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COLORADO DEPARTMENT OF HEALTH
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environment of the people of Colorado

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1 Cherry Creek Dr. S. Laboratory Building
Denver, Colorado 80222-1530 4210 E. 11th Avenue
Phone (303) 692-2000 Denver, Colorado 80220-3716
(303) 691-4700

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE

Roy Romer
Governor

Patricia A. Nolan, MD,
Executive Director

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BERMAN, H.S.		
CARNIVAL, G.J.		
COPP, R.D.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRANZ, W.A.		
HANNI, B.J.		
HEALY, T.J.		
HEDAHL, T.G.	X	
HILBIG, J.G.		
HUTCHINS, N.M.		
KELL, R.E.		
KIRBY, W.A.		
KUESTER, A.W.		
MAHAFFEY, J.W.		
MANN, H.P.		
MARX, G.E.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SETLOCK, G.H.		
STIGER, S.G.	X	
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILSON, J.M.		

February 28, 1994



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Mr. Mark A. Silverman
Manager
U.S. Department of Energy
P.O. Box 928
Golden, CO 80402-0928

RE: Information Request for RCRA Unit 15B (904 Pad)

Dear Mr. Silverman:

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), received a letter on May 17, 1993 from the Department of Energy (DOE) requesting a change for a portion of the 904 Pad (Unit 15B) from interim status container storage to interim status waste pile storage. The Division officially denied this request in a letter submitted to DOE on August 10, 1993 because the Rocky Flats Plant (RFP) did not meet the qualifications for the proposed change to interim status. During an August 24, 1993 meeting between members of DOE, EPA, EG&G, and Division staff, the Division clarified the basis of the denial for a change to an interim status waste pile, and reiterated that the request did not meet the criteria for Division approval contained in 6CCR 1007-3, Section 100.20(b)(3).

DOE stated in the August 24, 1993 meeting and in your May 17, 1993 letter that RFP is not managing the hazardous waste currently stored on Unit 15B in compliance with the interim status requirements of 6 CCR 1007-3, Part 265 for container storage. At the August 24 meeting, the Division requested that RFP submit the Standard Operating Procedures (SOPs) for the 904 Pad and potential plans for bringing Unit 15B into compliance. On December 27, 1993 the Division received a letter from DOE clarifying RFP's current compliance with 6 CCR 1007-3, Section 265.35 (required aisle space). The Division is unclear as to the purpose of this letter. The letter did not address the issue of compliance with all of the applicable requirements of Part 265, nor did it include the SOPs for the 904 Pad previously requested by the Division.

The purpose of this letter is to reiterate the Division's position regarding the future of Unit 15B. As discussed in the August 24 meeting, the Division is recommending that DOE reevaluate the

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ADMN RECORD/080	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
PATS/T130G	<input type="checkbox"/>	<input type="checkbox"/>

Reviewed for Addressee
Corres. Control RFP

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DOE ORDER # 5400.1

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future management of the 904 Pad. This evaluation should take into account, at a minimum, the following alternatives:

- pursuing a Part B waste pile permit application for Unit 15B;
- assessing the feasibility of bringing Unit 15B into full container storage compliance with the Colorado Hazardous Waste Regulations;
- further development of plans concerning shipments of pondcrete/saltcrete off-site. This issue is currently being discussed in the monthly Land Disposal Restriction (LDR) manager's meetings.

Through informal discussions with DOE, the Division believes that RFP is in the process of conducting studies to evaluate the alternatives listed above. The Division is requesting that DOE provide a summary of the information obtained in the studies concerning the management of Unit 15B. This information must include schedules for bringing Unit 15B into compliance and the estimated costs and other considerations associated with implementing each of the proposals.

Please provide a written response to this request within 30 days of the date of this letter identifying the facility's intentions for bringing Unit 15B into compliance. If you have any questions concerning this letter, please contact Chris Gilbreath at (303) 692-3371, or Lisa Weers at (303) 692-3451.

Sincerely,



Gary W. Baughman, Chief
Hazardous Waste Facilities Section
Hazardous Materials and Waste Management Division

cc: T. Lukow, DOE/WPD, RFO
B. Benedetti, EG&G
D. Maxwell, EPA
C. Alstatt, CDH
F. Dowsett, CDH
D. Miller, AGO
J. Berardini, CDH/OE
M. Johnson, Jefferson County Health Dept.