



Department of Energy

ROCKY FLATS OFFICE  
P O BOX 928  
GOLDEN COLORADO 80402-0928

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ACTION	LTR	ENC
BENEDETTI, R L		
BENJAMIN, A		
BERMAN, H S		
CARNIVAL, G J		
COPP R D		
CORDOVA, R C		
DAVIS J G		
FERRERA, D W		
FRANZ, W A		
HANNI B J		
HEALY T J		
HEDAHL T G	X	X
HILBIG J G		
HUTCHINS N M		
KIRBY W A		
KUESTER A W		
MAHAFFEY J W		
MANN H P		
MARX G E		
McKENNA F G	X	X
MORGAN R V		
PIZZUTO V M		
POTTER G L		
SANDLIN N B		
SATTERWHITE D G		
SCHUBERT A L	X	X
SETLOCK G H		
SULLIVAN M T		
SWANSON E R		
WILKINSON R B		
WILSON J M		
Keith S	X	X
Stiger S	X	X

93-DOE-13656

Mr Gary Baughman  
Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Dear Mr Baughman

The Department of Energy, Rocky Flats Office (DOE/RFO), hereby provides updated information on the status of Rocky Flats Plant (RFP) Unit 15B, Mixed Waste Storage Area, 904 Pad. This updated information clarifies RFP compliance with the container storage aisle space requirements of 6 CCR 1007-3, §265 35 (required aisle space). The DOE believes the current Unit 15B triwall stacking arrangement satisfies the requirements of 6 CCR 1007-3, §265 35 and that the triwalls are managed in a manner protective of human health and the environment. Unit 15B currently has interim status for container storage of up to 10,700 cubic yards of low level mixed waste (LLMW). The DOE estimates 5,468 cubic yards of the unit capacity exists as the backlog pondcrete/saltcrete currently in 7,771 plastic wrapped, fiberboard "triwall" stacks stored within large tents on the 904 Pad. Long-term storage of this pondcrete/saltcrete has been a mutual concern and the source of discussion with members of your staff and was referenced in a DOE/RFO waste pile request for change to interim status dated May 17, 1993. Submittal of updated storage information was specifically discussed with your staff at a 904 Pad compliance meeting on August 24, 1993. This letter addresses long-term storage concerns and facilitates long-term storage of pondcrete/saltcrete triwalls until eventual reprocessing and removal from RFP.

The pondcrete/saltcrete triwalls were created during the 1980's as a part of treatment of salts and pond sludge for disposal at the DOE's Nevada Test Site (NTS). The NTS's mixed waste disposal operations are shut down, however, the duration of this shutdown has surpassed original expectations and the date which NTS can dispose mixed waste remains unknown. The triwalls have since been stored in anticipation of reprocessing and disposal. A description of pondcrete/saltcrete waste management methods at RFP was originally described in a DOE/RFO letter dated January 29, 1987, which described pondcrete and saltcrete triwalls stacked outdoors in groups of 72 under tarps on the asphalt 750 Pad. Within each tarp, the triwalls were to be stacked 4 triwalls wide by 3 high by 6 deep on wooden pallets.

The current Unit 15B facilities were established in 1990 with the construction of the four metal-framed storage tents. Storage tents were also constructed at Unit 25 (Mixed Waste Storage Area 750 Pad). These tents were constructed to provide weather protection for pondcrete/saltcrete storage. The hazardous waste management activities at that time included repackaging existing pondcrete for off-site shipment to Nevada. This repackaging included removing free liquids from the pondcrete/saltcrete. Since May 8, 1990, no pondcrete/saltcrete has been shipped off site. Within the first four or five months of 1991, all existing pondcrete/saltcrete was repackaged in plastic and placed on 5-inch high wooden pallets. Pondcrete/saltcrete with insufficient structural integrity was placed in metal containers. These metal containers are now stored outdoors around the

CORRES CONTROL x x  
PATS/T130G

Reviewed for Addressee  
Corres Control RFP

1-5-94  
DATE BY

Ref Ltr #

DOE ORDER # 5400 3  
5400 1

ADMIN RECORD

A 0010-000121

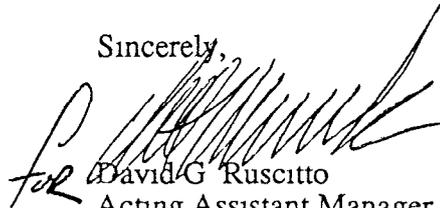
Mr. Baughman  
93-DOE-13656

perimeter of the 904 Pad and on the north side of the 750 Pad. During the spring of 1992, the pondcrete/saltcrete stored on the 750 Pad was moved to the 904 Pad to create storage space for pondcrete expected to be generated by future pondcrete processing operations. Pondcrete/saltcrete with deteriorated packaging was repackaged during this move. The blocks were sorted and stacked by relative structural integrity. A drawing representing the current stacking arrangement is enclosed.

