



KAISER•HILL
COMPANY

December 24, 2003

03-RF-01873

Mr. James Hindman
Colorado Department of Public Health & Environment
HMWMD-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Submitted via fax: 303-759-5355

**COMMENTS TO THE DRAFT STATE RESOURCE CONSERVATION & RECOVERY ACT (RCRA) PERMIT
FOR THE ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE - KN-157-03**

Kaiser-Hill Company, LLC is submitting the attached comments to Colorado Department of Public Health and Environment's (CDPHE) draft RCRA Permit for the Rocky Flats Environmental Technology Site (RFETS). Bold text represents additions to the draft text. Strikeout represents deletions to the draft text.

As noted in our comments, based on a meeting with CDPHE personnel on December 22, 2003, Kaiser-Hill is proposing the following changes:

1. Modifications to Section III, Container Storage to reduce the number of permitted storage units.
2. Deletion of Section IV, Tank Systems as all RCRA permitted tanks will be closed or RCRA Stable and undergoing closure at the anticipated date of issuance of the permit. No permitted RCRA storage tanks will be in operation at the anticipated date of issuance of the Permit.
3. Removal of all permitted treatment listed in Part V, Treatment Units with the exception of Unit S002 - Oil Solidification and Unit 881.3B - Mercury Amalgamation. In addition, clarification of size reduction has been proposed.
4. The Site no longer utilizes on-site laboratories and Section VI, Waste Analysis Plan has been revised to reflect such changes.

Kaiser-Hill looks forward to the issuance of the streamlined Part B RCRA Permit. Please feel free to contact us to discuss our comments or provide additional information. Our point of contact is Andrew Rosenman who can be reached at 303-966-3687.

Karan North

Karan North
Division Manager
Environmental Systems & Stewardship

AJR:jcm

Attachments:
As Stated

cc:
Richard Schassburger - DOE RFFO

page 5 for unit 865.3

ADMIN RECORD

Kaiser-Hill Company, L.L.C.
Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

1/12

IA-A-003019

Part I: Standard Conditions

No Comment

Part II: General Facility Conditions

Part II, Section B, Page II-1: The draft condition requires approval by the Director for receipt of waste from off-site "sources". Suggest the term "source" be replaced with the word "generator". It is not the intent for RFETS to be a commercial facility receiving waste from offsite generators, however, site generated wastes are returned from off-site "sources" from time to time.

Secondly, the permit currently requires notification seven days after the return of Site generated waste. Again, the receipt of returned site generated wastes should not require notification to the Division. Returned wastes are managed in accordance with the provisions of the RCRA permit and documented in the Operating Record. Therefore, the last sentence to this condition should be deleted as indicated by the strikeout text below:

"The Permittee shall not receive hazardous waste from off-site generators sources without the prior written approval from the Director. Division approval is not required when the Site generated and shipped the waste to another facility, and the waste is returned to the Site. ~~However, the Site must notify the division within seven (7) days after the return of the Site generated waste.~~"

Part II, Section L.4., Page II-4: The draft condition should be revised to delete the term "or the facility" as indicated by the strikeout text below.

"6 CCR 1007-3, Section 264.113 after receiving the final volume of hazardous waste at the hazardous waste management unit ~~or the facility.~~"

Part II, Section L.6., Page II-4: Condition ILL.6. specifies that 6 CCR 1007-3 Section 264.115 requires the submittal of certification that a hazardous waste management unit or facility, as applicable, has been closed with an approved closure plan within 60 days after completion. A hazardous waste management unit includes storage, treatment, or disposal units. As written, the permit condition is broader than the regulatory requirements outlined in 6 CCR 1007-3 Section 264.115. Specifically, the regulation requires "Within 60 days of completion of closure of each hazardous waste surface impoundment, waste pile, land treatment, and landfill unit, and within 60 days of the completion of final closure, the owner or operator must submit to the Department, by registered mail, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan..." As RFETS does not have any permitted surface impoundments, waste piles, land treatment or landfill units, this condition should be deleted from the permit.

Section III: Container Storage Area

General Comment: As discussed in a December 22, 2003 meeting with Agency personnel, it is Kaiser-Hill's intent to close all RCRA permitted storage units onsite with the exception of those listed below. With the closure of units, references to vaults may need to be removed throughout this section.

- Building 371/374 – Unit 371.1
- Material Stewardship: Units 14, 20, 440.1, 460.1, and 750.1.

