

File: RCRA Part B
Permit
Reapplication

RFP-1325.02 (Rev. 11/96)
Previously RF-46522

CORRES. CONTROL
INCOMING LTR NO.

00203RF97

DUE DATE
ACTION



Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

97-DOE-05145

FEB 13 1997

DIST.	LTR	ENC.
ALLEN, R.C.		
BACON, R.F.		
BENSUSSEN, S.J.		
BRAILSFORD, M.D.		
BUHL, T.R.		
CARD, R.G.		
COULTER, W.L.		
EVANS, B.L.		
FERRERA, D.W.		
FINNEY, M.J.		
GEIS, J.A.		
GILLISON, W.R.		
GLOVER, W.S.		
HARROUN, W.P.		
HEDAHL, T.G.	X	
HERRING, C.L.		
HILL, J.A.		
KELL, R.E.		
KELLY, G.M.		
MANI, V.		
MARTINEZ, L.A.		
MCANALLY, J.L.		
NORTH, K.		
OGG, R.N.		
PHILLIPS, F.J.	X	
SANDLIN, N.B.		
SPEARS, M.S.		
TUOR, N.R.		
VOORHEIS, G.M.		
WAITE, D.A.		
<i>Letman, R.</i>	X	
<i>Glennpatrick, W.L.</i>	X	
<i>Gregg, R.J.</i>	X	
<i>Hawkins, A.S.</i>	X	
<i>Wenzel, T.</i>	X	

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Control Program
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Schieffelin:

On October 30, 1996, Rocky Flats Environmental Technology Site (Site) timely submitted a RCRA permit application to the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (Division); in accordance with the Colorado Waste Regulations, 6CCR, 1007-3, §100.41.

Over the past several months, members of your staff have requested additional information and clarification of portions of the new application. The enclosed document represents, to the greatest extent possible, a proposed draft RCRA permit the Division may elect to issue for public review later this month. It is a compilation of all of the revised drawings and revised language resulting from discussions, tours, and requests for additional information that have taken place since the application submittal. It is recognized that the Division may include additional minor changes in the draft permit which have not been discussed in detail with the permit holders. If the Division decides to make significant changes to the proposed draft, the permit holders would appreciate notice prior to the draft's publication.

Additionally, based on discussions with members of your staff, the permit holders wish to withdraw the following units from the Part B portion of the application. As described below, the majority of these units are not operational and are destined to be closed, with the exception of two tanks which will continue to operate under interim status for a period of time. All of these units were originally included in the Part B portion of the application in order to ensure that interim status was not lost during the new application review process. Both the Division and the permit holders have since agreed that interim status for these units will not be lost so long as they are included in the Part A application. The permit holders are therefore requesting that the following units be withdrawn from the Part B application, but retained in the Part A.

Old Unit No.	New Unit No.	Tank No.	Management
43.01	374.3A	231A	Operate in accordance with the Hazardous Waste Tank Systems Management Plan until replaced by new unit in Bldg. 910.
43.02	374.3A	231B	Operate in accordance with the Hazardous Waste Tank Systems Management Plan until replaced by new unit in Bldg. 910.
40.01	428.2	D-853	Document "RCRA stable" by 3-17-97
40.35	444.3	T-4	Document "RCRA stable" by 3-17-97
39.01	444.3	Roll Filter Table	Document "RCRA stable" by 3-17-97
40.36	444.3	Sump Tank	Document "RCRA stable" by 3-17-97
39.02	447.3	Roll Filter Table	Document "RCRA stable" by 3-17-97
40.37	447.3	Sump Tank T-6	Document "RCRA stable" by 3-17-97
40.04	444.2A	T-2	Document "RCRA stable" by 3-17-97
40.05	444.3B	T-3	Document "RCRA stable" by 3-17-97

CORRES. CONTROL X X
ADMN RECORD/080
PATS/T130G

Reviewed for Addressee
Corres. Control RFP
2/14/97
DATE BY

Rel Ltr. #

DOE ORDER # 5480.22

ADMIN RECORD

SW-A-004661

1/2

Mr. Joe Schieffelin
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Finally, certain new units were being proposed to be permitted for the first time under this new application.

Members of your staff expressed concerns that some of the units being proposed for permitting may not be ready to operate for several years, if ever, and are not yet sufficiently defined to permit. The permit holders therefore request that the following units be withdrawn from both Parts A and B of the application.

774.3C - Temporary Sludge Immobilization System
910.3 - Aqueous Waste Evaporation
707.3B - Ash Stabilization Process
707.3C - Dry Residues Stabilization Process
371.3B - Wet Processing

The following is a list summarizing the changes to the application which are reflected in enclosed document; or documents provided to the Division as additional information:

1. a copy of the Site Area Plot Plan is included;
2. revised RCRA unit drawings are included;
3. lab procedures and process procedures used to conduct waste analysis are identified;
4. inspection procedures for the Stacker-Retriever are clarified;
5. inspection forms for treatment units are included;
6. certain unit specific storage conditions are clarified;
7. the closure plan is revised to include a definition of RCRA Stable and clarify the closure performance standard associated with rinsate analysis; and
8. the training section is revised to include a matrix identifying training requirements for Site personnel. New training requirements were identified for environmental professionals.

If you have any questions, please contact David Grosek, of my staff, at 966-3305.

Sincerely,

Gail S. Hill

Gail S. Hill, Acting Group Lead
Regulatory Liaison Group

Enclosure

cc w/o enc:
C. Gilbreath, CDPHE
D. Grosek, RLG, RFFO
R. Leitner, K-H
W. Wierzbicki, SSOC
R. Sgrignoli, DCI
G. Konwinski, RMRS
N. Van Tyne, RMRS



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