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STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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May 1, 1990

Roy Romer
Governor

Thomas M. Vernon
Executive Director



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Mr. Robert M. Nelson, Jr., Manager
Department of Energy
Rocky Flats Area Office
P.O. Box 928
Golden, CO 80402-0928

Re: Inside Closure Plans for OU3 Sites 211, 212, 204 and 210.

Dear Mr. Nelson:

A preliminary review of the Closure Plans for sites 204, 211, 212 and 210 has been completed by the Colorado Department of Health, Hazardous Materials and Waste Management Division ("the Division"). The Division's comments are as follows.

Sites 204, 210, 211 and 212.

-Submittal of ARAR analysis as an addendum to closure plans internal to buildings is necessary to satisfy requirements of I.B.10 of the IAG Statement of Work.

Site 210.

-Site 210, Unit 16 has been mistakenly listed with the inside building closures and will be relisted in the final IAG as an outside building closure.

Site 211.

-The use of 0.15M hydrazine, a listed hazardous waste, in the decontamination solution for Site 211, Unit 26 has been discussed with Howard Rose in a telephone conversation April 16, 1990. The substitution of tartaric acid, calcium chloride, Schubert's solution or other suitable non-hazardous chelating agents in place of hydrazine was also discussed. The reformulation of the decontamination solution for Site 211 should be addressed.

-Explain how complete decontamination of the wooden pallets from Site 211, Unit 26 would be demonstrated.

Site 212.

-The chemical constituents of the decontamination solution SOLNI used on Site 212, Unit 63 must be identified, if the efficacy of the solution is to be determined.

-After cleaning the epoxy coated floors in Unit 211 and 212, the condition of the floors should be reported. The presence of contamination and floor cracking may require soil sampling for possible contamination migration.

Site 204.

- All pieces of equipment which have come into contact with hazardous constituents of the cooling oils and solvents must be decontaminated. None of the equipment used to wash or feed the chips to the roaster is mentioned in the closure plan. The closure plan states, "The chips are first rinsed with hot water to remove excess oils and coolants and then fed into the entry chute of the chip roaster" page 10. Identify and list the equipment used in the rinsing process, and the equipment used to feed the chips into the roaster.
- At what locations are the "Six samples for HSL VOC" on Table 1, page 19 of the Closure plan going to be taken?
- The equipment used to hold, wash and/or feed the chips prior to being fed to the "chip inlet" (Figure 4, page 9) is not heated to thermal destruction temperatures and is in contact with the cooling oils and solvents. The preroasting equipment could have potentially contaminated surfaces. Are any of the six samples mentioned above being taken from "preroasting" equipment surfaces? If not, the sampling location list should be expanded to include preroasting equipment.
- Has the HEPA filter in the roaster stack been replaced since the roaster has ceased operation?
- What is the source of the oxalate, citrate and ammonium ions in the "inhibited" acidic powder being used as a cleaning solution listed on page 27?

Please respond to these comments within 30 days of your receipt of this letter. If you have any questions, please call Noreen Matsuura at 331-4920.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc Mike Arndt, EG&G
Martin Hestmark, EPA
Rich Schassburger, DOE
John Haggard, RFP
Howard Brown, Environmental Monitoring Council
Teresa Hampton, Attorney General's Office

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