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DOTY & ASSOCIATES

GEOTECHNICAL ENVIRONMENTAL AND GROUND-WATER ENGINEERS

1240 ORCHARD ROAD
GOLDEN COLORADO 80401
(303) 233-0577

August 2, 1989
1801-07

Mr. Thomas C. Greengard
Rockwell International
P.O. Box 464
Rocky Flats Plant
Building 250
Golden, Colorado 80402-0464

Subject: Department of Energy Audit Findings

Dear Mr. Greengard:

Enclosed is a brief discussion of the Department of Energy (DOE) audit findings regarding Inactive Solid Waste Management Units (SWMU's).

As you will see, the majority of the SWMU's that the DOE auditors identified as not addressed actually are addressed in a Rocky Flats document. Appendix 2 of the Original Process Waste Line Closure Plan should be modified to reflect SWMU numbers cited in the RCRA Part B Permit Application rather than constantly use the Original Process Waste Line SWMU number. This latter action will avoid confusion in the future. Four SWMU's (135, 147.2, 150.2 and 150.4) are not addressed in any existing documents.

I trust that this is adequate for your purposes. If you have any questions please feel free to call.

Sincerely,
DOTY & ASSOCIATES

Frank J. Blaha

Frank J. Blaha

cc: M. B. Arndt

DOCUMENT CLASSIFICATION
REVIEW W/STAFF PER
CLASSIFICATION OFFICE

ADMIN RECORD

SOLID WASTE MANAGEMENT UNIT DISCREPANCIES

Background

An audit conducted by the Department of Energy (DOE) noted discrepancies in the Solid Waste Management Units (SWMU's) identified and addressed in various Rocky Flats Plant (RFP) documents. In particular, all of the SWMU's identified in Appendix I of the December 15, 1987 Resource Conservation and Recovery Act (RCRA) Part B Permit Application were not scheduled for investigation under the RFP Environmental Restoration Program. A listing of these apparently omitted SWMU's was obtained from Mark Gilbertson of the DOE audit team on July 24, 1989. The list is reproduced below.

<u>SWMU</u>	<u>UNIT</u>
135	Cooling Tower Blowdown
137	Cooling Tower Blowdown - Bldg. 774
138	Cooling Tower Blowdown - Bldg. 779
144	Sewer Line Break
147.1	Process Waste Leak - Maas Area
147.2	Process Waste Leak - Owen Area
150.2	Radioactive Waste - W. of Bldg. 771
150.4	Radioactive Liquid Leak - E. of Bldg 750
150.6	Radioactive Liquid Leak - S. of Bldg 779
150.7	Radioactive Liquid Leak - S. of Bldg 779
150.8	Radioactive Liquid Leak - NE. of Bldg 779
198	VOC's in Ground-water

Research

A description of the omitted SWMU's was obtained from Appendix I of the December 15, 1987 RCRA Part B Permit Application. The SWMU description and the SWMU locations were checked against the "Remedial Investigation and Feasibility Study Plans for Low Priority Sites," June 1, 1988, and the Revised RCRA Closure Plans of 1988.

Results

SWMU's 138 and 150.8, listed by the DOE audit team as omitted from the ERP program, are specifically addressed in the Solar Evaporation Pond Closure Plan of July 1, 1988. See page 44 of the Closure Plan, Volume V of the Post-Closure Care Permit Application, October 5, 1988.

A number of the omitted SWMU locations are covered in the Closure Plan for the Original Process Waste Lines (OPWL). The decision to address a SWMU in the OPWL Closure Plan was made based upon 1) the SWMU being caused by the OPWL, or 2) due to the close proximity of the OPWL and the SWMU. Unfortunately, the SWMU's associated with the above areas are identified in the OPWL Closure Plan as SWMU 121 (the OPWL) rather than listing the SWMU associated with the spill or leak as should have been done. Rockwell's intention in the OPWL Closure Plan was to preferentially list the SWMU number associated with a spill or

leak at an area rather than the OPWL SWMU number (121). The SWMU's to be investigated as a portion of closure of the OPWL are listed below. A discussion of the listed pipes can be found in the Original Process Waste Line Closure Plan, October 3, 1988, Volume XV of the Post-Closure Care Permit Application of October 5, 1988 (Appendix 2).

<u>SWMU</u>	<u>DOCUMENT</u>
137	Included in Original Process Waste Line Closure Plan of October 3, 1988. See location and description of pipes P-27, P-28 and P-29.
147.1	Included in Original Process Waste Line Closure Plan of October 3, 1988. See location and description of pipes P-12 and P-13.
144	Included in Original Process Waste Line Closure Plan of October 3, 1988. See location and description of pipes P-20, P-26 and P-42.
150.6	Included in Original Process Waste Line Closure Plan of October 3, 1988. See location and description of pipe P-37.
150.7	Included in Original Process Waste Line Closure Plan of October 3, 1988. See location and description of pipe P-15.

SWMU 150.2 was originally thought to be associated with the OPWL. A review of drawings associated with the OPWL Closure Plan found that no original process waste lines were in the area. Therefore, this area was not included in the OPWL Closure Plan. This particular SWMU was not addressed in any document.

SWMU 198 is not specifically addressed in any one document since it has no specific location. Addressing SWMU 198 is the purpose of all of the RCRA and ERP site characterization and clean-up activities. Therefore, this SWMU is indeed being addressed.

SWMU's 135, 147.2 and 150.4 were not addressed in any document for undetermined reasons.