

MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

FOR THE REPORTING PERIOD
JULY 16, 1993 THROUGH AUGUST 15, 1993

REPORT DATE: SEPTEMBER 5, 1993

EG&G ROCKY FLATS, INC.
STANDARDS, AUDITS, AND ASSURANCE ORGANIZATION
ENVIRONMENTAL STANDARDS ANALYSIS

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This report is not intended to represent a comprehensive review or analysis of environmental compliance at the Rocky Flats Plant, but rather is intended to provide information for internal management review and planning. The data in this report is primarily based on data contained within the Plant Action Tracking Systems (PATS), with supplementation by appropriate program managers. Therefore, this report is neither intended to detail all environmental deficiencies contained in PATS, nor at the Plant, but rather to discuss highlights and trends of environmental deficiencies as well as successes.

TABLE OF CONTENTS

1.0	INTRODUCTION	1
	HIGHLIGHTS	i
2.0	CURRENT ISSUES	
2.1	SATELLITE ACCUMULATION AREAS	2
2.2	RESOURCE CONSERVATION AND RECOVERY ACT TRAINING	3
2.3	MIXED RESIDUE COMPLIANCE	3
2.4	MIXED RESIDUES LITIGATION	4
2.5	FACILITIES OPERATING IN NON-COMPLIANCE: SECONDARY CONTAINMENT	4
2.6	WASTE ENVIRONMENTAL MANAGEMENT SYSTEM	6
3.0	TASK FORCE ON ENVIRONMENTAL COMPLIANCE	6
4.0	PILOT PROGRAM PLAN (BUILDINGS 460 AND 559)	
4.1	SUMMARY	7
4.2	CURRENT STATUS	7
5.0	ENVIRONMENTAL PROGRAM MANAGER REPORTS	
5.1	SUMMARY	9
5.2	FACILITIES OPERATIONS ENVIRONMENTAL PROGRAMS	9
5.3	PLUTONIUM OPERATIONS	12
5.4	PLANT SERVICES	13
5.5	ENVIRONMENTAL RESTORATION/FACILITIES OPERATIONS MANAGEMENT	13
5.6	800 OPERATIONS	14
5.7	WASTE OPERATIONS	15
5.7.1	REGULATED WASTE OPERATIONS	15
5.7.2	WASTE SOLIDIFICATION OPERATIONS	15
5.7.3	NON-DESTRUCTIVE ASSAY/WASTE ASSAY AND SHIPPING (WA&S) ..	15
5.8	RESIDUE OPERATIONS	16
5.9	400 OPERATIONS	17
5.10	FACILITIES MANAGEMENT (BUILDING 371)	18
5.11	ENVIRONMENTAL AND QUALITY TRAINING	19
6.0	ENVIRONMENTAL WASTE AND MANAGEMENT PROGRAMS	
6.1	WASTE PROGRAMS	20
6.1.1	RESOURCE CONSERVATION AND RECOVERY ACT	20
6.1.2	TOXIC SUBSTANCES CONTROL ACT	22
6.1.3	MEDICAL WASTE	24
6.1.4	EXCESS CHEMICALS	24
6.1.5	CONTINGENCY PLAN	25

TABLE OF CONTENTS (cont.)

6.1.6	FEDERAL FACILITY COMPLIANCE AGREEMENT PROGRAM	25
6.2	ENVIRONMENTAL PROTECTION	
6.2.1	NATIONAL ENVIRONMENTAL POLICY ACT	28
6.2.2	CLEAN WATER ACT	28
6.2.3	CLEAN AIR ACT	30
6.2.4	SUPERFUND AMENDMENT AND REAUTHORIZATION ACT	32
6.2.5	FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT	32
6.3	ENVIRONMENTAL RESTORATION	
6.3.1	COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT	33

APPENDICES

- APPENDIX A1 ORIGINAL ENVIRONMENTAL DEFICIENCIES SUMMARY
- APPENDIX A2 CUMULATIVE ENVIRONMENTAL DEFICIENCIES SUMMARY
- APPENDIX A3 ENVIRONMENTAL DEFICIENCIES ADDED AFTER 11/9/92
- APPENDIX A4 REGULATORY ENVIRONMENTAL DEFICIENCY STATUS 1993

MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

1.0 INTRODUCTION

The Monthly Environmental Compliance Report (Report) is a deliverable under the EG&G Rocky Flats, Inc. (EG&G) Environmental Compliance Program (ECP) and is prepared by the Standards, Audits, and Assurance Environmental Standards Analysis (ESA) group.

This Report is primarily based on information collected from numerous Rocky Flats Plant (RFP) organizations, and is not meant to detail all environmental deficiencies, but rather to discuss highlights and trends of environmental deficiencies as well as successes. This document is not intended to represent a complete picture of environmental compliance, but rather provides up-to-date information for internal review and planning. The Report is reviewed for accuracy and completeness prior to each month's publication by appropriate program managers.

The scope of this Report covers major environmental compliance issues at both the RFP and the Oxnard, California facility. This Report presents a summary and status of the various environmental compliance items researched for the period covering July 16, 1993 through August 15, 1993.

