

~~THIS IS A REF ID: A600~~  
**ROCKY FLATS PLANT  
EMD OPERATING  
PROCEDURES MANUAL**

**Manual No.: 5-21000-OPS-SW**  
**Procedure No.: Table of Contents, Rev 7**  
**Page: 1 of 2**  
**Effective Date: 09/30/92**  
**Organization: Environmental Management**

**THIS IS ONE VOLUME OF A SIX VOLUME SET WHICH INCLUDES:**

- VOLUME I. FIELD OPERATIONS (FO)**
- VOLUME II: GROUNDWATER (GW)**
- VOLUME III: GEOTECHNICAL (GT)**
- VOLUME IV: SURFACE WATER (SW)**
- VOLUME V: ECOLOGY (EE)**
- VOLUME VI: AIR (AP)**

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DCN 92 01	Assure Quality Control	2	07/21/92
SW 02	Field Measurement of Surface Water Field Parameters	2	05/12/92
DCN 92 01	Allow Change In Instrumentation	2	07/21/92
DCN 92 02	Reduction In Chlorine Testing Requirements	2	07/21/92
SW 03	Surface Water Sampling	2	05/12/92
SW 04	Discharge Measurement	2	05/12/92
SW 05	Base Laboratory Work		To Be Added
SW 06	Sediment Sampling	2	05/12/92
DCN 92 01	Reduction In Personal Protectional Level Due to Local Knowledge	2	07/21/92
DCN 92 02	Clarification of Sampling	2	09/29/92
SW 07	Collection of Tap Water Samples	2	05/12/92

**ADMIN RECORD**

REVIEWED FOR CLASSIFICATION/UCR/

By [Signature]  
Date 10/8/92 [Signature]

**DOCUMENT CLASSIFICATION REVIEW WAIVER  
PER R. B. HOFFMAN, CLASSIFICATION OFFICE  
JUNE 11, 1991**

A-SW-001175

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Environmental Management**

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SW 09	Industrial Effluent and Pond Discharge Sampling	2	05/12/92
SW 10	Event-Related Surface Water Sampling	1	02/20/92
SW 11	Operation and Maintenance of Stream-Gaging and Sampling Stations	1	02/20/92
SW 12	Site Description	2	05/12/92
DCN 92 01	Reduction in Unrequired Quality Check	2	07/21/92
SW 13	Bacteriological Water Sampling	2	05/12/92
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SW 29	Dye Testing Building Drains	0	09/29/92
SW 30	Field Locating Chemicals of Concern	0	09/25/92
SW 33	Dye Testing Foundation Footing Drains	0	09/29/92

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EG&G - ROCKY FLATS PLANT  
ENVIRONMENTAL MANAGEMENT

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**FIELD LOCATING EFFLUENT PATHWAYS AND DRAINS**

EG&G ROCKY FLATS PLANT	Manual Number:	5-21000-OPS
EM OPERATIONS	Procedure No:	SW.28, Rev 0
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CATEGORY 2	Organization:	SWD

TITLE: FIELD LOCATING  
EFFLUENT PATHWAYS  
AND DRAINS

Approved By:

*George H. Setlock*

Director, Environmental Protection

9/25/92

Date

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By *[Signature]*  
Date 10/5/92 *(SWD)*

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## FIELD LOCATING EFFLUENT PATHWAYS AND DRAINS

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### 1. PURPOSE

The purpose of this procedure is to provide instructions for performing a drain and effluent pathway identification inspection as part of the Drain Identification Study (DIS) to ensure that hazardous or otherwise inappropriate substances at Rocky Flats Plant (RFP) cannot inadvertently enter the Sanitary Sewer (SS) system.

### 2. SCOPE

This procedure implements the requirements of the Drain and Effluent Pathway Assessment Criteria (Appendix 1) established by the Surface Water Division (SWD) of Environmental Management EG&G, RFP.

This procedure addresses inspection of every existing structure at RFP to locate, identify, and document on background layouts and log sheets, all drains and effluent pathways.

