

STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

<http://www.cdph.state.co.us/hm/>

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-3300
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222 S. 6th Street, Room 232
Grand Junction, Colorado 81501-2768
Phone (303) 248-7164
Fax (303) 248-7198



Colorado Department
of Public Health
and Environment

November 10, 1997

Karan North
Kaiser-Hill Company, L.L.C
Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, CO 80402-0464

**RE: Close-Out of the October 21, 1997 Inspection
EPA Identification Number C07890011526**

Dear Ms. North:

On October 21, 1997, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a routine compliance evaluation inspection at the Rocky Flats Environmental Technology Site (RFETS), consisting primarily of a walkdown of several areas within the facility. The Division has received and reviewed your response to that inspection, dated November 3, 1997. Based upon our review of your response, all issues identified during the referenced inspection have been resolved to the satisfaction of the Division. Therefore, the Division does not intend to take any further action in response to that inspection, at this time.

The Division appreciates your timely and complete response to the issues identified during the October 21, 1997 inspection. Please contact Ed Smith of my staff at (303) 692-3386 if you have any questions regarding this memorandum or the close-out of the inspection.

Sincerely,

Joe Schieffelin, Unit Leader
Federal Facilities Permitting and Compliance
Hazardous Materials & Waste Management Division

cc: w/attach

cc: w/o attach

Karan North, K-H
Bob April, DOE-RFFO
Gary Konwinski, RMRS
Rodney Sgrignoli, Dyncorp

Dan Miller, AGO
Janice Pierson, EPA
Tim Reyder, EPA
John Wrapp, K-H
Jefferson County Health Department

ADMIN RECORDED

IA-A-000454

132

EPA I.D. #CO7890010526

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: October 21, 1997

FACILITY: Rocky Flats Environmental Technology Site - US DOE,
Facility Walkdown

LOCATION: 16 miles NW of Denver
Golden, CO 80402

FACILITY REP: John Wrapp

TELEPHONE: 303-966-5883

TELEFAX:

NOTIFICATION STATUS: Large Quantity Generator
Land Disposal Facility

TYPE OF INSPECTION: Compliance Evaluation Partial

PARTICIPANTS: Edward Smith, CDPHE
Joe Schieffelin, CDPHE

WEATHER CONDITIONS: Cool and cloudy

TIME IN: 8:00 am, October 21, 1997

TIME OUT: 11:30 am, October 21, 1997

US DOE - Rocky Flats Environmental Technology Site Facility Walkdown

--- INTRODUCTION ---

At approximately 8:00 a.m. on the morning of October 21, 1997, inspectors Edward Smith and Joe Schieffelin 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). The purpose of the visit was to conduct a facility walkdown, primarily of the south side, for general observation purposes. As part of the walkdown, Division representatives observed the following areas: the Machine Shop in Building 460, the J. A. Jones laydown yard adjacent to Building 663, staging areas in Building 664, 440, and 881, waste chemical management activities in Building 881, a laydown yard to the north of Building 985 in the protected area, and the Solar Evaporation Ponds' perimeter.

--- OPERATIONS OBSERVED ---

Each of the areas observed by Division inspectors on October 21, 1997 is discussed in the following paragraphs.

Building 460, Machine Shop.

Division inspectors stopped by the Building 460 Machine Shop to follow-up on a used oil issue that had been previously identified in that building. Division inspectors observed eight 55-gallon containers of used oil, as identified on the associated waste traveler, in Room 142A. Those containers were not marked or labeled with the words "used oil". Additionally, Division inspectors observed another 55-gallon container of used oil and three 15-gallon containers that were labeled as "corrosive" and as "spent photographic solution" just to the north of Room 142A. The container of used oil was not marked with the words "used oil".

Building 440.

Division inspectors stopped by Building 440 and asked facility representatives if they would provide a tour of the building. Mr. D'Agostino of RMRS was available to escort Division inspectors through the building. After signing the building sign-in log book and the appropriate radiation work permit (RWP), Division inspectors observed the waste storage areas and the Permacon Unit that will be used for waste repackaging. Division inspectors observed that the stacked drums were not banded except for the top containers.

Laydown Yard by Building 663.

Division inspectors were able to observe the laydown yard by Building 663. The area was cluttered with miscellaneous equipment, tools, drums, etc. At the center of the laydown yard, Division inspectors observed two bulging 55-gallon containers that were labeled as hazardous waste. The drums appeared to be product drums and were still labeled with product labels. The manufacturer's labels on the drums indicated that the drums contained a non-flammable asphalt surfacing compound and sealer. Division inspectors also observed four pallets of 5-gallon containers of miscellaneous grouts, paints, and sealers. Most of the items still appeared to be in the original manufacturer's container. Kaiser-Hill representatives indicated that the items would be reused or collected a part of the waste chemical roundup program.

Building 664, Staging Area.

Division inspectors stopped by Building 664 and asked facility personnel if they could take a look at the staging areas in that building. After signing the building sign-in log book and the appropriate RWP, Mary Durcholtz of RMRS escorted Division inspectors to the staging areas. Ms. Durcholtz showed Division inspectors that all staging areas were posted as such in accordance with the RFETS RCRA Permit. However, one of the staging areas did not have the date that staging began identified on the associated staging area sign. Ms. Durcholtz indicated that the appropriate date would be assigned to the staging area sign in question.

Building 883, Product Receiving Area.

En route to Building 881, Division inspectors observed that Door Number 14 to Building 883 was open and there were a number of containers in that area. Division inspectors observed that most of the containers were product oils; however, one of the 55-gallon containers (Drum Number GO3527) was marked on the lid with the words "oil from pipe bender". This marking would indicate that the oil is used oil. However, the drum was not marked or labeled with the words "used oil".

Building 881, Room 267, Staging Area.

Division inspectors arrived at Building 881 at approximately 10:00 a.m. to meet with Karan Lavarato of Kaiser-Hill. The purpose of this scheduled visit was to observe waste chemical packaging activities and the waste chemical staging area in Room 267. After signing the building sign-in log book, Ms. Lavarato escorted Division inspectors to Room 267. Division inspectors were shown the waste chemical staging area and were provided with an overview of the reactive waste chemical treatment processes that were in operation at the time of the inspection. Division inspectors observed that the waste chemical staging area was not posted as a staging area with the date that waste staging began, as required by the RFETS RCRA Permit.