HIGHLIGHTS:

- The negotiations concerning the NOV Consent Order are complete and EG&G has obtained written approval from DOE to enter into the agreement. The State of Colorado has indicated that it is not yet prepared to execute the agreement.
- Nevada Test Site (NTS) conducted an audit August 23-27, 1993, to determine if RFP meets the requirements to resume shipment of straight low-level radioactive waste to the facility for disposal. The audit consisted of two parts. The first part was a field verification of the waste generator programs which included review of waste travelers, and interviewing waste generators. The second part of the audit included a review of the administrative portion of the waste generator program. This included a review of such items as waste generator document control, WSRIC and Waste Generator Training.

The audit report will be issued early October 1993 and is expected to reflect that the RFP program is a model program for the Complex. Additionally, if some minor issues such as the backlog identification and the Non-Conformance Report (NCR) training are corrected by the end of September the audit report will reflect no findings. This will be a first since there has never been an NTS audit where there have been "no findings".

Shipments of low-level waste to NTS may commence in the later part of October 1993.

- Is it an excess chemical or is it waste? Issues arising from characterization of chemicals determine whether or not the chemical is excess (and potentially useable somewhere else on plantsite) or waste have led to the establishment of a development team. The team will prepare a plan to inventory chemicals and make waste or excess determinations.

2.0 CURRENT ISSUES

2.1 Satellite Accumulation Areas: On April 7, 1993, CDH issued a guidance letter addressing the accumulation of hazardous waste in accordance with the Colorado Hazardous Waste Regulations (CHWR) 6 CCR 1007-3, Section 262.34. The CDH guidance provided an interpretive summary of the regulations concerning accumulation of waste in Satellite Accumulation Areas (SAAs) and included several examples of waste accumulation. In summary, the CDH guidance stated the following:

- A single SAA may be used for the accumulation of waste from a single "process".

Historically at the RFP, SAAs have been established to accumulate waste from several different processes (see Figure 1), which would not be in accordance with the above guidance.

- A single SAA may not collect more than 55-gallons of waste (or 1 quart of acutely hazardous waste).
- SAAs are allowed for accumulation of waste, not for storage.
- SAAs must be located "at or near" the point of generation of the waste.
- Maintenance activities performed routinely throughout plantsite or a building will result in waste being accumulated at the home base of the maintenance workers.

CDH originally requested that Buildings 460 and 559 be in compliance with their interpretation within 21 days of receipt of their letter, and that the entire plant be in compliance within 45 days. CDH allowed RFP to prepare an implementation plan to detail efforts to operate per the CDH guidance. This plan was presented to CDH, EG&G Facility Management and Operations and the United States Department of Energy (DOE), Rocky Flats Office (RFO) on May 10, 1993. The plan included the following:

1. Assess existing SAAs in Buildings 559 and 460. (Completed - May 21, 1993)
2. Assemble and train plantwide assessment teams. Develop assessment form. (Completed June 14, 1993)

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3. Assess all remaining SAAs at RFP. (Completed - July 9, 1993)
 4. Request corrective action plans be submitted to the Plant Action Tracking System (PATS). (Completed - August 20, 1993).

All scheduled SAA assessments were completed during this reporting period. A request for action plans was sent by August 6, 1993. Action plans were requested by August 20, 1993. Buildings 559 and 460 are in physical compliance.

As of this Report, 277 SAAs need to be modified or deleted, 133 SAAs are now in compliance (see other specific details in Section 5).

RCRA Regulatory Programs held a meeting with the Non-Destructive Testing Group on July 19, 1993. The topic of the meeting was to discuss the use of a non-hazardous solvent used during the weld inspection process. A non-hazardous substitute was found and is being used on a trial basis.

2.2 Resource Conservation and Recovery Act (RCRA) Training: A comprehensive RCRA Training Master Action Plan has been developed to attain and maintain compliance with RCRA Hazardous Waste requirements. This Action Plan is based on results of an analysis conducted by EG&G following the June 17, 1992 NOV issued by CDH.

A Causal Factor Analysis was completed by EG&G on October 16, 1992. Factors leading to the NOV were analyzed to determine causal factors which exist at the fundamental level of management control. The analysis identified three distinct areas of weakness and a general statement of condition believed to be pertinent to the prevention of further notices of violations.

The weaknesses were summarized in the form of problem statements to assure the sum of corrective actions planned are properly targeted. The focus of the action plan is on RCRA training and addresses concerns identified in the following problem statement:

"There is an insufficient cadre of adequately trained, qualified, and accountable RCRA custodians, knowledgeable supervision and knowledgeable personnel assigned to RCRA-regulated areas across the RFP site."

The action plan is to ensure the sum of tasks planned are properly targeted at the distinct areas of weakness and conditions believed to be pertinent to the prevention of further NOVs. The action plan is currently out for signature. A presentation on the action plan was given to CDH and is pending finalization.