### 3. REFERENCES

#### 3.1 Primary References

- 3.1.1 DIS Reference Book.
- 3.1.2 DIS Field Log Book.
- 3.1.3 Health & Safety Practices Manual, Section 2.08
- 3.1.4 Rocky Flats Plant Standard SX-164
- 3.1.5 Training Users Manual 1-10000-TUM

#### 3.2 Secondary References

- 3.2.1 NPDES FFCA Chromic Acid Incident Plan
- 3.2.2 Department of Energy (DOE) Orders:
  - a. DOE Order 5480.4 Environmental Protection, Safety and Health Protection Standards

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- b. DOE Order 6430.1A General Design Criteria
  - Section 1300-8 Special Facilities - Waste Management
  - Section 1300-9 Special Facilities - Effluent Control and Monitoring
  - Section 1323-5 Special Facilities - Radioactive Liquid Waste Facilities

3.2.3 Environmental Protection Agency (EPA) regulations:

- a. 40 CFR 122 National Pollution Discharge Elimination System Permit Regulations
- b. 40 CFR 131 Procedures for Approving State Water Quality Standards

3.2.4 Colorado Water Quality Control Act:

- a. CRS 35-8 Colorado Water Quality Control Act
- b. 5 CCR 1002 - Regulations for the State Discharge Permit System

3.2.5 Conduct of Engineering Manual Section 6.7

3.2.6 Conduct of Engineering Manual DES-19

3.2.7 Conduct of Engineering Manual DES-68A

**4. LIMITATIONS AND PRECAUTIONS**

None

**5. PREREQUISITES**

5.1 Personnel shall be current on all training required, per the Training Users Manual, 1-10000-TUM, to perform the tasks described in this procedure.

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5.2 Personnel shall be aware of and perform all requirements (i.e., Work Permits, Plan of the Day, appropriate notification, etc.) prior to entering a building or area.

**6. INSTRUCTIONS**

**NOTE**

All field investigations shall be performed in accordance with the Drain and Effluent Pathway Assessment Criteria included as Appendix 1.

**6.1 Materials**

6.1.1 Remove the designated Drain Identification Log Sheets (See Appendix 2), Pathway Identification Log Sheets (See Appendix 3), and corresponding Background Layouts from the Field Log Book and replace that section with a sign out sheet (See Appendix 4).

6.1.2 If a sheet of paper with the building number on it has been filed in place of Background Layouts, it means that there were no existing drawings. An inquiry should be made to Engineering Document Control, Building 130, as to whether the building has been entered into the Engineering CAD system. If not it is necessary to sketch that building onto that sheet.

6.1.3 If background layouts are available but are not in the Field Log Book obtain them from Engineering Document Control, Building 130, and include them in the DIS Field Log book.

**6.2 Locate Effluent Pathways and Drains**

6.2.1 Enter every room in the building or document the justification for not entering the room on the Drain Identification Log Sheets under comments.

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6.2.1.1 If a room or building is locked or warning signs require special assistance (e.g., key, Radiation Protection Technologist (RPT) or Security), note the situation on the Drain Identification Log Sheet under comments and retry entry at another time.

6.2.2 Investigate each room for drains and effluent pathways that would allow material to leave or enter the room in the event of a spill.

**NOTE**

All doorways between rooms are automatically considered an effluent pathway and do not need to be noted unless the doorway is bermed, then the approximate height of the berm is to be recorded under the door openings section of the Pathway Identification Log Sheet and the location reflected on the background layout.

6.2.2.1 Document all drains and effluent pathways in each room on the appropriate log sheet.

6.2.2.2 Document drains and effluent pathways on the Background Layouts with red pen or pencil using appropriate legend symbols (Appendix 5).

**NOTE**

All unlabeled drains must be noted.

6.2.3 Obtain access to those rooms and buildings that were previously inaccessible (e.g., locked, warning signs, etc.) by enlisting the assistance of the Operations Manager, the Building Manager, an RPT, Security, or any other appropriate source.

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### NOTE

If a room requires Supplied breathing air, confined space qualifications, or is off limits because of other excessive dangers, then entry need not be pursued. The room shall be considered Potentially Hazardous and Engineering Piping Drawings shall be examined to verify that known documentation does not implicate the SS system with that room.

6.2.3.1 If a room is determined to be inaccessible, note the reason on the Drain Identification Log Sheet under comments.

6.2.3.2 All rooms must be accounted for on the Drain Identification Log Sheets.

6.2.4 Sign and date all marked up Background Layouts and sign the Drain and Pathways Identification Log Sheets.

### 6.3 Investigate for Discrepancies

6.3.1 Randomly select some of the marked up Background Layouts and compare them to existing Sanitary Sewer or Process Waste (PW) piping drawings for discrepancies.

6.3.2 Field verify all discrepancies and correct the initial findings on the marked up Background Layouts and the Drain and/or the Pathway Identification Log Sheets.

### 6.4 Review Documents

6.4.1 Review the Drain and Pathways Identification Log Sheets and marked up Background Layouts for consistency of symbols (See Appendix 5) and completeness.