Building 331 Area

Division inspectors observed the areas to the north of Building 331 including an area that was being used for the collection of used oil and oil filters generated in Building 331. Also in that area, Division inspectors observed a full-size wooden crate containing lead-acid batteries. The container number for that crate is XO4540033100726. Subsequent to the inspection, Division inspectors requested a WEMS report for that crate that confirmed that the batteries are being accumulated for recycle and, therefore, are exempt from the regulatory requirements of 6 CCR 1007-3, section 262 through 267 and Parts 99 and 100. Representatives from Kaiser-Hill indicated that they would check to make sure the batteries are being recycled since the fill date on the WEMS report was specified as October 4, 1995.

Laydown Yard North of Building 985.

While en route to the Solar Evaporation Ponds, Division inspector Ed Smith observed a number of containers in a laydown yard to the north of Building 985. The containers observed at that time were either labeled as product or were empty. However, two containers in that area were labeled as "non-RCRA regulated". The drums themselves appeared to be the original product container but the contents of those containers could not be determined from the labeling. The bar code numbers for the two containers in question are NO446096800068 and NO44709680069.

Solar Evaporation Pond Perimeter.

As a follow-up to an inspection of the Solar Evaporation Ponds that was conducted on September 25, 1997, Division inspector Ed Smith proceeded to the Solar Evaporation Ponds to see if certain pieces of equipment had been marked or labeled as hazardous waste. In particular, a pond skimmer was identified during the September 25 inspection as an item that should be managed as hazardous debris. The pond skimmer had been labeled as a hazardous waste. Division inspector Ed Smith then proceeded to the 207-B North Pond to determine if the hazardous waste warning signs at that location had been posted; those signs were on the ground at the time of the September 25 inspection. An observation was made that the signs remained on the ground.

--- DOCUMENTS REVIEWED ---

A document review was not performed as part of the facility walkdown effort.

--- CLOSE-OUT ---

As a result of the facility walkdown, nine issues were identified and shared with facility representatives on October 22, 1997, at approximately 9:00 a.m.

1. Ensure that containers are marked or labeled as "used oil" at the following locations: 9 containers in Room 142A and adjacent to Room 142A in Building 460; one drum behind door number 14 at Building 883, and one drum to the north of Building 551 that is marked as "J.A. Jones Laborers".
2. Ensure that the staging area in Building 881, Room 267, is posted as a staging area with the date that staging began per the RFETS RCRA Permit condition number III.B.17.b.
3. Ensure that staging areas in Building 664 are marked with the date that staging began per the RFETS RCRA Permit condition number III.B.17.b. Ms. Durcholtz indicated that the date of staging would be posted on the sign at the end of the tour.
4. Provide a Material Safety Data Sheet (MSDS) or other documentation to confirm that the two 55-gallon drums identified as asphalt surfacing and compound sealer located at the J. A. Jones laydown yard next to Building 663 are not a hazardous waste, as indicated by the container labels.
5. Ensure that all stacked containers in storage at RCRA Unit 440.1 are banded per RFETS RCRA Permit condition III.B.14.c. and III.B.21.
6. Post the warning signs at the northeast corner of the Solar Evaporation Pond 207-B North that were observed to be on the ground during the September 25, 1997 inspection.
7. A 30-gallon drum of oil was identified at the laydown area to the north of Building 985. The drum did not have a lid and was half full of oil. Either close the drum or if the contents are used oil, close the container, mark the drum per 279.22(c), and disposition the container, as appropriate.
8. Identify the contents of two 55-gallon drums to the north of Building 985 that were labeled as non-RCRA regulated. The drums in question are number NO446096800068 and NO447096800069.
9. Provide the status of three 15-gallon containers in Building 460 that have been labeled as corrosive spent photographic solution. Subsequent to the inspection, Kaiser-Hill provided Waste and Environmental Management System (WEMS) reports for the containers in question that indicated the containers were filled on June 10, 1997. Because the contents of the containers will be recycled for precious metal (i.e., silver), such items are not a solid waste unless they are speculatively accumulated. A material is considered to have been speculatively accumulated if 75% of the material, on a site-wide basis, is not recycled within one calendar year commencing on January 1. Because the material was not in storage on January 1, 1997, it is not defined as a solid waste unless 75% of the material is not recycled by January 1, 1999. The material

6

will be considered to be "in storage for precious metal reclamation" commencing on January 1, 1998. Therefore, there is no regulatory issue associated with the material in question.

John Wrapp signed the NOI as the facility representative and a copy of the NOI was left with him. Division inspectors requested a written response to the above items by November 4, 1997.

--- FINDINGS ---

As a result of the facility walkdown, the following issues were identified as deficiencies with the Colorado Hazardous Waste Regulations:

1. Eleven containers believed to contain used oil had not been marked with the words "used oil" per 6 CCR 1007-3, section 279.22(c).
2. Staging areas in Building 664 and Room 267 of Building 881 had not been posted in accordance with the RFETS RCRA Permit, condition number III.B.17.b.
3. Stacked containers in storage at RCRA Unit 440.1 were not banded as required by the RETS RCRA Permit, condition number III.B.14.c and III.B.21.
4. Warning signs at the northeast corner of Solar Evaporation Pond 207-B North were not posted as required by 6 CCR 1007-3, section 265.14(c).

--- SIGNATURE BLOCK ---

Prepared by: Edward Smith 10-24-97
Edward Smith Date

Approved by: Joe Schieffelin 10/27/97
Joe Schieffelin Date

--- ATTACHMENTS ---

1. NOI
2. Kaiser-Hill's Response to the NOI

Attachment One
Notice of Inspection

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
 4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222
 (303) 692-3300

1 of 3

Notice of Inspection

Facility Name <u>Rocky Flats Env. Tech. Site</u>			EPA I.D. # <u>C07890010526</u>	Date <u>10/21/97</u>
Street <u>PO BOX 928</u>			Telephone # <u>303-7000</u>	Seq. # <u>N/A</u>
City <u>Golden</u>	County <u>Jefferson</u>	Zip <u>80402-0928</u>	Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Hour In: <u>8:00 am</u>
Facility Representatives and Titles			Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour Out: <u>11:30 am</u>
			Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other _____ If Status Changed, Facility Should Revise Notification				

COMMENTS:

- ① Ensure that containers are marked or labeled as "used oil" per 6CCR 1007-3, section 279.22(c) at the following locations:
 8 drums on the south side and one drum on east side @ machine shop in Bldg. 460; one drum behind door #14 @ Bldg 883 marked as "oil from pipebender"; one drum to the north of Bldg 551 marked as "JA Jones laborers."
- ② Ensure that the staging area in Bldg. 881, room 267 is posted as a staging area with the date that staging began per the RFETS RCRA Permit, condition III. B. 17.6.