Additional information will be provided to CDPHE as requested to address necessary permit changes.

Part III, Section B.2.e., Page III-2: The reference to vault storage areas should be deleted as units are closed or undergoing closure.

Part III, Section B.6., Page III-3: The second paragraph of this condition requires the permittee to provide notification and plans for the management of pyrophoric hazardous/mixed waste to the Division *prior to* storing the pyrophoric material in a permitted unit. The condition should be revised to allow for the immediate storage of pyrophoric hazardous/mixed waste within a permitted unit. Providing for immediate storage of the material in accordance with the buildings authorization basis and other safety requirements will be safer and more protective as opposed of holding the material in a non-permitted area that may not have the protective controls of a permitted unit.

Part III, Section B.10., Page III-5: Containers of hazardous/mixed waste currently are required to be labeled with compatibility codes under the draft condition. The condition should be revised to allow alternate systems for the management compatible hazardous/mixed wastes. As the Site progresses to closure, an alternate system, such as demarcating storage locations by compatibility groups instead of individual markings on the containers may be implemented. An example of the use of the management system may be during repackaging activities. Please revise the condition to include the bold text as noted below:

“All containers of hazardous waste will be labeled with the words..., and the compatibility code. **In lieu of individual compatibility codes on containers, the Permittee may use an alternate system for identification of compatibility.**”

Part III, Section B.11.a., Page III-6: Please revise the condition to reinstate the allowance for twenty one (21) days (versus 14 days) to place containers which are not actively leaking or have no radiation contamination detected at the area of concern of the pin hole breach in pans or overpacks. Previously, James Hindman of CDPHE authorized 21 days under a contact record dated 11/15/2000. In accordance with this approval, the authorization basis and site procedures were prepared to require 21 days. On 02/28/03, the Division approved a modification to the existing Part B permit incorporating the 14 day requirement into the permit conditions. From 11/15/2000 until 02/28/2003 wastes were managed within 21 days without an impact to human health or the environment. Because of this change, site requirements are conflicting.

Part III, Section B.14.b. Page III-82: Reference to vault storage areas should be removed as these units are closed or undergoing closure

Part III, Section B.11.g., Page III-6: Please revised the condition to read as noted below as there are non-cement mixer units that are sealed mixer units that may be used as the primary waste container at the site

“Cargo containers and sealed cement mixer units used as primary waste containers stored outside do not have to be covered as long as they are designed and maintained to prevent infiltration of precipitation.”

Part III, Section B.15.g., Page III-8: Please delete this redundant condition allowing Pipe Overpack Components (POCs) to be stacked four high if placed on pallets and secured with metal banding straps. POCs are subject to the conditions of III.B.15.c. which allow for stacking four high if placed on pallets and banded together above the second tier.

Part III, Section B.16.e., Page III-9: In the second paragraph of this section, please delete the sentence requiring the Permittee to document inspections of the areas where incidental liquids are to be stored immediately prior to storage of the incidental liquids. While the visual inspection of the area is performed, documentation of the initial inspection of the area is redundant and non-value adding. If the area does not meet the requirements for the storage of the incidental liquid, the container will not be located in the area. Secondly, the permitted RCRA inspection units are inspected weekly and documented in accordance with the inspection requirements specified in Part VII of the draft permit. Any deficiencies and corrective actions are noted in the inspection checklist or logs for the storage unit. In addition, by definition, incidental liquids are of small volumes and historically have not leaked from the container. Any leaks would be readily determined since the incidental liquid container is required to be elevated from the floor.

Please delete the third paragraph of this section. The compliance date of October 1, 2003 was met. The existing containers of hazardous waste with known incidental liquids have been repacked. Newly discovered incidental liquids after the compliance date are managed in accordance with the conditions of the fourth paragraph.

The fifth paragraph addresses the requirement for a tracking system. Please revise the sentence as noted below. As the Site progresses to closure, other tracking systems that are not exclusive to waste tracking may be used as part of the operating record. Deletion of the word "waste" would allow the use of dual purpose tracking systems that were not exclusive to waste tracking

"The waste tracking system (WEMS or other waste tracking system kept as part of the operating record) will be used..."

Part III, Section B.16.g.v. III-11: Please delete this condition. Bermed asphalt pads with berms sealed to the asphalt will not be used as secondary containment at the Site.