6.4.2 Field verify areas unaccounted for or to clarify documentation if necessary.

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6.4.3 Revise or reconstruct log sheets and Background Layouts for consistency of symbols (See Appendix 5) and neatness if necessary.

**6.5 Finalize Documents**

6.5.1 Ensure that all marked up Background Layouts and the Drain and Pathways Identification Log Sheets have been signed and dated.

6.5.2 Make copies of the Drain and Pathways Identification Log Sheets and Background Layouts.

6.5.3 File the log sheets and marked up Background Layouts under the appropriate section of the DIS Master Log Book and place the copies in the appropriate Field Log Book.

6.5.4 Mark an X under IDEN, on the Status Check List, in the Field Log Book and remove the sign out sheet (See Appendix 4).

**7. RECORDS**

The log sheets and background layouts are quality records and the originals shall be submitted to the EMD Records Center per 3-21000-ADM-17.01, Quality Records Management, for inclusion in the DIS Master Log Book.

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**APPENDIX 1  
Drain and Effluent Pathway Assessment Criteria**

**A.1 OBJECTIVE:**

**Improve source control to reduce the possibility of an inadvertent release of hazardous or otherwise inappropriate substance to the Sanitary Sewer system by:**

- A.1.1 Ensuring that all drains in a Potential Hazard Area do not feed into the Sanitary Sewer system.
- A.1.2 Ensuring that all identified Effluent Pathways within a Potential Hazard Area have been sealed or impeded.
- A.1.3 Ensuring that all Restricted Drains are adequately Protected.
- A.1.4 Ensuring that all drains dye tested in a NO Potential Hazard areas are labeled in accordance with the determined disposition ("SANITARY SEWER" or PROCESS WASTE).
- A.1.5 Ensuring that all drains not dye tested in a NO Potential Hazard Area are labeled "UNDETERMINED - Treat as Sanitary".
- A.1.6 Ensuring that all existing drain labels are visible and in good repair at the time of the Drain Identification Study (DIS) inspection.
- A.1.7 Ensuring that all new drain label installations generated by the DIS inspection and findings are per the RFP Standard SX-164.
- A.1.8 Ensuring that Foundation/Footing drains exposed to a Potential Hazard Area do not feed into the Sanitary Sewer system.

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Appendix 1 (Continued)

Drain and Effluent Pathway Assessment Criteria

**A.2 CRITERIA 1 (Drain and Effluent Pathway Assessment)**

Existing data sources shall be examined and each room in each building shall be walked through documenting drains and effluent pathway locations, Chemicals of Concern, and drain labeling integrity.

NOTE

Work has already been performed by the Resumption Team #6 on sections of Buildings 371, 707, 771, 776, 777 and 779. All previous documentation and findings shall be reviewed and included in the documentation. Any work not complying with current DIS procedures, and the Drain and Effluent Pathway Assessment Criteria, shall be incorporated into this study.

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**Labeled Process Waste drain in a Potential Hazard Area:**

The drain shall be dye tested using the approved RFP Dye Test procedure. The location and condition of the labels shall be examined and drains relabeled as necessary per the RFP Standard SX-164. If the drain is determined to be connected to the Sanitary Sewer system, then the drain shall be treated the same as "Labeled Sanitary Sewer in a Potential Hazard Area".

**Unlabeled drain in a Potential Hazard Area:** The drain shall be dye tested using the RFP Dye Test procedure to determine it's disposition and the appropriate action "Label Process Waste or treat the same as "Labeled Sanitary Sewer in a Potential Hazard Area".

**Labeled Sanitary Sewer drain in a Potential Hazard Area:** The drain shall be Locked Out and Tagged Out (LO/TO) and a corrective action initiated to have a radiological survey performed and permanently remove the drain from service or receive approval from SWD to take the necessary actions to convert it to a Restricted Drain.

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Drain and Effluent Pathway Assessment Criteria

**Effluent Pathways in a Potential Hazard Area:**

Appropriate action shall be initiated to contain the Potential Hazard Area (Cracks shall be filled, penetrations shall be sealed, barriers shall be installed, etc. as required).

**Labeled Process Waste drain in a NO Potential Hazard Area:** The location and condition of labels shall be examined and drains relabeled per RFP Standard SX-164 as necessary.

**Unlabeled drain in a NO Potential Hazard Area:** Drain shall be dye tested, existing engineering drawings may be investigated to determine the labeling, or the drain shall be labeled "Undetermined, TREAT AS SANITARY" per RFP Standard SX-164.