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and / or Photos Collected	4.
1. <u>respond to the above in</u>	5.
2. <u>writing by Nov. 4, 1997</u>	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

John Weapp

Signature of Facility Representative

Lead Inspector: <u>Ed Smith</u>
Assisting Inspector(s) and Multimedia Participant(s): <u>Joe Schieffelin</u>

Notice of Inspection

Facility Name <u>Rocky Flats Envr. Technology Site (south side inspection)</u>			EPA I.D. # <u>CO 7890010526</u>	Date <u>10/21/97</u>
Street <u>PO BOX 928</u>			Telephone # <u>966-7000</u>	Seq. # <u>N/A</u>
City <u>Golden</u>	County <u>Jefferson</u>	Zip <u>80402</u>	Inspection Arranged Prior to Inspection () Yes (X) No	Hour In: <u>8:00 am</u>
Facility Representatives and Titles			Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour Out: <u>11:30 am</u>
			Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or Other _____ <small>If Status Changed, Facility Should Revise Notification</small>				

COMMENTS:

- ③. Ensure that staging areas in Bldg. 664 are marked with the date that staging began per the RFETS RCRA Permit, condition III.B.17.b.
- ④. Provide MSDS or other documentation to confirm that the 2 drums ^{near} of Asphalt Surfacing + Compound Sealer at the JA Jones laydown yard (Bldg 663) are not hazardous waste, as labeled.
- ⑤. Ensure that all containers in storage in Unit 440.1 ~~are~~ that are stacked are banded per RFETS RCRA Permit, condition III.B.14.c and III.B.21.
- ⑥. Post warning signs at NE corner of solar Pond 207-B North per 9/25/97 inspection.

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. <input checked="" type="checkbox"/> Provide a written response	5.
2. <u>by Nov. 4, 1997</u>	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged
John K Wraff

Lead Inspector: Ed Smith
 Assisting Inspector(s) and Multimedia Participant(s):
Joe Schieffelin

Signature of Facility Representative

Notice of Inspection

Facility Name <u>Rocky Flats Env. Tech. Site</u>			EPA I.D. # <u>CO-7890010524</u>	Date <u>10/21/97</u>
Street <u>20 Box 928</u>			Telephone #	Seq. # <u>N/A</u>
City <u>Golden</u>	County <u>Jefferson</u>	Zip <u>80402</u>	Inspection Arranged Prior to Inspection () Yes (X) No	Hour In: <u>8:00 am</u>
Facility Representatives and Titles			Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour Out: <u>11:30 am</u>
			Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSP, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or Other _____ If Status Changed, Facility Should Revise Notification				

COMMENTS:

- ①. A 30-gallon drum of oil was identified at the laydown area North of Bldg 985. The drum did not have a lid and was 1/2 full of oil. Either close the drum or if the contents are used oil, mark the drum per 279.22(c), close the drum, and disposition as appropriate.
- ②. Identify the contents of 2 drums North of 985 labeled as NON-RCRA; Drum Numbers N0446096800068 and N0447096800069.
- ③. Provide status of 3-15-gallon containers in Bldg 460 identified as corrosive spent photographic solution.

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. <u>Provide a written response</u>	5.
2. <u>by Nov. 4, 1997</u>	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged <u>John K. Weapp</u> Signature of Facility Representative	Lead Inspector: <u>Ed Smith</u> Assisting Inspector(s) and Multimedia Participant(s): <u>Joe Schieffelin</u>
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Attachment Two

Kaiser-Hill's Response
to the Notice of Inspection

WASTE AND ENVIRONMENTAL MANAGEMENT SYSTEM

WEMR_2000

CONTAINER ACCURACY REPORT

22-OCT-97
04:09pm

Building: 460 Unit: 0 Room: HIGHBAY Locale:

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=====
Container ID: X08726046000972
=====
Container Type: CONTAINER - NOT DESCRIBED
Original Nbr:
Status: A
In Transit: N
Accumulation Start Date:
Fill Date: 10-JUN-97
IDC/WFC: 1931
IDC/WFC Description: PHOTOGRAPHIC DEVELOPER
EPA Codes: D011
Solid/Liquid/Both/Gas: Liquid
Compatibility Codes: 3A
Waste Type: HAZ
RCRA Haz: Y
Rad: N
CERCLA: N
LDR: Y
Container Capacity: 15 GA
Waste Volume: 0.00 GA
Gross Weight: 0 (lbs) 0 (kg)
Net Weight: 0 (lbs) 0 (kg)
Process Number: 460-21-2
Event Nbr:
Isotopes:
Total Gamma/Neutron Mr/Hr @ Surface: 0 Mr/Hr @ Meter: 0
RCT Employee Nbr:
RCT Date:
Asbestos/PCB (A/P/N): N
Permitted Abatement (Y/N):
Notes: FOR SILVER RECOVERY, RCRA WASTE, EPA CODE D011
IF SPILLED.
Fingerprint Name Fingerprint Result
=====

```

VERIFICATION SIGNATURE _____ DATE ____/____/____

Post-it® Fax Note	7671	Date	10/24/97	# of pages	3
To	Ed Smith	From	John K. [unclear]		
Co./Dept.	ENV: E HWMD	Co.	KR		
Phone #	692-3386	Phone #	5883		
Fax #	759-5255	Fax #	3578		

OCT-24-97 FRI 8:41

T1300

FAX NO. 303 966 3578

P.03

WASTE AND ENVIRONMENTAL MANAGEMENT SYSTEM

WEMR_2000

22-OCT-97

CONTAINER ACCURACY REPORT

04:09pm

Building: 460 Unit: 0 Room: HIGHBAY Locale:

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=====
Container ID: X08728046000974
=====
Container Type: CONTAINER - NOT DESCRIBED
Original Nbr:
Status: A
In Transit: N
Accumulation Start Date:
Fill Date: 10-JUN-97
IDC/WFC: 1931
IDC/WFC Description: PHOTOGRAPHIC DEVELOPER
EPA Codes: D011
Solid/Liquid/Both/Gas: Liquid
Compatibility Codes: 3A
Waste Type: HAZ
RCRA Haz: Y
Rad: N
CERCLA: N
LDR: Y
Container Capacity: 15 GA
Waste Volume: 0.00 GA
Gross Weight: 0 (lbs) 0 (kg)
Net Weight: 0 (lbs) 0 (kg)
Process Number: 460-21-2
Event Nbr:
Isotopes:
Total Gamma/Neutron Mr/Hr @ Surface: 0 Mr/Hr @ Meter: 0
RCT Employee Nbr:
RCT Date:
Asbestos/PCB (A/P/N): N
Permitted Abatement (Y/N):
Notes: FOR SILVER RECOVERY, RCRA WASTE, EPA CODE D011
IF SPILLED.
Fingerprint Name Fingerprint Result

