

**MONTHLY ENVIRONMENTAL
COMPLIANCE REPORT**

**FOR THE REPORTING PERIOD
AUGUST 16, 1993 THROUGH SEPTEMBER 15, 1993**

REPORT DATE: OCTOBER 5, 1993

**EG&G ROCKY FLATS, INC.
STANDARDS, AUDITS, AND ASSURANCE ORGANIZATION
ENVIRONMENTAL STANDARDS ANALYSIS**

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This report is not intended to represent a comprehensive review or analysis of environmental compliance at the Rocky Flats Plant, but rather is intended to provide information for internal management review and planning. The data in this report is primarily based on data contained within the Plant Action Tracking Systems (PATS), with supplementation by appropriate program managers. Therefore, this report is neither intended to detail all environmental deficiencies contained in PATS, nor at the Plant, but rather to discuss highlights and trends of environmental deficiencies as well as successes.

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MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

1.0 INTRODUCTION

The Monthly Environmental Compliance Report (Report) is a deliverable under the EG&G Rocky Flats, Inc (EG&G) Environmental Compliance Program (ECP) and is prepared by the Standards, Audits, and Assurance Environmental Standards Analysis (ESA) group

This Report is primarily based on information collected from numerous Rocky Flats Plant (RFP) organizations, and is not meant to detail all environmental deficiencies, but rather to discuss highlights and trends of environmental deficiencies as well as successes. This document is not intended to represent a complete picture of environmental compliance, but rather provides up-to-date information for internal review and planning. The Report is reviewed for accuracy and completeness prior to each month's publication by appropriate program managers.

The scope of this Report covers major environmental compliance issues at both the RFP and the Oxnard, California facility. This Report presents a summary and status of the various environmental compliance items researched for the period covering **August 16, 1993 through September 15, 1993**.

HIGHLIGHTS

- The final draft of the Memorandum of Understanding for Environmental Responsibilities (MOU) will be going out for review by all Associate General Managers and their designees. This document sets out responsibilities for environmental compliance activities at the floor level. Comments on the MOU are due by October 1, 1993.

2.0 CURRENT ISSUES

2.1 Department of Energy (DOE), Headquarters Request (HQ): DOE, HQ requested (by Memorandum dated November 16, 1992) a complex-wide inventory of "Materials Not Classified As Waste". The purpose of the request is to clarify what materials being stored at DOE sites might be designated as waste by the regulators and thus would potentially be regulated as a hazardous or mixed waste under the Resource Conservation and Recovery Act (RCRA). The goals of the project are to:

- (1) identify future waste streams,
- (2) identify those materials that have a potential RCRA vulnerability due to long-term

storage, if determined to be waste,

- (3) implement waste minimization measures by identifying unneeded materials at one site that may be needed at another site,
- (4) support regulatory negotiations with Environmental Protection Agency (EPA) on certain mixed waste and materials management issues; and
- (5) ultimately furnish guidance to the sites so they can evaluate their materials, make the appropriate determination on what materials are waste, and clearly document the reason for holding each material

Federal Facilities Compliance Agreement (FFCA) Programs is responsible for responding to the request FFCA Programs is working with Operations, the Excess Chemical Program, and the Chemical Tracking Program Tasks include the verification of chemicals, that if not used, would be classified as waste as well as other materials and material categories defined in the original request The Chemical Control System is being utilized to help identify potential excess chemicals not yet classified as waste DOE, HQ is concerned only with those materials that would become either hazardous or mixed waste FFCA Programs has provided guidance that certain equipment that would be either hazardous or mixed waste if discarded would not be included in the scope of this effort Completion of this effort is expected by the end of October 1993

2 2 Facilities Operating in Non-Compliance: Secondary Containment In a January 20, 1993 memorandum from DOE, Rocky Flats Office (RFO) (WMED DG 10688) to EG&G, a request was made to list and justify continued operation of equipment in RCRA noncompliance with secondary containment requirements The initial report was to have been submitted to RFO no later than February 1, 1993 and subsequent monthly updates of that information is to be reported in this Report To that end, the following information has been submitted for inclusion

The following equipment or systems continue to operate in non-compliance with RCRA secondary containment requirements Justification for continued operation of each of these systems was provided to RFO in correspondence (93-RF-1332, 93-RF-1335)

- Building 707 Process Waste Drain Line
- Buildings 444/447 Main Process Waste Line
- Building 374 Liquid Waste Processing Area
- Tank 231A, southeast of Building 374, storage of low-level waste feed solutions to Building 374 and Building 774 Liquid Waste Processing Area
- Building 771 Process Waste Lines
- Buildings 776/777 Process Waste Transfer Line
- Central Sump Discharge Line to Solar Pond 207B north
- Solar Pond waste transfer line through Buildings 771, 774, 776 and 778
- Building 123 (see Section 5 2, Page 12, AP#13)

Temporary measures, such as conducting daily visual inspections to detect leaks or performing daily verification of line integrity by hand-starting pumps and verifying normal flow, are in place as an interim action for these systems while they are in noncompliance and until corrective actions are implemented

There were no reported significant changes to these systems during this reporting period (with the exception of Section 5.3, Plutonium Operations, discussion about 776/777 Process Waste Transfer Line)

RCRA Regulatory Programs has submitted Justification for Continued Operations to DOE, RFO for the list of systems provided in this section. These systems must be operational for health and safety reasons. Because the RFP facility was built in 1952, many of its original systems were not designed or built to conform with RCRA, which was promulgated many years later in 1976 and its regulations first promulgated in 1980. A waste water treatment unit (WWTU) exemption request for exemption from regulations at 40 CFR Parts 264 and 265 is being sought in light of the fact that these systems are presently out of compliance and corrective action will take a significant amount of time and resources. If the WWTU request is successful, the above requirements will no longer apply. The exemption request recognizes that mitigating measures must be maintained during the interim period until full closure is completed or the waste water treatment unit exemption is approved. The progress on the exemption request is included in the RCRA permitting section of this Report at 6.1.1 and will be reported specifically within this section also.

2.3 Waste Environmental Management System: Drums containing hazardous waste are tracked in the Waste Environmental Management System (WEMS) where expirations for drums stored beyond the 90-day time-frame can be readily identified. WEMS tracks all drums on plantsite, including empty drums.

According to the WEMS report for this period, there are 40 containers of excess chemicals in Building 559, and 21 drums of Investigative Derived Material (IDM) in the contractor yard that are exceeding the 90-day storage requirement. Upon further investigation, all 21 drums of IDM have been moved to interim status in RCRA Unit 18.03. All 40 containers of excess chemicals in Building 559 have also been moved to interim status units.

The WEMS action plan is progressing on schedule. To date, 6 tasks have been completed. They are as follows:

- An analysis of the WEMS 90-day data has been completed, and a three-month forecast of waste container throughput for Real Time Radiography (RTR) has been developed.
- Resources are being provided to support waste container traveler/label validation to eliminate backlogs in 90-day areas.
- Resources are being provided to support waste container RTR to eliminate/avoid backlogs in 90-day areas.

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- The WEMS database has been programmed to report a summary of waste containers due to expire within six weeks in 90-day areas
 - Ninety-day unit owners and their associated management are now receiving the six week report generated from the WEMS database
 - An Envirogram has been published which outlines the proper steps for dispositioning RCRA regulated excess chemicals via 90-day accumulation areas

2.4 Smaller Container Availability: As a result of the clarifying guidance for the Satellite Accumulation Areas (SAAs) to have containers for each type of waste in one process, there is a need for smaller size containers other than 55 gallon drums. The plant currently does not stock containers for waste under 35 gallons. While some areas have ordered smaller containers (five and ten gallon) on their own, others have not

The immediate concern is to evaluate and bring all SAA's into compliance. The issue of ordering and stocking smaller containers will be subsequently addressed by Waste Programs. Meanwhile, Regulated Waste Operations (RWO) is accepting partially filled drums, repackaging like waste in order to fill drums, and then shipping the empty drums back to the generator.

