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STATE OF COLORADO

Bill Owens, Governor
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Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
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**Colorado Department
of Public Health
and Environment**

November 15, 1999

Karan North
Kaiser-Hill Company, L L C
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B
Building T130C
Golden, CO 80403-8200

RE: Close-Out of the September 2, 1999 Subpart BB Organic Air Emission Inspection of Building 774; EPA Identification Number C07890010526

Dear Ms North

On September 2, 1999, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a routine compliance inspection of Building 774. The purpose of that inspection was to determine compliance with the Subpart BB Air Emission Standards for Equipment Leaks as applied to Tanks 102 and 103 in Building 774.

The Division has received your written response, dated October 26, 1999, to the referenced inspection. Your response indicated that welded connectors are not defined as equipment and referenced the federal regulatory definition of "equipment" as defined at 40 CFR Part 1031. Your response indicated that the term equipment means "each valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, or flange, and any control devices or systems required by this subpart". Your response further referenced a proposed February 5, 1987 *Federal Register* to indicate that piping and/or connectors are not "equipment" subject to the Subpart BB regulations. The Division does not agree with your assessment on this matter for reasons that are explained in the following paragraph.

The definition of "equipment" was revised and published in the January 21, 1999 *Federal Register*. Accordingly, the definition of equipment has been revised to include "other connectors" in the list of components that are considered equipment under the Subpart BB Air Emission Standards for Equipment Leaks (refer to 64 FR 3383). Therefore, it is clear that the EPA intended other connectors to be included in the list of equipment covered by the rule. The Division believes that connectors, such as welded connections used to connect two pipelines or a

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ADMIN RECCRD

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COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION	September 2, 1999
FACILITY	Rocky Flats Environmental Technology Site - US DOE, Subpart BB Inspection at Building 774
LOCATION	16 miles NW of Denver Golden, CO 80402
FACILITY REP	Veronica Orozco, RMRS
TELEPHONE	303 966-7000
TELEFAX	
NOTIFICATION STATUS	Large Quantity Generator Land Disposal Facility
TYPE OF INSPECTION	Compliance Evaluation Partial
PARTICIPANTS	James Hindman, CDPHE Edward Smith, CDPHE Veronica Orozco, RMRS Leslie Langlois, RMRS Steve Romano, RMRS Tim Schweitzer, RMRS Mark Hackett, SSOC
WEATHER CONDITIONS	Warm and Sunny
TIME IN	9 00 am
TIME OUT	3 30 pm

-- OPERATIONS INSPECTED --

Accompanied by facility representatives, Division inspectors proceeded to Room 220 to observe Tank 102 and Tank 103. Upon arrival at the area, the inspectors questioned facility representatives regarding marking and tagging of equipment that is subject to the Subpart BB air emission standards. Because Building 774 is in a state of transition, the environmental personnel who were present for this inspection were not familiar with the process of monitoring this system for compliance with the Subpart BB requirements. Mr. Romano indicated that he would locate one of the personnel who is responsible for conducting the Subpart BB inspections for the tanks in question.

While Mr. Romano was locating one of the inspectors, Ms. Langlois left to obtain a copy of the procedure that details the process for conducting the Subpart BB inspections. Ms. Langlois returned with a document entitled *RCRA Organic Air Emissions Daily Inspection, Building 774*. Attachment one provides a copy of this procedure. The inspectors were introduced to Mr. John Lucero, one of the individuals who performs Subpart BB inspections.

After reviewing the procedure and evaluating the system in question, the inspectors reached the following conclusions:

1. Equipment associated with Tank 102 and Tank 103, to which Subpart BB applies, was not tagged or marked in a manner that it can be distinguished from other pieces of equipment,
2. The equipment that was identified in the referenced procedure did not match the identification numbers of the tags that were present on equipment associated with Tank 102 and Tank 103,
3. The equipment associated with Tank 102 and Tank 103 that was tagged appeared to be tagged for maintenance purposes and not for compliance with Subpart BB requirements,
4. The schematic included in the referenced procedure did not include all of the equipment, as that term is defined at 6 CCR 1007-3, Section 264.1034, associated with the Tank 102 and 103 system, and
5. Mr. John Lucero stated, at the time of this inspection, that the schematic associated with the referenced procedure does not accurately reflect the current configuration of Tank 102 and Tank 103.

After evaluating Tank 102 and Tank 103, facility personnel escorted the inspectors into Room 210 to evaluate the OASIS treatment system. Although this system is not being utilized, the inspectors wanted to check to see if the system had been tagged for Subpart BB compliance. Facility representatives indicated that Tanks T-13 and T-14 were the two tanks that have most recently stored organic wastes that were treated in the last operation of the OASIS treatment

with these regulations and the written procedure did not correspond to the actual configuration of Tank 102 and Tank 103

--- INSPECTION CLOSE-OUT ---

At approximately 3 30 pm on September 2, 1999, Division inspectors conducted a brief close-out meeting with facility personnel. A notice of inspection was completed and signed by Veronica Orozco of RMRS. Attachment 5 provides a copy of the notice of inspection that was completed for this inspection. Facility personnel were allowed 15-days to respond to the notice of inspection. That date has now been extended to October 17, 1999.

--- INSPECTION FINDINGS ---

There were several findings of non-compliance identified as a result of this inspection. Attachment 5 provides the findings during this inspection.

