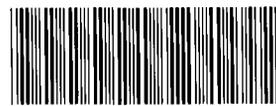


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ARTHUR, J.M.		
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WARDS, J.D.		
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TZ, R.C.		
JINN, L.A.	X	X
JGHES, F.P.	X	X
ANALLY, J.L.		
OWER, A.P.		
ED, A.B.		
SON, A.M.		
AGNER, M.J.		
HEELER, M.	X	X



Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone:(303) 966-2729
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August 28, 1997
Randy Leitner, Program Manager
Compliance & Performance Assurance
Building T130C
Kaiser-Hill

CLOSURE PLAN FOR RCRA INTERIM STATUS UNITS AT ROCKY FLATS- GRK-226-97

Rocky Mountain Remediation Services, L.L.C., (RMRS) is submitting the enclosed Closure Plan for Interim Status Units at Rocky Flats. This Closure Plan addresses closure of 71 hazardous and mixed container storage, tank storage and treatment units at the Site. The scheduling of closure activities will be coordinated with the integrated management and prioritization of all Site activities through the Rocky Flats Cleanup Agreement (RFCA) annual budget planning and Integrated Sitewide Baseline (ISB) process.

ARS RECORDS X X

This Closure Plan is submitted pursuant to the Code of Colorado Regulations, 6 CCR 1007-3, Section 265.112, and is necessary for the closure of interim status units in a manner consistent with the approved closure methodology for permitted units at RFETS.

CLASSIFICATION:

ONI		
CLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

Draft transmittal letters to the Department of Energy, Rocky Flats Field Office (DOE, RFFO) and to CDPHE are also attached. We request that the Interim Status Closure Plan be transmitted to DOE, RFFO at your earliest convenience, for submittal to CDPHE.

AUTHORIZED CLASSIFIER

SIGNATURE:
Natalie Van Tyne
Date: 8/28/97

If you have questions, please contact me at extension 2729, or Natalie Van Tyne at extension 5893.

REPLY TO RF CC NO.:

Gary R. Konwinski
Gary R. Konwinski
Environmental Manager

ACTION ITEM STATUS:
q PARTIAL/OPEN
q CLOSED

TR APPROVALS:

TRIG. & TYPIST INITIALS:
NCTVT

NCTVT



ADMIN RECCRD

IA-A-000801

1/37

R.M. Leitner
GRK-226-97
Page 2

Attachments (3):
As Stated

cc:

K. North	-	Kaiser-Hill
J.K. Wrapp	-	Kaiser-Hill
W.M. Wierzbicki	-	Safe Sites
R.D. Sgrignoli	-	DCI

Attachment 1
GRK-226-97
Page 1

DRAFT

DRAFT

DRAFT

September xx, 1997

97-RF-xxxxxx

Joseph Legare
Environmental Liaison Division
Rocky Flats Field Office
U.S. Department of Energy

Attn.: David Grosek

**CLOSURE PLAN FOR RCRA INTERIM STATUS UNITS AT ROCKY FLATS - RML-
xxx-97**

Kaiser-Hill Company, L.L.C. is submitting the enclosed Closure Plan for Interim Status Units at Rocky Flats. This Closure Plan addresses closure of 71 hazardous and mixed container storage, tank storage and treatment units at the Site. The scheduling of closure activities will be coordinated with the integrated management and prioritization of all Site activities through the Rocky Flats Cleanup Agreement (RFCA) annual budget planning and Integrated Sitewide Baseline (ISB) process.

This Closure Plan is submitted pursuant to the Code of Colorado Regulations, 6 CCR 1007-3, Section 265.112, and is necessary for the closure of interim status units in a manner consistent with the approved closure methodology for permitted units at RFETS.

A draft transmittal letter to the Colorado Department of Public Health and Environment (CDPHE) is enclosed. We request that this modification request be submitted to CDPHE at your earliest convenience.

If you have questions, please contact me at extension 3537, or Natalie Van Tyne of RMRS at extension 5893.

Randy Leitner, Program Manager
Compliance & Performance Assurance

Enclosure:
As Stated (2)

Original and 1 cc. - Joe Legare

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Attachment 1
GRK-226-97
Page 2

Distribution w/enclosure:

D.Grosek	-	DOE, RFFO
K. North	-	Kaiser-Hill
N.C.T.Van Tyne	-	RMRS

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DRAFT

DRAFT

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

Dear Mr. Scheiffelin:

Pursuant to the requirements of 6 CCR 1007-3, Section 265.112 for submittal of RCRA closure plans, the United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) is submitting the enclosed Closure Plan for Interim Status Units at Rocky Flats. This Closure Plan addresses closure of 71 hazardous and mixed container storage, tank storage and treatment units at the Site. The scheduling of closure activities will be coordinated with the integrated management and prioritization of all Site activities through the Rocky Flats Cleanup Agreement (RFCA) annual budget planning and Integrated Sitewide Baseline (ISB) process.

This Closure Plan is submitted pursuant to the Code of Colorado Regulations, 6 CCR 1007-3, Section 265.112, and is necessary for the closure of interim status units in a manner consistent with the approved closure methodology for permitted units at RFETS.