2.3 Mixed Residue Compliance: The primary compliance issues for Residue Compliance can be divided into the following general categories: secondary containment for "to-be-permitted" mixed residue areas, ancillary equipment for Category B and D tanks, general RCRA programmatic issues, and the August 13 and 22, 1993 compliance dates driven by both the Mixed Residues Tank Systems Management Plan and the federal court-mandated deadline for

State RCRA Permit Part B Modification for Mixed Residues.

Secondary containment for "to-be-permitted" issues include berming and sealing units to be permitted for liquids. This would be done for units where stored drums contain liquids and units which are tank systems. An extensive effort has been underway for most of this fiscal year to complete the secondary containment for mixed residue units. These secondary containment issues were completed August 13, 1993.

Ancillary equipment for Category B and D tanks (which are to be permitted) must be free of defects and inspectable on a routine basis. Repair of the ancillary equipment has been completed. Inspection issues have been addressed either by issuing work orders to correct the situation or by identifying alternate inspection techniques in the updated Mixed Residues Tank Systems Management Plan (currently in DOE/RFO review).

Programmatic RCRA issues have been identified for "to-be-permitted" mixed residue units. These programmatic issues cross several building boundaries and are expected to be addressed on an individual basis through FY94.

2.4 Mixed Residues Litigation

The U.S. District Court ruled in favor of DOE on its emergency motion seeking relief from the court's August 22, 1992 Amended a Judgement granting a 90 day stay. The stay is scheduled to run through November 19, 1993. The Amended Judgement originated out of a lawsuit filed by the Sierra Club over the management of mixed residues at Rocky Flats Plant. Without the stay, Rocky Flats would have been required to shut down certain hazardous and mixed waste generating operations by midnight August 22, 1993 for lack of a state-issued RCRA operating permit covering mixed residues.

The RCRA permit application was submitted to the Colorado Department of Health (CDH) more than a year ago, but the permit has not yet been issued by the State. It is unlikely that the permit will be issued within the time period of the stay.

The court has indicated two tracks to resolve the mixed residue permit problem. The first track is to negotiate changes to the Amended Judgement with the Sierra Club, State of Colorado and DOE. A second track is to proceed forward with litigation.

2.5 Facilities Operating in Non-Compliance: Secondary Containment

In a January 20, 1993 memorandum from DOE, RFO (WMED:DG:10688) to EG&G, a request was made to list and justify continued operation of equipment in RCRA noncompliance with secondary containment requirements. The initial report was to have been submitted to RFO no later than February 1, 1993 and subsequent monthly updates of that information is to be reported in this report. To that end, the following information has been submitted for inclusion.

The following equipment or systems continue to operate in non-compliance with RCRA secondary

containment requirements. Justification for continued operation of each of these systems was provided to RFO in correspondence (93-RF-1332, 93-RF-1335).

- Building 707 Process Waste Drain Line
- Buildings 444/447 Main Process Waste Line
- Building 374 Liquid Waste Processing Area
- Tank 231A, southeast of Building 374, storage of low-level waste feed solutions to Building 374 and Building 774 Liquid Waste Processing Area
- Building 771 Process Waste Lines
- Buildings 776/777 Process Waste Transfer Line
- Central Sump Discharge Line to Solar Pond 207B north
- Solar Pond waste transfer line through Buildings 771, 774, 776 and 778
- Building 123 (see Section 5.2, Page 12, AP#13)

Temporary measures, such as conducting daily visual inspections to detect leaks or performing daily verification of line integrity by hand-starting pumps and verifying normal flow, are in place as an interim action for these systems while they are in noncompliance and until corrective actions are implemented.

The following information has been submitted for inclusion as a status update regarding equipment or systems, reported last month, which were operating or which continue to operate outside RCRA compliance.

Building 707 - Process Waste Drain Lines continue to operate in noncompliance with RCRA secondary containment because of the use of threaded fittings. Action plan has been submitted to upgrade process lines to welded or flanged joints.

Building 444/447 - Main Process Waste Lines continue to operate in noncompliance with RCRA secondary containment because of the use of threaded fittings. A work order has been written to upgrade wastelines to welded or flanged joints. Work delayed because of funding.

Building 374 - Liquid Processing Area - Vapor body berms to contain liquids are in process of completion with a target date of September 8, 1993.

Tank 231A - The completion target date for the overflow prevention control of August 20, 1993 was missed because of material procurement problems. No new completion date has been set.

Building 771 - Process Waste Lines - Corrective Action Plan CAB-233-92 Deficiency #2, to tagout hazardous waste ancillary equipment is targeted for completion by September 30, 1993.

Building 776/777 - Process Waste Transfer Lines continue to operate in noncompliance with RCRA secondary containment. Secondary containment for all ancillary equipment has been upgraded.

2.6 Waste Environmental Management System: Drums containing hazardous waste are tracked in the Waste Environmental Management System (WEMS) where expirations for drums stored beyond the 90-day time-frame can be readily identified. WEMS tracks all drums on plantsite, including empty drums.

According to the WEMS report for this period, there are currently 51 drums in Building 559, one drum in Building 777, and 18 drums in the Contractor Yard that are exceeding the 90-day storage requirements.