Part III, Section B.19.d., Page III-13: Please revise the condition as noted below. As the Site progresses through closure and building demolition continues, the availability of loading docks of permitted storage units will decrease. The proposed revision will allow the preparation of RCRA waste shipments and expedite closure without an increase risk to human health or the environment.

"Wastes being shipped or received may be temporarily held outside of permitted storage areas kept on loading docks of permitted storage units or on transport vehicles parked at such docks for up to 72 hours and checked periodically during that time to ensure no spills or other releases occur. Within 24 hours following such use, the dock area will be checked for any signs of leakage from the waste containers..."

Part III, Section B.21., Page III-13: Please delete this condition. The storage of non-RCRA hazardous/mixed waste in a RCRA permitted unit is not within the scope of the RCRA regulations. As the Site moves closer to final closure, waste storage will be consolidated into fewer and fewer areas. This will result in more RCRA and non-RCRA waste commingled in fewer storage units. Current permit conditions require that non-RCRA waste be managed as RCRA waste when stored in permitted units. Due to the planned consolidation, this will create

complications (e.g., secondary containment, aisle space, etc.). Segregation of non-RCRA and RCRA can be maintained within the units, however, the Site is requesting that remaining permit conditions be eliminated for non-RCRA waste.

Part III, Section B.22., Page III-14: Please change the section heading from "Unit Transfer from RCRA Management to RFCA Management" to "RCRA Stable Requirements". The revision more accurately reflects the intent of the Section and will aid users of the permit. (Note: Refer to wording in Section V.B.11 and 12 more clearly describes the intent of this requirement)

Part III, Section C.: As noted above in the general comment, please delete the following units: Units 1, 10, 18.03, 24, 707.1, 776.1, and 777.1. These units are either RCRA stable, closed, or undergoing closure.

Part IV – Tank Systems:

General Comment: All RCRA permitted tanks will be closed or RCRA Stable and undergoing closure at the anticipated date of issuance of the permit. No permitted RCRA storage tanks will be in operation at the anticipated date of issuance of the permit. Please delete this Part of the permit.

Part V: Treatment Units

General Comment: At this time, only 3 permitted treatments will remain at RFETS as noted below. It is requested that all other permitted treatments be deleted from the permit.

1. Unit S002 – Oil Solidification
2. Unit 881.3B – Mercury Amalgamation
3. Permit Modification #03-04 – Size Reduction

Part V, Section V.B.10., Page V-5: Please revise the condition to read as noted below. Mechanical size reduction activities are necessary to meet off-site facility waste acceptance criteria for certain waste streams. Operational controls are dependent upon the type of material being size reduced and methods used to size reduce the material. The controls are specified in site procedures, integrated work control plans, or other site documents. These controls may include the use of Permacons, gloveboxes, localized ventilation controls, and other methods. Note, if this comment is not incorporated into the final permit, please include mechanical size reduction treatment as specified in permit modification request #03-04 which is currently being reviewed by the Division.

"Mechanical size reduction may be performed in any permitted storage unit."

Part V, Section V.C.1, Page V-5: Permit Modification #02-02 to the existing RFETS Part B permit became effective on June 20, 2002. The modification included the addition of aqueous hazardous mixed waste streams to the types of waste that may be treated in Treatment Unit S002 ("Oil and/or Aqueous Solidification Process", formerly known as the "Oil Solidification Process"). DOE and K-H requested CDPHE to incorporate previously approved modifications into the permit renewal application. The modification was not incorporated into the draft permit. It is requested that the existing permit language for Treatment Unit S002 be incorporated into the renewal permit.

Part V, Section V.C.2. and V.C.3, Pages V6 - 10: Please delete the caustic waste treatment system and the aqueous waste treatment system from the permit. These units are undergoing closure in accordance with a Rocky Flats Cleanup Agreement (RFCA) decision document. The units are no longer in operation and need not be permitted.

Part V, Section V.C.4.a. and V.C.4.b, Pages V10 - 13: Please delete the epoxy macroencapsulation process and the BOH Environmental Arrow-Pak treatment units from the permit. These units were never installed or operated at the Site.

Part V, Table I – Treatment Unit Specific Conditions – S002 Oil Solidification: Please update the unit specific condition sheet to reflect the currently approved conditions.

Part VI: Waste Analysis Plan

General Comment: RFETS no longer utilizes onsite laboratories. All analytical work required by or associated with the RCRA permit are now performed by contracted offsite commercial laboratories. All references to onsite laboratories or procedures should be deleted.