The design and operating practices which now provide waste containment and safe storage include the asphalt 904 Pad, the bermed metal-framed fabric tents, the layers of plastic wrapping around the triwalls, the pallets which elevate the triwalls off the asphalt pad as well as weekly RCRA inspections of all storage facilities. Each tent has a main aisle of at least 10 feet in width for fork truck access. Each tent also has 4 to 6 smaller aisles of approximately 4 feet in width for personnel egress. Fork truck access, personnel egress routes as well as access for spill control and decontamination equipment have proven to be adequate during the past 2 years of pondcrete/saltcrete operations. Based on this established history, DOE believes the current Unit 15B triwall stacking arrangement satisfies the requirements of 6 CCR 1007-3, §265.35 and that the triwalls are managed in a manner protective of human health and the environment.

We believe this letter resolves a mutual compliance concern. We look forward to your review and comment as soon as possible. Additional details on the enclosed information can be provided on request. If you have any questions, please contact Steve Howard at 966-3040 or John Rampe at 966-6246.

Sincerely,

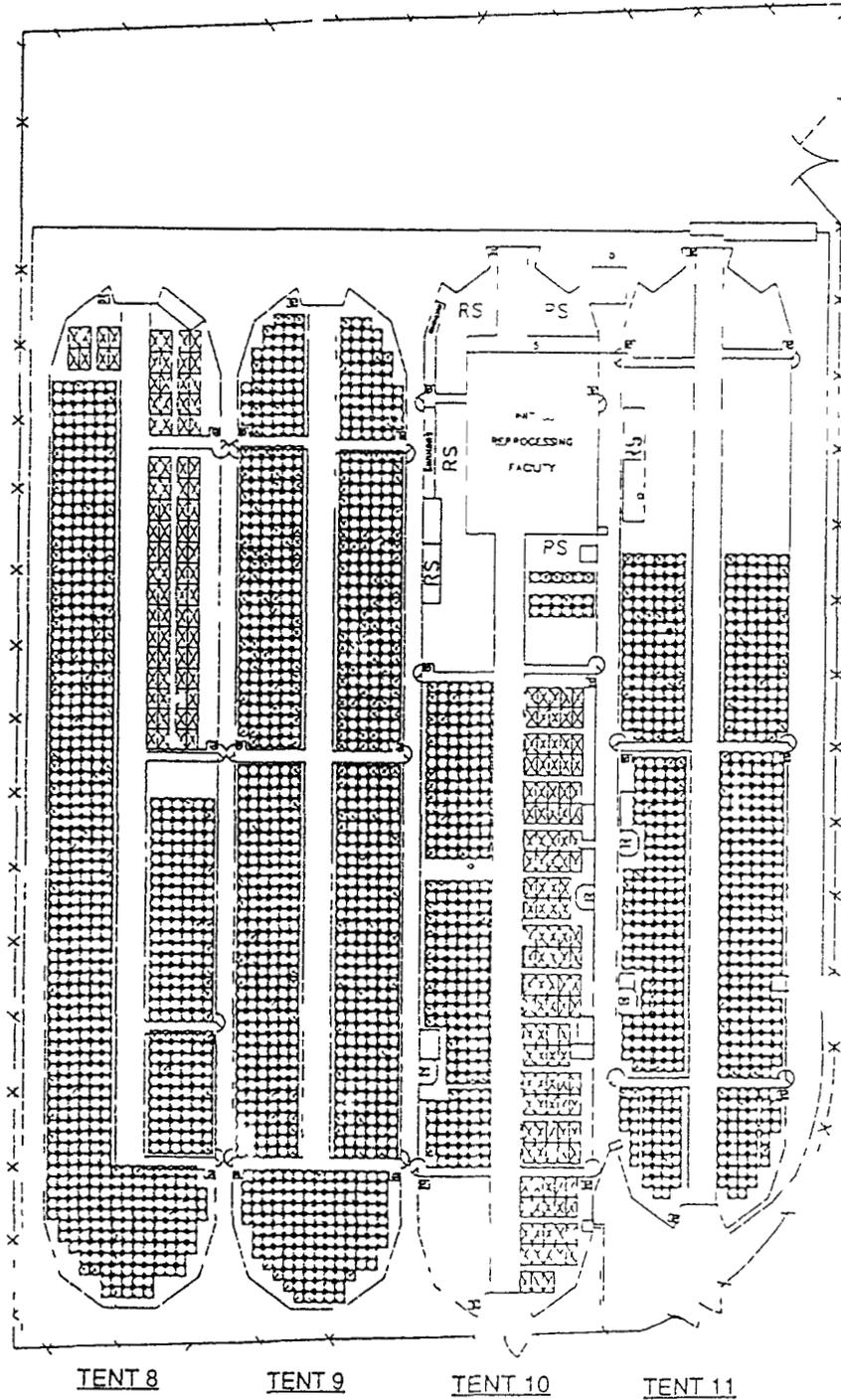


for David G. Ruscitto  
Acting Assistant Manager  
for Operations and Waste Management

Enclosure

cc w/Enclosure  
F Dowsett, CDH  
J Wienand, RFO  
D Mauer, RFO  
S Howard, RFO  
D Waltz, CDH  
L Weers, CDH  
T. Burns, EPA  
D Maxwell, EPA  
T G Hedhal, EG&G, RFO  
S R Keith, EG&G, RFO  
F G McKenna, EG&G, RFO  
A L Schubert, EG&G, RFO

904 PAD DIAGRAM



□ COPPER  
○ TYPICAL

TENT 8

TENT 9

TENT 10

TENT 11

TYPICAL UNIT 15B WASTE CONFIGURATION