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

Joseph Legare, Director
Environmental Liaison Division

Enclosure

cc w/enclosure:

C. Gilbreath	-	CDPHE
D. Grosek	-	DOE, RFFO
R.M. Leitner	-	Kaiser-Hill
W.M. Wierzbicki	-	Safe Sites
R.D. Sgrignoli	-	DCI
G.R. Konwinski	-	RMRS
N.C.T. Van Tyne	-	RMRS

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**CLOSURE PLAN FOR INTERIM STATUS UNITS
AT THE ROCKY FLATS
ENVIRONMENTAL TECHNOLOGY SITE**

August, 1997

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RCRA CLOSURE PLAN FOR INTERIM STATUS UNITS

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CLOSURE PLAN FOR INTERIM STATUS UNITS

A. INTRODUCTION

This Closure Plan addresses closure of all hazardous and mixed waste container storage, tank storage, and treatment units identified in Appendix I as units in interim status. General closure information is contained in Section B, while information regarding the specific activities to be conducted for closure of an interim status unit is identified in Sections C, D, and E of this Part. All closure activities for interim status units will be conducted in a manner that protects human health and the environment and in accordance with this Closure Plan.

The Rocky Flats Environmental Technology Site (Site) is planning to accomplish clean closure of all interim status units. Contamination from these units found during closure activities that is impracticable to excavate or treat (if any) will be addressed through a modification of the Closure Plan to meet in-place closure standards. The scheduling of closure activities will be coordinated with the integrated management and prioritization of all Site activities through the Rocky Flats Cleanup Agreement (RFCA) annual budget planning and Integrated Sitewide Baseline (ISB) process.

There are two scheduling scenarios for closure of interim status units:

1. closure independent of cleanup activities regulated under RFCA (e.g., a unit/area which will not be covered by the Decommissioning Program Plan (DPP) or a Decommissioning Operations Plan (DOP)); and
2. closure as part of a specific cleanup activity regulated under RFCA (e.g., a unit/area within buildings to be decommissioned under the DPP or DOP process).

In either case, the closure plan described herein, or a closure plan modified in accordance with regulatory requirements, shall be used to accomplish closure.

It is anticipated that final closure for interim status units will occur in most instances as part of building decommissioning regulated under RFCA. RFCA provides that partial closure activities, in particular the removal of hazardous waste inventories and removing system components from operation will occur before decommissioning begins. Some residual amounts of hazardous wastes may remain in systems and components after initial removal of inventories - that is, the units may be clean closed as part of decommissioning under RFCA.

When partial or final closure is done as part of a specific cleanup activity regulated under RFCA, a decision document for that cleanup activity (e.g., an Interim Measure/Interim Remedial Action IM/IRA), a Proposed Action Memorandum [PAM], or Decommissioning Operations Plan [DOP]) will be submitted and approved in accordance with RFCA. Although there will be a decision document for each activity, several activities may be consolidated under a single decision document. The decision document will reference the applicable approved closure plan.

If a modification to the Interim Status Closure Plan is necessary due to the nature of the cleanup activity being accomplished under a RFCA decision document, the modification request will be part of the decision document. The modification will be reviewed and approved (including any required public comment period per the Colorado Hazardous Waste Regulations) as part of the RFCA decision document review and approval process. The RFCA decision document will also contain the Closure Description Document information specified in Section B.2 of this Closure Plan.

This Closure Plan contains the following information for the closure of the interim status units at the Site identified in Appendix I of this Closure Plan: regulatory requirements; strategies for conducting closure; and criteria to determine if closure has been successful. Regulatory requirements are identified in Section B: General Closure Information. Implementation of the closure strategies and closure performance standards are discussed in Section C: Clean Closure by Decontamination; Section D: "Debris Rule" Decontamination; and Section E: RCRA Stable.

B. GENERAL CLOSURE INFORMATION

The following describes the general regulatory requirements necessary for closure of the interim status units at the Site.

1. Closure Plan

- a. CCR 1007-3, Part 265 requires the Operator to submit a plan for closure of the interim status units at the Site. This Closure Plan addresses the following requirements: Part 265, Subpart G - Closure and Post-Closure (Parts 265.110 through 265.120); Subpart I - Containers (Part 265.178); and Subpart J - Tanks (Parts 265.190 and 265.199). This Closure Plan meets these requirements.
- b. No demonstration of financial responsibility is required because compliance with 6 CCR 1007-3, Part 266, Subpart A - Financial Requirements, is not required for government-owned facilities.
- c. If post-closure care requirements are determined to be necessary, they will be addressed through a modification of the Closure Plan and will be completed in accordance with an approved RFCA Decision Document.

2. Content of the Closure Plan and Closure Description Document

- a. Each interim status unit at the Site will be closed in accordance with this Closure Plan. This Closure Plan identifies the methods of accomplishing closure and criteria, in the form of closure performance standards, which will be used to evaluate closure performance.

- b. In addition, it identifies methods by which closure of interim status units may be accomplished through RFCA regulated cleanup activities in accordance with an approved RFCA decision document.
- c. Specific plans for individual interim status unit closures will be contained in a Closure Description Document. The purpose of the Closure Description Document will be to identify the portions or sections of this Closure Plan applicable to specific interim status unit closures. The Closure Description Document will provide information on and rationale for the method of closure; the defined boundaries of the interim status unit; the type of closure to be performed (either partial or complete); the type of contamination to be addressed; decontamination method to be conducted; decontamination media to be used; the schedule for accomplishing closure; and other applicable information associated with interim status unit closure activities.
- d. This strategy for closure implementation is mandated by the number of interim status units that must be closed and the circumstances under which each of them will be closed relative to the options for closure. Additionally, due to uncertainties concerning the future need for the buildings containing some of the existing interim status units, this strategy allows for their closure as appropriate.

3. Facility Closure Notification

The Director will be notified of the intent to perform partial or final closure of any interim status unit(s) at least 45 days prior to the beginning of closure of the interim status unit(s). Accompanying the closure notification will be the Closure Description Document detailing the portions of this Closure Plan applicable to the interim status unit scheduled for closure. In the case of closures of interim status units being done as part of a RFCA regulated cleanup activity, notification is accomplished by submittal of the RFCA decision document or by submittal of a closure notification and Closure Description Document.