3.0 TASK FORCE ON ENVIRONMENTAL COMPLIANCE

The Environmental Compliance Task Force (Task Force) was established subsequent to the effective resolution of the Ten-Point Action Plan by the Joint Environmental Compliance Operating Committee (JECOC). The committee is made up of top-level management within EG&G and DOE, RFO utilizing technical advisors from each major organization. The major objective is to assure that a viable Environmental Compliance Program (ECP) has been established at the RFP. The committee is chaired by the Environmental and Waste Management (E&WM) Associate General Manager.

The subcommittee formed to re-evaluate the Task Force and chart its new direction has met on several occasions and has drafted a new Task Force charter, measurement criteria, and has formulated additional recommendations. The package will be presented to the Task Force for its consideration on October 5, 1993 at its regular meeting. The subcommittee intends to present its new ideas briefly, submit the materials, and ask Task Force members to carefully review the information during the following week. The Task Force will then discuss the subcommittee's ideas and recommendations at a subsequent meeting. More details about the recommendations, Task Force responses, and a time line for further action will be presented in the November 5, 1993 Report.

The Task Force was briefed on significant accomplishments which have occurred during the past three months regarding environmental compliance.

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- The Nevada Test Site (NTS) audit was deemed a preliminary success, although the final NTS conclusions have not been issued
 - The Solar Pond cleanup is progressing. The sludge from the 207B North Pond has been removed, radiological smears are being completed, and Solar Ponds 207A, 207B North, and 207B Center have been emptied significantly ahead of scheduled dates.
 - A shipment of 49 drums of low-level asbestos waste was shipped to the Hanford Site for disposal. This was the second shipment of RFP low-level asbestos waste sent to Hanford in FY93 and brings the total number of drums to 138
 - The 750/904 Pad sealing project was completed under budget in August 1993. Several obstacles were overcome early in the summer, and the project was completed well before the onset of winter weather.
 - New port installation was completed on the Building 771 stack on June 8, 1993, to bring airborne radionuclide monitoring into compliance with requirements under the Clean Air Act. All flow testing for maintaining compliance with monitoring requirements was completed at eight building locations by June 30, 1993. This completes all of the work necessary to meet the requirements under the National Environmental Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 61, Subpart H
 - Waste Programs (WP) have completed a polychlorinated biphenyl (PCB) database for use in developing the PCB Annual Document Log and providing a centralized file for all of the PCB records. Information in this database has been distributed to custodians of the Toxic Substances Control Act (TSCA) storage units for confirmation and update as required. Waste Programs will continue to use this information to conduct routine programmatic and operational self assessments
 - Upgrade of the RFP environmental thermoluminescent dosimeter (TLD) network was completed on schedule. The upgrade included procurement and installation of Panasonic Model 814 TLDs, gasket holders, and standardized mounting brackets, as well as procurement of a shielding storage safe for TLDs used to monitor background penetrating gamma radiation levels in the environs of RFP and to provide emergency response gamma monitoring capability in the event of a criticality accident

4.0 PILOT PROGRAM (BUILDINGS 460 AND 559)

4.1 Summary: The Environmental Compliance Pilot Program resulted from the June 1992 Notice of Violation (NOV) issued by the Colorado Department of Health (CDH) regarding alleged RCRA non-compliances. The program is designed to address environmental compliance at the "floor level", and incorporates various methods for doing so, including

building books for each building, the establishment of new positions for Environmental Program Managers (EPMs) and Environmental Coordinators (ECs), and environmental training. The program design and implementation will be an integral component of the Consent Order which formally resolve the NOV. The Consent Order has not yet been executed, but will be discussed in detail in a future Report.

The pilot floor level compliance effort involves testing new or improved environmental compliance activities and methodologies associated with RCRA in Buildings 559 and 460 (one plutonium and one non-plutonium related building). Once these two Buildings refine methodologies, the same activities will be initiated plantwide.

4.2 Current Status: A meeting was held on September 13, 1993 with Environmental Restoration (ER) to discuss how their organization will be involved in the Hazardous Waste Comprehensive Program Plan (HWCPP), which is the operating document for the Pilot Project. Under ER there are 3 primary organizations: Remediation Program Management (RPM), Environmental Science and Engineering (ES&E), and Facility Operations (FO). RPM manages the 16 Operable Units (OUs) that are governed by the Interagency Agreement; and, each OU has a manager. ES&E employs scientists who are matrixed to RPM and perform various activities such as remediation investigations. FO closely monitors RPM activities by establishing regulatory requirements and compliance information. One EPM and one EC are in place for ER.

Waste generated from investigatory activities associated with OU remediation has been managed as Investigative Derived Material (IDM). However, CDH has stated that certain materials must be managed as hazardous waste until such waste is fully characterized. The result is a monumental task of managing up to 1700 IDM "grey drums" generated to date. FO currently receives the waste and stores it in interim status units.

In line with expanding the Pilot Program to other organizational areas of RFP, both ER and E&WM's Regulated Waste Operations will be developing its plan to incorporate the requirements under the HWCPP for its organization.

A significant milestone met during this reporting period was the completion and implementation of the Unit Information Sheets and RCRA Inspection Log Sheets for both Buildings 559 and 460. These sheets provide critical, up-to-date information about waste streams in these buildings and information leading to proper reporting and correction of deficiencies. As the EPMs and ECs use this information and apply it to their activities, close monitoring will be conducted to determine their effectiveness. This effort was the result of having worked closely for five months with Waste Programs, Environmental & Waste Management, Quality Assurance, and Operations and Waste Surveillance.

5.0 ENVIRONMENTAL PROGRAM MANAGER REPORTS

5.1 Summary: Following are environmental compliance activity summaries provided by each EPM.

5.2 Facility Operations Environmental Programs

Unknown Discovered Containers - The Facility Operations (FO) EPM is responsible for 133 buildings and approximately one-third of the Rocky Flats plant site open areas. This is physically a large area of responsibility and there are ongoing discoveries of drums, containers and crates that can not be accounted for. It is unknown from where these containers are coming, the EPM attempts to track down ownership for these items, but generally has little success. The unmarked drum program was established because of these and other ongoing findings. However, FO continues to report these discoveries and handle their disposition. Examples from this reporting period include:

- A black 55-gallon drum was found south of Building 881 cargo container at trailer 690L. Building 881 Lab personnel stated that the origin of the drum is not known. The drum will be managed under the Miscellaneous Waste Material Handling Procedure.
- Waste Surveillance notified FO that they discovered a leaded glove on a glove box that was used for training and was now being stored outdoors. The glove was bagged and placed under control. Disposition is pending.
- An unmarked drum was discovered east of Building 223 Nitrogen Plant. The drum contained a nonhazardous wet vacuum. Disposition is pending.
- Thirty-three waste crates were discovered in a field east of Building 549. Disposition is pending.

Building 123 Waste Lines Secondary Containment - FO has been attempting to obtain a facility project for the installation of secondary containment around the process waste lines in Building 123 for several months. The lack of secondary containment is a validated RCRA deficiency. Due to the missions supported by the Building 123 Analytical Laboratories, the waste system is continuing to be operated under a Contingency Plan. The project cost is \$1.7 million which puts it into the Capital Line Item category where funding can take up to three or four years to obtain. The EG&G Rocky Flats Facilities Project Management department and the Associate General Manager (AGM) of E&WM have been working with the DOE Construction Branch and DOE Financial Branch since January 1993 in an attempt to reappropriate current Fiscal Year Line Item funds to this project. On May 25, 1993, the AGM Facility Project Review Board identified this project for submission in the FY97 Line Item Budget. Additionally, the EG&G Rocky Flats, Inc., Waste Management Directorate is pursuing a Waste Water Treatment System Exemption for the entire Rocky Flats Process Waste System (including the ancillary equipment in Building 123) with CDH. EG&G's formal request for exemption was submitted to CDH in July 1993. As of August 31, 1993, CDH still had not provided any formal reply to the request indicating approval or disapproval. If EG&G is unsuccessful in obtaining the exemption, FO, along with E&WM, will request emergency line item funding for this project.

