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# STATE OF COLORADO

**COLORADO DEPARTMENT OF HEALTH**  
*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Roy Romer  
Governor

Patricia A. Nolan MD, MPH  
Executive Director

August 13, 1993

Tom Lukow  
Waste Programs Division  
U.S. Department of Energy  
Rocky Flats Office  
P O. Box 928  
Golden, CO 80402-0928

Dear Mr Lukow,

Enclosed are the minutes for the August 6, 1993 Mixed Residues meeting. If you have any questions, please contact Chris Gilbreath at (303)692-3371, or Lisa Weers at (303)692-3451.

Sincerely,

Gary W Baughman, Chief  
Hazardous Waste Facilities Section  
Hazardous Materials and Waste Management Division

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

cc D Mauer, DOE/RFO  
W Seyfert, DOE/RFO  
K Ticknor, EG&G  
J Henderson, EG&G

ADMIN RECORD

14058

MKS  
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Attendees:	Tom Lukow	DOE/RFO
	Debbie Mauer	DOE/RFO
	Warren Seyfert	DOE/RFO
	Kirk Ticknor	EG&G
	Judith Henderson	EG&G
	Fred Dowsett	CDH
	Gary Baughman	CDH
	Dave Waltz	CDH
	Lisa Weers	CDH
	Chris Gilbreath	CDH

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The purpose of the meeting was to discuss the Colorado Department of Health's written comments concerning the Rocky Flats Plant Mixed Residue Permit Modification Number 8. Prior to the meeting, the Department of Energy provided a cursory response to each specific written comment provided by CDH.

DOE identified 3 items to be discussed in the meeting: 1) Dialogue on CDH comments and the DOE responses; 2) The application for Class 3 Permit Modification Request Number 15. The request is designed to incorporate the storage of mixed residues. The proposed changes are being requested in addition to changes requested by the principal Mixed Residues Permit Modification Number 8; 3) An assessment for the segregation of regulated and non-regulated material stored in RCRA units at RFP.

DOE submitted Class 3 Permit Modification Request Number 15. Specific changes requested are identified in enclosure 1 of the request. RFO also submitted a document entitled "Assessment of Segregation of Regulated and Nonregulated Material" to be reviewed by CDH.

CDH is requesting further documentation regarding the design of SAAM units and an RFO priority schedule for mixed residue units to be permitted.

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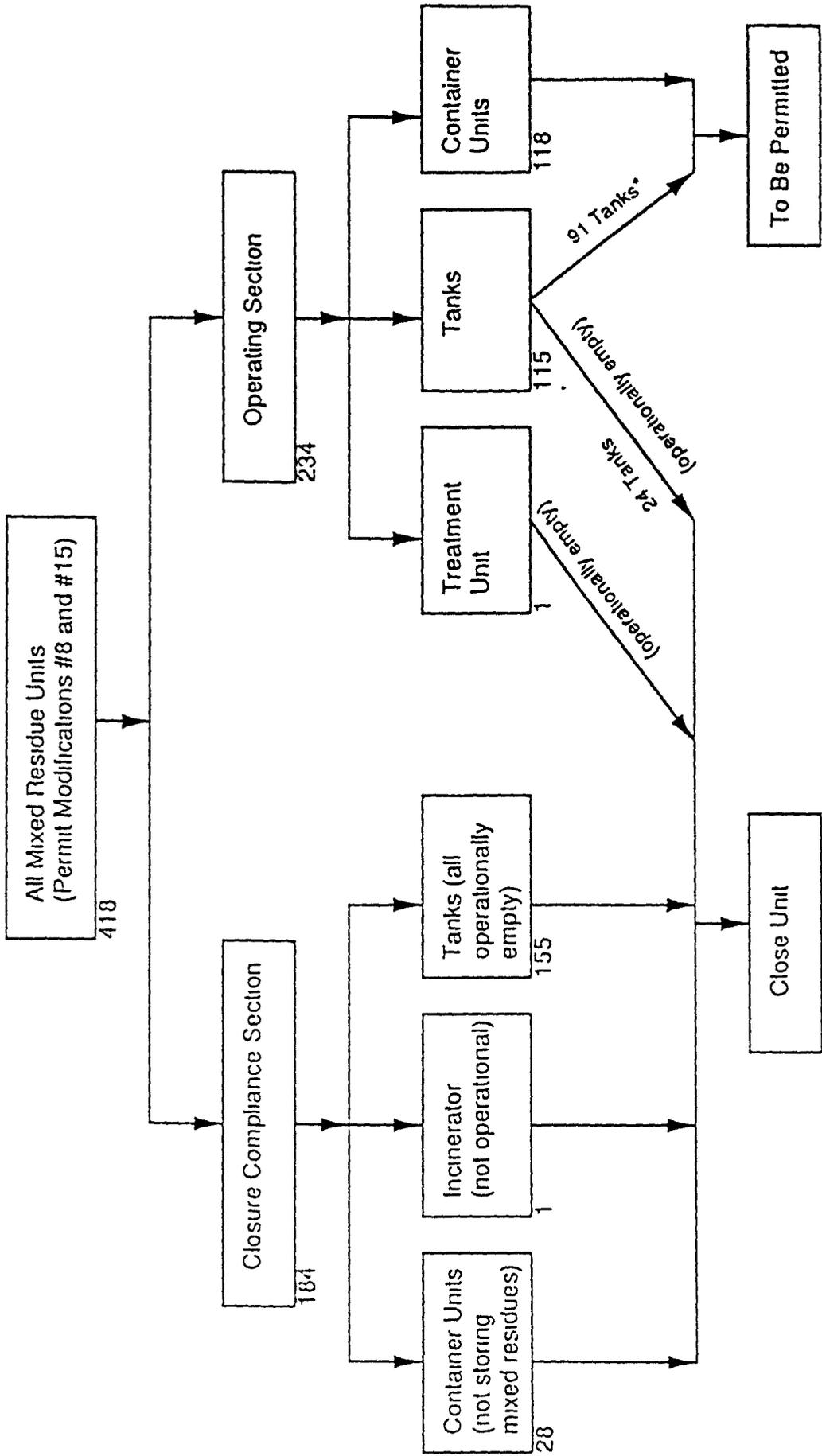
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The following issues were discussed during the meeting which were either agreed upon or were to be resolved at a later date:

