

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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Roy Romer
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Executive Director

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<i>Jones</i>	

Mr. Albert E. Whiteman
Area Manager
Rocky Flats Area Office
U.S. Department of Energy
P.O. Box 928
Golden, Colorado 80402-0928



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Dear Mr. Whiteman:

This letter is a follow-up to our inspections of your facility on November 3 and 4, 1988, November 17, 1988, December 2, 1988, December 6, 1988 and December 16, 1988. All of the inspections except the one on December 6, 1988 were inspections of transuranic mixed waste storage areas. The December 6, 1988 inspection was an inspection of some of the areas that you requested to be permitted or closed in your Part B permit application for hazardous and low level mixed waste.

The following violations of the Colorado Hazardous Waste Regulations were found during the inspections:

Building 371, Unit 63:

- Inadequate aisle space.
- Storage without a permit or interim status for 37 drums of low level mixed waste. This area was not included on the Part A application for hazardous and low level mixed waste, and therefore does not have interim status for the storage of low level mixed waste.

Building 776, Unit 11:

- Inadequate aisle space (This was corrected by the December 2, 1988 inspection).
- No hazardous waste determination, nor any waste analysis had been performed for the drums received from Idaho.
- No accumulation start dates were marked on the drums received from Idaho.



ADMIN RECORD

DOCUMENT CLASSIFICATION
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IA-A-001279

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Albert E. Whiteman
Rocky Flats Area Office
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- Storage without a permit or interim status for at least two drums of transuranic mixed waste near the LOSAC counter in a caged area of room 134 that was marked as a 90-day storage area (unit 776-827) by a painted sign. These two drums had accumulation start dates that exceeded 90 days. This area was not shown or described as part of unit 11 in the June 1988 Part B permit application and therefore does not have interim status.

- One container did not have an accumulation start date marked on it.

Building 776, Unit 69:

- Inadequate aisle space.

- One container of mixed waste had the accumulation start date crossed out with another date written below, and another container had an accumulation start date that was different from the date that was shown in the log.

Unit 1, Main Hazardous Waste Storage Area:

- Two drums stored on racks in the solid hazardous waste area were found to be leaking liquid. This is a violation of interim status inspection and container storage requirements.

All storage units:

- Accumulation start dates on containers of transuranic mixed waste do not accurately reflect the date that the waste was placed in the container. Containers were found with up to 110 days difference between the date that the container was filled (as indicated on the drum count label) and the accumulation start date that was marked on the drum. This is a violation of 262.34 which requires that the accumulation start date be marked on the container when the accumulation starts.

ATMX Cars:

- Cars numbers 604, 605, 609, 611, 612, and 614 contain containers of transuranic mixed waste with accumulation start dates that exceeded 90-days storage prior to October 23, 1988. This is a violation of storage without a permit or interim status because prior to October 23, 1988 the ATMX cars did not have interim status for the storage of transuranic mixed waste.

- Car number 608 which was received from Idaho has several violations of the Colorado Hazardous Waste Regulations associated with it. These include the following:

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- No hazardous waste determination has been made.
- No waste analysis has been performed to insure that the facility can treat or store the waste.
- Storage of transuranic mixed waste without a permit or interim status.

If you should have any questions, or wish to schedule a meeting to discuss these violations, please contact Jim Kiefer at 331-4853.

Sincerely,



Frederick R. Dowsett, Unit Leader
Monitoring and Enforcement
Hazardous Materials and
Waste Management Division

cc: Dominic Sanchini, Rockwell International
Judy Wong, EPA

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