CDH Air Tours - CDH conducted an inspection of four emergency diesel generators, one at each Personnel Accountability Control Station in Buildings 372A, 762A, and 792A and one at the West Guard Post. The inspectors were satisfied with the consolidation of the generators and the associated fuel tanks. However, the inspectors were concerned that no logs were maintained to record the operation of the generators. Effective June 1993, FO's Shift Operations Engineer (SOE) began tracking hours of operations for all FO generators.

Individual Hazardous Substance Sites (IHSS) and OU Equipment - FO is meeting with ER regarding the transfer of IHSS and OU equipment which no longer serves an operational function. Two examples are the 964 Yard IHSS on which Property Utilization and Disposal (PU&D) has cleared all equipment and the 429 tanks which supported old process drain lines for Building 441 which have been out-of-service since the 1970's. FO's position is that these areas should be under the control of ER. ER is concerned with control and usage after the transfer.

ISP #92-420 - Spill Response Equipment & Training - Action Plan 92-420 was created to meet concerns expressed by CDH regarding the knowledge and consistent application of individual employee actions toward spill response. The Waste Programs Spill Response and Reporting group created a training package for incidental versus emergency spill action. Within FO, the individual tasks for the plan were assigned to the tenant organizations. FO's EPM conducted briefings to tenant management within FO's Operations Area on the tasks required for the identification of equipment and supplies. A briefing on "Incidental and Emergency Release Response" was also presented. Tenants were required to prepare Action Plans for the completion of these tasks and were required to implement these plans by August 27, 1993. Training of affected employees is scheduled by September 30, 1993, however, many organizations are reporting that they will be unable to meet this date due to lack of FY93 funding and manpower.

Building 331 Gasoline Leak Remediation - The release of gasoline to the Fuel Line Access Pit (Pit) from a fuel line leak on May 18, 1993, is governed under the Underground Storage Tank regulations. Excavation of the gasoline contaminated soil in the Pit began in June 1993. Excavation continued to the top of the tank (approximately 5.5 feet). The east wall of the Pit is still saturated with gasoline. Further sampling was scheduled for the end of July, but could not occur due to rain which had dampened the soil. RCRA Regulatory Compliance has arranged with a contractor, already scheduled for sampling of the IHSS area in late September, to conduct a "Soil Gas Analysis." The result of the analysis will determine what further actions are necessary.

Final Disposition of Unknown Drums - As a result of a Notice of Inspection (NOI) from CDH, an Action Plan was written for the disposition of 169 drums found in the 964/965 Yard. The last of these drums were disposed of on September 7, 1993 with the exception of one Low Level Waste (LLW) drum. The LLW drum was shipped to Building 371 for drum counting and will be subsequently shipped to Building 664 for storage. This completes all tasks in the action plan. As requested through the NOI, final notification to CDH was provided on September 10, 1993.

Air Quality Division - The Air Quality Division is conducting a review of Facility Operations regulated air emissions to update the RFP Air Pollution Emission Notices (APENS) to be submitted to CDH

5.3 Plutonium Operations: There were no formal inspections conducted by either CDH or EPA during the reporting period; however, several Waste Surveillance inspections were performed. Only minor findings were discovered during the Waste Surveillance inspections. All findings were corrected immediately.

Plutonium Operations requested CDH enforcement to relax inspection requirements in one area. Daily inspections are required of RCRA tanks that are "operationally empty". The Building 528 tank system has been verified empty. Based on that information, permission was granted by CDH enforcement to inspect the 528 Pit only on a bi-weekly basis, but not the associated ancillary equipment in other buildings.

Responding to an inquiry from CDH enforcement, Plutonium Operations informed CDH that there were 95 excess chemicals left in room 103B and 103D and the flammable cabinet in Building 559. All of the excess chemicals were scheduled for removal by the end of September. Excess chemicals became an issue originally in Building 559 as the result of an EG&G Corporate Operation Readiness Review in 1991. Subsequently, the Pilot Program was developed.

There was one spill and one incidence of contamination reported in Plutonium Operations. Radioactively contaminated hazardous waste leaked from an organic waste transfer line associated with Building 776. The waste dripped onto an air line valve and two to four drops (combined area less than two centimeters in diameter) reached the floor.

The radioactive contamination on the floor was discovered during a daily routine Contamination Control tour of the Building. Due to other possible sources of radioactive contamination, the release was not immediately determined to be a release from a hazardous waste tank system. The valve assembly on an air line was initially identified as the most likely source of the release based on the color of the released material. The material was dark green rather than the normal color of dark brown to black indicating spent TCA. Thus, it was concluded that the material was contaminated grease from the suspect air line valve and not liquid waste. A wet Kimwipe was placed on the floor to prevent airborne contamination. The suspect valve was cleaned and wrapped with plastic to prevent spread of further contamination. Cleanup was not performed within the requisite 24-hour period because of a scheduled shutdown of the steam plant during the weekend during which time hot water was not available to decontaminate personnel or equipment.

Subsequently, another drop of radioactive contamination was observed on the floor and, a small string of material, about 1/2 inch long, was found hanging from an elbow on the organic waste transfer line that is located just above the suspect air line. The cause of the leak then appeared to be corrosion resulting in a pinhole at the weld joint on a stainless steel elbow on the organic waste transfer line. A work package is being prepared to drain and repair the transfer line. As an interim measure to prevent any further release of hazardous waste, the leaking elbow was

wrapped in plastic and tape. The elbow will be inspected daily and any visible liquid accumulation will be removed within 24 hours of discovery (see Collection and Transfer System, Building 774 to 776/777 discussion below)

Radiological contamination was discovered on a portion of the Organic Transfer Line between Building 776/777 and Building 774. The contamination was discovered after a survey was ordered for suspected corrosion of a welded coupling and evidence of an oily substance on the coupling area of the pipe. Decontamination efforts failed when the radiological survey revealed removable and fixed contamination. The area was sealed and marked and is being evaluated for appropriate repairs.

A box was found in Building 564 containing sample bottles. Upon investigation, it was determined that the 21 bottles contained hazardous waste samples. The Sample Team had returned the bottles to the then RCRA Custodian as much as 5 months earlier, but they were not properly disposed of. The chemicals have since been transferred to Building 559, the new RCRA Custodian is working toward eventual disposal. An occurrence has been filed by the Shift Manager and a critique will be held.

A portion of the Collection and Transfer System line running between Buildings 774 and 776/777 was discovered not to have been inspected on a daily basis for leak detection and general condition. This discovery was made during the critique associated with the 776 radioactively contaminated waste leak discussed above. This line is "operationally empty" requiring daily inspection under RCRA. A portion of the ancillary piping runs through the wall to the outside of Building 776/777 and is gravity fed to Building 774. A 70 to 80 foot section of piping slopes back to Building 776/777 the length of which is not inspectable. The double containment disallows the ability to view the internal pipe for leaks. Work Request Forms have been submitted to Maintenance Planning and Scheduling for remediation which will consist of installing a tube gathering line in between the two pipes that will feed any leaking liquid into a glass bottle secured on the outer pipe. This way, a visual inspection for leaks may be performed. Inspections of the portion of piping without secondary containment piping are being conducted daily for leak detection and general condition. Note that this system is one that is reported under Section 2.5, *Facilities Operating in Non-Compliance*, of this Report.

A Justification of Continued Operations (JCO) was submitted for Building 779, T-5 Tank System in February of 1993. This is another system which is listed and reported on regularly under Section 2.5, *Facilities Operating in Non-Compliance*, of this Report. However, Plutonium Operations reports this month in greater detail, the following. In early February of 1993, Waste Surveillance (WS) conducted an audit which included the T-5 Tank System and which resulted in a finding requiring characterization of waste water being accumulated. While other minor findings were noted and corrected right away, this one was extended until April 2, 1993 allowing time for the sampling and analyses. Plutonium Operations (PO) was assured that their sample would be given priority due to the nature of the finding.