Part VI, Section VI.A.2, Page VI-1: Please revise the following as indicated below:

- “Section D references ~~post~~pre-treatment analysis.” The reference is incorrect.
- “Section E references ~~sampling methods~~post-treatment analysis.” The reference is incorrect.
- “Section F references ~~analytical~~ sampling methods.” The reference is incorrect.
- “Section G references analytical methods.” The reference was omitted.
- “Section ~~G~~ H briefly describes the quality assurance/quality control (QA/QC) program and ~~references the RFETS Analytical Services On Site Laboratories Quality Assurance Plan (ALQAP).~~” The Site no longer operates on-site laboratories. Required analytical work is performed by off-site laboratories. In addition, the reference is incorrect.
- “Section ~~H~~ I describes the characterization of waste for off-site shipment.” The reference is incorrect.

Part VI, Section VI.B.2, and VI.B.4., Page VI-2: Please delete the requirements to perform a review against the permit requirements prior to sending waste to storage units. All EPA hazardous waste codes are permitted in all the storage units across the Site and the same general container storage conditions apply to all the units making this review unnecessary.

Part VI, Section VI.B.3., Page VI-2: Please revise the second paragraph as noted below:

“Samples will be submitted to ~~the on-site laboratory or~~ an RFETS approved contract laboratory for analyses. The appropriate analytical ~~methods (L Procedures)~~ are ~~referenced in Section F of this part.~~ Sample and management quality control/quality assurance procedures are referenced in Section F and H of this Part.”

Part VI, Section VI.F., Page VI-4: Please revise the paragraph as noted below as the on-Site laboratory is being closed. Sampling will be conducted according to Site protocols and practices which are in conformance with the regulatory requirements.

“Sampling methods used to collect hazardous waste samples at Rocky Flats shall comply with those described in Appendix I of 6 CCR 1007-3, Section 261 or an equivalent method approved by the Division as allowed in 6 CCR 1007-3, Section 264.13(b)(3). Sampling location, sample matrix, sample container type and size, and accessibility shall be taken into consideration when assigning a sampling method in order to ensure collection of a representative sample in accordance with the ~~RFETS Analytical Services On-Site Laboratories Quality Assurance Plan (ALQAP)~~ and appropriate Site procedures, plans and work practices. ~~L-Procedures. The ALQAP and L-Procedures are available upon request.~~ Table VI-I of this Part lists waste matrices and appropriate sample methods.”

Part VI, Section VI.G., Page VI-4: Please delete the existing two paragraphs of this section and insert the wording as noted below. As noted earlier, the on-Site laboratory is being closed and contract or off-site laboratories will be used. The analytical methods used by the laboratories are maintained by the laboratories and are periodically reviewed by the Permittee for conformance with regulatory requirements.

“Off-site laboratory have procedures and/or methods developed to meet the technical requirements for analyzing wastes. The test methods are maintained by the contracted off-site laboratory.”

Part VI, Section VI.H., Page VI-4: Please delete the existing paragraph of this section and insert the wording as noted below. As noted earlier, the on-Site laboratory is being closed and off-site/contract laboratories will be used. The QA/QC programs used by the laboratories are maintained by the laboratories and are periodically reviewed by the Permittee for conformance with regulatory requirements.

“The Quality Assurance/Quality Control (QA/QC) programs are developed and maintained by the off-site contracted laboratories.”

Part VII: Procedures to Prevent Hazards

Part VII, Section C.1., Page VII-6: Please revise the second paragraph of this section to read as noted below. As the Site closes, certain areas will no longer be covered by the fire alarm and/or LS/DW systems and other means of communication will be used. The paragraphs following the second paragraph provide for alternate methods for fire/communication systems when this occurs for the permitted units.

“The fire alarm system and Life Safety/Disaster Warning (LS/DW) public address system or other means of communication are available in some locations ~~will be used~~ to notify facility personnel of an emergency situation and provide immediate emergency instructions except in remote locations.”

Part VII, Section C.1., Page VII-6: Please revise the text of the fourth paragraph of this section to read as noted below. As the Site has progressed with closure, units and buildings have undergone closure. Part of the closure process includes deactivating electrical systems to allow for the decommissioning of the building. The change more accurately reflects Site conditions.

"Finally major some buildings are equipped with and automatic fire suppression/detection and alarm system that will immediately and concurrently alert personnel at the Fire Department and the Site protection central alarm station when a fire is detected. In lieu of automatic concurrent alarms, alternative and equivalent measures will be used to notify the Fire Department."