E&WM will institute transmitting a bi-weekly report to managers responsible for 90-day areas which identifies containers that must be moved within six weeks. This report will be prepared and issued by the WEMS organization starting the week of September 13, 1993. The 6-week time period represents the optimum time necessary for waste sample collection, analysis/characterization and data validation, all of which are prerequisites to container movement.

In the course of evaluating the issue of delinquent containers in 90-day areas, other systemic problems were identified that need to be resolved in order to have a managed and effective process for maintaining compliance. A corrective action plan addressing the total problem has been developed. All tasks associated with the action plan will be completed by December 1, 1993. The plan describes actions necessary to institute a system that (1) ensures prompt entry of waste containers into the WEMS tracking system upon receipt into a 90-day area; (2) forecasting and reporting future 3-month through-put rate for waste traveller/label validation and real-time radiography (RTR) to enable affected organizations to plan resource requirements and schedule work; (3) provide notification to 90-day area owners of containers that need to be moved and when to maintain compliance; and (4) improve instructions on how to manage containers to ensure proper characterization and transfer to permitted or interim status storage areas.

3.0 TASK FORCE ON ENVIRONMENTAL COMPLIANCE

The Environmental Compliance Task Force (Task Force) was established subsequent to the effective resolution of the Ten-Point Action Plan by the Joint Environmental Compliance Operating Committee (JECOC). The committee is made up of top-level management within EG&G and DOE, RFO utilizing technical advisors from each major organization. The major objective is to assure that a viable ECP has been established at the RFP. The committee is chaired by the E&WM Associate General Manager.

A subcommittee has been formed to re-evaluate the task force and chart its new direction. The subcommittee will present its suggestions and recommendations to the Task Force on September 28, 1993.

A presentation was made to the Environmental Task Force regarding the RFP Toxic Substance Control Act (TSCA) program. The RFP TSCA program manager has identified several compliance issues regarding PCBs including: storage and disposal of PCB wastes, remediation of PCB

historical spill sites, and elimination of equipment containing PCBs. Waste Regulatory Programs is beginning to take corrective actions in these areas.

Currently, 20 PCB historical spill sites have been identified as requiring remediation under TSCA. Cleanup criteria is scheduled to be completed for these sites in FY 94. The cleanup criteria will require concurrence from DOE RFO, and EPA Region VIII. Actual cleanup of the PCB spill sites will begin in FY 95.

Negotiations are also underway between EG&G, DOE, and EPA concerning a Federal Facility Compliance Agreement (FFCA) or similar compliance agreement for continued storage of radioactive PCBs until national capacities for disposal are developed.

4.0 PILOT PROGRAM (BUILDINGS 460 AND 559)

4.1 Summary: The Environmental Compliance Pilot Program resulted from the June 1992 NOV issued by CDH regarding alleged RCRA non-compliances. The program is designed to address environmental compliance at the "floor level", and incorporates various methods for doing so, including building books for each building, the establishment of new positions for Environmental Program Managers (EPMs) and Environmental Coordinators (ECs), and environmental training. The program design and implementation will be an integral component of the Consent Order which will formally resolve the NOV. The Consent Order will likely be executed in September and, if so, will be discussed in detail in the next Report.

The pilot floor level compliance involves testing new or improved environmental compliance activities and methodologies associated with RCRA in Buildings 559 and 460 (one plutonium and one non-plutonium related building). Once these two Buildings refine methodologies, the same activities will be initiated plantwide. Generally, the remaining tasks (either currently ongoing or yet to be started) include: RCRA custodian and waste generators training, specifically targeting new methodologies; new/updated informational documents like waste and compliance guides, tank procedures, spill response, etc.; the excess chemical program; 30 new environmental compliance (EC) positions; and ultimately the expansion of the entire program into remaining areas of environmental regulation beyond RCRA; i.e., the Clean Air Act, Clean Water Act, Toxic Substances Control Act, etc.

4.2 Current Status: E&WM Procedures has committed to having Revision 1 of the Building 559 Waste & Environmental Compliance (W&EC) Guide completed by October 13, 1993. This revision is required to standardize the sections and convert to the new Plant Procedures Group (PPG) format for plantwide use.

<u>Activity</u>	<u>Estimated Completion Date</u>
Draft	August 26, 1993
Parallel Review	September 2, 1993
Verification & Validation	September 15, 1993

Edit & Work Process	September 23, 1993
Concurrence	September 29, 1993
Safety Screen	October 5, 1993
Final Review	October 11, 1993
Document Control	October 13, 1993

On July 27, 1993 the Air Pollution Control Division (APCD) of CDH inspected the Building 559 complex as part of an annual Air Pollution Emission Notice (APEN) inspection. The purpose of the inspection was to verify emissions reported on APENS. They requested and were given fuel consumption and hours of operation data for diesel generators.

