

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

4210 East 11th Avenue
Denver, Colorado 80220
Phone (303) 320-8333



Roy Romer
Governor

Thomas M. Vernon, M.
Executive Director

REFER TO	
_____	Area Mgr _____
_____	Dept Ar Mgr _____
_____	Counsel _____
_____	CH Adm Br _____
_____	CH S&S Br _____
_____	CH Op Br _____
_____	CH QA Br _____
_____	CH S&E Br _____
_____	CH Fin Br _____
_____	PRMP _____
_____	<i>James</i> _____

9 September 1988

Rocky Flats Area Office
U.S. Department of Energy
P.O. Box 928
Golden, Colorado 80402

Attn: Mr. Albert E. Whiteman, DOE Area Manager
Mr. Dominic J. Sanchini, President & General Manager,
Rockwell International

Re: EPA I.D. No. CO7890010526
Building 443, No. 4, Fuel Oil Tank
Closure Plan - Additional Information Request

Dear Messers. Whiteman and Sanchini:

The Hazardous Materials and Waste Management Division of the Colorado Department of Health has evaluated the closure plan for the Building 443, No. 4 Fuel Oil Tank for compliance with the Colorado Hazardous Waste Regulations 6 CCR 1007-3, Part 265, Subpart G, Closure and Post-Closure Requirements. The evaluation was based on information presented in the Rocky Flats Plant closure plan, submitted April 5, 1988, entitled: "Closure Plan, Building 443, No. 4 Fuel Oil Tank".

The main purpose of the Part 265 Subpart G regulations is to ensure that units are closed in a manner that minimizes the need for post-closure care and controls, minimizes or eliminates the escape of waste, leachate or waste decomposition products to ground or surface waters and the atmosphere. Pursuant to this, the Division's review of the closure plan has found a need for additional information as defined in the attached comments.

SEP 14 1988

ADMIN RECORD

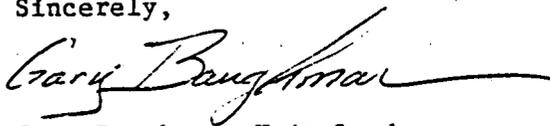
A-SW-001266

U.S. Dept. of Energy
Rockwell International
9 September 1988

Page Two

The Division would like to discuss these comments in a meeting with you or your staff. Please contact George Dancik at 331-4842 to arrange a meeting date.

Sincerely,



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



George Dancik, Public Health Engineer
Hazardous Facilities Unit
Hazardous Materials and
Waste Management Division

cc: Robert Duprey, EPA
Nat Miullo, EPA
Jefferson County Health Dept.
Boulder County Health Dept.

Attachments

GB:GD/cal
3343K:1-2

Building 443 #4 Fuel Oil Tank Closure Plan Comments

1) The cross-section in Figure 6 is inadequate for characterizing the geology in the vicinity of Tank #4. Silty-sand lenses are known to be present within the Rocky Flats alluvium. Sandstone facies (Kass) are also commonly found within the Arapahoe Claystone (Ka). These units may impart a large local change in hydraulic conductivity and therefore a potentially larger-than-expected contamination plume. Provide your rationale for estimating the depth of soil excavation. The closure plan should describe how the plant will address contamination of the soils and/or groundwater if contamination is more extensive than estimated. For example, if groundwater is contaminated, better characterization of the geology and a monitoring program will need to be described in the post-closure permit. Figure 4 shows the approximate excavation area extending 13-14 feet from Tank #4. However, page 31 states that "volume estimate is based on an estimated volume of backfill extending 10 feet beyond the edges of all the tanks". Explain the discrepancy. Volume 1 of the Remedial Investigation and Feasibility Plans for Low Priority Sites, dated June 1, 1988, shows SWMU 157.1 as being located near the Building 443 tanks. Explain if there will be a coordination of the cleanups for the two individual units.

2) 6 CCR 1007-3 265.113(b) allows for a time of closure greater than 180 days if the closure will take longer by necessity.

A) The time to remove Tank #4 should not exceed 180 days. Explain the rate determining step that controls the progress of this operation.

B) 6 CCR 1007-3 265.113(b)(2) states that the owner/operator will take all steps to prevent threats to human health and the environment from the unclosed but not operating facility. Explain how the Rocky Flats Plant (RFP) will protect human health and the environment given the contamination found in the fence posthole.

C) The Statement of Basis for 6 CCR 1007-3 Subpart G states that: "In no case may closure take more than three years to complete". The Figure 9 schedule of closure activities shows a projected closure schedule exceeding this three year period. Numerous and extensive environmentally-related activities are ongoing at the RFP and may dictate the need for extended schedules for lower-priority units. An overall listing of closure activities and projected schedules should be provided to describe the time-frame of various operations as well as to justify the necessity for the extended closure schedule.

3) If ground-water contamination is present at the #4 Fuel Tank site, and ground-water monitoring is deemed necessary, then a ground-water protection standard needs to be chosen by RFP and approved by CDH. This will be included in the post-closure care permit, if needed. 6 CCR 1007-3 264.92 indicates that the RFP must comply with a ground-water protection standard, specified in the facility permit, to insure that concentration limits of hazardous constituents are not exceeded.

4) A reasonable estimate of the amount of waste remaining in Tank #4 should be provided. This should be indicative of the volume of residue remaining in the tank and attached lines. 6 CCR 1007-3 265.112(b)(3) indicates the need for a detailed description of removal, transportation, treatment, storage and disposal methods of all hazardous waste residues, contaminated containment system components, equipment, structures and soils. Page 34 of the Closure Plan indicates that any residual tank sludge "will be observed, characterized and removed....prior to approval of the closure plan by CDH". Explain how the residual waste will be observed and characterized, and how it will be disposed. Explain how management and disposal of any excavated contaminated soil will vary depending on contamination type (VOC, radiation, etc.) (page 33)? Include potential scenarios for the types of soil contamination which may be present at the site. Also, explain how rinsate obtained from tank decontamination will be processed if RFP determines that this rinsate is a hazardous waste according to 6 CCR 1007-3, Section 261.3(a)(2)(iv)(D).

5) The scale drawing of Tank #4 and the associated piping should include the location of the east-end vertical pipe which was used to add solvents to the tank. This drawing is also unclear as to pipe origination. The drawing should make clear that the one easterly line originates from Tanks 1 and 2 outside Building 551, while the four westerly lines connect to Building 443. Explain how the tank heater and centrifugal pump (auxiliary equipment) will be disposed if tank contamination is found and decontamination procedures do not meet the closure performance standard. Explain if the auxiliary equipment will be disposed along with the tank and associated lines, as described in the Closure Plan Section 3.3.3.

6) 6 CCR 1007-3 265.115 requires closure certification requirements within 60 days of closure completion, not "when closure is completed", as stated in Closure Plan Section 6.1.

7) The vicinity map on page 2 should include the location of the cities of Broomfield and Arvada. These communities are cited in the Closure Plan Section 1.1.1. as being 9 to 12 miles from the RFP, along with the cities of Boulder and Golden which are included on the map.