```

=====

VERIFICATION SIGNATURE _____ DATE ___/___/___

WASTE AND ENVIRONMENTAL MANAGEMENT SYSTEM

WEMR_2000

27-OCT-97
01:26pm

CONTAINER ACCURACY REPORT

Building: 331 Unit: 0 Room: 0000 Locale:

```

=====
Container ID:                    X04540033100726
=====
Container Type:                CONTAINER - NOT DESCRIBED
Original Nbr:
Status:                        A
In Transit:                    N
Accumulation Start Date:
Fill Date:                     04-OCT-95
IDC/WFC:                       1980
IDC/WFC Description:         BATTERIES
EPA Codes:
Solid/Liquid/Both/Gas:       Solid/Liquid
Compatibility Codes:         1B
Waste Type:                    NON
RCRA Haz:                      N
Rad:                            N
CERCLA:                        N
LDR:                            Y
Container Capacity:           32 FT
Waste Volume:
Gross Weight:                 0 (lbs) 0 (kg)
Net Weight:                    0 (lbs) 0 (kg)
Process Number:               331-1-8
Event Nbr:
Rtr Date:
Rtr Passed:
Isotopes:
Total Gamma/Neutron        Mr/Hr @ Surface: 0   Mr/Hr @ Meter: 0
RCT Employee Nbr:
RCT Date:
Asbestos/PCB (A/P/N):        N
Permitted Abatement (Y/N):
Notes:                         USED LEAD ACID BATTERIES FOR RECYCLE D002,D008
                                 USED LEAD ACID BATTERIES FOR RECYCLE D002,D008
                                 USED LEAD ACID BATTERIES FOR RECYCLE D002,D008
=====

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VERIFICATION SIGNATURE _____ DATE ___/___/___

Post-it* Fax Note	7671	Date	# of pages 1
To	EO SMITH	From	JOAN WRAPP
Co./Dept.	COPPER HWMD	Co.	KP
Phone #	692-3386	Phone #	5883
Fax #	759-5355	Fax #	3578



Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2729
Fax: (303) 966-8244

November 3, 1997

John Wrapp
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

RESPONSE TO CDPHE INSPECTION OF OCTOBER 21, 1997 - GRK-337-97

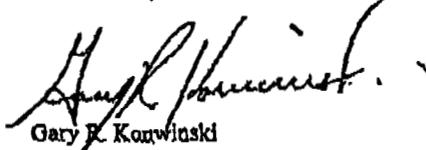
On October 21, 1997, the Colorado Department of Public Health and Environment (CDPHE) conducted an unannounced inspection of various areas of the plant. No Environmental Manager or other Site representative accompanied the CDPHE during this activity. There were nine issues documented on the Notice of Inspection, dated October 21, 1997. The issues, the responsible company, and responses to the RMRS issues follow:

- Ensure that containers are marked or labeled as "used oil" per 6CCR 1007-3, Section 279.22 C at the following locations: 8 drums on the south side and one drum on the east side of Building 460; one drum behind door #14 of Building 883 marked as "oil from pipebender"; one drum north of Building 551 marked as JA Jones Laborers. This is a Manufacturing Sciences Corporation and DynCorp issue.
- ✓ • Ensure that the staging area in Building 881, Room 267 is posted as a staging area with the date that staging began per the RCRA Permit, condition III.B.17.b. This is a Kaiser-Hill issue. Response: The staging area that is referenced is supporting chemical treatment that is taking place in Building 881. RMRS is the owner of the treatment unit and it is currently being used by a subcontractor to Kaiser-Hill in support of the chemical removal effort. It is the users responsibility to ensure that the treatment unit is operated in a fashion that is in compliance with the RCRA Permit and the regulations. In recognition of this, the user of the treatment unit has posted the staging area accordingly.
- ✓ • Ensure that the staging areas in Building 664 are marked with the date that staging began per the RCRA Permit, condition III.B.17.b. This is a RMRS issue. Response: The staging area in Building 664 has been appropriately posted. Furthermore the staging area is in constant use and receives containers on a variety of different dates. Consequently, the container-receipt dates are maintained in a log book. There are also times when the containers reside in the staging area in excess of 15 days. In these instances the container locations are entered into the Waste and Environmental Management System (WEMS).

John Wrapp
November 3, 1997
GRK-337-97
Page 2

- Provide an MSDS or other documentation to confirm that the two drums of Asphalt Surfacing & Sealer Compound at the J. A. Jones lay-down yard (near Building 663) are not hazardous waste, as labeled. This is a Kaiser-Hill issue.
- ✓ • Ensure that all containers in storage in Unit 440.1 that are stacked are banded per RFETS RCRA Permit, condition III.B.17.b. This is a RMRS issue. Response: The permit requires that all drums that are on pallets be banded. This requirement is strictly followed in all RMRS facilities.
- ✓ • Post warning signs at the northeast corner of solar ponds 207B. This is a RMRS issue. Response: RMRS installed additional warning signs around the perimeter of the solar ponds during September. The signs were affixed to the ropes that surround the solar ponds. Although RMRS believes that sufficient restraints and warnings exist throughout the entire solar pond area, the northeast corner of the ponds will be posted.
- A 30-gallon drum of oil was identified at the lay-down area north of Building 985. The drum did not have a lid and was half full of oil. Either close the drum or if the contents are used oil, mark the drum (as used oil), close the drum, and disposition as appropriate. This is a RMRS issue. Response: Kaiser-Hill is responding to this issue on behalf of the Site.
- Identify the contents of two drums north of Building 985 labeled as non-RCRA; with drum numbers N0446076800068 and N0447096800069. This is a RMRS issue. Response: Kaiser-Hill is responding to this issue on behalf of the Site.
- Provide the status of three 15-gallon containers in Building 460 identified as corrosive spent photographic solution. This is a DynCorp issue.

RMRS is pleased to provide this information and requests that you forward it to CDPHE on or before November 4, 1997. If I can be of additional assistance in this effort please contact me at extension 2729.



