276
			15-MAY-96	R515818	gen_bldg		123
0123	00276		20-MAR-97	N901318	container_status	A	S

22 rows selected.

BW
01/20/97

active
MT

4/30/97

N0446076800068

N0447096800069

TO: V. OROZCO
FAX 4542

1 PAGE

Post-It® Fax Note	7671	Date	10-29-97	# of pages	3
To	CELIA MOYNIHAN	From	H WELLS		
Co./Dept.	RMRS	Co.	KH		
Phone #	5358	Phone #	4653		
Fax #	4542	Fax #	3578		

219
Apr 6-11-97

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OSHA No. 309-107

MATERIAL SAFETY DATA SHEET

Required under OSHA Safety and Health Regulations for Ship Repairing,
Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME Merrison Enterprises Inc. Attn: Sales Manager, Denver, CO, and 2nd Coast 3000 Clarkson Unit 7, Denver, CO 80216		EMERGENCY TELEPHONE NO. 303-296-3439
CHEMICAL NAME AND SYNONYMS SODIUM HUMATE ESTER	TRADE NAME AND SYNONYMS Loop Seal - 40 NATURAL HUMATE ORGANIC BINDER	

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV Range	ALLOYS AND METALLIC COATINGS	%	TLV Range
PIGMENTS	N/A	0	BASE METAL	N/A	0
CATALYST	N/A	0	ALLOYS	N/A	0
VEHICLE	N/A	0	METALLIC COATINGS	N/A	0
SOLVENTS	N/A	0	FILLER METAL FLUX COATING OR CORE FLUX	N/A	0
ADDITIVES	N/A	0	OTHERS		
OTHERS	N/A	-	CSE - 1 Emulsified Asphalt	30	
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV Range
NONE				0	

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	212°F	SPECIFIC GRAVITY (H₂O=1)	1.07 to 1.0
VAPOR PRESSURE (mm Hg.)	VOID/ION	PERCENT VOLATILE BY VOLUME (%)	None
VAPOR DENSITY (AIR=1)	VOID/ION	EVAPORATION RATE (WATER=1)	Water solution
SOLUBILITY IN WATER	YES		
APPEARANCE AND ODOR	BLACK AQUEOUS SOLUTION WITH a slight asphalt smell		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (closed cup)	NONE; WATER BASE PRODUCT	FLAMMABLE LIMITS	LFL	UFL
EXTINGUISHING MEDIA	NON REQUIRED - WATER BASE PRODUCT			
SPECIAL FIRE FIGHTING PROCEDURES	NON REQUIRED - WATER BASE PRODUCT			
UNUSUAL FIRE AND EXPLOSION HAZARDS	NONE			

SECTION V - HEALTH HAZARD DATA	
THRESHOLD LIMIT VALUES	NONE - WATER BASE PRODUCT
EFFECTS OF OVEREXPOSURE	NONE
EMERGENCY AND FIRST AID PROCEDURES	RINSE WITH WATER Treat the same as with asphalt

SECTION VI - REACTIVITY DATA			
STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	NONE
Hazardous Oxidizing Properties		NONE	
Hazardous Decomposition Products		NONE	
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	NONE

SECTION VII - SPILL OR LEAK PROCEDURES	
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED	
WASH AREA WITH WATER	
WASTE DISPOSAL METHOD	
Burn on with asphalt	

SECTION VIII - SPECIAL PROTECTION INFORMATION			
RESPIRATORY PROTECTION (OSHA 1910.134)			
VENTILATION	LOCAL EXHAUST	NONE REQUIRED	SPECIAL
	MECHANICAL (Room)	NONE REQUIRED	N/A
PROTECTIVE CLOTHING	RUBBER GLOVES		OTHER
	OTHER PROTECTIVE EQUIPMENT		OTHER
EYE PROTECTION		GOGGLES	

SECTION IX - SPECIAL PRECAUTIONS	
A WATER BASE PRODUCT - KEEP FROM FREEZING TO PREVENT DAMAGE TO STORAGE CONTAINERS	
OTHER PRECAUTIONS	

10

Turn to
Welcome

Record
Search

Chemicals



Go to
Tank
Database

395556

66099

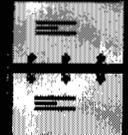
MEGASEAL LONG SEAL 40 SEALER

User Needs To Define

663

5480

N/A



Flam Cabinet #5, northwest of bldg. 663

D-Steel drum

5/13/97

55.00

Gallon (gal)

Liquid

L. Kallerud

Waste

3



Company
→ KH

~~Kym Corp~~
Harold Walls
x4653
p 1409

MSDS

Gary -
Harold knows about these.
He's taking care of them (?!?)
Celia

**Chemical
Safety**

LISTING OF CHEMICAL CONTAINERS

<i>BarCode</i>	<i>Loc Code</i>	<i>Building</i>	<i>Room</i>	<i>Chemical</i>
395555	5480	663	N/A	megaseal long seal 40 sealer

12/12