4. Closure Schedule

- a. Final closure of the interim status units identified in Appendix I will be completed by 2015.
- b. If the amount of time required for closure activities for an interim status unit will exceed 180 days, the Director will be notified of the additional time necessary to complete the closure and the reason for the delay.
- c. The scheduling of closure activities will be coordinated consistent with the integrated management and prioritization of all Site activities through the RFCA annual budget planning process.

- d. Environmental monitoring procedures will be employed for RCRA units which have released hazardous waste to the environment. These procedures will allow for the identification of the migration of any hazardous constituents. If, during environmental monitoring, unanticipated migration of hazardous constituents is identified, remedial actions to prevent further migration will be evaluated and implemented per RFCA.
- e. The closure of waste management facilities at the Site will be scheduled in conjunction with the Integrated Stewed Baseline (ISB) to occur as part of a RFCA regulated cleanup activity or as an independent activity as need dictates. In some cases, the closures of individual units may occur at the same time that other units are being closed.

The actual descriptions of how closure may be conducted under each of the closure options is discussed in Sections C, D, and E of this Closure Plan. The logical sequence of an interim status unit closure is described in the following section.

5. Sequence of Activities for Closure

- a. The closure of an interim status unit and associated equipment will be accomplished in accordance with this Closure Plan and the Division- approved Closure Description Document as described earlier in this section.
- b. The Director will be notified of the intent to close an interim status unit identified in Appendix I of this Closure within 30 days of the receipt of the final volume of waste at the unit, or at least 45 days prior to the initiation of closure activities.
- c. Where final closure is to be delayed to accomplish closure as part of a RFCA-regulated cleanup activity, closure will begin as specified in B.5.b. above and waste inventory will be removed from the interim status unit within 180 days of commencing closure activities to achieve partial closure. Administrative and engineering controls (e.g., lock-out/tag-out, restricted access, etc.) will be used to prevent any further hazardous or mixed waste inventory from entering the interim status unit.
- d. Unit-specific closure schedules are currently unavailable for the interim status units at the Site. In lieu of a unit-specific closure schedule, the ISB will be the basis for determining which buildings or structures are to be deactivated and/or decommissioned in a given year. From this, the interim status units that will require closure may be identified. The plan for the decommissioning of all buildings and structures at the Site will be contained in the DPP. However, unit-specific closure schedules must be included in their respective Closure Description Document at the time submittal.
- e. Decontamination of an interim status unit will be initiated as soon as practicable following the removal of wastes or containers. Decontamination of equipment will be

done after the last use of the equipment in closure activities, or prior to leaving the contaminated area, as necessary. Detailed information on decontamination is provided in Sections C and D of this Closure Plan.

- f. Soil sampling and analysis, when required as a part of this Closure Plan, will be accomplished in accordance with soil contamination evaluation procedures discussed in Section F of this Closure Plan.

6. General Closure Activities

a. Partial Closure Activities

For the purposes of this closure plan, partial closure refers to the closure of portions of an interim status unit. Some examples include: the closure of a tank while the ancillary equipment is left for a RFCA regulated cleanup activity; the closure of individual cargo containers or gloveboxes within an interim status unit; or the closure of an area or areas within an interim status unit.

b. Closure of Interim status Units

Specific information regarding the method of closure for individual interim status units will be provided in the Closure Description Document or RFCA decision document. The appropriate document will be provided to the Division for approval as part of the preclosure notification of the intent to initiate closure of an interim status unit.

c. Maximum Waste Inventory

The maximum inventory capacity of each of the interim status units is identified in Appendix II - Interim Status Units Listed in the site RCRA Part A Application. Authorized waste types and authorized hazardous waste codes are also identified for the interim status units in Appendix II.

d. Closure personnel

Actual numbers of personnel required for the closure of individual interim status units will be determined at the time of closure based on the closure schedule, safety, and regulatory standards. Minimum crews are required for health and safety (H&S) requirements. Personnel involved in the closure of interim status units will be qualified in accordance with Part IX: Personnel Training, of this Closure Plan, and trained in necessary mechanical skills for conducting the closure, decontamination techniques, and safety procedures necessary to accomplish closure.

e. Replacement of Equipment and Components

Prior to the closure of the Site, some equipment and components in interim status units may require replacement or removal. The equipment or components to be replaced or removed will be characterized, treated, stored or disposed in accordance with applicable regulations.

f. Final Closure of Units

The options for the final closure of the interim status units identified in Appendix I of this Closure Plan have been developed to meet the regulatory requirements for their closure and to allow interim status unit closure to be conducted concurrently with RFCA regulated cleanup activities. As a part of closure, all interim status units and equipment thereof will either be disposed of appropriately or decontaminated, as necessary, to meet the applicable closure performance standard.

Closure plans for the interim status units are predicated on the availability of some combination of on-site and off-site waste management capabilities for the storage, treatment, and disposal of inventory and cleanup waste. Efforts will be made to minimize waste generation as a result of closure.

The final disposal of any hazardous or mixed waste generated as a result of closure will be dependent on the nature of the waste and the availability of permitted waste management facilities within the DOE complex and the private commercial sector.

g. Waste Requiring Disposal as Part of Closure

The amount of waste generated from the closure of an interim status unit or units at the Site will be dependent on the type and amount of decontamination conducted, the size of the interim status unit, and the applicable closure performance standard. The volume of waste requiring disposal will include up to the maximum waste volume held in storage and the waste volume generated during closure of the interim status unit. It is difficult to determine the final amount of waste at the Site that will require disposal as a result of closure; however, an estimate would be at least the total volume of waste approved for storage at the Site.