When laboratory results were not provided as promised in early April, it was learned that the 771 Stabilization Project and the 964 Pad had been given priority. The laboratories then

promised a new date in early August of 1993. Samples were taken in late June. Part of the analyses were completed and part were not due to an instrument failure. Samples had to be retaken which was done in mid-August. Full characterization was to have been completed by mid-September. Whether or not this eight-month project has been completed and the results, if any, will be reported in the next month's report. Meanwhile, requests for extensions, justifications, and other required paperwork has cost significant time and productivity.

Last month's Report addressed an issue surrounding the ceiling in Building 776/777 container storage areas. Many years ago a fire retardant, fibrous material was sprayed on the ceilings and then spray-painted. Now the aged material is crumbling off and falling below into the rooms and onto containers and floors. An evaluation has been conducted of the ceiling area by Waste Systems Engineering which recommended the scrapping, cleaning, resealing and painting of the ceiling. A scope and estimate has been submitted to building management. FY94 Baseline Change Proposals will be required as this scope of work was not included in the FY94 work packages.

5.4 Plant Services: Depleted uranium chips were found in the Building 566 Laundry waste water trenches and in the area where dirty clothing enters the building. This resulted in a temporary shutdown of laundry operations until the material was cleaned up. The source was tracked back to the 400 Area and was a repeat of a previous incident. The 400 Area is now performing a thorough inspection of all clothing prior to shipment to the laundry. Additional corrective actions will be defined in Occurrence report RFO-EGGR-NONPUOPS1-1993-0014.

In addition, two more occurrence reports were filed as a result of contaminated clothing found in Building 566 Laundry. This makes a total of six occurrences in 1993 for either contaminated clothing or identification of uranium chips. The information on all of the occurrences has been submitted to Issues Management for evaluation.

A leak in a natural gas line near Portal 1 resulted in the release of a small amount of natural gas. In order to make repairs, the line was vented. Since the leak disrupted service to the Protected Area while repairs were performed, an occurrence report was filed. The Spill Response and Reporting Group and the Clean Air Group were notified prior to the venting operation and a courtesy notification was made to CDH.

Remediation is ongoing to remove polychlorinated biphenyl contamination from the soil and transformer pad for transformer 443-2. To date a total of 40 drums of contaminated soil and concrete have been removed. Additional samples have been taken by Construction Management and Toxic Substances Control Act (TSCA) program personnel will determine the need to continue remediation.

Sample results were received for several of the remaining miscellaneous containers at PU&D and guidance was provided from WTS on consolidation. There are currently 22 containers which require further analysis or evaluation of the results and 9 containers which require alpha/beta results. As soon as all of the hazardous materials have been identified and processed the RCRA 90-day area will be deleted. Many samples are being returned from the lab after the analysis results have been provided and the original containers have been disposed of. This has created a

sample disposal problem since the samples cannot be returned to their original container. A memorandum is being drafted by the EPM for Plant Services to the labs requesting a meeting to solve the delay in sample turnaround time.

All of the lead-acid batteries accumulated at the Building 130 90-day RCRA area have been packaged for transport to a recycling facility, but no date has been set for transport. This area will no longer accept any batteries and no new area has been designated to accept batteries. One container of nickel-cadmium batteries is still in the area pending disposal as hazardous waste.

One drum of solvent contaminated oil is still on hold at Building 443 in the 90-day RCRA area. All of the sampling and paperwork to dispose of the drum are complete, however, the material cannot be shipped since the RCRA area has never been entered in WEMS. The paperwork to enter the area was submitted in July. The paperwork has been resubmitted. An additional three drums of oil are on hold awaiting sampling to determine if solvents are present. The requests for analysis were also submitted in July.

5.5 Environmental Restoration/Facilities Operations Management: DOE, WPD conducted a walk-through inspection on Buildings 131, T131A and the surrounding areas on July 8, 1993. The inspection resulted in a report of improper storage of IDM by Building T131A. The lids to the drums had corroded from exposure to the elements, which, over time, will result in a breach of containment. Even though these drums were cited as being improperly stored, ERM's position is that the drums were in fact not improperly stored but needed attention due to weathering. The drums have been repainted and were sent to RCRA interim status unit 18 03 on September 17, 1993. RCRA interim status unit 18 03 has compliance issues which are discussed below, however it is the only storage area currently available for IDM.

ERM experienced one release during the reporting period. On August 26, 1993, approximately 50,000-60,000 gallons of treated effluent water was released from effluent tank TK-207 (facility B-891). The sample analysis for this tank had not been completed at the time of discharge. The release was caused by a valve that was left open from the recirculation of TK-207 on the previous day. Subsequent receipt of analytical results have shown that Applicable or Relevant and Appropriate Requirements were met with the exception of dissolved iron. The results for dissolved iron were slightly above the regulatory limits, however they are still within an acceptable limit. EG&G has reported the results to DOE and DOE has reported the results to CDH. ERM expects no impact downstream due to the release.

The following is a significant compliance issue that has been on-going. The RCRA interim status unit 18 03 underlying base is not free of cracks and gaps. The asphalt is in need of repair to support the activity and movement of drums in the tent. An Engineering Job Order (EJO) has been completed to repair the asphalt and the work is scheduled to be completed in October 1993.

A Granular Activated Carbon Unit, which processes surface water removing radionuclides, is located in OU2 and generates filter cake (a mixed waste stored in white drums). The white drums are then managed in the 90-Day Accumulation Area in T900D. Upon waste characterization, the drums are moved to 18 04 interim status unit for storage.

5.6 800 Operations. A high priority Transition project involved the removal of excess chemicals. Building 865 was the pilot building for removal of excess chemicals, the goal was to minimize waste generation to the lowest possible level. This activity included the elementary neutralization of certain chemicals prior to introducing the chemicals into the process waste system. This project for Building 865 was completed in early September.

Building 865 Transition tasked Engineering to develop an Engineering Work Package for the stripout of the beryllium chloride electro-refining cell in Building 865. The Engineering Title II stripout package for the Building 865 beryllium electro-refining cell will be completed by September 30, 1993. The actual project removal activities are currently unfunded. Engineering is investigating the feasibility of neutralizing the beryllium chloride solution. The resultant material would be salts, water and beryllium oxide. Meetings with engineering, metallurgical and environmental personnel are continuing.

The Air Quality Division is conducting a review of the 800 Area regulated air emissions to update the RFP APENS to be submitted to CDH.

5.7 Waste Operations. RWO reports having shipped a total of 82 drums and one 4000-gallon tanker truck (equals 80 drums in volume) during this reporting period. The 82 drum shipment consisted of RCRA hazardous waste and other wastes regulated under Subtitle D of the Solid Waste Disposal Act and the Clean Water Act. The tanker truck handled 4 tanks of electro-chemical milling solution from Building 460. Both shipments were sent to Chemical Waste Management, Inc. These shipments bring the total number of barrels shipped off site by RWO (by volume which includes tanker trucks) to 849 drums as of September 15, 1993. The projected FY93 total will exceed 1000 drums.

Waste Shipping in Building 664 reports that there were no regulatory inspections conducted during the reporting period; however, Waste Operations conducted its inspections of the storage areas resulting in no findings. However, the NTS audit resulted in one finding having to do with the drum labeling. There are approximately 8000 drums/crates in storage in Building 664, about 90% of which were packaged by the various generators prior to new packaging criteria. Different packaging criteria designed specifically for each generator was promulgated by the end of 1990, now, most of these drums predate the new criteria. Each such drum must be stamped "backlog" to identify it as not meeting the current, necessary packaging requirements. Thus, these "backlog" drums will have to be repackaged before they can be shipped off site. The approximately 10% "new" drums that were packaged subsequent to the latest packaging criteria can be shipped as early as mid-October, when NTS is ready to begin accepting waste.