Gary R. Konwinski
Environmental Manager

Attachment
As Stated

cc:
K. North, KH (w/o attachments)



October 30, 1997

John Wrapp, T130C
Compliance & Performance Assurance
Kaiser-Hill, LLC

**RESPONSE TO COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
(CDPHE) OCTOBER 21, 1997, NOTICE OF INSPECTION - RDS-1014-97**

The following information is provided in response to Item 1 (part 1) and Item 9 of the CDPHE Notice of Inspection for Building 460 dated October 21, 1997.

Item 1 (part 1) stated that containers should be marked or labeled as "used oil". It identified 8 drums on the south side and one drum on the east side of the machine shop in building 460. DCI investigated this item and found 8 drums on the north side of the machine shop, assumed to be the drums "on the south side" in question. DCI could not find any corresponding drums on the south side of the building. Five of the drums (G04517, G04518, G04519, G04522, and G04362) were previously labeled as "waste oil" and were changed to "used oil" on October 21, 1997. One drum, G04363 contains non-hazardous waste coolant and thus was not changed to "used oil". The drum listed on the east side of the machine shop is assumed to be a drum located at the north end of the machine shop at room 142, north highbay area. DCI could not find any corresponding drum on the east side of the building. This drum, G04326, is used coolant and is labeled "used coolant, water, oil, *Das Cool*". Attached you will find supporting analytical and Waste Stream and Residue Identification and Characterization (WSRIC) information for the two coolant drums. Two of the 8 drums (G043359 and G04361) were generated by J. A. Jones (contracted by Kaiser Hill); these drums were labeled as "spent oil" and have been changed to "used oil".

Item 9 requested a status for three 15-gallon containers, in building 460, identified as corrosive spent photographic solution. The liquid in these drums is rinsate which was generated from the removal of residue from the bottom of recycle containers from Non-Destructive Testing (NDT) operations in building 460. Due to possible silver contamination, these drums are scheduled for offsite silver recovery as part of the sitewide recycling program. Upon receipt of the radiological release paperwork, these drums will be sent to RMRS for consolidation and shipment to an offsite precious metal recycler.

If you have further questions, please contact myself at X6659, or Jane Mynard at X6087.


Rodney D. Sgrignoli
Manager, Envl. Programs & Compliance
DynCorp of Colorado, Inc.

RDS/jmm

Attachment
as stated

cc: T. Manzanares F. Pineda

**Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division**
4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222
(303) 692-3300

1 of 3

Notice of Inspection

Facility Name Rocky Flats Env. Tech. Site		EPA I.D. # C07890016526	Date 10/21/97
Street PO BOX 928		Telephone # 966-7000	Seq. # N/A
City Golden	County Jefferson	Zip 80402-0928	Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Facility Representatives and Titles		Enter By: <input checked="" type="checkbox"/> Consent <input type="checkbox"/> Warrant	Hour In: 8:00 am
		Agency: <input checked="" type="checkbox"/> State <input type="checkbox"/> Oversight <input type="checkbox"/> Joint	Hour Out: 11:30 am
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or Other _____ If Status Changed, Facility Should Revise Notification			

COMMENTS:

- ①. ^{part 1} Ensure that containers are marked or labeled as "used oil" per 6CCR 1007-3, section 279.22(c) at the following locations:
8 drums on the south side and one drum on east side @ machine shop in Bldg. 460; ^{part 2} one drum behind door #14 @ Bldg 883 marked as "oil from pipebender"; ^{part 3} one drum to the north of Bldg 551 marked as "JA Jones Laborers."
- ②. Ensure that the staging area in Bldg. 881, room 267 is posted as a staging area with the date that staging began per the RCRA Permit, condition III.B.17.b.

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. see above to the above in	5.
2. writing 12/ Nov. 4, 1997	6.
3.	7.

Samples requested and received by facility: Yes No If Yes: Duplicate Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: **EJ Smith**
Assisting Inspector(s) and Multimedia Participant(s):

Joe Smith

Signature of Facility Representative

20

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
 4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222 *283*
 (303) 692-3300

Notice of Inspection

Facility Name <i>Rocky Flats Env. Technology site (south site inspection)</i>		EPA I.D. # <i>CO 7890010526</i>	Date <i>10/21/97</i>
Street <i>PO BOX 928</i>		Telephone # <i>303-700</i>	Seq. # <i>N/A</i>
City <i>Golden</i>	County <i>Jefferson</i>	Zip <i>80402</i>	Inspection Arranged Prior to Inspection () Yes (X) No
Facility Representatives and Titles		Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour In: <i>8:00 am</i>
		Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	Hour Out: <i>11:30 am</i>

NOTIFICATION(S): LQG, SQG, Exempt, LDF, TSF, Transporter, Non-Notifier, or Other
If Status Changed, Facility Should Revise Notification

COMMENTS:

- 3) Ensure that staging areas in Bldg. 664 are marked with the date that staging began per the RFETS KIRA Permit, condition II. B.17.6.
- 4) Provide MSDS or other documentation to confirm that the 2 drums near of Asphalt Surfacing + Compound Sealer at the JA Jones laydown yard (Bldg 66) are not hazardous waste, as labeled.
- 5) Ensure that all containers in storage in Unit 440.1 ~~are~~ that are stacked are banded per RFETS KIRA Permit, condition III. B.14.c and III. B.21.
- 6) Post warning signs at NE corner of solar panel 307-B North per 9/25/97 inspection

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. <i>Provide a written response</i>	5.
2. <i>by 11/14/97</i>	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: *Ed Smith*
 Assisting Inspector(s) and Multimedia Participant(s):

Signature of Facility Representative