1. Liquid storage - CDH requested that all containers storing liquid be elevated. DOE contested this request based on the amount of low-level waste generated. The possibility of a variance was considered but further discussion will be necessary to resolve this issue
2. Non-regulated container storage - CDH requested that non-regulated waste stored near regulated waste be separated using a berm, dike, painted stripe, or other barrier. Also any material stored in a hazardous waste unit will be handled and managed as a hazardous waste and must comply with 6 CCR 1007-3 Subpart 264 Further discussion will be necessary to implement the request.
3. Secondary containment systems - CDH is concerned with adequate ventilation in hallways and smaller rooms as well as emergency access through these units The proposed units will be inspected by CDH in order to determine compliance
4. Remote monitoring design - CDH requested more detail concerning the original design of the SAAM units which will include air flow patterns and smoke tests performed in each remote monitored area This information to be included as an addendum to the permit application
5. Label corrections - CDH is requesting immediate relabeling upon recharacterization Further discussion is necessary
6. Storage of containers with caps loosely in place - CDH agreed to the storage of containers with caps loosely in place in gloveboxes, provided that no volatile organic compounds or other hazardous wastes escape and they comply with requirements of Section 264.17
7. Nuclear Material Safety Limits - NMSL will not be violated because of RCRA aisle space requirements

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- 8 Vaults - containers shall be spaced so that no more than 5 containers need to be moved to reach a container. This is only approved for units (vaults) storing solid materials which employ remote monitoring equipment in place of visual inspections
9. Beryllium monitoring - mainly in terms of the potential for exposure when transferring materials containing beryllium into drums. Further discussion necessary.
- 10 Tank certification - CDH is requiring RFP to have all tanks to be permitted certified fit-for-use. The fit-for-use certification will require an integrity assessment performed by a qualified and registered professional engineer CDH will require certification upon completion of closure for all tanks in compliance with the Colorado Hazardous Waste Regulations. Further discussion on this issue is necessary
- 11 External corrosion protection for each tank - unnecessary due to the absence of contact with water and/or soil (according to Kirk Ticknor)
- 12 Safety cutoffs for tank systems - a description of safety cutoffs included in the permit modification to be discussed further
- 13 Catch basins and liners - future tank systems to include catch basins and/or flexible membrane liners CDH agreed to leave the original wording of the permit application
- 14 Secondary containment - minimum berm height calculations will be calculated to include both tank and container volumes (10% of the total volume of liquid stored in containers plus the volume of the largest tank) for units which contain both tanks and containers
- 15 Minimum berm heights - CDH agreed to include the surface areas of rooms 2207 and 2223 for the minimum berm height calculations based on NMSL concerns



\*of these 91 tanks

- a 17 will continue operation
- b 6 have liquid but will be emptied and closed under a compliance schedule
- c 68 will eventually be closed but require a permit because 24 have liquid and the others may be needed to store/treat liquids