Part VII, Attachment A, Page VII-11: Please delete the Facility/Unit Level requirement for remote monitoring of vaults and the Area Level remote vault monitoring criteria. The units have been closed or are undergoing closure.

Part VIII: Contingency Plan

General Comment: Please replace the existing draft Part VIII with the modification request #03-04 Part VIII previously submitted to the Division. The pending modification request was submitted as a Class 1 with prior approval and updates the Contingency Plan to reflect recent minor administrative changes.

With the proposed removal of Section V and modified Sections III and IV, it is recommended that a new Contingency Plan reflecting permitted activities be submitted to the agency for approval.

Part IX: Training

General Comment: With the proposed removal of Section V and modified Sections III and IV, it is recommended that a new Training Plan reflecting permitted activities be submitted to the agency for approval.

Part IX, Section IX.B.1.c., Page IX-2: Please revise the sentence to read as noted below. The annual refresher trainer for RCRA and the area specific training provides updates and reinforcements to the elements of the RCRA requirements. The annual update training is not intended to cover the entire scope of the initial RCRA training.

"Personnel with job responsibilities involving the generation or management of hazardous waste will be provided general updated RCRA training and area specific training on an annual basis".

Please revise the final sentence of the paragraph on training frequency to read as noted below. The change is requested to allow area-specific training to be provided by appropriate subject matter experts other than direct supervisors of individuals.

"These individuals are also provided with area specific training ~~by their supervision.~~"

Part IX, Section IX.B.2.c., Page IX-2: Please revise the first sentence of the first paragraph to read as noted below. The change is requested to allow area-specific training to be provided by appropriate subject matter experts other than line management of individuals.

"Area-specific emergency response training is provided ~~line management~~ in the specific area of assignment while general Site emergency training is provided in classroom training sessions. "

Part IX, Appendix A; Page IX-6: Please revise the RCRA training matrix as indicated in the attachment. The training matrix has been revised to delete the RCRA Organic Air Emissions training requirements. All the units subject to these regulatory requirements have been removed; therefore, training on this subject is no longer applicable. The table has also been revised to reflect the combination of the RCRA waste and waste generator courses into one combined course.

Part IX, Waste Characterization Subject Matter Expert (SME) Position Description, Page IX-8: Please revise the third bullet to read as noted below. The organization's name responsible for this function has changed since the time of the application.

"Assist the waste generating organization and ~~Waste Customer Service organization~~ Waste Requirements Group in preparing Waste Generating Instructions."

Please delete the seventh and eight bullets of this section. The Non-Routine Waste Origination Log (NRWOL) is no longer used at the Site.

Please remove the reference to NRWOL in the ninth bullet of this section. The NRWOL is no longer used at the Site.

Part IX, Hazardous Waste Management Guidance Position Description, Page IX-10: Please delete the first bullet of this section. The Non-Routine Waste Origination Log (NRWOL) is no longer used at the Site.

Part IX, Hazardous Waste Management Personnel Position Description, Page IX-12: Please delete the fourth bullet of this section. As discussed earlier, there are no systems remaining at the Site that are subject to the RCRA Organic Air Emissions systems.

Part X - Closure

Part X, X.D.1., Page X-6: The last sentence of the first paragraph states that if the Permittee achieves clean closure, "...the permitted unit will be certified as "clean closed in accordance with 6 CCR 1007-3, Section 264.115, and will require no post-closure care or maintenance." The referenced regulation, 6 CCR 1007-3, Section 254.115 states "Within 60 days of completion of closure of each hazardous waste surface impoundment, waste pile, land treatment, and landfill unit, and within 60 days of the completion of final closure, the owner or operator must submit to the Department, by registered mail, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification must be signed by the owner or operator and by an independent registered professional engineer..." It should be noted that the requirement does not include storage or treatment units. Therefore, it is Kaiser-Hill's position that an independent professional engineer certification is not required for clean closure of storage and treatment units.