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
 4300 Cherry Creek Drive South, Mall Code: HMWMD-CP-B2, Denver, CO 80222
 (303) 692-3300

3 of 3

Notice of Inspection

Facility Name <u>Rocky Flats Env. Tech. Site</u>		EPA I.D. # <u>CO7890010524</u>	Date <u>10/21/97</u>
Street <u>PO BOX 929</u>		Telephone #	Seq. # <u>N/A</u>
City <u>Golden</u>	County <u>Jefferson</u>	Zip <u>80102</u>	Inspection Arranged Prior to Inspection () Yes (X) No
Facility Representatives and Titles		Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour In: <u>8:00 am</u> Hour Out: <u>11:30 am</u>
		Agency: <input checked="" type="checkbox"/> State () Oversight () Joint	

NOTIFICATION(S): LQG, SQG, Exempt, LDP, TSF, Transporter, Non-Notifier, or
 Other _____
If Status Changed, Facility Should Revise Notification

COMMENTS:

1. A 30-gallon drum of oil was identified at the laydown area North of Bldg 985. The drum did not have a lid and was 1/2 full of oil. Either close the drum or if the contents are used oil, mark the drum per 379.22(c), close the drum, and disposition as appropriate.

2. Identify the contents of 2 drums North of 985 labeled as NON-RO2A, Drum Numbers N0446096800068 and N0447096800069. - 3/20/97 shipped as chem waste mg

3. Provide status of 3- 15-gallon containers in Bldg 460 identified as corrosion-resistant photographic solutions.

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. Provide a written response	5.
2. 10/21/97	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: Ed Smith
 Assisting Inspector(s) and Multimedia Participant(s):
Doc Smith

Signature of Facility Representative

WASTE STREAM AND RESIDUE DESCRIPTION AND CHARACTERIZATION

Process Number: 334-2-14
IDC/WFC: 1951

Title: MACHINE SHOP
Description: Waste Coolant

- | | | |
|---|--|--|
| <input type="checkbox"/> RCRA Hazardous | <input type="checkbox"/> Product | <input type="checkbox"/> Fuel Blending |
| <input type="checkbox"/> RCRA Nonhazardous | <input type="checkbox"/> High Content Residue | <input type="checkbox"/> Uncontained Gas |
| <input type="checkbox"/> By Analytical Data | <input type="checkbox"/> Low Content Residue | <input type="checkbox"/> RCRA Sample |
| <input type="checkbox"/> By Process Knowledge | <input type="checkbox"/> Transuranic | <input type="checkbox"/> Recyclable Material |
| <input type="checkbox"/> LDR Regulated | <input type="checkbox"/> Low-Level | <input type="checkbox"/> Recycled/Reused |
| <input type="checkbox"/> Not LDR Regulated | <input type="checkbox"/> Nonradioactive | <input type="checkbox"/> TSCA Reg. Waste |
| <input type="checkbox"/> Non-Wastewater | <input type="checkbox"/> Source/Special Nuclear
Materials | <input type="checkbox"/> Evaluated in Another
Process |
| <input type="checkbox"/> Wastewater | <input type="checkbox"/> Debris | |

EPA Codes:**Description (Material, Type, Size, Color, etc.):**

Waste Coolant consists primarily of coolants (including Trim Sol) and may contain some oil, but not enough for fuel blending.

How the Output Is Generated:

During Fluids Changeout And Replacement

Generation Rate:

Variable

How the Output is Managed:

Waste coolant is placed in a green 55-gallon drum and sent to Regulated Waste Operations for disposition.

Chemicals/Contaminants in or on the Output:

Waste Coolant, Trim Sol And Oil

Characterization Rationale:

This used coolant is considered a solid waste as provided in Section 261.2(a)(1). Per process knowledge and supported by analytical data (Sample 96L2435) this output does not exhibit any RCRA hazardous characteristics nor contains any RCRA listed constituents. Therefore this output is designated a nonradioactive, nonhazardous waste.

FORM 1A-1

INORGANIC ANALYSIS DATA SHEET

Lab Name: Building 569 PA Inorganic Laboratories Sample No.: 5
 Lab Sample ID: X-98L2435-001 Bldg 334 Coolant/Oil Mix (C4322001)
 Section: ICPAES Lab Sample I.D.s beginning with 'X' indicates TCLP Extract.
 % Solids for Sample : 45.3013
 Date Sampled: 7/2/86 SDG No.: JUL02
 Lab Receipt Date: 7/2/86 QC Report No.: SD070296.RPT
 Matrix: Water _____
 Soil _____
 Sludge _____
 Other X

Elements Identified and Measured

Concentration Units: mg/L

N V * E O O S +

Analyte	Concentration	C	Q	M
Aluminum	0.3149	B		P
Antimony	0.1000	U		P
Arsenic	0.1000	U		P
Barium	0.2077	B		P
Beryllium	0.0050	U		P
Cadmium	0.0200	U		P
Calcium	1.5713	B		P
Chromium	0.0500	U		P
Cobalt	0.0500	U		P
Copper	0.1000	U		P
Iron	19.8656	B		P
Lead	0.1835	B		P
Magnesium	0.2087	B		P
Manganese	0.2843	B		P
Molybdenum	0.0500	U		P
Nickel	0.0503	B		P
Phosphorus	0.5000	U		P
Selenium	0.0750	U		P
Silver	0.0300	U		P
Strontium	0.0174	B		P
Thallium	0.1000	U		P
Titanium	0.0200	U		P
Vanadium	0.0500	U		P
Zinc	0.7380	B		P

Color Before: Brown/White - White Clarity Before: Cloudy - Cloudy
 Color After: White - White Clarity After: Cloudy - Cloudy

Texture:

Artifacts: Dark brown fine mesh solids left on TCLP filter

Comments: Sample > 0.50 % solids. Pressure filtrations of the initial TOLP extract phases through TCLP pressure filtration units, containing 0.7 micron borosilicate glass fiber filters, were performed before combining the phases together for the TCLP final combined sample extract.

000006

Process Number	IDC/WFC Number	CCCx RCRA Reg. Consl.	CCCx Non-RCRA Reg. Consl.	Comp. Codes	Description RCRA Reg. Chemical Constituents Non-RCRA Reg. Chemical Constituents	Collection	Solid Waste	RCRA Hazardous Waste	RCRA Land Disposal Restricted (Part 268)	Output Category	EPA Codes
460-7-10	1950	00	3212	4A	Used Lubricating Oils RCRA Reg. Chemical Constituents: None Non-RCRA Reg. Chemical Constituents: Oil (Used) Chromium	Green 55-Gallon Drum, Room 135	YES	NO	NO	Fuel Blending	
460-7-11	1951	00	7832	3A	Recycled Das Cool-521 (Recycled In Process) RCRA Reg. Chemical Constituents: None Non-RCRA Reg. Chemical Constituents: Das Cool-521 Oil (Used)	Centrifuge, Building 460, Room 140	NO	NO	NO	Recycled/ Reused	

JUL- 1-97 TUE 9:48

SITELINE ACTIONS

FAX NO. 9882823

P. 02

JUN- 6-97 FRI 11:59

7130D

FAX NO. 903 966 3744

P. 02

APR-15-97 TUE 13:11

