

DOE ORD. NO 5400.1

94 RF 11571

EG&G ROCKY FLATS

DIST	IN	EXC
AMARAL, M E		
BURLINGAME, A H	X	
BUSBY, W S		
BRANCH, D B.		
CARNIVAL, G J		
DAVIS, J G		
FERRERA, D W		
RAY, R. E.		
GEIS, J. A.		
GLOVER, W. S.		
GOLAN, P. M.		
HANNI, B. J.		
HARMAN, L. K.		
HEALY, T. J.		
HEDAHL, T.		
HILBIG, J. G.		
HUTCHINS, N. M.		
JACKSON, D. T.		
KILL, R. E.		
KUESTER, A. W.		
MARX, G. E.		
M. DONALD, M. M.		
MCKENNA, F. G.		
MONTROSE, J. K.		
MORGAN, R. V.		
POTTER, G. L.		
PIZZUTO, V. M.		
RISING, T. L.		
SANDLIN, N. B.		
SCHWARTZ, J. K.		
SELOCK, G. H.		
STEWART, D. L.		
STIGER, S. G.	X	
Braussard, M. C.	X	
Burnmaster, M. C.	X	
Dr. Ho, J. R.	X	
Fredoni, Frost, L. A.	X	
Quinn, G. D.	X	
Quinn, L.	X	
Hollibush, L.	X	
Leiter, R. M.	X	
Peter, K. G.	X	
Schmieder, A. K.	X	
CORRESP. CONTROL	X	X
ADMIN RECORDS	X	X
RAFFIC		
ATS/T130G	X	

EG&G ROCKY FLATS INC
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 (303) 966 7000

November 18 1994

94 RF 11571

Jessie M Roberson
Assistant Manager for
Environmental Restoration
DOE, RFFO

Attn B I Williamson

NOTIFICATION TO RETAIN INTERIM STATUS FOR RCRA UNIT 18 01 (10835) - SGS 601 94

Action None required

The purpose of this letter is to (1) inform the Department of Energy of EG&G's intent to retain Interim Status for Resource Conservation and Recovery Act (RCRA) Unit 18 01 and (2) document the established acceptance criteria for the Decontamination Pads as requested in the referenced letter

The Main Decontamination Facility (Unit 18 01) presently has interim status. By retaining interim status for Unit 18 01 anticipated future Environmental Restoration Program Division (ERPD) activities including Decontamination and Decommissioning (D&D) will be supported. Unit 18 01 is the only facility of its kind with interim status and deregulation of this unit may prevent Rocky Flats Environmental Technology Site from performing current and future D&D and ERPD activities

Prior to accepting any equipment materials or facilities (hereafter equipment) for decontamination or accepting any waste for accumulation and storage the equipment and the waste are evaluated against the acceptance criteria defined for the unit. An evaluation is also conducted to determine the disposition of the wastes which will be generated from the proposed decontamination or waste accumulation activities. Additionally in accordance with EMD Operating Procedure FO 4 (5 21000 OPS FO 4) all gross contamination is scraped off in the field prior to the equipment being brought to the Decontamination Facility

Presently Unit 18 01 is utilized for environmental activities performing RCRA Facility Investigation/Remedial Investigation (RFI/RI) Comprehensive Environmental Response Compensation and Liability Act (CERCLA) investigations and Remedial Action fieldwork for operable units (OUs) on plantsite. Examples of these activities include decontamination of drill rigs auger bits drums trucks front end loaders and the accumulation of field decontamination rinsates and purgewater from groundwater monitoring wells. The advantages to retaining interim status are described below

CLASSIFICATION

UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER SIGNATURE
DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICER DATE

IN REPLY TO REF. CC NO 3883-RF-94

OPTION ITEM STATUS PARTIAL/CLN BY CLAS'D APPROVALS
RIG & TYPIST INITIALS

J M Roberson
November 18 1994
94 RF 11571
Page 2

Ability to perform centralized decontamination of equipment contaminated with visible hazardous waste and hazardous debris
Ability to decontaminate empty and non empty containers (e g tanker trucks)
Closure not required at this time and
If closed and future needs are identified the process to obtain permit modifications may be lengthy