7. Recordkeeping

The following closure records will be maintained at the Site during closure activities and at a federal repository for a minimum of 30 years following certification of Site closure:

- a. record of sampling activities (date, number, and type);
- b. results of screening activities, sampling of decontamination rinse waters, soil sampling, or groundwater sampling;

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- c. actions taken to decontaminate or remove waste structures or soils, including contaminated soils;
- d. other documentation which verifies that the Closure Plan is following the work package and the conditions of this permit; and
- e. records of volume of hazardous waste generated during closure, including contaminated soils.

8. Amendment of the Closure Plan

CCR 1007-3 Part 265.112 requires the Operator to amend the Closure Plan whenever changes in the operating basis or facility design occur that affect the Closure Plan, or a change in the expected year of closure occurs. 6 CCR 1007-3, Part 265.112(c)(3) requires the Operator to request modification of the closure plan within 30 days of identification of any event that causes modification of the closure plan to be necessary. In conducting final or partial closure, unexpected events that are identified during the implementation of closure activities may require an amendment of this Closure Plan. Modifications to this Closure Plan will be made in accordance with applicable regulatory requirements.

C. CLEAN CLOSURE BY DECONTAMINATION

Clean closure of interim status units at the Site will be conducted in accordance with one of the three methodologies (decontamination, "debris rule" decontamination, or unit removal) described in the following sections.

The objective of clean closure of an interim status unit at the Site is to eliminate the need for maintenance and post-closure care due to waste or constituents remaining at the interim status unit or on unit equipment. Clean closure by decontamination will be accomplished by removing all waste present in the interim status unit; decontaminating all unit equipment and structures; removing any and all contamination present due to the operation of the unit; and achieving compliance with applicable closure performance standards. If this objective is attained, the interim status unit will be certified as "clean closed," and will require no post-closure care or maintenance.

To achieve clean closure, it will be necessary to conduct and document activities as part of closure in accordance with this Closure Plan. The following standard activities are to be conducted for accomplishing the clean closure of an interim status unit using decontamination techniques.

1. Waste Inventory Removal

All wastes remaining in the interim status unit to be closed will be transferred to another interim status unit for storage or treatment or shipped off-site for treatment, storage, or

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disposal. For interim status units that are not actively managing waste at the time of closure, the unit owner will verify and document that no wastes are present within the unit and/or equipment.

2. Contaminant Evaluation

Decontamination requirements for the interim status unit being closed are dependent on the presence and distribution of contamination in the unit. To determine the degree of contamination present within an interim status unit scheduled to undergo closure, the Operator will conduct an evaluation of the interim status unit. The contaminant evaluation, to be included in the Closure Description Document, could include the use of process knowledge, radiological survey results, historical records, wipe or smear samples, or other non-intrusive methods to identify the presence and degree of contamination.

The need, degree, and process for decontamination will be based on the information obtained from the evaluation. For instance, for a container storage unit where no releases or only minor releases have occurred and documentation is available to track the life of the unit, it is possible to eliminate the decontamination step and proceed directly with rinsing and sampling to verify closure.

3. Decontamination

The type and degree of decontamination to be conducted and the decontamination materials to be used will be described in the closure description document, and its determination will be based on the contaminant evaluation of the interim status unit or upon general criteria relative to the entire unit. In general, the two types of decontamination identified for use at the Site are solution and mechanical decontamination. Solution decontamination will be conducted when possible due to less destructive results.

Selection of the appropriate solution for decontamination will be based on the types of waste previously managed in the unit and the contaminants that are present. Typical decontamination solutions include: water with sodium carbonate and trisodium phosphate; water with calcium hypochlorite and sodium hydroxide; water with sulfuric acid; deionized water with ethylenediaminetetraacetic acid (EDTA) and citric acid; petroleum ether or other non-hazardous organic solvent; and water. These solutions may be applied by one or more of the following methods: manual application, hydroblasting, foam cleaning, or steam cleaning.

Decontamination may also be conducted using more physically destructive methods. Mechanical decontamination methods could include abrasive blasting, scarification, spalling, and vibratory finishing.

1. Decontamination Activities

Decontamination of the interim status unit will be initiated in accordance with this Closure Plan and as part of a Division-approved unit-specific document (e.g., Closure Description Document or RFCA Decision Document). In some cases, decontamination will begin by removing any dust or other loose debris by vacuuming the unit.

For tanks, generally, a decontamination solution will be introduced into the tank through existing piping. If mechanical decontamination is to be conducted, steps to isolate the area being decontaminated will be taken. The following general principles will be followed while conducting decontamination activities.

- a. Whenever decontamination is being conducted, all efforts will be made to "contain" the contamination as part of H&S protocols. Containment of the contamination released through decontamination may be accomplished by the use of temporary structures or other devices. For instance, plastic sheeting may be placed on walls when floors are being cleaned to minimize contact with overspray or debris resulting from the decontamination technique.

Small berms could be placed around areas of higher contamination to confine the decontamination media and the removed contaminants and not allow the contaminants to migrate to less contaminated areas of the interim status unit.

- b. Decontamination will be carried out in a manner to prevent redeposition and relocation of contaminants. In most cases, decontamination should be carried out from higher parts of the interim status unit toward the lower portions and from lower contamination areas to areas exhibiting higher amounts of contamination.
- c. Whenever possible, methods which roughen or gouge the surface being cleaned shall be avoided. If they are necessary, precautions will be taken to minimize the transfer of contaminants due to the decontamination method.
- d. A preliminary consideration in selecting a decontamination method will be the minimization of decontamination wastes.

