

92 RF 9048

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 (303) 966-7000

August 11, 1992

92-RF-9048

	LTR	ENC
JAMIN A		
MAN, H S		
NCH DB		
NIVAL G J		
P RD		
S J G		
RED JE	X	X
PERA DW		
DWIN, R		
VI BJ		
MAN, L K		
Y TJ		
IG, J G		
ER, E H		
SH, J M	X	X
Y WA		
STER A W		
G D		
EM		
ESTIG, W B		
X G E		
ONALD, M M		
GAN R V	X	X
TFR GL	X	X
TO V M		
UN, N B		
PIER, B I		
JVAN MT		
NSON E R		
MAN, K G		
SE JS		
INSON, R B		
SON J M		
E J O		
EF	X	X
EC	X	X
HA	X	X
CH	X	X
WY-PROG	X	X
WY	X	X
RES CONTROL	X	X

Terry A Vaeth
Manager
DOE, RFO

Attn J K Hartman

EXPIRATION OF INTERIM STATUS FOR RESOURCE CONSERVATION RECOVERY ACT (RCRA)
UNITS - JMK-0759-92

Enclosed is a draft letter to the Colorado Department of Health (CDH) defining the regulatory status of RCRA interim status units with respect to the November 8, 1992, interim status deadline. This letter is the result of several recent discussions my staff has had with CDH attempting to clarify the interim status expiration provisions of the Colorado Hazardous Waste Regulations.

If you have any questions regarding this issue, please contact Pam Edrich at extension 7752 or Bill Bruninga at extension 8281.


J M Kersh, Associate General Manager
Environmental and Waste Management

WMB sf

Orig and 1 cc - T A Vaeth

Enclosure
As Stated

CLASSIFICATION

CLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

DIVISIONAL MANAGER
8/11/92

REPLY TO RFP CODE

EM STATUS

CLOSED

PARTIAL

APPROVALS

TYPIST INITIALS

ADMIN RECORD

REVIEWED BY	UW
BY	BN
DATE	8-19-92

DRAFT

DRAFT

DRAFT

Gary W Baughman, Unit Leader
Hazardous Waste Facilities
Hazardous Materials Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, CO 80220

Mr Frederick R Dowsett, Ph D
Monitoring and Enforcement Unit Leader
Hazardous Materials and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, CO 80220

Gentlemen

Based on 6 CCR 1007-3, Parts 100 20(a), 100 20(c)(6) and 40 CFR 270 73, we believe interim status does not expire on November 8, 1992, for the following operational Rocky Flats Plant (RFP) RCRA units

- 1 Units described in the various Rocky Flats Plant (RFP) Part B Permit applications submitted to the Colorado Department of Health (CDH) before November 8, 1988
- 2 Units which gained interim status after November 8, 1984, were included in the RFP Part B Permit application submitted to CDH in November, 1986, but were removed from the application prior to November 8, 1988 This refers specifically to the following three units withdrawn from the November 1986 Part B Permit application because it was believed they would not be operated past November 8, 1992
 - Unit 6, Chip Drum Storage Area, Building 447
 - Unit 21, Pondcrete Storage Area, Building 788
 - Unit 25, Mixed Waste Storage Area, 750 Pad
- 3 Units which gained interim status after November 8, 1988, and therefore, were not included in pre-November 1988 Part B Permit applications

Enclosure

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The Department of Energy, Rocky Flats Office, hereby requests confirmation or clarification of the above interpretation. We request your response by September 1, 1992.

If you have any questions, please contact Debbie Mauer at 966-5598.

cc

M Hestmark, EPA Region VIII
P W Edrich, EG&G Rocky Flats, Inc
J M Kersh, EG&G Rocky Flats, Inc
A L Schubert, EG&G Rocky Flats, Inc