

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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March 12 1991

Thomas T Olsen
 Project Manager Decontamination Pad
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 Ec t l e D l ector

Dear Mr Olsen

The Colorado Department of Health Hazardous Materials Waste Management Division, the Division has reviewed and compared the information submitted August 1990 by the Department of Energy DOE in the Remedial Action Temporary Decontamination Pad RATDP with the requirements in 6 CCR 1007-3 Part 262 and Part 265 Subpart J Interim Status Standards for Tanks

Although not explicitly stated in the RATDP the Division has assumed that storage of hazardous waste in the two sedimentation and four holding tanks will not exceed 90 days Tanks which contain hazardous wastes for longer than 90 days must be covered by a permit or interim status

After review and comparison of the RATDP and the appropriate sections of 6 CCR 1007-3 Parts 262 and 265 Subpart J the Division was unable to locate the information required for compliance with following standards

1 A written assessment which has been reviewed and certified by an independent, qualified Professional Engineer registered in the State of Colorado should be submitted with the following items

a Design calculations showing that the tank support pallets will support the fully loaded 1000 gallon sedimentation tanks and the 2600 gallon storage tanks in the RATDP Section 265 192 (a)(5)(1)

b A statement that the high density crosslinked rotationally molded polyolefin is expected to be suitable material for the hazardous wastes to be stored in the decontamination pad tanks Section 265 192 (a)(5)(1)

c The effects of frost heave have been considered in the design of the tank system and will not effect the structural integrity or the operation of the tanks Section 265 192 (a)(5)(111)

d Proper procedures are adhered to during the installation of the new tank system and prior to placing the new tank system into use an inspection of the system for the presence of any of the following items Weld breaks punctures scrapes of protective coatings cracks, corrosion other structural damage or inadequate construction/installation The points listed above could be added to Component Checkout or the Quality Acceptance Criteria Checklist submitted in the RATDP and when approved by an independent registered Professional Engineer will fulfill this requirement Section 265 192 (b)

2 Section 265 192 (d) All new tanks and ancillary equipment must be tested for tightness prior to being placed in use The Division is unable to determine whether or not this requirement is met since the contents of the System Operational, SO test sheets were not included for review If a tightness criteria is included in the System Operational test sheets this requirement is met The Division would like a copy of the System Operational test sheets showing the tightness criteria

3 Section 265 192 (e) Ancillary equipment must be supported and protected against physical damage and excessive stress due to settlement vibration, expansion or contraction The Division is unable to determine whether or not this criteria is met because piping drawings between the tanks and between the decontamination pad and the tanks were not included for review Is the piping between the decontamination pad and the first sedimentation tank protected from vehicular vibration?

4 Section 265 192 (g) The owner or operator must obtain and keep on file with the facility operating record the written statements and certifications pertaining to the tank design and installation

5 The requirements in the following list can be filled by modifications to include daily inspection checklists in the Standard Operating Procedures February 1991, Section 12 Part 5 3 1 Equipment Decontamination Pad

a Provide a leak detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours Section 265 193 (c)(3) The six inch monitoring/access pipe placed at the lowest point in the secondary containment system will fill this requirement if the monitoring pipe is inspected daily for leaks

b Section 265 193 (f)(1)(2)(3) and (4) Ancillary equipment aboveground piping joints pumps etc must be inspected daily for leaks

c Section 265 195 (a) and (b) The owner or operator must develop and follow a schedule and procedure for inspecting overfill controls daily and must inspect at least once each operating day the leak detection system the construction materials and area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, and document in the operating record of the facility an inspection of the above items

6 Section 265 196 Response to leaks or spills and disposition of leaking or unfit-for-use tank systems The RATDP does not contain a contingency plan for the tank system once it becomes operational The Division has enclosed a copy of this section of the regulations, and requests that DOE submit a leak/spill plan which complies with the regulations

All of the above requirements must be filled before the Division can approve a change to interim status for the Remedial Action Temporary Decontamination Pad

If you have any questions regarding the requirements please contact Noreen Matsuura of my staff at (303) 331-4920

Sincerely



Gary W Baughman
Unit Manager
Hazardous Waste Facilities

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cc Jim Koffer EG&G
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