Waste Residue Assay and Shipping reports no regulatory inspections during the reporting, but two tours were conducted. CDH permit writers toured Building 371 to gather additional information regarding the mixed residue Part B permit modification. While no significant problems were noted, questions arose from the CDH permit writers about the location of the waste drums in proximity to the gloveboxes. The permit writers noted that the drawings were not accurate, the drawings are being corrected. The log sheets and operating records were

inspected and found to be satisfactory. Representatives from Waste Isolation Pilot Plant (WIPP), EPA and DOE toured Building 371 in anticipation of future shipments to WIPP. The tour was informational in nature and focused on the technical operation of the drum counter operation.

Liquid Waste Treatment Operation reports two issues relative to its waste water evaporator in Building 374. The secondary containment berm, which is lined, had accumulated rocks on top of the liner such that the liner was no longer visible for required inspection. Visual inspections are required to detect any liner failures. The rocks have been removed from the berm and adequate inspections are ongoing. The evaporator unit is currently being operated at a reduced capacity due to a faulty heat exchanger. Reduced operations continue to ensure that necessary service to the laundry and other utility systems is maintained, the heat exchanger is scheduled for complete replacement.

5.8 Residue Operations: Thirty-seven waste drums of Item Description Code (IDC) 331 are present in Building 771, of which 35 will require repackaging due to the possible presence of incompatible liquids. An action plan has been established to determine labor requirements, to determine funding, and contingent upon funding, appropriately repackage the drums.

Building 771 Operations has implemented Task Information Package (TIP) Number 11 and activities are underway to remove hazardous waste from ion columns in Line 42 in response to a CDH NOI. The cleanup portion of TIP 11 was 40% complete as of September 15, 1993.

An operations order for Environmental Compliance in Buildings 771/774 is being drafted. Most items for this operations order exist in current shift orders except for building specific criteria for RCRA inspections and the building Operating Record. This operations order will be published prior to October 4, 1993.

5.9 400 Operations. The process waste line between Buildings 460 and 374 is not in use. Currently, tanker trucks are transporting the process waste between the two buildings. Although the tanker truck is certified for such waste, there is concern with pH levels damaging the tanker trucks over an extended period of time. The Engineering Order is being pushed by EPM to repair the process waste line between Buildings 460 and 374, to discontinue use of tanker trucks.

Daily tank inspections in room 9A of Buildings 444/447 were missed for five consecutive days during the reporting period. As a corrective action, 400 Operations management required an approved Management Plan from the Materials and Surface Technology Group outlining how future RCRA inspections would remain in compliance.

5.10 Facilities Management (Building 371): The 20 nickel-cadmium wet cell batteries in 90-day storage area 373-1990 were transferred to permitted storage outside of the PA before their 90-day deadline.

Waste drums in the 371 Material Access Area were inspected to identify and mark the

travellers of those drums containing waste generated prior to November 2, 1992 Forty-six (46) drums were marked as containing either Backlog/Low Level Waste or Backlog/Potential Low Level Waste (pending assay) Based on further direction from Radioactive Waste Programs, all drums will be inspected a second time to identify those drums containing waste generated prior to April 2, 1992

All potentially hazardous waste with IDC 480 that has been generated in Room 3412 by the PA Radiochemistry Lab has been flagged in the WEMS database as pending characterization

RCRA Category D Ancillary Equipment Drawings were received as information only copies during late August. These drawings were necessary for the RCRA Permit Part B modification.

Non-Routine Waste Generation Logs in Integrated Work Control Package (IWCP) work packages require that all waste entries be characterized properly Technical assistance was provided to IWCP personnel by Facility Management for these logs for 6 IWCP work packages during the reporting period This is a significant step towards incorporating environmental compliance into the work control arena

5.11 Environmental and Quality Training: A major revision of the Solid Radioactive Waste Generator formal training course has been approved and is on-line This revised course replaces the Waste Generator courses, Radioactive Waste Generator, Non-Protected Area (Non-PA) and Radioactive Waste Generator inside the Protected Area (PA)

49 CFR DOT Awareness, 4 hour, course has been approved and is on-line This course covers general information for any HazMat employee that is responsible for the safe transportation of hazardous materials

49 CFR DOT, 16 hour, basic hazardous material course has been approved and is on-line This course is the equivalent of a 40 hour course, condensed to cover the requirements of a HazMat employee in the area of general awareness and addition to the job/function specific requirements

A new 8-hour course entitled Waste Determination and Waste Stream Residue Identification and Characterization was piloted This course was designed to ensure that all waste generators have the knowledge necessary for compliance with 40 CFR, Parts 261 and 262 and 6 CCR-1107-3, Parts 261 and 262

COURSE NAME	COURSE #	PRIMARY DRIVER	#STUDENTS 8/16-9/17	#STUDENTS FYTD
40 Hour Haz Wst Ops	018-691-03	29CFR 1910 120	24	352
24 Hour Haz Wst Ops	018-691-02	29CFR 1910 120	25	305
8 Hour Haz Wst Ops Mgmt	018-691-01	29CFR 1910 120	11	50
8 Hour Haz Wst Ops Refr	018-691-05	29CFR 1910 120	178	2136

COURSE NAME	COURSE #	PRIMARY DRIVER	#STUDENTS 8/16-9/17	#STUDENTS FYTD
Responder Awareness	062-472-01	29CFR 1910 120	20	90
Responder Operations	062-471-01	29CFR 1910 120	14	84
Resp Awareness Refr	019-471-01	29CFR 1910 120	0	13
Responder Ops Refr	019-472-01	29CFR 1910 120	3	18
Incident Command	021-370-01	29CFR 1910 120	2	40
Incident Command Refr	019-370-01	29CFR 1910 120	4	20
Responder Technician	019-474-01	29CFR 1910 120	4	4
SCBA	019-170-01	29CFR 1910 134	57	341
SCBA Refresher	019-171-01	29CFR 1910 134	0	0
Haz Com Workshop, Mgrs	090-754-01	29CFR1910 1200	5	85
Lab Chem Hygiene Wkshop	031-183-01	29CFR 1910 1450	12	12
Waste Generator - PA	067-285-01	40CFR Part 264/265	0	1191 Closed
Waste Generator-NonPA	067-285-02	40CFR Part 264/265	0	415 Closed
Waste Generator-NonRad	067-575-01	40CFR Part 264/265	39	1646
Wst Determination/WSRIC	125-574-01	40CFR Part 264/265	0	0 In Development
RCRA Custodian	018-863-01	40CFR Part 264/265	94	775
RCRA Tank Custodian	016-863-01	40CFR Part 264/265	21	469
Confined Space Entry	068-741-01	29CFR 1910 146	96	1467
TSCA	016-936-01	40CFR	0	272 Closed
Asbestos Awareness	056-352-01	AHERA-40CFR	74	598
Line Control Program	019-974-01	DOE 5483 XX	12	211
Safety Monitor	019-975-01	DOE 5483 XX	0	102

COURSE NAME	COURSE #	PRIMARY DRIVER	#STUDENTS 8/16-9/17	#STUDENTS FYTD
Environmental Laws & Reg	016-100-01	0	0	0 In Development
PCB Awareness	068-124-01	40CFR	56	56
Emer Mgmt Org (EMO)	021-101-01	DOE 5500 3A	93	93
Emer Mgmt Refresher	032-102-01	DOE 5500 3A	56	56
DOT Awareness	023-434-01	49 CFR Part 100-199	0	0 New Course
DOT	023-434-02	49 CFR Part 100-199	0	0 New Course
Waste Generator - Rad	067-285-01	40 CFR Part 264/265	87	87 New Course
TOTAL			987	11,059

6.0 ENVIRONMENTAL WASTE AND MANAGEMENT PROGRAMS

6.1 Waste Programs

6.1.1 Resource Conservation and Recovery Act

RCRA regulates the generation, storage, treatment and disposal of hazardous waste to prevent harm to human health and the environment. Additionally, RCRA requires that hazardous waste management personnel be properly trained to manage their waste and to properly respond to emergencies. At RFP, there are many waste streams which are considered hazardous or mixed (radioactive waste combined with hazardous waste).

