

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

**Date/Time:** 2/8/02 / 1:40

**Site Contact(s):** David Ward, B371/374  
**Phone:** 303-966-5938

**Regulatory Contact:** James Hindman  
**Phone:** 303-692-3345

**Agency:** Colorado Department of Public Health and Environment

**Purpose of Contact:** To obtain approval for a staging area for T231 tanks,

## Discussion

Requested a staging under the Tank Management Plan and Consent Order 97-08-21-01 to remove sludge from the T231 tanks. Sludge will be removed the tanks and put in drums and drums need to be staged in the area during filling, draining of water and accumulating the appropriate number of drums for transporting to a permitted area. The attachment is the change to the Tank Management Plan that will be submitted as a pre-approved change under paragraph 37.3) of the Consent Order.

**Contact Record Prepared By:** David Ward

## Required Distribution:

R. DiSalvo, RFFO  
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T. Hopkins, K-H 776  
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## Additional Distribution:

\_K. Harms\_\_\_\_\_  
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Contact Record 4/10/00  
Rev. 10/11/00

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CHANGES TO SECTION 8 OF THE TANK MANGEMENT PLAN  
(ORDER ON CONSENT 97-08-21-01)

MANAGEMENT OF T231 A AND B TANK SLUDGE REMOVAL

**8.0 TANK SYSTEM DESCRIPTIONS**

DESCRIPTION OF THE 231 TANK SYSTEM

“1<sup>st</sup> Existing Paragraph”

Change the last sentence to: “The alarm systems are monitored once per day to ensure any leakage is identified quickly and appropriate response actions taken.”

Add: “Level indicating devices and alarms do not have to be monitored for a tank when that tank has been pumped down as low as possible with existing equipment and all inlets and outlets has been locked and tagged out.”

“2<sup>nd</sup> Existing Paragraph” No change

Sludge removal from the tanks is required from time to time for the management of the tanks. The sludge may be removed by pumping or other mechanical means. The sludge will be transferred to containers or tankers. The containers or tankers may have to be staged in the immediate area of the T231 tanks prior to being transferred to permitted storage or shipped off site.

If containers are used they will be staged in a heated Waste Containment Sea Land Container located outside of the bermed area. Tankers may be parked in the immediate vicinity for loading. The area required for the removal and transfer of the sludge will be managed under this “Tank Management Plan” as a 30-day staging area. The staging area requirements are:

1. Will be identified by clearly marked signs, and by rope, tape boundary, or other appropriate identifier.
2. Containers will be configured to provide sufficient space for inspections, personnel egress, and access by emergency responders:
  - (A) Unless staged against a wall, containers may be grouped together in arrays of up to three containers wide by ten containers long, with minimum 26-inch aisle around each group.
  - (B) Groups of containers staged along a wall will not exceed two containers wide.
  - (C) The total capacity of these drums will count against the total capacity of the entire T231 tank area.
3. The start date for each container placed into the staging area will be recorded on a logsheet. Each container must be moved from staging area to permitted storage in 30 days or less. The accumulation start date will be the approximate first day waste entered the appropriate T231 tank.
4. The containers will be inspected weekly.

The waste will be managed in accordance with a “Tank Sludge Management Plan”.