

Cc. Frank Goodwin

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COLORADO DEPARTMENT OF HEALTH

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SEP 11 1990

RECEIVED

Roy Romer
Governor

Thomas M. Vernon, M
Executive Director

Robert N. Nelson, Jr.
Manager,
U.S. Department of Energy
P.O. Box 928
Golden, CO. 80402-0928

SEP 18 1991

GENERAL MANAGER'S OFFICE

Mr. Philip Warner,
Manager
EG&G, Rocky Flats Inc.
Rocky Flats Area Office
P.O. Box 928
Golden, CO. 80402-0928

Re: Waste Characterization and Handling for ER
Program Field Operations

Dear Messrs. Nelson and Warner:

The Colorado Department of Health, Division of Hazardous Materials and Waste Management (the "Division") in conjunction with the Environmental Protection Agency (EPA), Region 8 conducted an inspection on June 21, 1990 of the 881 Hillside project restart. During that inspection, the decontamination pad and the storage area for drill cuttings were also investigated. The storage area and accompanying log books were found to be in poor condition and possibly in violation of the Colorado Hazardous Waste Act.

A November 29, 1989 letter with attachment to Mr. Simonson from R.D. Sherill, Acting Director of Plutonium Operations, Rockwell Int., outlines the screening procedure for hazardous waste characterization and storage of drill cuttings entitled, Waste Characterization and Handling for ER Program Field Operations. Mr. Sherill requested DOE's review of the draft procedures. CDH commented on previous draft of the procedures but did not receive a copy of a final version for approval. Operations at the decontamination storage area in place during the June 21, 1990 inspection were not in accordance with the procedures provided in Mr. Sherill's letter.

The draft procedures state that drill cuttings will be placed in gray drums and that the drums will be labeled identifying the location and date the cuttings were drummed. The drums will then be transported to a staging area awaiting analytical results which is estimated at 70 days. Once the wastes are identified as hazardous waste or mixed waste, the drums will be transported to a 90-day accumulation area then to an interim status or permitted storage area. Transfer of drums will take approximately three days.

ADMIN RECORD

A-DU017000119

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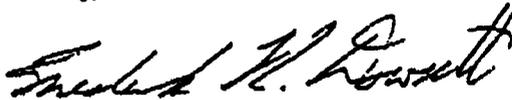
Inspection of the log book for this staging area revealed that the above stated procedures were not in practice. Drums were labeled with a number only; two drums were labeled with the same number (92). In some cases, the number was no longer legible. The drum number, complete date (missing year), and analytical results were not recorded. According to the log book, some drums had been in storage since September. Assuming this was September 1989, the drum was staged approximately 9 months which is well over the 70-day period stated. In addition to record keeping problems, not all drums were on pallets and arranged in such a manner that would allow easy inspection.

Failure to make a hazardous waste determination is a violation of the Colorado Hazardous Waste Regulations, Section 262.11. In addition, if the wastes are found to be hazardous or mixed waste, storage violations are also apparent. The Division is, therefore, requiring submittal of the following documents:

- an officially transmitted copy of the Waste Characterization and Handling for ER Program Field Operations screen document,
- date the cuttings were collected and drummed,
- date the drums were transferred to the staging area, 90-day storage area and permitted storage area,
- the location of all holes drilled since January 1, 1989 and their proximity to SWMUs and
- the analytical results of all cuttings collected since January 1, 1989.

This documentation must be submitted to the Division for review on or before October 1, 1990. If you or members of your staff have any questions regarding this matter, please contact Noreen Matsuura at 331-4920.

Sincerely,



Frederick R. Dowsett, Unit Leader
Monitoring & Enforcement
Hazardous Waste & Waste
Management Division

FRD/PC/pc/jmp
5787K/22-23

cc: Gary W. Baughman, CDH
Debbie Mauer, CDH
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