The majority of hazardous waste storage and treatment units at RFP are regulated under interim status. Fifteen hazardous and low-level mixed waste container storage units are currently included in the State RCRA Part B permit.

RFP has provided information to the Colorado Department of Health to apply the wastewater treatment unit exclusion to the majority of the aqueous process waste treatment and storage system (see Section 2.2). Additionally, the RCRA training program is being upgraded to include improved training to supervisors and generators of waste.

Following are Part A and Part B permit tables providing status

RCRA PART A PERMIT (INTERIM STATUS)

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	DATE	COMMENTS
Revision 12 of Combined Part A (Revision which is currently in effect)	May - 93	
Request for change to Interim Status for various EPA waste codes	8/13/91	Awaiting final CDH approval
Contractor Cleanout Operations	8/10/92	Submitted to CDH for Approval - currently on hold
Request for change to Interim Status for 904 Pad Waste Pile	5/18/93	Denied

RCRA PART B PERMIT

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	PERMIT MOD NUMBER	APPLICATION DATE	DATE	COMMENTS
PART B PERMIT				
Original Permit			9/30/92	
Modification for Miscellaneous Corrections	Request #1	10/28/91	4/30/92	
Modification for Miscellaneous Corrections	Request #2	11/6/91	N/A	CDH approval not required
Modification for Training Compliance	Request #3	12/31/91	N/A	CDH approval not required
Modification for Counters and Waste Codes	Request #4	1/15/92	6/9/92	
Modification for Training Section Revision	Request #5	1/29/92	TBD	Awaiting CDH approval
Modification for Part 3 Reformat	Request #6	2/25/92	N/A	CDH approval not required
Modification for Reformat Remainder of Permit	Request #7	3/20/92	N/A	CDH approval not required
Modification for Mixed Residues	Request #8	6/30/92	TBD	Awaiting CDH approval
Modification for Centralized Waste Storage	Request #TBD	TBD		In preparation
Modification for Phase I of building 374 Evaporator Upgrade	Request #9	8/26/92	TBD	Awaiting CDH approval

RCRA PART B PERMIT (CONT.)

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	PERMIT MOD NUMBER	APPLICA-TION DATE	DATE	COMMENTS
Modification for Phase II of Building 374 Evaporator Upgrade	Request #13		TBD	On hold
Modification for Contingency Plan and Code Additions	Request #10	TBD		In preparation
Modification for Interim Status Units	Request #12	11/6/92	TBD	Awaiting CDH approval
Modification for NOID and TRU Units	Request #TBD	TBD		On hold
Revised Permit	Request #14	6/16/93	TBD	Awaiting CDH issuance
Mixed Residue	Request #15	Aug 93	TBD	Awaiting CDH approval

RCRA MISCELLANEOUS SUBMITTALS AND GUIDANCE

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	DATE	COMMENTS
DESCRIPTION OF SUBMITTAL/GUIDANCE REQUEST		
Closure Plans for Interim Status Units	TBD	In preparation
Supplemental to Part B Application for Organic Air Emission	2/27/92	Awaiting CDH approval
Request to delete Organic Air Monitoring		In preparation
Change to Interim Status Closure Plan	7/12/93	Awaiting CDH approval
Management of out-of-service RCRA units		In preparation
Alternate Containment in Cargo Containers		In preparation
Ancillary Equipment Clarification		In preparation
Request for RTR Exemption for Heat Exchanger Storage		Awaiting CDH response

6 1 2 Toxic Substances Control Act

No new developments were reported during this period

6 1.3 Medical Waste

No new developments were reported during this period

6.1.4 Excess Chemicals

Waste Regulatory Programs is currently working to identify funding and additional resources to address the current backlog of chemicals. Both on-site regulatory expertise and off-site expertise are being investigated for possible use.

Waste Regulatory Programs has completed its efforts supporting the TSIP demonstration in building 865 for the excess chemical program. The project was completed on schedule.

The Excess Chemical program is currently developing an aggressive program to properly identify, make waste determinations and manage excess chemicals throughout plantsite. The deadline to complete these determinations is December 23, 1993. A revision to the previously issued Excess Chemical Environgram explains some of these details. It is anticipated that the final inventory of excess chemicals will be in the 15,000 to 20,000 range.

6.1.5 Contingency Plan

The RCRA Contingency Plan has been implemented eight times during this calendar year. The most recent implementation was due to a hazardous waste incident that was discovered on September 10, 1993. This hazardous waste incident is documented in RCRA CIPR 93-008 which was transmitted to DOE, RFO on September 21 and updated on September 23, 1993.

The hazardous waste incident involved the leaks of hazardous waste from two RCRA tank systems. The total quantity of all material released was less than one teaspoon. Due to radiological concerns, the residue from the first leak was not cleaned up within 24 hours of discovery. The hazardous waste leaked from organic waste transfer lines in Building 776, Room 141. These lines are ancillary equipment associated with RCRA tank systems that have been drained, are not in service, and are scheduled for closure pending the CDH approval of the RFP Building 777 Tank Systems RCRA Interim Status Closure Plan. These systems are being managed under the Mixed Residue Tank System Management Plan. (See Section 5.3 for more details about this spill.)

6.1.6 Federal Facility Compliance Agreement Program

No new developments were reported during this period.

6.2 ENVIRONMENTAL PROTECTION

6.2.1 National Environmental Policy Act

No new developments were reported during this period.

Following is a schedule of NEPA reviews based upon upcoming plant projects:

PROJECT UNDER REVIEW	START DATE	END DATE	RESULT	COMMENTS
Bldg 707 Thermal Stabilization EA	Jun-93	Aug-93		
Stockpile Reliability Evaluation Program Transfer	Jul-93	Nov-93	Eliminated	This project has been transferred to Las Alamos for inclusion in its similar EA
Surface Water Structures EA	Jul-93	Nov-93		
Sitewide EIS		Dec-96		

6.2.2 Clean Water Act

No new developments were reported during this period.

Following is a list of permits/plans in a table format for quick reference.

PERMIT/PLAN	EFFECTIVE DATE	EXPIRATION DATE	COMMENTS
National Pollutant Discharge Elimination System (NPDES) Permit	12/26/84	6/30/89	By EPA letter of 6/6/89 the NPDES Permit was administratively extended until renewed
NPDES Federal Facilities Compliance Agreement	3/25/91	None	
NPDES Storm Water Discharge Permit			Application Submitted 10/1/92
Spill Prevention Control and Counter- Measures/Best Management Practices (SPCC/BMP) Plan	9/30/92	9/30/95	
Separate Spill and BMP Plans			To meet requirements under the Oil Pollution Prevention Act and NPDES regulations Next Revision Approx 9/1994
Pollution Prevention Plan			In Preparation Anticipated Storm Water Permit Requirements, must be developed within 6 months of permit issuance

6.2.3 Clean Air Act

No new developments were reported during this period

CLEAN AIR ACT PERMITS

BUILDING/EMISSION SOURCE	PERMIT #	PERMIT STATUS	COMMENTS
Bldg 122 Incinerator (3/25/82)	C-12,931	Final Permit (Inactive Source)	To be canceled Fall 1993
Bldg 771 Incinerator (8/28/85)	12JE932	Final Permit (Inactive Source)	To be canceled Fall 1993
Bldg 776 Incinerator (3/25/82)	C-13,022	Final Permit (Inactive Source)	To be canceled Fall 1993
Fugitive Dust Renewed (12/26/91)	87JE084L	Final Permit	Expires 12/31/94
Pondcrete Shelter #5, Pad 750	90JE045-1	Expired permit 2/17/93	
Pondcrete Shelter #6, Pad 750	90JE045-2	Expired permit 2/17/93	
Pondcrete Shelter #10, Pad 904	90JE045-3	Expired permit 2/17/93	
Pondcrete Shelter #11, Pad 904	90JE045-4	Expired permit 2/17/93	
Bldg 123, Uralysis Fume Hood	86JE018	Final Permit	
Bldg 776, Supercompactor and Repackaging Facility (SARF) Transuranic Waste Shredder HEPA filter	91JE047	Initial Permit Issued 12/91	Awaiting Final Permit
Bldg 333 paint spray booth	91JE300-1	Initial Permit Issued 7/31/92	Awaiting Final Permit
Bldg 333 grit blaster	91JE300-2	Initial Permit issued 7/31/92	Awaiting Final Permit
Bldg 910, 3 nat gas generators	91JE316-1	Initial Permit issued 7/31/92	Awaiting Final Permit
Bldg 910, 1 nat gas water htr	91JE316-2	Final Permit 2/18/93	
Bldg 995 nat gas fired sludge dryer	91JE430	Initial Permit issued 2/11/92	Awaiting Final Permit
Bldg 440 paint spray booth	91JE537-1	Final permit 5/12/92	
Bldg 440 paint spray booth	91JE537-2	Final permit 5/12/91	
Bldg 373, Vent 1, Detroit diesel engine pump	92JE473	Initial permit issued 3/9/93	Awaiting Final Permit

CLEAN AIR ACT PERMITS (CONT.)