SITELINE ACTIONS

FAX NO. 9862823

P. 02

WASTE VERIFICATION ANALYSIS REQUEST AND REPORT

Rocky Mountain Remediation Services
Rocky Flats Environmental Technology Site
P. O. Box 464
Golden, Colorado 80402-0464
Cost Center 3293 Account Number: RE189240 (Business Analysts Only)
SAMPLE INFORMATION

DRUM NUMBER: 604326

LAB ID NUMBER: NA
APO NUMBER: NA

Requestor: J. MYNARD Ext: 6087 Page: 4258

Generator: A. FERNANDEZ Ext: 7672 Page: 3678

Unit Coordinator: N/A Ext: _____ Page: _____

Sample Location: BLD - #1690A1 Container Type: 55 GAL. DRUM ID/WRC: 1951

Unit or 90-Day Area Number: N/A 90-Day Expiration Date: N/A

Waste Stream Description: Recycled Gas Coal-521

Waste Stream ID Number: 460-7-11 NRWOL Number: N/A WRE Number 970611-76903-061

EPA Codes: N/A Building Area Type: RMMA NON-RMMA

SCREENING INFORMATION

12" HEADSPACE

Date Sampled: 7/1/97 Sampler Initials: T.S. Date Analyzed: 7/1/97 Analyst Initials: T.S.

Number of Phases: 2 Number of Phases Tested: 2 Sample Returned: 7/1/97

Appearance (Color, Viscosity, etc.)

Single or Top Phase: med. brown, semi-opaque, semi-viscous liquid.
20% of sample

Middle Phase: NA

Bottom Phase: cream brown, opaque, non viscous liquid
80% of sample

Top or Single	Middle	Bottom
Watershed Test for Water: <u>NEG.</u>	Watershed Test for Water: <u>NA</u>	Watershed Test for Water: <u>POS.</u>
pH: <u>NA (organic)</u>	pH: <u>NA</u>	pH: <u>5</u>
Miscibility with Water: <u>NO</u>	Miscibility with Water: <u>NA</u>	Miscibility with Water: <u>YES</u>
Reactivity with Water: <u>NO</u>	Reactivity with Water: <u>NA</u>	Reactivity with Water: <u>NO</u>
Specific Gravity: <u>< 1</u>	Specific Gravity: <u>NA</u>	Specific Gravity: <u>~1</u>
Ignitability (°F): <u>> 140°</u> <u>No Green Halo</u>	Ignitability (°F): <u>NA</u>	Ignitability (°F): <u>> 140°</u> <u>No Green Halo</u>
Chlorinated Solvents (ppm): <u>NA</u>	Chlorinated Solvents (ppm): <u>NA</u>	Chlorinated Solvents (ppm): <u>NA</u>

Boiling Point: Single or Top Phase NA Middle Phase NA Bottom Phase NA

Comments: Chlorinated solvents not tested due to absence of green halo on ignitability test.

Technical Lead Review and Approval: D. J. Austin

DATE: November 3, 1997

TO: Ed Smith, Colorado Department of Public Health and Environment

FROM: *J. Wrapp*
John K. Wrapp, Kaiser-Hill EM&C

SUBJECT: RESPONSE TO CDPH&E INSPECTION ON OCTOBER 21, 1997.

In response to an inspection conducted by yourself and Joe Scheffelin, the following information is provided for those issues which are either Kaiser-Hill's or MSC's responsibility:

- Ensure that containers are marked or labeled as "used oil" per 6 CCR 1007-3, Section 279.22 © at the following locations: 8 drums on the south side and one drum on the east side of Building 460; one drum behind door #14 of Building 883 marked as "oil from pipebender"; one drum north of Building 551 marked as J.A. Jones Laborers. **Response:** The drum located north of Building 551 was verified to be used oil. This drum has been marked with a "used oil" sign. Efforts are underway to disposition this oil. According to Mike Simmons with MSC, the one drum located behind door #14 at Building 883 is a drum of oil that was drained out of a piece of surplus equipment. This equipment and oil will be re-utilized through the PU&D process. The oil is still good and will accompany the equipment for re-use.
- Provide MSDS or other documentation to confirm that the two drums of asphalt surfacing compound sealer at the J.A. Jones Laydown Yard near Building 663 are not hazardous waste, as labeled. **Response:** This waste has been characterized as non-hazardous waste. MSDS are enclosed for your review. In addition, the hazardous waste labels will be removed. These labels were crossed out, however, it was unclear as to whether the waste was hazardous or not.
- There were two issues identified on the Notice of Inspection (NOI) that after further discussion with you, we were able to locate the containers in question. These two issues are #7 and #8 on the NOI. **Response:** The 30-gallon container contains used oil. Efforts are underway to cover the drum and mark as "used oil". The contents of the 2 drums labeled as non-RCRA require further investigation. We are evaluating a file of analytical results from containers located in former 968 and 980 Buildings. We will contact you with the characterization as soon as we complete evaluation of the file.

If you have any questions regarding this response, please contact me on extension 966-5883.

219
Rev. 6-17-97

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 40-10107

MATERIAL SAFETY DATA SHEET

Required under USOL Safety and Health Regulations for Ship Repairing,
Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME Morrison Enterprises Inc.	EMERGENCY TELEPHONE NO. 303-296-3430
ADDRESS (Number, Street, City, State, and ZIP Code) 5000 Clarkson Unit E Denver, CO 80216	
CHEMICAL NAME AND SYNONYMS SODIUM HUMATE ESTER	TRADE NAME AND SYNONYMS Long Seal - 40
FORMULA	FORMULA NATURAL HUMATE ORGANIC BINDER

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS	N/A	0	BASE METAL	N/A	0
CATALYST	N/A	0	ALLOYS	N/A	0
VEHICLE	N/A	0	METALLIC COATINGS	N/A	0
SOLVENTS	N/A	0	FILLER METAL	N/A	0
ADDITIVES	N/A	0	PLUG COATING OR CORE FLUX	N/A	0
OTHERS	N/A	-	OTHERS		
			C99 - 1 Emulsified Asphalt	30	
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV (Units)
NONE				0	

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	212°F	SPECIFIC GRAVITY (H₂O=1)	1.07 to 1.09
VAPOR PRESSURE (mm Hg.)	Variable	PERCENT VOLATILE BY VOLUME (%)	None
VAPOR DENSITY (AIR=1)	Variable	EVAPORATION RATE (Water=1)	Water solution
SOLUBILITY IN WATER	YES		
APPEARANCE AND ODOR	BLACK AQUEOUS SOLUTION WITH a slight asphalt smell		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Methods used)	NONE; WATER BASE PRODUCT	FLAMMABLE LIMITS	LFL	UFL
EXTINGUISHING MEDIA	NON REQUIRED - WATER BASE PRODUCT			
SPECIAL FIRE FIGHTING PROCEDURES	NON REQUIRED - WATER BASE PRODUCT			
UNUSUAL FIRE AND EXPLOSION HAZARDS	NONE			

SECTION V - HEALTH HAZARD DATA	
