

**RCRA PERMIT MODIFICATION REQUEST #18**

**State R.C.R.A. Permit No. 91-09-30-01  
CO 7890010526**

**United States Department of Energy - Rocky Flats Plant**

December 1993

**DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE**

**ADMIN RECORD**

**A-DU08-000191**

## PERMIT MODIFICATION SUMMARY

This document is submitted as a Class 1 Permit Modification requiring prior approval from the Colorado Department of Health pursuant to 6 CCR 1007-3 100.63(a). The modification incorporates previously approved changes to the Environmental Restoration Interagency Agreement milestone schedules in the Corrective Action Requirements Section of the State RCRA Permit for Rocky Flats Plant. Changes to the milestone schedules are shown in bold and strike-out.

Please note that extension requests have been submitted for Operable Units 1, 8, 10, 12, 13, and 14, but they have not yet been accepted. In addition, the stop work order currently in effect for Operable Units 2 through 7 and recently lifted for Operable Unit 1 will significantly impact all the milestone dates for these Operable Units.

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

OU 1  
881 HILLSIDE

OU 1 PHASE III RCRA FACILITY INVESTIGATION/REMEDIAL  
INVESTIGATION (RFI/RI)

Submit Draft Phase III RFI/RI Work Plan	February 6, 1990
Submit Final Phase III RFI/RI Work Plan	October 30, 1990
Submit Draft Phase III RFI/RI Report	October 28, 1992
Submit Final Phase III RFI/RI Report	November 15, 1993

OU 1 CORRECTIVE MEASURES STUDY/FEASIBILITY  
STUDY (CMS/FS)

Submit Draft CMS/FS Report	February 11, 1994
Submit Final CMS/FS Report	August 3, 1994

OU 1 CORRECTIVE AND REMEDIAL ACTION PROPOSED PLAN (PP)

Submit Draft PP	September 27, 1993
Submit Final PP	January 4, 1994
Submit Responsiveness Summary	May 6, 1994
Submit Final Responsiveness Summary	August 3, 1994

OU 1 CORRECTIVE ACTION DECISION AND RECORD OF  
DECISION (CAD/ROD)

Submit Draft CAD/ROD	August 3, 1994
Submit Final CAD/ROD	November 1, 1994

OU 1 CORRECTIVE /REMEDIAL DESIGN (CD/RD)

Submit CD/RD Work Plan	November 1, 1994
Submit Draft Title II Design	July 5, 1995
Submit Final Title II Design	October 3, 1995

OU 1 CORRECTIVE/REMEDIAL ACTION

Begin Corrective/Remedial Action Construction	May 7, 1996
Complete Corrective/Remedial Construction	November 4, 1997
Submit Performance Assessment Report	February 10, 1998

OU 1 INTERIM MEASURE/INTERIM REMEDIAL ACTION (IM/IRA)

Submit Draft Proposed IM/IRA Decision Document	September 18, 1989
Submit Proposed IM/IRA Decision Document	October 6, 1989
Submit Final IM/IRA Decision Document	January 5, 1990
Submit IM/IRA Implementation Document	February 22, 1991
Begin Phase I-A IM/IRA Construction	January 15, 1990
Begin Phase I-B IM/IRA Construction	October 8, 1990
Begin Phase II-A IM/IRA Construction	April 1, 1991
Begin Phase II-B IM/IRA Construction	September 3, 1991
Complete IM/IRA Construction	April 13, 1992
Begin IM/IRA Testing	August 5, 1991

**OU 2 CORRECTIVE/REMEDIAL ACTION**

Begin Corrective/Remedial Action Construction	January 20, 1997
Complete Corrective/Remedial Action Construction	July 20, 1998
Submit Performance Assessment Report	October 15, 1998

