

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH
Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

September 17, 1993

ADMIN RECORD

Bruce Thatcher
U.S. Department of Energy
Rocky Flats Office

RE: OUG Tanks

Bruce,

Here is a breakdown of the "active" OUG tanks. The tank number designations are taken directly from Table 2.2 of the Final RFI/RI Workplan. It is worth noting that none of the OUG tanks are in the current RCRA operating permit.

Tank	Bldg	#	Status
T-5	444	2	Interim status - RCRA units 40.04, 40.05
T-24	881	7	Interim status - RCRA units 40.20 - 40.26
T-25	883	2	Interim status - RCRA units 40.30, 40.31
T-26	883	3	Interim status - RCRA units 40.39 - 40.31

These tanks will be closed under the interim status requirements of the Colorado Hazardous Waste Regulations.

T-4	447	3	Spill control
T-6	444	2	Spill control
T-7	559	2	90-day
T-8	771	2	Plenum deluge
T-9	776	2	Plenum deluge
T-11	707	2	Secondary containment
T-19	779	2	Plenum deluge
T-28	889	2	Spill control
T-30	707	1	Secondary containment
T-32	881	1	Secondary containment
T-38	779	1	90-day

These are the tanks of concern. These are all part of IHSS 121, and some are part of other IHSSs since added to OUG (known releases, etc); therefore, they must be investigated and at least administratively closed. The PSP of the OUG Workplan states "...tanks and pipelines which are active waste management units are not included in the scope of this Workplan because their structures and associated soils will be addressed at the time of their closure in accordance with the RCRA Part B Permit Applications...". The problem is, they are neither permitted nor do they have interim status, meaning these closure mechanisms are not available. I believe they differ from the 750/904 pads in that they are not slated for becoming permitted and then closed through the permit (correct me if I'm wrong).

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

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I think you can see how these tanks fall into a grey area. Please find out what the tanks are needed for, if at all, and for how much longer. If they are to continue to be in use indefinitely, we still need to identify a mechanism to close them at some point.

Please give me a call at 692-3415 when you have a feel for how we can deal with these tanks.

Dave Norbury

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