Appendix A
RCRA Personnel Position Descriptions
Required Initial and Continuing Training Matrix

ENVIRONMENTAL PERSONNEL	RCRA TRAINING PROGRAM								
	WASTE GENERATOR PROGRAM			INITIAL					CONTINUING
	Waste Generator All Areas Classroom ¹	Waste Determination/WSRIC Classroom ¹	Waste Generator All Areas Qualification	RCRA Waste Management Classroom ¹	RCRA Tank Management Classroom ¹	RCRA Waste Management Qualification	RCRA Organic Air Emissions Briefing ²	RCRA Organic Air Emissions Qualification ²	RCRA/Waste Generator Annual Training (Checklist)
Waste Generators	R	X	R	X	X	X	X	X	R
Waste Characterization Subject Matter Experts	R	R	X	X	X	X	X	X	R
RCRA Unit Owners	R	R	X	R	R1	X	R1	R1	R
Hazardous/Mixed Waste Management Guidance Personnel	R	R	X	R	R1	X	R1	R1	R
Hazardous/Mixed Waste Management Personnel • RCRA Container Unit Inspectors	R	R	X	R	X	R	R1	R1	R
Hazardous/Mixed Waste Management Personnel • RCRA Tank Inspectors	R	R	X	R	R	R	R1	R1	R
Immediate Supervision of Hazardous & Mixed Waste Management Personnel	R	R	X	R	R1	X	R1	R1	R

Notes: R = Required

R1 = Required if duties involve applicable systems

X = Not Required

1. In lieu of separate courses, individuals may complete the course titled Waste 101 which combines the content of all the courses.

2. The Site has no units subject to these requirements

CORRES. CONTROL
OUTGOING LTR NO.

DOE ORDER #

00 RF01226



KAISER-HILL
COMPANY

Rocky Flats Environmental Technology Site

DIST.	LTR	ENC
BACA, T.		
BRALSFORD, M.D.		
BYRNER, C.J.		
CARD, R.G.		
COX, C.M.		
CRAWFORD, A.C.		
FERRERA, D.W.		
FERRI, M.S.		
FULTON, J.C.		
GIACOMINI, J.		
MARTINEZ, L.A.		
NOTES, J.L.		
PARKER, A.M.		
POWERS, K.		
SCOTT, G.K.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N.R.		
Steve Nesta	X	
A. Konwinski	X	
R. Meyers	X	
Alaric K.	X	
Leage, J.	X	
Hippman, J.	X	
Gilbreath, L.	X	
Grasek, D.	X	
FOR CONTROL	X	X
MAN RECORD		
STE REC. CTR		
EAFFIC		
PATS/T130G		
CLASSIFICATION:		
UNCLASSIFIED	X	
CONFIDENTIAL		
SECRET		

April 12, 2000

Mr. Joe Schieffelin
Permitting and Compliance Unit Leader
Federal Facilities Program
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

00-RF-01226
00-DOE-02231

ADMINISTRATIVE CLOSURE FOR TREATMENT UNIT 865.3 IN BUILDING 865
KN-049-00

Dear Mr. Schieffelin:

Pursuant to the Rocky Flats RCRA Part B Permit (June 1997), Kaiser-Hill Company, L.L.C. and the United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) are submitting this letter requesting closure of RCRA Treatment Unit 865.3 in Building 865, effective immediately.

This unit was never placed into service, never treated hazardous waste and has no intended use at alternate locations on Site. Therefore, we request approval to remove this unit upon receipt of this letter. In addition, a permit modification will be submitted removing the unit from the RCRA Part B Permit.

If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation Industrial Site Services (RISS) at 303-966-6386.

AUTHORIZED CLASSIFIER
SIGNATURE
PerCEX-266-95

Date

IN REPLY TO RFP CC
NO:

ACTION ITEM STATUS

- PARTIAL/OPEN
- CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS

Revision 300

William W. G. North 4/27/00
Karan North, Division Manager Date
Environmental Systems and Stewardship
Kaiser-Hill Company, L.L.C

KLM:kca

cc:
J. Hindman - CDPHE
C. Gilbreath - CDPHE
D. Grosek - DOE, RFFO

Joseph A. Legare 4-18-00
Joseph A. Legare Date
Assistant Manager
for Environment and Infrastructure
U.S. Department of Energy

712

12/12

RFETS MASTER ACRA UNITS
Table 1 Units Still under the permit... were closed under the permit

	A	B	C	D	E	F	G	H	I	J
1	[REDACTED]									
68	865.3	SITE	Polymer Macroencapsulation	PERMITTED	Request for administrative closure transmitted to CDPHE 4/28/00 (00-RF-01226) was later rescinded via telephone communication with J. Hindman (6/15/00). This unit has never been placed into service but may be moved to an alternate location for future use on Site.	NA	NA	SITE		N