On July 27 and 28, 1993, a RCRA inspection was conducted by the Hazardous Materials and Waste Management Division of CDH for the purpose of discussing the status of the Satellite Assessment Program for Buildings 460 and 559, and to determine what corrective actions have been accomplished as a result of the satellite assessment performed in May 1993, additionally, the inspection was to determine the general RCRA compliance in the buildings.

The issues identified and noted by CDH during the July 27, 1993 inspection of Building 460 are as follows:

In Room 118, waste carbon tetrachloride, used to clean parts, is accumulated in a four liter bottle stored under a laboratory hood. It takes approximately three months to fill the four liter bottle which is then transferred to SAA 460-1862 located in Room 118. CDH requested that the bottle be labelled with a "hazardous waste" label because the spent carbon tetrachloride is stored in the bottle for longer than one shift. Materials and Surface Technology took the action and labeled the bottle.

In Room 141B, there are two grey drums; one contains waste mercury vapor lamps and the other waste sodium vapor lamps. The information in the Waste/Residue Travelers characterizes the waste in both drums as hazardous for mercury based on process knowledge. However, the drums were being managed as non-hazardous per WTS guidelines. The contents of the gray drums have been repacked in black and white drums and moved to a 90-day accumulation area.

In Room 141A, a new satellite accumulation area was established to contain mercury that was removed from an electro-chemical machine that is out-of-service. CDH disapproved the use of the new satellite to contain the mercury because an active process does not support the satellite. CDH requested that the mercury be placed in a 90-day or permitted/interim storage unit which has been done.

In Room 141B, there is a tank that currently contains 4000 gallons of sodium nitrate with chromium that was generated from electro-chemical machining. According to building personnel, the process has been out-of-service for approximately two years. CDH requested that the waste be removed as soon as possible. This issue was identified in January 1993, and is being tracked under Commitment Number 92-007590, Task Number 00032.

While reviewing inspection log sheets for RCRA Tank Units 40.08 and 40.09, it was difficult for CDH to correlate a noted deficiency on the log sheets with the date in which the noted deficiency was corrected. CDH requested that inspection log sheets be evaluated to show corrective action dates. In addition, CDH requested that inspection log sheets be evaluated to see that personnel are completing them accurately. Meetings have been held with the RCRA custodians to prevent a reoccurrence of this problem.

The issues identified and noted by CDH during the July 28, 1993 inspection of Building 559 are as follows:

Rooms 103B and 103D have been designated as 90-day accumulation areas to manage excess chemicals in Building 559. The excess chemicals in the two rooms have an accumulation start date of April 30, 1993. The 90-day time limit for these excess chemicals expired on July 30, 1993. Not removing these chemicals within 90-days is a violation of CHWR, 6CCR 1007-3, 262.34. This occurrence was reported to the Shift Superintendent by Analytical Operations at 1:00 a.m. on July 30, 1993. The occurrence was reported as off-normal. The chemicals have been sampled; dispositioning is pending analytical results. This situation is targeted for completion by September 20, 1993.

Room 101 contains SAA 559-1528 which is a flammable chemical cabinet and contains 20 containers of hazardous waste. Of concern to CDH is that the containers were sampled in January 1993, and Building 559 has not received analytical results. CDH feels that the management of this satellite accumulation area is inadequate. All containers except for one four liter bottle, have been packaged.

In Room 102, Glovebox C-45B, there is a four liter bottle labelled "528 Pit Groundwater". This bottle was identified by CDH in December 1992 and at that time CDH requested that the liquid be characterized and disposed of accordingly. The July 28, 1993 inspection verified that the bottle is still in the same location. Laboratory analysis is still pending. Dispositioning is thus pending. The main problem was failure of the sample characterization program.

5.0 ENVIRONMENTAL PROGRAM MANAGER REPORTS

5.1 **Summary:** Following are environmental compliance activity summaries provided by each EPM. The reports are included herein with only minor editing.

5.2 Facility Operations Environmental Programs:

SAA Modification Plans - All action plans were completed and reviewed by RCRA Regulatory Programs by August 19, 1993, with the exception of B993A. Facility Operations (FO) wrote an action plan for B993A to outline the actions to be taken. Action plans have not been entered into PATS as they are being routed for Task Manager concurrence with the estimated completion dates. The majority of FO's action plans will be completed by September 30, 1993.

Mixed Residue Court Order (August 22, 1991) - The Evaluation of Hazardous Operations Attachments for submittal to the court were reviewed by FO and the Functional Management of the Operation. Attestment forms were completed and submitted to Federal Facility Compliance Act (FFCA) Program as requested on August 6 and August 13, 1993. Contingency Plans were evaluated and drafts prepared in preparation for a temporary shutdown. These short-term actions will be re-evaluated and finalized pending guidance from FFCA. Direction from FFCA Human Resources, and Legal must be received before long-term contingency plans can be drafted. No further action is being taken regarding contingency plans at this time.

B250 - Waste and Product at Windsite - The 250 Windsite complex was transferred from DOE, RFO to National Renewable Energy Lab (NREL) on July 1, 1993. FO is working through appropriate parties to move waste in SAAs and delete the stations from RFP operating record. Also, FO has some product at the Windsite which was sampled to confirm process knowledge. The sample results are not yet available. FO is awaiting guidelines from Waste Technical Support (WTS) on storage requirements for movement from the windsite. Commitments and guidance are pending.