Decontamination media will be removed from the surface undergoing decontamination by vacuum or other means and collected. The area will then be rinsed with water that will be collected and managed, appropriately. Treatment of the decontamination media may occur at the interim status unit undergo closure in accordance with the generator treatment provisions 6 CCR 1007-3, or these media may be transferred to another location (on or off-site) for treatment.

5. Decontamination Residuals and Rinsate Management

Residuals from decontamination will be physically separated and collected from the

surface or equipment undergoing decontamination. This may include removal by mopping, vacuuming, vibrating, wiping, compressed air, rinsing, or other means. Residuals from decontamination Will be characterized and managed appropriately as a waste.

The disposition of the rinsate will be dependent on the requirement for further decontamination. If the rinsate is generated from an intermediate rinse of an interim status unit and not the final rinse, it will be collected and managed as a waste, as appropriate. If it represents the final rinsing of the interim status unit undergoing decontamination, it will be placed into a container, sampled, and analyzed to determine compliance with the applicable closure performance standard. Following the completion of sampling and analysis, the rinsate will be managed as a waste and treated or disposed of accordingly.

All sampling and analysis will be conducted in accordance with Site L-procedures that have been developed to comply with the methods specified in SW-846 and referenced in Part VI of this Closure Plan. Following decontamination and rinsing the Co-Operator will evaluate the rinsate analysis results against the applicable closure performance standard.

6. Closure Performance Standard

An interim status unit, unit equipment, or a portion thereof will be considered decontaminated upon removal of all visible waste residuals and when the final rinsate contains concentrations of priority pollutants (identified as having been managed in the unit) and heavy metal concentrations less than the maximum contaminant levels for drinking water. The pH of the rinsate will be between 6 and 9.

The final rinsate volume for external surfaces will not exceed two gallons per 100 square feet of surface area rinsed.

The final rinsate volume for internal surfaces of tanks will not exceed 5% of the capacity of the tank.

Analytical procedures will be conducted in accordance with approved laboratory procedures which meet the requirements of SW-846.

These standards have been developed to attain a reasonable standard for the closure of the interim status units and equipment at the Site subject to clean closure. The standard is intended to provide a minor degree of flexibility to attain clean closure while address anomalous situations that can be traced to non-waste sources (e.g., lead-containing paint within a unit that could leach when subjected to decontamination activities).

Information regarding non-waste constituent sources that could impact the clean closure efforts will be identified in the Closure Description Document submitted to the Division as information on the interim status unit closure.



If the results of the evaluation indicate that the applicable closure performance standard has been met, the unit or unit equipment will be considered "clean closed" and documentation will be prepared for certification by an independent professional engineer. If the results indicate that contamination remains, appropriate steps, possibly including additional decontamination, to remove the remaining contaminants will be initiated.

During the decontamination process, the interim status unit structures and equipment that fail to meet the closure performance standard will be managed as hazardous waste. The decontamination procedures identified in Section C.4 of this Part may meet the requirements of a debris rule waste-specific treatment standard as an extraction technology. Therefore, the closure standard for debris (identified in Section D of this Part) can be used without further washing or other decontamination provided the decontamination method meets the definition of an extraction technology as provided in 6 CCR 1007-3, Part 268.45, Table I(A)(1) and (2), provided the unit structures and equipment meet the definition of debris, and provided the debris is managed as a non-hazardous solid waste.

If equipment or structures within the unit cannot be successfully decontaminated, they will be removed and managed as a waste. Following the completion of closure activities for an interim status unit, the equipment used during closure will be cleaned using an appropriate method to remove any contaminants that are present.

7. Soil Contamination Evaluation

Where appropriate, an evaluation to determine if soil contamination is present will be conducted in accordance with the process steps identified in Section F of this Closure Plan.

D. "DEBRIS RULE" DECONTAMINATION

Debris Rule decontamination methods apply to portions of units and unit components for which there is no intended use or reuse and the debris is intended for discard. This determination will be made based on the economic value of a particular component of a unit versus the cost of decontaminating the component to achieve a clean closure standard that would allow for continued use or reuse (i.e. rinsate analysis closure performance standard). All components subjected to this standard must meet the definition of debris and be disposed of in accordance with applicable regulatory requirements. Typical candidates for the Debris Rule decontamination standard include components that are impregnated with fixed radioactive contamination, tank systems and/or associated ancillary equipment, gloveboxes, other miscellaneous equipment.

Since no portions of interim status units subject to this type of closure will be reused off-site and all debris will be disposed of as waste, decontamination utilizing extraction technologies identified in the "debris rule" are appropriate to attain a clean closure performance standard.

The following identifies standard activities to be conducted for accomplishing the clean closure of a interim status unit through "debris rule" decontamination.

1. Waste Inventory Removal

All wastes remaining in the interim status unit and unit equipment to be closed will be removed and transferred to another interim status unit or shipped off-site for storage, treatment, or disposal.

2. Contaminant Evaluation

Since this closure option is dependent on the decontamination of hazardous debris in accordance with the "debris rule," the contaminant evaluation is necessary only for the identification of the contaminants present and not the degree of contamination.

Therefore, the contaminant evaluation will focus on the hazardous or mixed wastes managed in the interim status unit, the characterization and location of any releases or spills of the wastes having been managed, and the location of any staining on the surfaces of structures and equipment within the unit where waste management occurred.