--- SIGNATURE BLOCK ---

Prepared by Edward H. Smith 9/27/99
Edward Smith Date

Reviewed by James C. Hindman 10/08/1999
James Hindman Date

Approved by Edward H. Smith 10/12/99
Edward Smith Date

--- ATTACHMENTS ---

- 1 RCRA Organic Air Emission Daily Inspection Procedure
- 2 Daily Tank Inspection Log Sheets Verifying Leaks
- 3 Daily Subpart BB Inspection Log Sheets Verifying Leaks
- 4 RMRS Memos Regarding Leaks from Tank 102 and 103
- 5 Notice of Inspection

system The inspectors observed that equipment associated with these two tanks appeared to have been tagged for Subpart BB compliance Because these tanks are now empty, no further investigation as to previous compliance with the Subpart BB requirements was pursued for these tanks

Prior to breaking for lunch, facility personnel were informed of the information that would be reviewed after lunch The inspectors referred facility personnel to the information required by 6 CCR 1007-3, Section 264.1064(b) and indicated that they would like to review such information after the lunch break

The inspectors returned to Building 774 at approximately 1:15 pm to conduct a document review At that time, Ms. Carlan Richards of RMRS was present to answer questions Ms Richards was the previous Building Manager for Building 774 Ms Richards was informed that all of the equipment associated with Tank 102 and 103 was not tagged for Subpart BB compliance Ms Richards responded that the system was tagged at one point However, she did not know why the system was no longer tagged per the regulations The inspectors questioned Ms Richards as to the vapor pressure of the waste contained within Tanks 102 and 103 After reviewing some analytical data, Ms Richards indicated that the vapor pressure of the waste was assumed to be the same as water, however, analytical data to verify this assumption was not available at the time of this inspection

--- DOCUMENTS REVIEWED ---

Division inspectors reviewed a number of documents as part of this inspection The documents that were reviewed and any issues associated with that review are discussed in the following paragraphs

- 1 Daily RCRA hazardous waste tank inspection log sheets were reviewed dating back to 1997 Attachment 2 provides copies of daily inspection log sheets that identify leaks in the ancillary equipment associated with Tanks 102 and/or 103
- 2 Daily Subpart BB inspection log sheets for Tanks 102 and 103 were reviewed dating back thru 1997 Attachment 3 provides copies of the log sheets where deficiencies have been identified by the inspector who performed these inspections Attachment 4 provides a copy of two memorandums related to a leak associated with Tank 102 and Tank 103
- 3 Training and Scheduling Records (TSR) Reports were evaluated for personnel who have been conducting the Subpart BB inspections Training records for the following personnel were reviewed John Lucero, Lamont Stewart, Mike Pope, W D Craig, A M Scharf, and S L Kaiser Although these personnel have had the required one-time training for Subpart BB compliance, there is some question as to whether the training was adequate given that the system in question was not marked or tagged for compliance

US DOE - Rocky Flats Environmental Technology Site Subpart BB Inspection at Building 774

--- INTRODUCTION ---

On the morning of September 2, 1999 inspectors James Hindman and Edward Smith from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) arrived at the Rocky Flats Environmental Technology Site (RFETS) to conduct a partial compliance evaluation inspection of Building 774. The purpose of this inspection was solely to evaluate Tank 102, Tank 103, and the Organic and Sludge Immobilization System (OASIS) for compliance with the Subpart BB air emission requirements. Equipment that comes into contact with hazardous waste with organic concentrations of greater than ten percent by weight is subject to Subpart BB requirements. This inspection had been arranged with facility personnel prior to the date of this inspection.

Division inspectors met the following personnel from RMRS: Veronica Orozco, Leslie Langlois, Steve Romano, and Tim Schweitzer. Upon arrival at Building 774, the inspectors met with Mr. Mark Hackett of Safe Sites of Colorado who is on loan to Building 774 for technical support. Facility personnel were informed that the inspectors would be focussing this inspection on compliance with the RCRA Subpart BB air emission requirements. In particular, the inspectors informed facility personnel that they wanted to evaluate Tank 102 and Tank 103 located in Room 220 and the OASIS system located in Room 210 for compliance with these requirements.

As background information, Building 774 serves as the waste treatment facility for liquid wastes that cannot be treated at Building 374. The Miscellaneous Waste Handling and Solidification process (i.e., the Bottlebox) is located in Room 210 and is used for the solidification of characteristic, transuranic, laboratory waste. The OASIS process is also located within Room 210 and was used for the solidification of transuranic mixed waste oils that were stored in Tanks T-13 and T-14.

In addition to the above treatment processes, the Aqueous Waste Treatment process is located within Building 774 in Rooms 241 and 103. This treatment process is capable of handling either acidic or caustic aqueous waste. Acidic wastes are neutralized prior to chemical precipitation. Caustic wastes are treated in a precipitation process to remove radioactive contaminants. The treatment process is supported by several tanks that are used for treatment and/or storage of wastes. These tanks include Tanks T-201, T-202, T-203, T-204, and T-40.

pipeline to a piece of equipment, are "equipment" subject to the marking requirements of 6 CCR 1007-3, Section 264 1050(d) It is important to note that only those connectors that are also flanged fittings that are not covered by insulation or other materials are subject to the reporting and recordkeeping requirements of 6 CCR 1007-3, Section 264 1064.

The Division believes that further enforcement action on this matter is not necessary provided that the Site initiates actions to identify all "equipment" associated with Tank 102 and 103, including "other connectors" and that such items are inspected for leaks. Therefore, the division intends to close the inspection of September 2, 1999 However, the Division will evaluate the Site's efforts to achieve compliance with the Subpart BB Air Emission Standards for Equipment Leaks during the next annual inspection of Building 774

Attached for your information is a copy of the inspection report for the referenced inspection

Please contact me at (303) 692-3386 if you have further questions regarding the close-out of these two inspections

Sincerely,



Edward H Smith
Hazardous Waste Compliance Unit

cc w/att Janice Pearson, EPA

cc w/o att Cindy Burbach, CDPHE
Joe Schieffelin, CDPHE
James Hindman, CDPHE

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