Silver Recovery - B774 Silver Recovery from photographic type solutions has been out of operation due to the land disposal restrictions since February 1993. Waste Minimization (WM) has been working through Procurement to secure a subcontractor who will take over the recycling of these solutions for the silver. The subcontractor is expected to begin operation by the first of September 1993 and recycle 100% of the solutions generated. (Note: these solutions are all generated on the "cold-side" of the Plant.)

ISP #92-420 - Spill Response Equipment & Training - Plant Action Plan, Commitment number 92-420 was created to meet the concerns expressed by CDH in regards to the knowledge and consistent application of individual employees actions toward spill response. Waste Programs Spill Response and Reporting created an action plan for the site and created a briefing package for incidental versus emergency spill action. Within FO the individual actions of the plan will be assigned to the tenant organizations for completion. The EPM conducted briefings held August 2 through 11 for Management within FO's Operation Area regarding the tasks of identification of equipment and supplies and the "Incidental and Emergency Release Response Briefing". Action Plans for identification and implementation of incidental spill response equipment are due to Facility Operations Environmental Programs (FOEP) by August 27. Implementation of the incidental spill equipment and completion of briefing effected employees is scheduled for September 30, 1993.

Gas Leak in Building 131 - A natural gas leak occurred on the morning of Monday, August 9, 1993 from Building 131. The cause of the gas leak was from a loose connection of an A-valve. This was corrected the same morning. On the same day, Industrial Hygiene, Facility Operations, and Utilities again checked the area, as a result of continued complaints, and found no further leaks; however, the system was placed out of service as a precaution. Public Service Company (PSC) of Colorado was called to perform an analysis. PSC arrived, performed the tests, and discovered a leak approximately 25 feet from the building. Excavation revealed

corroded pipe. The corroded pipe is being replaced. An Occurrence Report was filed on the first occurrence, due to the facility evacuation as a result of a spill. A release of natural gas is not covered under the Clean Air Act. The Clean Air Program was notified as a courtesy.

551 Nitric Acid Spill - On July 20, 1993 the Hazardous Material Team (HAZMAT) responded to a Nitric Acid spill in the 551 Warehouse. Due to the toxicity of the acid, Building 551 and the T551 trailers were evacuated. The spill amounted to less than a pint and was neutralized by HAZMAT for cleanup. The product drum was placed in secondary containment and is in the process of being dispositioned as an excess chemical. The cleaned up waste was the sanitary drain in Building 551 per direction from Waste Programs and Sanitary Waste Departments. A critique meeting was held on July 21, 1993 for the incident and was filed under Occurrence Report number 93-0016. A documentation of guidance letter regarding the initial response was issued on August 2, 1993 by Waste Programs. The letter also gave guidance in disposing of the rags/wipes used in cleaning the overpack drum which contained the neutralized Nitric Acid. The guidance provided instructed the Building Manager to dispose of the rags/wipes into the sanitary repository. The 10-day Occurrence Report was issued on August 4, 1993; the Final Report is due September 7, 1993.

663 Construction Yard - Waste (hazardous and non-hazardous) from a spill of construction chemicals which occurred on June 15, 1993 has been sampled and the analysis completed. Pending characterization, all waste will be dispositioned to appropriate storage. The original drums and containers are scheduled through IWCP for clean-out, cut-up, and disposition. All actions are on schedule for completion by September 12, 1993, which is the expiration date for the 90-Day Unit number 663-1989.

Nevada Test Site (NTS) Review of B123 - Radioactive Waste Programs held a plantwide meeting on July 30, 1993, to brief Operations on the upcoming Nevada Test Site (NTS) audit. On July 28, 1993 an oversight team was formed to review B123 Analytical Laboratory's readiness. The Team consisted of the Building Representative, EC, Building Qualification Program Manager (BQPM), WTS Engineer, EPM, and Building Operation Manager. An action plan was set forth and all areas of the Building were reviewed. Remaining issues include: errors in the Waste & Environmental Management System (WEMS) Report; annual reverification and major changes to the Waste Stream Residue Identification and Characterization (WSRIC) Books and associated Hazardous Waste Travelers; errors in the Plant Training System Record (TSR). All areas of concern have been corrected or explained. A review team from the NTS toured and examined B123 Analytical Laboratory on August 23, 1993. No findings were presented at the daily close-out meeting on August 24, 1993.

964/965 Drums - The 964/965 Drums were originally the 169 drums found north of Building 964. They were primarily empty product drums without an identified "owner". FO accepted responsibility for dispositioning these drums. In accordance with Action Plan 105.1 and with agreement from CDH, the following actions have been completed during this period:

- Twenty-six "unknown" drums were characterized as non-hazardous through sampling.

- Five "unknown" drums were taken to complete gross alpha/beta testing as required for disposition.
- Seven "suspect non-hazardous" drums were confirmed as non-hazardous through sampling.
- Two green drums were shipped to Regulated Waste Operations (RWO) deferred waste non-hazardous waste cargo storage area. The two drums which contained oil-dri are in the process of full characterization analysis.