3. Decontamination Options

For interim status units that are to be closed using the "debris rule" (e.g., tanks, roll filters, equipment, etc.) decontamination will be conducted in the form of a waste-specific decontamination technology in accordance with 6 CCR 1007-3, Part 268.45, Table 1. By appropriately using the applicable waste-specific decontamination technology and obtaining acceptable results, contamination is removed and a visual closure performance standard is attained. Hazardous debris that cannot be decontaminated or visually evaluated due to the physical nature of the debris (e.g., piping, valves, etc.) will continue to be managed as hazardous debris.

4. Decontamination Activities

Prior to land disposal, hazardous debris must be decontaminated for each "contaminant subject to treatment" defined in 6 CCR 1007-3, Part 268.45(b) using the technology or technologies identified in Table 1, therein. The following general principles will be utilized for waste-specific performance standards:

- a. Hazardous debris that exhibits the characteristic of ignitability, corrosivity, or reactivity will be deactivated using one of the technologies identified in Table 1.
- b. Performance standards identified in Table 1 must be achieved for each type of debris contained in a mixture of debris types.

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- c. Debris contaminated with more than one contaminant subject to treatment must be treated for each contaminant using one or more of the treatment technologies identified in Table 1.

5. Decontamination Residuals Management

Residuals from the decontamination of hazardous debris will be physically separated from the decontaminated debris. This may include removal by vacuuming, compressed air, rinsing, or other means. Residuals from the decontamination of hazardous debris will be characterized and managed as a waste in accordance with the general requirements identified 6 CCR 1007-3, Part 268.45(d)(1).

6. Closure Performance Standard

Following the completion of strip-out, dismantlement, waste-specific decontamination and the removal of decontamination residuals, the Co-Operator will visually inspect the surface of the debris, as appropriate, against the closure performance standard for a "clean debris surface."

The closure performance standard for determination that debris is no longer hazardous is a "clean debris surface." This is defined as "a surface that, when viewed without magnification, shall be free of all visible contaminated soil or hazardous waste except that residual staining from soil and consisting of shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits may be present provided that such staining and soil and waste in cracks, crevices, and pits is limited to no more than 5% of each square inch of surface area."

If the results of the inspection indicate the closure performance standard has been met, the hazardous debris will be considered a non-hazardous solid waste and will be removed and managed as non-hazardous debris for subsequent disposal.

Documentation of the inspection will then be prepared and certified by an independent professional engineer. If the results indicate that contamination remains, appropriate steps will be initiated to remove the remaining contamination or manage the debris appropriately.

At any time before or after attempting alternate or additional waste-specific decontamination procedures, hazardous debris that fails to meet the closure performance standard may be managed as hazardous waste. If hazardous debris within the interim status unit cannot be successfully decontaminated, it will be removed and managed as a hazardous waste

Following the completion of closure activities for an interim status unit, the equipment used during closure will be cleaned using an appropriate method to remove any contaminants that are present.

7. Soil Contamination Evaluation

Where appropriate, an evaluation to determine if soil contamination is present will be conducted in accordance with the process steps identified in Section F of this Part.

E. RCRA STABLE

This strategy for clean closure allows the Co-Operator to conduct closure of the interim status unit in two stages; first by rendering a unit or portion of a unit "RCRA Stable," as described below, followed by completion of the final stage of closure as part of a RFCA regulated cleanup activity. Once an interim status unit is placed in RCRA Stable configuration, final closure of the unit is deferred until it is scheduled pursuant to the RFCA budget planning process and prioritized and integrated with other activities. RCRA Stable units will be indicated as such, pending final closure, in the Master List of RCRA Hazardous Waste Units at Rocky Flats, which is updated semi-annually. Elements of this closure strategy include the following:

1. Waste Removal

a. Rooms and Cargo containers

All hazardous and mixed waste in containers will be removed from the unit. Surfaces of the unit (walls, floors, ceilings, tank sides, etc.) will be wiped down or otherwise cleaned to a level that satisfies the definition of a clean debris surface as defined in paragraph D.6 of this Closure Plan.

b. Gloveboxes

All hazardous and mixed waste in containers will be removed from the unit. Surfaces of the unit (walls, floors, ceilings, tank sides, etc.) will be wiped down/cleaned with the objective of satisfying the definition of a clean debris surface. In the event that the unit's surfaces can not be made to satisfy the clean debris surface definition, the unit will be wiped down to remove as much remaining removable contamination as reasonably possible. The objective is to eliminate any significant risk from the remaining residuals.

c. Tank systems within buildings

Tanks and ancillary equipment will be emptied to the maximum extent possible using readily available means, with the objective of achieving less than 1 % by volume of holdup in the L and ancillary equipment, no significant sludge remaining, and no significant risk associated with the remaining residuals. Once RCRA stable, tanks and ancillary equipment will be locked out and tagged out until closure is initiated.

2. Eliminate Future Waste Input

Following the removal of the remaining wastes to the degree described above in 1., the Co-Operator will eliminate the possibility of further waste introduction to the unit through physical means. These could include blanking flanges on piping, locking out valves, deenergizing circuitry, locking doors to container storage units, or other means necessary to ensure that wastes cannot be reintroduced to the unit.

3. Unit Management

After the unit is placed in a RCRA Stable configuration, the risk posed by the unit will be minimized and the Co-Operator may implement less stringent unit management practices by requesting a Closure Plan modification. RCRA Stable units will be marked or labeled so as to indicate the type and volume of inventory remaining in the unit, in accordance with requirements identified in the Colorado Hazardous Waste Regulations. The inspection and monitoring requirements for a given tank system will be approved by the Division on a case by-case basis considering the type, volume of residuals remaining in the tanks, ancillary equipment and considering controls to prevent access to further additions of hazardous waste. Once approved, the modified inspection and monitoring requirements will become part of the unit's operating record.