**OU 2 SURFACE WATER INTERIM MEASURE/INTERIM REMEDIAL ACTION (IM/IRA)**

Submit Draft Proposed IM/IRA Decision Document	June 19, 1990
Submit Proposed IM/IRA Decision Document	September 18, 1990
Submit Draft Responsiveness Summary	December 13, 1990
Submit Final Responsiveness Summary and Final IM/IRA Decision Document	January 11, 1991
Field Treatability Test System Installation Complete	May 10, 1991
Begin Field Treatability Testing	May 13, 1991
Submit Draft Treatability Test Report	April 1, 1992
Submit Final Treatability Test Program Report	June 2, 1992
Complete IM/IRA Construction	April 24, 1992
Begin Field Treatability Testing (Entire System)	April 27, 1992

**OU2 SUBSURFACE INTERIM MEASURE/INTERIM REMEDIAL ACTION (IM/IRA)**

Submit Draft Proposed IM/IRA Decision Document	March 2, 1992
Submit Draft Responsiveness Summary	June 11, 1992
Submit Final Responsiveness Summary and Final IM/IRA Decision Document	August 14, 1992
Release Final Responsiveness Summary and IM/IRA Decision Document to Public	September 4, 1992

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

OU 3  
OFF-SITE RELEASES

OU 3 DRAFT REMEDY REPORT

Submit Draft Past Remedy Report	October 26, 1990
Submit Final Past Remedy Report	April 2, 1991

OU 3 HISTORICAL INFORMATION AND PRELIMINARY  
HEALTH RISK ASSESSMENT

Submit Draft Historical Information and Preliminary Health Risk Assessment Report	November 9, 1990
Submit Final Historical Information and Preliminary Health Risk Assessment Report	April 16, 1991

OU PHASE I RCRA FACILITY INVESTIGATION/REMEDIAL  
INVESTIGATION (RFI/RI)

Submit Draft Phase I RFI/RI Work Plan	July 10, 1991
Submit Final Phase I RFI/RI Work Plan	December 6, 1991
Submit Draft Phase I RFI/RI Report	February 14, 1994
Submit Final Phase I RFI/RI Report	October 21, 1994

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

SITE-WIDE ACTIVITIES

BACKGROUND STUDY

Submit Draft Background Study Report (Water)	December 15, 1989
Submit Draft Background Study Report (Soils)	December 15, 1989
Submit Revised Background Study Report	December 21, 1990

COMMUNITY RELATIONS

Submit Draft Community Survey Plan	January 23, 1990
Submit Final Community Survey Plan	March 22, 1990
Submit Draft Community Relations Plan	November 1, 1990
Submit Final Community Relations Plan	January 22, 1991
Submit Community Relations Plan Responsiveness Summary	June 21, 1991

HISTORICAL RELEASE REPORT

Submit Draft Historical Release Report	January 8, 1992
Submit Final Historical Release Report	June 3, 1992

HEALTH AND SAFETY PLAN

Submit Draft Health and Safety Plan	August 15, 1990
Submit Final Health and Safety Plan	November 12, 1990

PLAN FOR PREVENTION OF CONTAMINANT DISPERSION

Submit Draft Plan for Prevention of Contaminant Dispersion	September 19, 1990
Submit Final Plan for Prevention of Contaminant Dispersion	July 22, 1991
Submit Responsiveness Summary on Plan for Prevention of Contaminant Dispersion	November 25, 1991

DISCHARGE LIMITS FOR RADIONUCLIDES (Work Plan)

Submit Draft Work Plan for Discharge Limits for Radionuclides	April 5, 1991
Submit Final Work Plan for Discharge Limits for Radionuclides	September 16, 1991
Submit Responsiveness Summary Discharge Limits for Radionuclides	January 30, 1992