THRESHOLD LIMIT VALUE	NONE - WATER BASE PRODUCT
EFFECTS OF OVEREXPOSURE	NONE
EMERGENCY AND FIRST AID PROCEDURES	
	RINSE WITH WATER
	Treat the same as with asphalt

SECTION VI - REACTIVITY DATA			
STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	NONE
INCOMPATIBILITY (As per MSDS)		NONE	
HAZARDOUS DECOMPOSITION PRODUCTS		NONE	
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	NONE

SECTION VII - SPILL OR LEAK PROCEDURES	
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED	
WASH AREA WITH WATER	
WASTE DISPOSAL METHOD	
SHINE ON WITH ASPHALT	

SECTION VIII - SPECIAL PROTECTION INFORMATION			
NECESSARY PROTECTION (Specify type)			
VENTILATION	LOCAL EXHAUST	NONE REQUIRED	SPECIAL
	MECHANICAL (Room)	NONE REQUIRED	N/A
PROTECTIVE GLOVES	RUBBER GLOVES	EYE PROTECTION	GOGGLES
OTHER PROTECTIVE EQUIPMENT			
N/A			

SECTION IX - SPECIAL PRECAUTIONS	
X WATER BASE PRODUCT - KEEP FROM FREEZING TO PREVENT DAMAGE TO STORAGE CONTAINERS	
OTHER PRECAUTIONS	

29

Colorado Department of Public Hazardous Materials and Waste

4300 Cherry Creek Drive South, Mail Code: HW
(303) 692-3

Notice of Inspection

Post-It® Fax Note	7671	Date	10/27/97	# of pages	3
To	GARY KONIOWSKI	From	LEON WRAPP		
Co./Dept	RMRS	Co.	KE		
Phone #	2729	Phone #	5883		
Fax #	4641	Fax #	3578		

Facility Name Rocky Flats Env. Tech. Site

Street PO BOX 928

City Golden

County Jefferson

Zip 80402-0928

CO7890016526

10/21/97

Telephone # 266-7000

Seq. # N/A

Inspection Arranged Prior to Inspection
 Yes No

Hour In: 8:00 am

Enter By: Consent Warrant

Hour Out: 11:30 am

Agency: State Oversight Joint

NOTIFICATION(S): LQG, SQG, Exempt, LDF, TSF, Transporter, Non-Notifier, or
Other _____ If Status Changed, Facility Should Revise Notification

COMMENTS:

- Ensure that containers are marked or labeled as "used oil" per 6CCR 1007-3, section 279.22(c) at the following locations: 8 drums on the south side and one drum on east side @ machine shop in Bldg. 460; one drum behind door #14 @ Bldg 883 marked as "oil from pipebender"; one drum to the north of Bldg 551 marked as "JA Jones laborers." *Fred White/Kim MSC Papp*
- Ensure that the staging area in Bldg. 881, room 267 is posted as a staging area with the date that staging began per the RFEES RERA Permit, condition III.B.17.b. *me/Kim/Radian*

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. <u>Response to the above in</u>	5.
2. <u>writing by Nov. 4, 1997.</u>	6.
3.	7.

Samples requested and received by facility: Yes No If Yes: Duplicate Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: Ed Smith
 Assisting Inspector(s) and Multimedia Participant(s):
Joe Schreffelin

Signature of Facility Representative

Colorado Department of Public Health and Environment

Hazardous Materials and Waste Management Division

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222 (303) 692-3300 283

Notice of Inspection

Facility Name Rocky Flats Envr. Technology Site (South Site Inspection)		EPA I.D. # CO 7890010526	Date 10/21/97
Street PO BOX 928		Telephone # 303-7000	Seq. # N/A
City Golden	County Jefferson	Zip 801102	Inspection Arranged Prior to Inspection () Yes (X) No
Facility Representatives and Titles		Enter By: (X) Consent () Warrant	Hour In: 8:00 am
		Agency: (X) State () Oversight () Joint	Hour Out: 11:30 am
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or Other _____ If Status Changed, Facility Should Revise Notification			

COMMENTS:

- 3) Ensure that staging areas in Bldg. 664 are marked with the date that staging began per the RFEES KERR Permit, condition III.B.17.b. M. Dancheltz
- 4) Provide MSDS or other documentation to confirm that the 2 drums near Airport Surfacing + Compound Spalter at the JA Jones laydown yard (Bldg 66) are not hazardous waste, as labeled. E. Benton
- 5) Ensure that all containers in storage in Unit 440.1 that are stacked are banded per RFEES KERR Permit, condition III.B.14.c and III.B.21. Rob Early
- 6) Post warning signs at NE corner of Solar Panel 307-B North per 7/25/97 inspection B. Cathell

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. Provide a written response	5.
2. by Dec. 4, 1997	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: Ed Smith
Assisting Inspector(s) and Multimedia Participant(s):
Joe Swartz

Signature of Facility Representative

OCT-27-97 MON 11:04

T1300

FAX NO. 303 966 3578

P. 03

Colorado Department of Public Health and Environment

Hazardous Materials and Waste Management Division

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222

(303) 692-3300

3 of 3

Notice of Inspection

Facility Name <u>Rocky Flats Env. Tech. Site</u>		EPA I.D. # <u>CO7890010524</u>	Date <u>10/21/97</u>
Street <u>PO Box 928</u>		Telephone #	Seq. # <u>N/A</u>
City <u>Golden</u>	County <u>Jefferson</u>	Zip <u>80402</u>	Inspection Arranged Prior to Inspection () Yes (X) No
Facility Representatives and Titles		Enter By: (X) Consent () Warrant	Hour In: <u>8:00 am</u> Hour Out: <u>11:30 am</u>
		Agency: (X) State () Oversight () Joint	
NOTIFICATION(S): <u>X</u> LQG, <u> </u> SQG, <u> </u> Exempt, <u>X</u> LDF, <u> </u> TSE, <u> </u> Transporter, <u> </u> Non-Notifier, or <u> </u> Other <u> </u> If Status Changed, Facility Should Revise Notification			

COMMENTS:

2. A 30-gallon drum of oil was identified at the laydown area North of Bldg 985. The drum did not have a lid and was 1/2 full of oil. Either close the drum or if the contents are used oil, mark the drum per 379.22(c), close the drum, and disposition as appropriate.
3. Identify the contents of 2 drums North of 985 labeled as NON-RCRA; Drum Numbers N0446096800068 and N0447096800069. ~~Ed Smith~~
S. Wilson
7. Provide status of 3-15-gallon containers in Bldg 460 identified as corrosive spent photographic solution. M. Papp

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. Provide a written response	5.
2. 12/1 Nov. 4, 1997	6.
3.	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: Ed Smith
 Assisting Inspector(s) and Multimedia Participant(s):
Doc DeWitt

32/32
 Signature of Facility Representative