BUILDING/EMISSION SOURCE	PERMIT #	PERMIT STATUS	COMMENTS
Bldg 460, Machining and product inspection processing/high bay vents	92JE1247	Initial permit issued 3/11/93	Awaiting permit cancellation In process of revising APEN for these operations VOC emission now less than 1 ton/year Below threshold for permit and APEN
Open Burn Permit	1140-OB-1001	Final permit	Permit expires 10/31/93
Steam Plant - 4 Boilers	92JE833	Initial Permit Pending	Under review for initial permit
Bldg 702 - 4 nat gas engines	92JE833	Initial Permit Pending	Under review for initial permit
Bldg 776 - 4 nat gas engines	92JE833	Initial Permit Pending	Under review for initial permit
Bldg 374 - Salt Spray Dryer	93JE542	Initial Permit Pending	Under review for need for permit
Emergency Generators (Bldg 120, 566, 708(B), 708(C), 715A, 776, 881G, 920, 762A (PACS-1), 372A (PACS-2), 792A (PACS-3), Portables A and B	92JE473 (AP) #s 1-15	Initial Permit Pending	The permit application for these generators is currently under review for issuance of an initial permit
Bldg 708 & 711 diesel pumps and emergency generators Bldgs 124, 127, 371, 427, 443, 559, 562, 708(A), 715, 727, 729, 779, 827, 989	92JE833 (AP)#s 1-29	Initial Permit Pending	The permit application for these units is currently under review for issuance of an initial permit
Bldg 886 Uranium Solution Evaporator	90JE045(AP)	Permit Exempted	Determined by CDH no permit is required (8/21/91)
Bldg 881 spray paint booth	91JE481(AP)	Permit Exempted	Determined by CDH no permit is required (8/8/91)
Bldg 991-1 spray paint booth	91JE538(AP)	Permit Exempted	Determined by CDH no permit is required (8/23/91)
Bldg 442 filter test penetrometers (Q-76 & Q-107) and Bldg 556 plasma arc cutter	92JE1247(AP)	Permit Exempted	Determined by CDH no permit is required (3/12/93)

CLEAN AIR ACT PERMITS (CONT.)

BUILDING/EMISSION SOURCE	PERMIT #	PERMIT STATUS	COMMENTS
OU2 generator	N/A	Application in preparation, will be submitted to CDH during the first week of Aug-93	The generator at OU2 is estimated to contribute 15 tons per year of air pollutants. This unit should have been permitted, its pollutant contribution may impact RFP major/minor source categorization.

6.2.4 Superfund Amendment and Reauthorization Act

No new developments were reported during this period

6.2.5 Federal Insecticide, Fungicide, and Rodenticide Act

No new developments were reported during this period

6.3 Environmental Restoration

6.3.1 Comprehensive Environmental Response, Compensation, and Liability Act

Procurement has been interfacing with RFO's upper management in addressing DOE's request for implementation of Section 3161 of the National Defense Authorization Act. Based upon this request, Procurement facilitated the gathering of data for justification of Environmental Restoration/Environmental Protection (ER/EP) compliance to Section 3161 and submitted this report to the EG&G Assistant General Manager (AGM) for Administration and Planning.

Parallel to this exercise was a request by the Deputy AGM to the General Manager for a response from EP/ER on plans for the reduction in subcontractors to support workforce restructuring. Procurement initiated the collecting of data and condensing into report form the justification for utilization of subcontractors within EP/ER. This report was then presented for evaluation to upper management.

The regulatory agencies have agreed with the need to stop work on the following portions of the baseline Human Health Risk Assessments (HHRA) for OUs 1, 2, 3, 4, 5, 6, and 7:

- 1 Aggregation of RI data for the purpose of comparing to background concentrations
- 2 Selection of the contaminants of concern for both ecological and baseline HHRA
- 3 Aggregation of data for the purpose of conducting an exposure assessment.

Work will be stopped until an agreement is reached among the parties to the IAG to guidance on the methodology for the baseline risk assessments and preparation of the RFI/RI Reports. Work stopped for OUs 1, 2, and 7 as of June 21, 1993, for OUs 4, 5, and 6 as of August 12, 1993, and for OU 3 as of July 23, 1993. OU 2 NOV issued to DOE on September 10, 1993 arising in part from stop work order.

An incorrect valve was left open during the discharge of Tank 206 in OU 1 that resulted in the unplanned release of approximately 60,000 gallons of treated effluent water from Tank 207 being released into the South Interceptor Ditch (SID) without verification of laboratory analysis. Based on historical data obtained on effluent tanks, it is expected that this water will have no adverse impacts to the environment. Corrective actions to prevent a similar occurrence have been taken.

The scheduled start date for the OU 2 Soil Vapor Extraction Pilot Test at Site 1 is projected to be missed. An expedited schedule has been constructed to minimize schedule slippage.

A milestone extension has been requested on the OU 12 Draft RFI/RI Report due on April 20, 1994, and the Final RFI/RI Report due on September 15, 1994. The extension is being requested due to field work activities being postponed due to funding limitations in fiscal year (FY) 93 and the coordination of Individual Hazardous Substance Sites (IHSS) clean up with the RFP Decontamination and Decommissioning (D&D)/Transition Planning, which was included in the FY95-99 Five Year Plan (FYP) submittal.

Following are tables taken from the *Environmental Restoration Monthly Report* for August 1993. The ER report provides comprehensive information about ER activities and is produced monthly for DOE, RFO.

IAG Performance Indicators for Monthly Report

<u>Number of IAG Milestones to Date</u>	<u>Current FY93</u>	
	<u>(10/1/92 - 9/30 /93)</u>	<u>Since IAG Inception</u>
Scheduled (including approved extensions)	15	91
Met	11	67
Extensions Granted	7	22
Extensions Denied	2	2
In Dispute - OU 4 Phase I Draft/Final Report	1	1
Remaining this FY93 (to 9/30/93)	3	n/a

<u>Deliverable in Review by Regulators</u>	<u>Project</u>	<u>Date Submitted</u>
	OU 14 Final Phase I RFI/RI Work Plan	19 Oct 92

Field Work Currently Underway**Project****Scheduled Complete**

OU 2	23 Aug 93
OU 3	13 Jul 93
OU 4	Jan 96*
OU 5	15 Jul 93
OU 7	30 Apr 93
OU 10	20 Jul 94

* for all field work phases

IM/IRA Status**Gallons Treated**

OU 1 881 Hillside Treatment
OU 2 903 Pad Water Treatment
OU 4 Water Management Tasks