SAMPLING AND ANALYSIS PLAN

Submit Draft Quality Assurance Project Plan	August 29, 1990
Submit Final Quality Assurance Project Plan	March 1, 1991
Submit Draft Standard Operating Procedures	August 29, 1990
Submit Final Standard Operating Procedures, Volume 1 - Field Operations, Volume 2 - Groundwater, Volume 3 - Geotechnical	March 1, 1991
Submit Final Standard Operating Procedures, Volume 4 - Surface Water, Volume 5 - Ecology	March 1, 1991
Submit Final Standard Operating Procedure, Volume 6 - Air	March 1, 1991
Submit Final Standard Operating Procedure Addendum for OU 2 Phase II RFI/RI Workplan	March 1, 1991
Submit Final Standard Operating Procedure Addendum for OU 1 Phase III RFI/RI Workplan	March 1, 1991

TREATABILITY STUDY

Submit Draft Treatability Study Plan	September 21, 1990
Submit Final Treatability Study Plan	June 3, 1991
Submit Draft Treatability Study Report	May 26, 1993
<del>Submit Final Treatability Study Report</del>	<del>October 20, 1993</del>

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

OU 4  
SOLAR PONDS

OU 4 SOLAR PONDS PHASE I RCRA FACILITY INVESTIGATION/  
REMEDIAL INVESTIGATION (RFI/RI)

Submit Draft Phase I RFI/RI Work Plan	June 8, 1990
Submit Final Phase I RFI/RI Work Plan	November 26, 1991
<del>Submit Draft Phase I RFI/RI Report</del>	<del>May 21, 1993</del>
<del>Submit Final Phase I RFI/RI Report</del>	<del>October 18, 1993</del>

OU 4 SOLAR PONDS PHASE I INTERIM MEASURE/INTERIM  
REMEDIAL ACTION

Submit Draft Phase I Proposed IM/IRA Decision Document	April 14, 1994
Submit Phase I Proposed IM/IRA Decision Document	June 24, 1994
Submit IM/IRA Responsiveness Summary	November 1, 1994
Submit Phase I Final IM/IRA Decision Document and Final Responsiveness Summary	January 13, 1995
<del>Submit IM Design Work Plan</del>	<del>May 24, 1995</del>
<del>Submit Phase I IM/IRA Implementation Document</del>	<del>February 26, 1996</del>
Submit Final IM Title II Design	February 10, 1995
Begin Phase I IM/IRA Construction	September 27, 1995
All Solar Ponds Emptied of Water and Sludge	January 20, 1995

OU 4 SOLAR PONDS PHASE II RFI/RI

Submit Draft Phase II RFI/RI Work Plan	April 22, 1994
Submit Final Phase II RFI/RI Work Plan	September 19, 1994
Submit Draft Phase II RFI/RI Report	April 16, 1996
Submit Final Phase II RFI/RI Report	September 11, 1996

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

OU 6  
WALNUT CREEK

OU 6 PHASE I RCRA FACILITY INVESTIGATION/REMEDIAL  
INVESTIGATION (RFI/RI)

Submit Draft Phase I RFI/RI Work Plan	April 19, 1991
Submit Final Phase I RFI/RI Work Plan	September 16, 1991
Submit Draft Phase I RFI/RI Report	June 10, 1994
Submit Final Phase I RFI/RI Report	November 18, 1994

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

OU 8  
700 AREA

OU 8 700 AREA PHASE I RCRA FACILITY INVESTIGATION/  
REMEDIAL INVESTIGATION (RFI/RI)

Submit Draft Phase I RFI/RI Work Plan	May 1, 1992
Submit Final Phase I RFI/RI Work Plan	December 1, 1992
Submit Draft Phase I RFI/RI Report	February 14, 1994
Submit Final Phase I RFI/RI Report	July 12, 1994

TABLE 6  
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE SCHEDULE

OU 14  
RADIOACTIVE SITES

OU 14 RADIOACTIVE SITES PHASE I RCRA FACILITY INVESTIGATION/  
REMEDIAL INVESTIGATION (RFI/RI)

Submit Draft Phase I RFI/RI Work Plan	June 26, 1992
Submit Draft Phase I RFI/RI Work Plan	October 19, 1992
Submit Draft Phase I RFI/RI Report	December 20, 1994
Submit Draft Phase I RFI/RI Report	May 23, 1995