Treatment will not be conducted at the Decontamination Facilities as defined in the Colorado Hazardous Waste Regulations (6 CCR 1007 3 Section 261 7)

Treatment means any method technique or process including neutralization designed to change the physical chemical or biological character or composition of any hazardous waste so as to neutralize such waste or so as to recover energy or material resources from the waste or so as to render such waste non hazardous or less hazardous safer to transport store or dispose of or amenable for recovery amenable for storage or reduced in volume

In accordance with the existing interim status conditions for Unit 18 01 only the following waste codes are presently accepted generated or stored A request will be submitted for any additional waste codes which may be encountered and are not already stated in Part A

D004	Arsenic	D019	Carbon Tetrachloride
D005	Barium	D022	Chloroform
D006	Cadmium	F001	Spent Halogenated Solvents used in degreasing
D007	Chromium	F002	Spent Halogenated
D008	Lead	F003	Spent Non halogenated Solvents
D009	Mercury	F005	Spent Non halogenated Solvents
D011	Silver		

Listed below are waste and equipment that are presently accepted and anticipated in the future at the Decontamination Facilities and the options for dispositioning the waste generated The decontamination facility wash water can be dispositioned at the following units OU1 Treatment Unit located in Building 891 OU2 Field Treatability Unit (FTU) Building 374 Liquid Waste Treatment Operations Sewage Treatment Plant (STP) The acceptance criteria for each of these facilities has been previously established The unit to which each batch of decontamination facility wash water will be dispositioned is determined on a batch by batch basis based on the types of equipment decontaminated the types of wastes accumulated and the concentrations of specific analytes in the wastes generated

J M Roberson
November 18 1994
94 RF 11571
Page 3

OU1 Treatment Facility (accepts only contained in wastes and characteristic RCRA regulated hazardous wastes)

Decontamination wash water from environmental operations that meets the OU1 acceptance criteria and
Purge water from groundwater wells and
Tanker trucks & empty containers that meet the definition of RCRA empty
(6 CCR 1007 3 Section 261 7)

OU2 Field Treatability Unit (FTU) (accepts only contained in wastes and characteristic RCRA regulated hazardous wastes)

Decontamination wash water from environmental operations that meets the OU2 acceptance criteria and
Tanker trucks & empty containers that meet the definition of RCRA empty and
Purge water from groundwater wells

Building 374 Liquid Waste Treatment Operations (accepts contained in mixture rule and derived from wastes)

Decontamination wash water from environmental operations that meets the Building 374 waste acceptance criteria and
Tanker truck & empty Containers that meet the definition of RCRA empty
Sludge Sucker and equipment for OU4 operations
Decanted water from OU2 drums and
Rinsate from RCRA closures

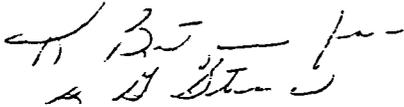
Sewage Treatment Plant (STP) (accepts contained in mixture rule and derived from wastes)

Decontamination wash water from environmental operations that meets the STP acceptance criteria and
Equipment that is a hazardous waste (e g decontamination not meeting the definition of treatment)
Purge water from groundwater monitoring wells
Decanted water from OU2 drums
Sludge Sucker and equipment from OU4 operations and
Tanker trucks & empty containers that meet the definition of RCRA empty

J M Roberson
November 18 1994
94 RF 11571
Page 4

RCRA Unit 18 01 does not accept excess chemicals or empty containers from P" listed waste (accepts only contained in mixture rule and derived from wastes)

If necessary the Protected Area Decontamination Facility (PADF) will also be permitted in the future and if the need is identified both decontamination facilities will be permitted for treatment as well as storage If you have any further questions on RCRA Unit 18 01 please contact Annette Schmiechen of my staff at extension 3191



S G Stiger Director
Environmental Restoration Program Division
EG&G Rocky Flats Inc

MBU alc

Orig and 1 cc - J M Roberson

cc

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S R Grace -
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