There are seven drums remaining for disposition (five "unknown" and two solids of oil dry). All characterizations have thus far confirmed non-hazardous. The Action Plan remains on schedule with an overall completion date of September 7, 1993.

Backflow Preventor Action Plans - FO has completed repairs to five Backflow Preventor valves in Buildings 111, 118, 122 and 331. Currently, in FO, there are 18 Backflow Preventors which require repairs and six which need installation.

Action Plan #13, Building 123 System Summary Report - RCRA System Summary Report for the ancillary equipment for Building 123 was completed according to Action Plan number 13 on Monday, July 19, 1993. The report was also submitted to the Assistant General Manager (AGM) of Facility Management and Operations (FM&O) to include in the Plants System Summary Report on July 19, 1993.

92-007355 ENVDEF #17.1, Building 121 Incinerator - Four drums of incinerator ash from past operations at Building 121 have been smeared and released. The incinerator ash was dumped at the landfill per guidance on August 5, 1993. The drums were returned to Building 121 where they will be cut up and sent to the scrap yard.

5.3 Plutonium Operations: Five gallons of Ethylene Glycol/water was released to the floor of Building 705 on August 5, 1993, from a cooling system. Notification was made. The material was characterized as non-hazardous and properly disposed of per written guidance.

Liquid was discovered by NDT methods in Mixed Residue tanks T-6, T-7, T-8, and T-9 in Building 777 on July 29, 1993. These tanks had previously been listed as operationally empty in the Mixed Residue Tank Systems Management Plan. The liquid has been removed.

"Operationally Empty" was verified for Tank SR-3 in Building 777, Tanks T-6, T-7, T-8, and T-9 in Building 776 and RCRA Unit Tanks 90.01 through 90.19 (C-Pit) in Building 707 by the August 13, 1993 Residue Compliance date.

The complete upgrade of secondary containment (painted concrete) throughout Buildings 776, 777, and 707 was completed.

Buildings 776/777 management is addressing an issue concerning the condition of the

areas in several rooms in Buildings 776/777. The ceiling is deteriorating in some areas and causing a rusty-like material to drop from the ceiling. The deterioration is causing a discoloration in the ceiling. RCRA Regulatory Programs is concerned that this issue may impede the acquisition of a RCRA Permit for these areas. An Integrated Work Control Program (IWCP) has been issued to Wastes Systems Engineering (WSE) to develop a scope of estimate for repairs to the ceiling. The IWCP will be withdrawn and an Engineering Job Order (EJO) will be issued to fund the repair of the ceiling area.

Buildings 776/777 management is addressing an issue concerning the adequacy of secondary containment in several areas in Buildings 776 and 777. The floor area paints in several container storage areas, and floor paints in rooms accommodating these container storage areas is bubbling and causing a concern over the adequacy of secondary containment in these units. The bubbling effect is a separation of the paint surface from the concrete underlying surface. The painted surface in some areas is approximately 1/8" to 1/4" thick and requires filler to remediate the floor. There are also Radiological concerns with contamination under the bubbling. An action plan is being developed and will be submitted to PATS, with IWCPs to complete the repairs.

5.4 Plant Services: Two releases were reported at the Property Utilization and Disposal (PU&D) North yard. The first release was less than a pint of oil to the ground. This was located outside of the IHSS and was cleaned up by HAZMAT. The second release was a mixture of water (approximately 95%) and Trimsol from a scrap metal dumpster to a secondary containment. The material was determined to be non-hazardous and was cleaned up. These two items were addressed on one internal report.

Site remediation is underway at Building 443 to remove Polychlorinated Biphenyl (PCB) contamination from the soil and transformer pad for transformer 443-2. The transformer was previously removed and disposed of. Construction Management is responsible for the cleanup.

Three containers of Toxic Substances Control Act (TSCA) waste generated during the PU&D cleanup are on hold at PU&D due to the lack of a Property/Waste Release Evaluation (PRE). Rad Engineering will not release the material as non-rad since there is no history available of where it has been. It is expected that the material will be treated as low level waste and repacked in white drums. Guidance is required from WTS.

In the Report issued last month (JGD-1163-93) an issue was noted concerning whether or not the residue from the bulb crushers should be characterized as hazardous or non-hazardous waste. There is no change in the status. Plant Services is treating the crushed bulbs and filters in accordance with written guidance from WTS. After the additional testing and analysis is completed WTS will issue revised guidance if necessary.

5.5 Environmental Restoration/Facilities Operations Management:

Finding #93-WM-00S-891-005-008, "Improper Labeling of Hazardous Waste", dated January 29, 1993: This finding identified approximately 200 drums of Investigative Derived

Material (IDM) in a 90-day storage area which were not labeled as hazardous waste.