**Labeled Sanitary Sewer drain in a NO Potential Hazard Area:** Drain shall be dye tested, existing engineering drawings may be investigated to confirm the labeling, or the drain shall be relabeled "Undetermined, TREAT AS SANITARY" per the RFP Standard SX-164.

**Effluent Pathway in a NO Potential Hazard Area:** No action shall be required.

**A.3 CRITERIA 2 (Potential Hazard Area Assessment)**

A Hazard Assessment (HA) shall be performed on each building to establish Potential Hazard Area boundaries by walking through the buildings examining each room for Chemicals of Concern (COC) and by tracking the source and purpose of each chemical location.

**Potential Hazard Area:** A room or area which contains or has access to any chemicals of concern exceeding the established SWD Limit or has a combination of chemicals deemed potentially hazardous by SWD in any quantity.  
**All radiation control areas are to be considered Potential Hazard Areas.**

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Drain and Effluent Pathway Assessment Criteria

**NO Potential Hazard Area:** An area which does not meet the definition of a Potential Hazard Area (eg; offices, restrooms and janitor closets located outside radiation control areas and without access to COC).

**Restricted Drain:** A Sanitary Sewer drain which remains in a Potential Hazard Area with the approval and application of specific restrictions by SWD. Restrictions may include the following:

The drain must remain locked out and sealed against inadvertent discharge except for approved restricted use.

Warnings signs must be posted.

A current list of materials not suitable for discharge into the drain, shall be posted or remain accessible at all times to the approved users of the drain. This list shall be provided originally to the Operations Manager by SWD.

The approved users of the drain shall be trained in the appropriate use of the drain.





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**APPENDIX 4  
Signout Sheet**

**FIELD LOG BOOK  
SIGN OUT SHEET**

Name \_\_\_\_\_

Date \_\_\_\_\_

Building \_\_\_\_\_

Log Sheets \_\_\_\_\_

Drawings \_\_\_\_\_

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APPENDIX 5  
Symbols, Terms & Definitions

Symbols

DRAWING AND LOG SHEET  
SYMBOL LEGEND

SYMBOL

SS	Sanitary Sewer Drain
PW	Process Waste Drain
FD	Floor Drain
SH	Shower Drain
SU	Sump
TR	Trench
UT	Utility Trench
U/L	Unlabeled Drain
WWA	Wet Work Area
o	Approx. Drain location
	Secondary Containment

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### APPENDIX 5 (Continued) Symbols, Terms & Definitions

#### TERMS & DEFINITIONS

**Chemicals of Concern (COC)** - Toxic chemicals, hazardous chemicals, bases, oils, solvents, paints, radioactive and waste materials, PCBs, etc. in liquid or fine solid form. COC are identified by SWD and used to define Areas Potential Hazardous to surface waters.

**DIS Field Log Books** - Each book represents a group of buildings categorized according to priority. Each book contains; an area map; a list of buildings in each group; log sheets and background layouts. These items constitute the field work sheets. When a drawing of a building could not be located, a blank sheet of paper with the building number on it has been placed in the book.

**DIS MASTER Log Book - PROJECT DATA MANUAL.** The DIS Master Log Book shall, upon completion of the DIS project, contain the Building Group Lists, Status Check List, Flow charts, Procedures, Health & Safety (H&S) Plan, Chemicals of Concern List, Calculation sheets (where applicable), Drain and Pathway Identification Log Sheets, Background layouts, Dye Test Log Sheets, Dye Sighting (DS) Log Sheets, and Corrective Action Lists.

**DIS Reference Book** - A collection of reference data including contact lists, procedures, forms, standards, action plans, schedules information, and resumption findings for use in performing DIS field evaluations.

**Drain** - Any drain location above or below floor level (floor drain, sink, shower, sump, wet work area, etc.) that provides access to the Sanitary Sewer or the Process Waste systems.

#### **Note:**

The only drains of no concern are toilets, drinking fountains, dishwashers, ice makers, and hand basins in a confirmed NO Potential Hazard Area, and approved equipment directly plumbed into a SS or PW system.

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**APPENDIX 5 (Continued)  
Symbols, Terms & Definitions**

**Effluent Pathways** - Any labeled or unlabeled access to the Sanitary Sewer, Process Waste, or Foundation Drain Systems (e.g., All trenches, floor penetrations, cracks, pipe runs, expansion joints, etc.).

**Foundation Footing Drain** - A pipe or series of pipes which collect and discharges ground water from the foundation footing of a structure.