4. Removal of the Unit

The interim status unit will remain idle until it is dismantled and the equipment and debris are handled appropriately. When the unit and equipment have been cleaned or removed, closure field activities will be considered complete and all applicable certifications, including independent P.E certifications, will be completed and submitted as necessary.

F. SOIL CONTAMINATION

During conduct of closure activities, but not later than after the interim status unit structures and equipment have been successfully decontaminated, soil contamination will be evaluated. This evaluation will be either non-intrusive or intrusive based on the following:

1. If documentation is available for all or part of the life of the RCRA interim status unit/area that identifies no spills or releases to the environment having occurred at any time during the operation, a visual evaluation will be conducted for verification. This evaluation will document the presence or absence of any visible soil discoloration, spill residues, or other indicators of a spill or release to the environment having taken place from the interim status unit. Once documented, any soil contamination as a result of waste management activities within the interim status unit will be deemed nonexistent; or

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2. Interim status units that have secondary containment structures which have not been compromised or overtopped by a release of waste during the active life of the unit and visually verified and documented will not require soil sampling-, or
3. Soil beneath interim status units that utilize an asphalt pad for secondary containment or as a base on which waste management took place will require sampling and analysis to determine the presence or absence of contamination; or
4. If soil contamination is discovered and it is determined that it may be effectively remediated as part of the current closure process, it will be addressed at the time of the ongoing closure activities for the interim status unit; or
5. If soil contamination is discovered and it is determined that remediation should be conducted as part of a RFCA regulated cleanup activity, the soil remediation will be included in the appropriate RFCA decision document.

If soil sampling identifies contaminated soils associated with an area undergoing closure, a request for modification of the Closure Plan will be submitted which includes a schedule for closure activities. Modification requests for closures being done as part of a RFCA regulated cleanup activity in accordance with an approved RFCA decision document will be accomplished in accordance with the work change documentation requirements of RFCA (including any required public review and comment). A separate Closure Plan modification request will not be submitted.

G. CORRECTIVE ACTION

The RFCA has been established as the governing document for accomplishing the requirements of the corrective action program under 6 CCR 1007-3, Part 265. 100. Therefore, whenever contamination of soil or groundwater is discovered, corrective action (remediation) is to be addressed and regulated by RFCA.

H. POST-CLOSURE CARE REQUIREMENTS

The criteria used to determine if an interim status unit undergoing closure will be certified closed or follow post-closure procedures will be based upon the presence of soil or groundwater contamination. If these media have been contaminated by an interim status unit and are to be left in place, then post-closure procedures will be conducted as identified in the applicable RFCA remediation decision document.

APPENDIX A

RFETS RCRA UNITS REGULATED UNDER INTERIM STATUS

This Appendix contains a description of each RFETS RCRA unit currently in interim status. It is organized in the same general format as the **Master List of RCRA Hazardous Waste Units at Rocky Flats**.

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg. #	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
3	444/447	Drum Storage Area (IHSS #208)	Container Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; change to interim status approved by CDH letter dated 10/9/88 ; subject to 6 CCR 1007-3, Part 265 .
4	444	Acid Dumpsters (IHSS #207)	Container Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
35	904 Pad	Pond Crete/Salt Crete Reprocessing Facility (Exists but will be closed: No IHSS #)	Treatment	To be closed	RCRA Interim Status TSD unit for hazardous waste; change to interim status approved by CDH letter dated 4/5/90 . Subject to 6 CCR 1007-3, Part 265 .
39.01	444	Fabric Filtration (listed in HWTSMF) *	Misc. Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 . *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp) dtd 2/5/97
39.02	447	Fabric Filtration (listed in HWTSMF) *	Misc. Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 . *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp) dtd 2/5/97

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
40.01	428	Tank D-853 (listed in HWTSMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.02	444	Acid Waste Tank No. 1 (listed in HWTSMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.03	444	Acid Waste Tank No. 2 (listed in HWTSMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.04	444	Process Waste Tank T-2 (IHSS #121 (T-5)) (listed in HWTSMP) *	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 . *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp) dtd 2/5/97
40.05	444	Process Waste Tank T-3 (IHSS #121 (T-5)) (listed in HWTSMP) *	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 . *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp) dtd 2/5/97

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
40.06	444	Cyanide Waste Tank No. 3 (listed in HWTSMIP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.07	444	Cyanide Waste Tank No. 4 (listed in HWTSMIP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.16	732	Laundry Waste Tank T-4	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.35	444	Filter System Holding Tank T-4 (listed in HWTSMIP) *	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 . *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp) dtd 2/5/97
40.36	444	Sump Tank under Fabric Filter (listed in HWTSMIP) *	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 . *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp)

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
40.37	447	Holding Tank T-6 (listed in HWTSMMP) *	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265. *RCRA Stable - RMRS Ltr., GRK-054-97, To K-H (J. Wrapp) dtd 2/5/97
40.50	near 881	Valve Vault 1 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265.
40.51	near 883	Valve Vault 2 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265.
40.52	near 889	Valve Vault 3 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265.
40.53	near 889	Valve Vault 4 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265.

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
40.54	near 889	Valve Vault 5 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.55	near 865	Valve Vault 6 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.56	near 707	Valve Vault 7 (IHSS #123.1) (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.57	near 707	Valve Vault 8 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.58	near 707	Valve Vault 9 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.59	near 559	Valve Vault 10 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
40.60	near 559	Valve Vault 11 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.61	near 231	Valve Vault 12 (IHSS #186) (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.62	near 374	Valve Vault 13 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.63	near 371	Valve Vault 14 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.64	near 443	Valve Vault 15 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.65	near 443	Valve Vault 16 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .

Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
40.66	near 444	Valve Vault 17 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.67	near 460	Valve Vault 18 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.68	near 444	Valve Vault 19 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
40.69	near 444	Valve Vault 20 (listed in HWTSMMP); currently in operation	Tank Ancillary	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 264 .
X42.14	374	Inactive D-836 Haz. Waste Tank (IHSS #206, this unit was originally a jacked up tanker truck; the truck is currently being used at RF as a container unit)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 264 .
43.01	374	Process Wastewater Tank T-231A (250,000 gallons) (listed in HWTSMMP)	Tank Storage	Limited Operation under Consent Order	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

8/27/97

Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
43.02	374	Process Wastewater Tank T-231B (950,000 gallons) (listed in HWTSMMP)	Tank Storage	Limited Operation under Consent Order	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
44.01	776	Oil Storage Tank T-2, 350 gallons (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
44.02	776	Oil Storage Tank T-1, 400 gallons (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
48	788	Pond Crete Solidification Process (Exists but will be closed: no IHSS #)	Treatment	To be closed (RFCA)	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
49.01	776	Fluidized Bed Unit (Production Unit) (Exists but will be closed: no IHSS #)	Incinerator/ Misc. Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
49.02	776	Fluidized Bed Unit (Pilot Unit) (Exists but will be closed: no IHSS #) (This also includes T-1 and T-2 pencil tanks) (listed in HWTSMMP)	Incinerator/ Misc Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
53	371	Miscellaneous Cementation: Building 371 Room 2325 (Existed but will be closed: No IHSS#)	Treatment	To be closed	RCRA TSD Unit without interim or permit status; subject to 6 CCR 1007-3, Part 265. (Note: see DOE ltr. to CDPHE dated 3/1/88)
53	771	Miscellaneous Cementation: Building 771 Room 114 (Existed but will be closed: No IHSS#)	Treatment	To be closed	Former RCRA TSD Unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order (89-07-10-01) but lost interim status on 8/8/92 because not included in Part B Application; subject to 6 CCR 1007-3, Part 265.
55.01	774	Tank T-1A Caustic Receiving Tank (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08); subject to 6 CCR 1007-3, Part 265.
55.02	774	Tank T-1RF Caustic Receiving (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08); subject to 6 CCR 1007-3, Part 265.
55.03	774	Tank T-4L Distillate Receiving (listed in HWTSMMP)	Treatment in Tank	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08); subject to 6 CCR 1007-3, Part 265.
55.04	774	Tank T-10 Filter Feed Tank (Existed but out of service: No IHSS #) (listed in HWTSMMP)		To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08); subject to 6 CCR 1007-3, Part 265.

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

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Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
55.05	774	Tank T-4R Incinerator Caustic Receiving (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.07	774	Tank T-70 Flash Mixer (listed in HWTSMMP)	Treatment in Tank	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.08	774	Tank T-5 Flocculator (listed in HWTSMMP)	Treatment in Tank	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.09	774	Tank C-1 Clarifier (listed in HWTSMMP)	Treatment in Tank	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.10	774	Tank T-9 Sludge Tank (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.11	774	Tank T-2F Acid Receiving (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

8/27/97

Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
55.12	774	Tank T-12F Acid Neutralization (listed in HWTSMMP)	Treatment in Tank	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.22	774	Vacuum Filter B	Treatment in Tank	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.23	774	Tank T-73 B- Vacuum Filtrate Receiving (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.24	774	Tank T-210A Filter Feed Tank (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.25	774	Tank T-71 Acid Receiving (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .
55.27	774	Tank 40, 2nd Stage Sludge Tank (this tank was built to replace Unit 55.13) (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 8/86 Compliance Agreement (RCRA-VIII-86-08) ; subject to 6 CCR 1007-3, Part 265 .

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

8/27/97

Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
56.01	774	Tank T-1 Waste Oil Tank (This tank existed but was inactivated and was to be replaced by Unit 56.09; No IHSS#) (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
56.02	774	Tank T-2 Waste Oil Tank (This tank existed but was inactivated and was to be replaced by Unit 56.10; No IHSS#) (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
56.03	774	Tank T-13 Waste Oil Tank (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
56.04	774	Tank T-14 Waste Oil Tank (listed in HWTSMMP)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
56.05	774	OASIS Glovebox Mixer	Misc Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
56.07	774	T-374A Waste Oil Backup Tank (listed in HWTSMMP; no IHSS#)	Tank Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .

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Regulatory Status of RCRA Hazardous Waste Units at Rocky Flats

8/27/97

Unit No.	Bldg.#	Unit Name	Type of Unit	Condition	Current Regulatory Status and Drivers
61	776	Room 146 - Size Reduction Vault (SRV)	Container Storage	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07--10-01 ; subject to 6 CCR 1007-3, Part 265 .
61	776	Room 146 - Size Reduction Vault (SRV)	Misc Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; received interim status pursuant to 7/89 Compliance Order 89-07-10-01 ; subject to 6 CCR 1007-3, Part 265 .
74	776	Supercompaction and Repackaging Facility (SARF) (Note: The unit number 74 was previously used for a proposed storage area near the 904 Pad, but the area was never built. See the TRU Mixed Part A Application, Rev. 2, which was never submitted to CDH.)	Misc. Treatment Unit	To be closed	RCRA Interim Status TSD unit for hazardous waste; change to interim status approved by CDH letter dated 6/4/92 , subject to 6 CCR 1007-3, Part 265 .

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