1,537,963 gallons
17,402,740 gallons
Project is in operations phase

IAG Document Deliverables Due Next 6 months**Due Date****Expected Date**

OU 1 Final Phase III RFV/RI Report	04 Jan 93	15 Nov 93
OU 1 Draft Proposed Plan	27 Sep 93	30 Sep 94
OU 1 Final Proposed Plan	04 Jan 94	17 May 95
OU 2 Final Treatability Test Report (RRS)	08 Sep 93	08 Sep 93
OU 2 Draft CMS/FS Report	04 Nov 93	30 Oct 96
OU 4 Draft Phase I RFV/RI Report	21 May 93	15 Apr 94
OU 5 Draft Phase I RFV/RI Report	30 Nov 93	09 Feb 95
OU 6 Final Phase I RFV/RI Report	07 Jan 94	10 Jul 98
OU 7 Draft Phase I RFV/RI Report	12 Oct 93	20 Dec 93

Overdue Deliverables**Due Date****Expected Date**

OU 2 Draft RFV/RI Report	12 Mar 93	16 Dec 93 *
OU 2 Final Phase II RFV/RI Report	09 Aug 93	23 May 94 *
OU 6 Draft Phase I RFV/RI Report	04 Aug 93	11 Jul 94

*TBD because of HHRA issues work stoppage

NEAR-TERM IAG MILESTONES

<u>OU#</u>	<u>Milestone Description</u>	<u>IAG Date Scheduled to EPA/CDH</u>	<u>Status</u>
2	Submit Draft Phase II RFI/RI Report	12 Mar 93	Extension denied/delinquent
4	Submit Draft Phase I RFI/RI Report	21 May 93	Extension to 14 Sep 93 (in dispute)
2	Submit Subsurface Test Plan Site #2	24 Jun 93	Complete
2	Submit Final Treatability Test Report	13 Jul 93	Extension to 8 Sep 93
3	Submit Draft Phase I RFI/RI Report	16 Jul 93	Extension to 14 Feb 94
6	Submit Draft Phase I RFI/RI Report	4 Aug 93	Extension request submitted
2	Submit Final Phase II RFI/RI Report	9 Aug 93	Extension denied/delinquent
7	Submit Draft Phase I RFI/RI Report	12 Oct 93	*
4	Submit Final Phase I RFI/RI Report	18 Oct 93	Extension to 14 Feb 94 (in dispute)
2	Submit Draft CMS/FS Report	04 Nov 93	*
1	Submit Final Phase III RFI/RI Report	04 Jan 93	Extension to 15 Nov 93
5	Submit Draft Phase I RFI/RI Report	30 Nov 93	*
3	Submit Final Phase I RFI/RI Report	13 Dec 93	Extension to 21 Oct 94
1	Submit Draft Proposed Plan	27 Sep 93	Extension request submitted
1	Submit Final Proposed Plan	04 Jan 94	Extension request submitted
6	Submit Final Phase I RFI/RI Report	07 Jan 94	Extension request submitted
1	Submit Draft CMS/FS Report	31 Mar 94	Extension to 11 Feb 94
8	Submit Draft Phase I RFI/RI Report	14 Feb 94	*
7	Submit Final Phase I RFI/RI Report	16 Mar 94	*
9	Submit Final Phase I RFI/RI Report	11 Apr 94	*
4	Submit Draft Phase I Proposed IM/IRA Decision Document	14 Apr 94	*
12	Submit Draft Phase I RFI/RI Report	20 Apr 94	Extension request submitted
4	Submit Draft Phase II Work Plan	22 Apr 94	*
5	Submit Final Phase I RFI/RI Report	03 May 94	*
1	Submit Draft Responsiveness Summary	06 May 94	*
2	Submit Final CMS/FS Report	10 May 94	*
2	Submit Draft Proposed Plan	10 May 94	*
8	Submit Final Phase I RFI/RI Report	12 Jul 94	*
15	Submit Draft Phase I RFI/RI Report	01 Aug 94	On schedule
1	Submit Final CMS/FS Report	03 Aug 94	*
1	Submit Draft CAD/ROD	03 Aug 94	*
1	Submit Final Responsiveness Summary	03 Aug 94	*
1	Submit Draft CAD/ROD	03 Aug 94	*
13	Submit Draft Phase I RFI/RI Report	08 Aug 94	*
2	Submit Final Proposed Plan	09 Aug 94	*
10	Submit Draft Phase I RFI/RI Report	25 Aug 94	*
9	Submit Final Phase I RFI/RI Report	06 Sep 94	*
4	Submit Final Phase I Proposed IM/IRA Decision Document	12 Sep 94	*
7	Submit Draft Phase II RFI/RI Work Plan	13 Sep 94	*
12	Submit Final Phase I RFI/RI Report	15 Sep 94	Extension request submitted
4	Submit Final Phase II RFI/RI Work Plan	19 Sep 94	*
11	Submit Draft Phase I RFI/RI Report	20 Sep 94	*

*Behind original IAG schedule, extension required

APPENDIX A

TABLE A1

Original ENVIRONMENTAL DEFICIENCIES Deficiency Summary

253	Potential environmental deficiencies identified as of 11/9/92															
	SOURCE: H P. Mann ltr, 92-RF-13195, to R M Nelson, Environmental Deficiencies - HPM-074-92, November 9, 1992															
-69	Items removed as potential deficiencies identified as of 1/5/93															
	SOURCE: 1) G.L. Potter ltr., 92-RF-14705, J K. Hartman, Regulatory Compliance Report - GLP-212-92, December 21, 1992 2) D S Tallman ltr, DST-001-93 A.L. Schubert, January 5, 1993															
184	TOTAL CONFIRMED ENVIRONMENTAL DEFICIENCIES															
8	ENVDEF #38 added 7 plans ENVDEF #168 added 1 plan															
192	TOTAL DEFICIENCIES TRACKED															
-113	Deficiencies corrected as of 9/17/93															
79	DEFICIENCIES REMAINING FOR CORRECTION															
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Of the 79 deficiencies:</td> <td style="width: 20%;">Correction in Progress</td> <td style="width: 10%; text-align: center;">67*</td> <td style="width: 10%;">Plans due</td> <td style="width: 10%; text-align: center;">1</td> </tr> <tr> <td></td> <td>Overdue</td> <td style="text-align: center;">0</td> <td>Tasks complete/ final paperwork due</td> <td style="text-align: center;">11</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td style="text-align: center; border-top: 1px solid black;">79</td> </tr> </table>		Of the 79 deficiencies:	Correction in Progress	67*	Plans due	1		Overdue	0	Tasks complete/ final paperwork due	11					79
Of the 79 deficiencies:	Correction in Progress	67*	Plans due	1												
	Overdue	0	Tasks complete/ final paperwork due	11												
				79												
* 21 plans are referenced to existing plans																

TABLE A2

Cumulative ENVIRONMENTAL DEFICIENCIES Deficiency Summary

253	Potential environmental deficiencies identified as of 11/9/92			
	SOURCE:	H.P. Mann ltr., 92-RF-13195, to R.M. Nelson, Environmental Deficiencies - HPM-074-92, November 9, 1992		
-69	Items removed as potential deficiencies identified as of 1/5/93			
	SOURCE:	1) G.L. Potter ltr., 92-RF-14705, J.K. Hartman, Regulatory Compliance Report - GLP-212-92, December 21, 1992 2) D.S. Tallman ltr., DST-001-93 A.L. Schubert, January 5, 1993		
184	TOTAL CONFIRMED ENVIRONMENTAL DEFICIENCIES			
1968	Deficiencies re-categorized as Environmental Deficiencies in the Plant Action Tracking after 11/9/92	(see "Deficiencies Added" for details concerning sources of these deficiencies)		
2152	TOTAL DEFICIENCIES IDENTIFIED as of 9/17/93			
-1901	Environmental Deficiencies corrected as of 9/17/93			
251	TOTAL ENVIRONMENTAL DEFICIENCIES REMAINING FOR CORRECTION			
	Of the 251 deficiencies:	Correction in Progress	191*	Plans due
		Overdue	17	Tasks complete/
		Hold	3	final paperwork due
				36
	*32 referenced to other plans			251

9/17/93

TABLE A3

REGULATORY ENVIRONMENTAL DEFICIENCY STATUS 1993

Individual months are represented by month ending data points

