

2002/2603

CORRES CONTROL
INCOMING LTR NO

4840 RF 93

DUE
DATE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

NOV 3 1993

Nov 8 8 10 AM '93

EG&C
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ACTION	DIST	LTR	ENC
BENEDETTI, R.L.			
BENJAMIN, A			
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			
HILBIG, J.G			
HUTCHINS, N.M		X	
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			
SULLIVAN, M.T			
SWANSON, E.R			
WILKINSON, R.B			
WILSON, J.M			
mcHugh			
J.MX			
Busby W.X			

Mr. Richard Schassburger
Rocky Flats Office
U.S. Department of Energy
P.O. Box 928
Golden, Colorado 80402-0928

Subject: Technical Review Comments on Rocky Flats Plant
Draft Standard Operating Procedures (SOP)
FO.28, Rev. 0 Tank and Pipeline Investigation

Dear Mr. Schassburger:

As a result of our review of the above referenced document,
EPA has the following comments.

General Comments

This SOP initially states that it is for the investigation of
abandoned tanks and pipes. However, at numerous places within the
SOP the reader is given the impression that active units are being
investigated. This SOP must be carefully reviewed and revised as
necessary to clarify that all procedures are for abandoned units
only.

A site-specific health and safety plan (HSP) is cited
throughout the document. Therefore, Section 2.0 should clearly
state that this SOP will be used with a site-specific HSP that
accompanies each field sampling plan (FSP). Site-specific HSPs are
critical to the safe conduct of operations described in this SOP.

Specific Comments

1. Section 3.0, Page 5. This section lists the training that
personnel must complete prior to tank and pipeline
investigations. The list must include confined space training
now required by the Occupational Safety and Health
Administration (OSHA).
2. Section 4.2, Page 7. This section lists specific tank
characteristics that will direct the overall strategy of the
investigation. It lists characteristics of past input to the
tank as one of these. This section must also evaluate the
possibility that incompatible wastes have been placed in tanks
resulting in hazardous material formation.
3. Section 4.2, Page 7. This section lists specific tank
characteristics that will direct the overall strategy of the

CORRES CONTROL	x	x
PATS/7130G		
ADMN RECORD/0601	X	#

Reviewed for Addressee
Corres Control RFP

11-8-93 Ci
DATE BY

Ref Ltr #

DOE ORDER # 5400-1

ADMIN RECORD

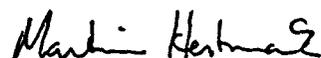
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE on Recycle

investigation. It states that depth to groundwater will be determined. However, the documentation required to make this determination (past remedial investigation (RI) reports) is not listed in Section 4.1 as an important source of information. Past RI reports should be included in Section 4.1.

4. Section 5.2.1, page 10, procedure 3. It is stated here that any waste generated during sampling will be handled in accordance with SOP FO.8. A determination must be made for wastes generated from sampling and if such wastes are hazardous, they must be handled appropriately.
5. Section 5.2.2, page 11, procedure 1. How does one "make sure that the sampler is clean"? This should probably be specified in more detail.
6. Section 6.2.1, page 16, paragraph 4. This paragraph discusses the removal of shielding or insulation, but does address the case where such materials are themselves hazardous wastes. This must also be addressed so that such materials are properly handled.
7. Section 6.2.3.1, page 17. This section lists equipment and materials necessary to conduct a video inspection of pipelines. While such inspections may be quite beneficial in certain circumstances, the principles of waste minimization are an important consideration. Generation of unnecessary hazardous waste at great cost may result from indiscriminate use of video inspections.
8. Section 6.2.3.3, page 20. The first part of this section discusses removal of sediments from pipelines but does not mention that a waste determination of such sediment needs to be performed. This must be added to the procedures of this section. In addition, the maximum pulling speed should probably be quite a bit less than the 30 feet per second listed here.
9. Section 6.4, page 22. This section needs more detail regarding what types of pipelines are appropriate for pressure testing versus inert gas injection or other methods of leak detection. Also needed are specifics regarding time intervals for pressure testing.

If you have any questions or comments on this review, please contact Gary Kleeman of my staff at 294-1071.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project