



PRELIMINARY COMMENTS ON THE  
ROCKY FLATS PART B APPLICATION

SECTION C

(6 CCR 1007-3, Sections 264.13, 100.41(a)(2), and 100.41(a)(3))

1. The application does not include a waste analysis plan specific to the treatment and storage activities. The applicant has supplied a detailed generator analysis of the waste, but this waste identification analysis does not satisfy all the requirements applicable to a treatment, storage, or disposal facility. The owner or operator of a TSD facility must establish a plan to analyze all waste streams to the extent necessary to treat, store, or dispose of the wastes in accordance with the regulations. The generator identification analysis may supplement the TSD waste analysis, but the applicant must still develop a more extensive TSD waste analysis plan.

The applicant must identify waste analysis parameters specific to each of the waste treatment and storage activities. These parameters must be sufficient to insure all wastes can be safely treated or stored, based on the design and operating limits set for each unit. For example, to operate an incinerator safely in accordance with the regulations, factors such as waste composition, ash content, heat of combustion, chlorine content, solids content, and other waste parameters should be determined.

Once the waste analysis parameters for each regulated unit are identified, the rationale, the sampling method, the analytical method, the sampling point, and the frequency of sampling must be determined. Again, these factors must be based on the needs of the treatment or storage activity, and not just the generator needs.

2. The applicant must describe how incompatible wastes are determined. What test method is used to determine incompatibility? When knowledge of the waste is used in place of testing, the applicant must explain the criteria used to identify incompatible wastes.

SECTION D

(6 CCR 1007-3, Section 100.41(b), and Part 264 Subpart I)

1. The applicant should apply the new tank regulations published as final in Federal Register, Vol. 51, No 134, Monday, July 14, 1986. The new tank regulations will be effective in Colorado before a final decision is reached on the Rocky Flats application. The new tank regulations require the applicant to supply significantly different information from the type of information required by the existing tank regulations. To change paths from the old to the new regulations at a later time will delay the Department's review of the application and cause the applicant to waste time and efforts.

Under the new tank requirements the applicant must submit an independent review and certification of each regulated tank. This submittal must include calculations and supporting material used to make each certification. The applicant must also demonstrate complete secondary containment for each tank.

2. The following regulated units must be more clearly defined:

Unit 40 - The applicant must identify all the individual tanks which compose unit 40. The description of the entire system is important, however, each regulated tank must be clearly defined. A tank information table similar to tables D-3 through D-11 should be provided for the unit 40 tanks.

Unit 42 - The applicant is considering pursuing a National Pollution Discharge Elimination Standards (NPDES) permit. This decision should be made up front so that all tanks which will be covered under the NPDES permit can be identified and withdrawn from the hazardous waste permit application.

Unit 1 - The applicant proposes the permitting of 500 hazardous and mixed waste container storage areas under Unit 1. This number of storage areas seems excessive; the applicant should explain the reason for the proposed capacity. In any case, the applicant must clearly identify the location of each container storage area.

Unit 25 - The applicant originally proposed the asphalt pad area as a temporary storage area, to be covered only under interim status, and not to be permitted. The intent was to store the pond and salt crete only until the Department of Energy obtained approval for an off-site location to accept the material. We again urge the Department of Energy and Rockwell to concentrate their efforts on obtaining from EPA either a delisting of the pond crete and salt crete from hazardous waste regulation or an approval for interim status at an off-site mixed waste disposal facility. As you have shown with waste analysis of these materials, the level of organics in the solidified blocks are below the land-ban levels. Consequently, these materials could be safely landfilled.

Furthermore, this container storage area, as currently designed and operated, does not meet the 264 permit requirements. First, not all containers appear to be inspectible on a weekly basis. Second, the specified protective covering has a projected life of only three years (p.D-41 of the application).

SECTION E:

(6 CCR 1007-3 Part 264 Subpart F, and Section 41(c))

1. The proposed point of compliance is too far from the regulated units. The compliance point must be adjacent to the regulated unit(s) so that any releases of hazardous constituents can be quickly detected.
2. The application must include a proposed compliance monitoring program. Where hazardous constituents have been detected in the groundwater around regulated units, the facility must initiate steps towards compliance monitoring, not simply detection monitoring.

SECTION F

(6 CCR 1007-3 Part 264 Subpart C, and Section 100.41(a)(8))

1. Preventative procedures, structures, and equipment must be addressed on a unit specific basis.

Loading and unloading procedures must be detailed for each type of activity (i.e. container transfer, transfer of concrete blocks, transfer to tanks). For areas where loading and unloading of tanks or containers occur repeatedly such as on loading docks the applicant must explain what structures and procedures are in place to contain spills.

For those units which are outside of buildings the applicant must provide unit specific run-on/run-off control measures. How is run-on prevented and run-off controlled and monitored to prevent releases of hazardous wastes?

The applicant must describe on a case by case basis, the types of equipment used to protect Rocky Flats personnel from dangerous exposures to hazardous waste. The applicant may submit independent certification demonstrating that all protective equipment associated with hazardous waste activities meets OSHA requirements.

2. The applicant must describe in greater detail the procedures and precautions used to prevent reaction of ignitable, reactive, and incompatible wastes.

The applicant must define which units will accept ignitable waste, reactive wastes, or incompatible wastes. The applicant must also describe how these wastes are identified and labeled.

The applicant must provide information on a unit specific basis demonstrating compliance with all applicable National Fire Protection Association (NFPA) codes. ~~The applicant may submit an independent certification demonstrating compliance with all applicable NFPA codes.~~

The applicant must identify where mixing of incompatibles occurs. The applicant must describe how the mixing is monitored and controlled to prevent releases of hazardous constituents. Where incompatibles or reactive wastes are stored in the same area, the applicant must describe for each case, what structures and procedures are in place to prevent mixing of wastes and spills.

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