**LO/TO** - Lock out, Tag out - A temporary measure to deter use of a drain until the drain can be permanently removed. This Provides a physical barrier (not necessarily permanent) to prevent the use of the drain designated by a red tag affixed to the drain (per Health & Safety Practices Manual 2.06).

**Remove Drain** - Permanently remove drain from service. This can be accomplished by the plugging of the drain with concrete, installing a permanently sealed cover or cap, or removing the drain pipe, etc.

FIELD LOCATING EFFLUENT PATHWAYS AND DRAINS

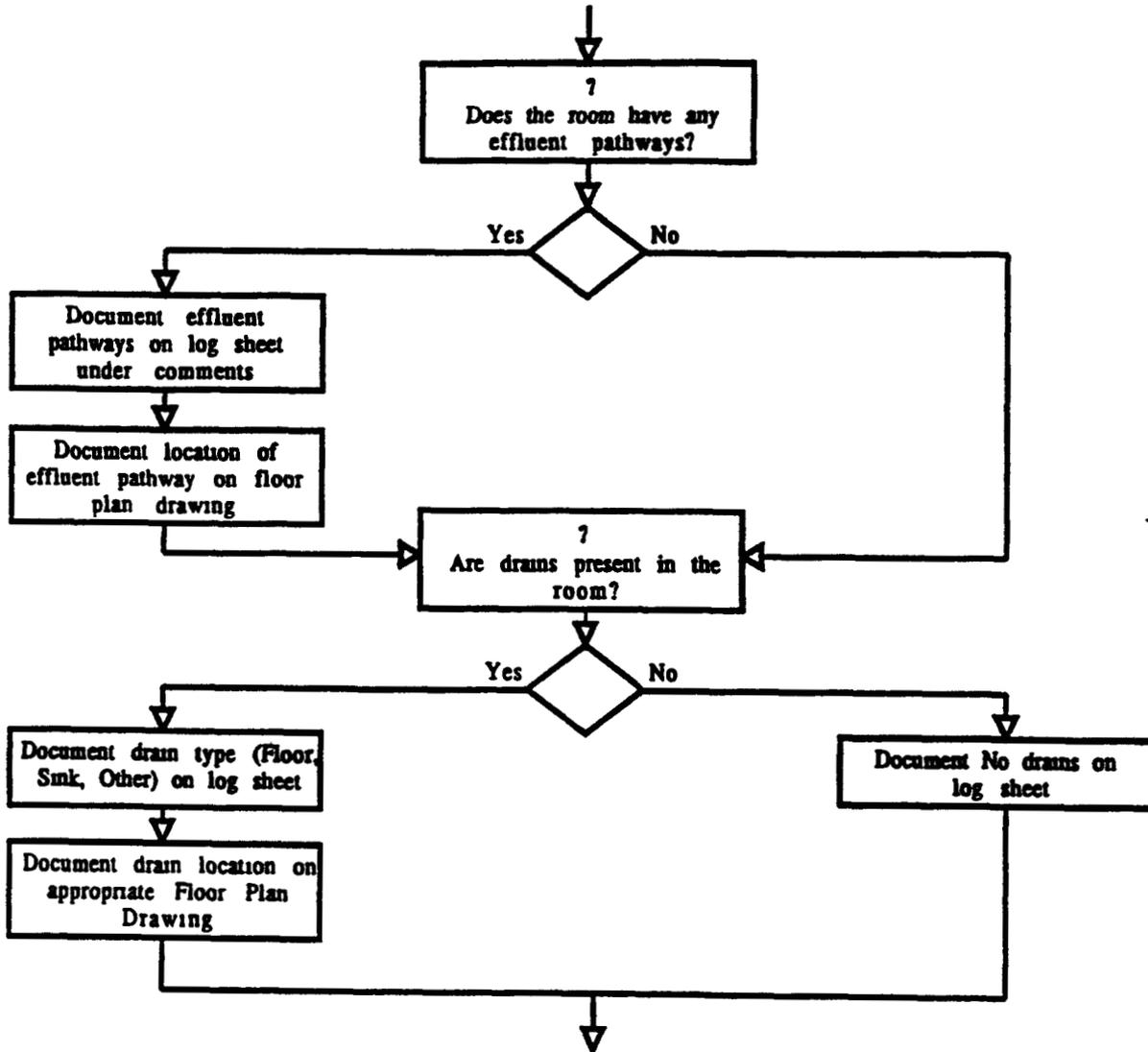
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APPENDIX 6  
Flow Chart



FIELD LOCATE EFFLUENT PATHWAYS AND DRAINS  
ACTIVITY FLOW CHART

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