



INTEROFFICE CORRESPONDENCE

DATE: July 20, 1992

TO: Distribution

FROM: K. G. Peter, RCRA Permitting, Bldg. T130C, X6345 *K.G. Peter*

SUBJECT: CHANGES TO STATE RCRA PERMIT NO. 91-09-30-01 - REVISION 2
- KGP-012-92

The Colorado Department of Health (CDH) has recently approved a RCRA Permit Modification Request submitted in January 1992. This letter summarizes the approved changes and serves as your official notification which should be inserted into your State RCRA Permit, issued on October 1, 1991.

Permit Modification Request Number 4, submitted to CDH on January 12, 1992, was granted temporary authorization which expired on June 8, 1992. Approval of temporary authorization was summarized in a letter to you dated May 20, 1992. CDH subsequently granted approval of this modification on June 9, 1992. This approved permit modification includes the following changes to the permit:

1. Approval to store D003, D010, D011, P Series and U Series waste in permitted Unit 10.
2. Approval to store D005 and F005 waste in permitted Units 12 and 27.
3. Approval to store D004, D005, D009, D010, P Series and U Series waste in permitted Unit 15-A.
4. Approval to store D010, P Series and U Series waste in Unit 13.

NOTE: All other conditions specified in the permit for Units 10, 12, 13, 15-A and 27, including compatibility and permitted capacity, must be adhered to.

Also, 6 additional container storage areas have been authorized to store mixed wastes constrained by the following conditions:

1. Unit 78, Building 371 Passive/Active Drum Counter (PADC) (Room 2202).
Indoor storage area dimensions 56-feet by 23-feet.
Maximum permitted capacity 1650 gallons in 30 fifty-five gallon drums.
2. Unit 90.016, Building 371 drum storage area (Room 2325).
This room serves as a container staging area for Unit 78, the passive/active drum counter located in Room 2202.

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By *[Signature]* *[Initials]*

- Indoor storage area dimensions 67-feet by 70-feet.
Maximum permitted capacity 1650 gallons in 30 fifty-five gallon drums.
3. Unit 79, Building 707 Segmented Gamma Scan (SGS) drum counter (Room 196).
Indoor storage area dimensions 39-feet by 50-feet.
Maximum permitted capacity 1650 gallons in 30 fifty-five gallon drums.
 4. Unit 90.001, Building 371 drum storage area (Room 3189).
Indoor storage area dimensions 21-feet by 50-feet.
This room also stores nonregulated wastes. A small section of the floor in the middle of the room is used to stage drums for the segmented gamma scan drum counter also in Building 371.
Maximum permitted capacity 1650 gallons in 30 fifty-five gallon drums.
 5. Unit 90.011, Building 371 SGS drum counter (Room 3187B).
Indoor storage area dimensions 28-feet by 93-feet.
Maximum permitted capacity 55 gallons in 1 fifty-five gallon drum.
 6. Unit 90.025, Building 771 High Efficiency Particulate Air (HEPA) Low Specific Activity Counter (LOSAC) and SGS counter (Annex).
This room is located adjacent to loading docks and is between two air locks.

All six new container storage units associated with counters are subject to the operating constraints and conditions listed below:

1. Low-level, transuranic (TRU) mixed waste and mixed residue described by the following waste codes may be stored in each of the above units:

D001	Ignitable Waste
D002	Corrosive Waste
D003	Reactive Waste
D004	Arsenic Waste
D005	Barium Waste
D006	Cadmium Waste
D007	Chromium Waste
D008	Lead Waste
D009	Mercury Waste
D010	Selenium Waste
D011	Silver Waste
F001	Halogenated Solvent Waste
F002	Halogenated Solvent Waste
F003	Non-halogenated Solvent Waste
F005	Non-halogenated Solvent Waste
F006	Wastewater Treatment Sludge
F007	Cyanide Plating Waste

F009 Cyanide Plating Waste
P Series Waste
U Series Waste

2. Liquid and solid low-level and TRU mixed waste and mixed residues may be stored in 55-gallon drums or other DOT approved containers, subject to the compatibility requirements of Part III.K of the permit.
3. The perimeter walls will be regularly kept in good condition and maintained free of holes or gaps.
4. A minimum 26-inch aisle space will be maintained between double rows of drums.
5. Solid and liquid low-level radioactive mixed waste, TRU radioactive mixed waste and mixed residues in 55-gallon drums or other DOT approved containers, subject to compatibility requirements. Unit 90.025 may store HEPA filters in stainless steel "filter coffins," measuring approximately 38-inches x 57-inches x 68-inches.
6. Overpack drums may be used as necessary and must be properly labeled.
7. Drums may be stored on a concrete floor which is free of cracks or gaps and is coated with epoxy paint or other compatible coating approved by the director of CDH.
8. Incompatible wastes must be separated by a dike, berm, wall or other device.
9. Containers will not be stacked.
10. Each stored container must be accessible and inspectable, without moving any other container.
11. A container must always be closed during storage, except when it is necessary to add or remove waste.
12. A container must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
13. At least weekly, stored containers and the containment system must be inspected for leaking, deterioration, corrosion or other factors which may compromise the safe handling of the waste stored in the unit.
14. Drums containing free liquid must have secondary containment capacity of 10% of the total volume of liquids in each unit and be elevated off the floor.
15. Any accumulated liquid within the containment area will be removed in a timely manner.

Distribution
July 20, 1992
KGP-012-92
Page 4 of 5

16. Lead aprons and other radiologic protection gear and practices will be used when appropriate.
17. Where applicable, Selective Alpha Air Monitors (SAAMs) will be inspected and tested weekly. Spill response equipment will be stored within each building.

If you have any questions or require additional information, please call me.

KGP:aaf

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July 20, 1992
KGP-012-92
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