Significant Action Plan Tasks have been completed which address the finding and they include:

- Task 2: Submittal of Standard Operating Procedure FO.23, "Management of Soil and Sediment Investigative Derived Material" July 1, 1993.
- Task 5: A confirmation of extension to label IDM as hazardous waste has been given from DOE to Facilities Operations Management (FOM) until July 30, 1993.

On July 10, 1993 at 0230, approximately 7000 gallons of treated water with a high pH (basic) were released from the Operable Unit (OU) 2 Surface Water Treatment Unit to Ponds B4 and B5. The water showed a pH of 12 which exceeded the normal levels of pH6 and pH9 for the ponds, respectively. Neither Applicable or Relevant and Appropriate Requirements (ARARs), or Water Quality Commission Standards of Streams were exceeded. Operations were resumed at 0550.

5.6 800 Operations: Sampling activities for OU 15 were initiated in Building 881. Sampling activities in Building 881 will be completed by August 20, 1993. Sampling in Buildings 865 and 883 is scheduled for the week of August 23, 1993.

OU 9 project members held meetings with 800 Area personnel to arrange inspections of the original process waste lines in the 800 Area. Project members also obtained site history information of the original process waste lines from the 800 Area Utilities Manager and other 800 personnel familiar with past operations that utilized the now abandoned waste lines. OU 9 personnel will be taking numerous environmental and health and safety training courses before they will be able to inspect all areas of interest in the 800 Complex. Areas within the 800 Complex that do not require extensive training will be toured between August 10 through August 20, 1993. Sampling activities have not yet been scheduled.

Building 865 Transition tasked Engineering to develop an Engineering Work Package for the stripout of the BeCl_2 electro-refining cell in Building 865. Project scope is being developed through coordinated efforts between Engineering, Met Ops, WTS, H&S and 800 Area E&WM. The project is tentatively scheduled to occur in FY94, contingent on approval of adequate Transition budget and all required approvals. Details on project approach will be provided as they are finalized.

The low level waste (LLW) NTS audit is scheduled for the week of August 23, 1993. Each area will be audited for compliance with the NTS LLW requirements. If an area passes the audit, it will be able to ship LLW to NTS. All 800 Area managers have been briefed on their responsibilities for the upcoming audit. All managers of waste generators will be required to certify in writing that they have inspected all of their LLW containers and that they meet the NTS requirements. Most of the 250 LLW generators in the 800 Area have attended a refresher on the LLW requirements.

5.7 Waste Operations

5.7.1 Regulated Waste Operations

On July 15, 1993 four drums of RCRA/Toxic Substances Control Act (TSCA) regulated waste were discovered in the non-regulated storage area (Occurrence REGSANWST #1052). The drums were immediately moved to RCRA Unit 1 where a PCB storage area was created. Based on analytical results the drums were verified to contain RCRA constituents but no TSCA constituents. The PCB Storage Area has been deleted.

On July 30, 1993 the four Heated Safety Storage Units (HSSUs) were placed back in service. The HSSUs were taken out of service and moved off site while repairs were made to the secondary containment. The HSSUs have now been certified to have adequate secondary containment.

On August 16, 1993 approximately 1600 IDM drums were labeled as Hazardous Waste Pending Characterization per CAR#08, Rev. 1, Commitment 93-001195.

5.7.2 Waste Solidification Operations

Completed transfer of sludge from 207B Center Pond to 207B South Pond. Commenced transfer of sludge from 207B North Pond to 207B South Pond. Building 559 incidental water that was held in Air Force tankers was transferred to the Sewage Treatment Plant.

5.7.3 Non-Destructive Assay/Waste Assay and Shipping (WA&S)

It was discovered in the 90-day containment area unit 374-1956 that two containers have exceeded the 90-day accumulation period. The containers will be moved to a storage area upon written approval from CDH to store the containers without performing RTR. This action has been completed.

On Wednesday, July 7, 1993, Liquid Waste Treatment operators lost control of contaminated oil that was being drained from a pipe resulting in a spill (approximately two quarts) inside and outside of the work-area containment tent. The spilled oil contained low levels of Plutonium contamination and suspected volatile organic RCRA constituents. The spill was confined to the "posted anti-C required" area and the operators were protected with anti-C clothing and Self-contained Breathing Air during the operation. No airborne contamination monitors in the area were alarmed. The maintenance repair work procedure was stopped, the flange was retightened to stop the oil flow and the operators exited the affected area. The oil spilled outside the tent was immediately cleaned up from the floor. The following morning further actions were initiated to cleanup the spilled material inside the tent.

Initial investigations determined that the catch (which was expected to control the flow of oil flow to bottles) and tent were inadequate to prevent the spread of contamination during the evolution.

The OU Manager categorized the event as an Internal Report. The FR has advised the OM/UM that RFO consider the event OFF-NORMAL per DOE 5000.3B.

OM personnel reported a leak in the primary containment piping between Modular Storage Tanks, Pump House #308-B and the interceptor Trench System (ITS) Sump (Central Sump), 308-A. An estimated 300 gallons of RCRA regulated ground water was released from the system into the secondary containment of the pump house. An additional 5-6 thousand gallons were released to the central sump which is an unlined concrete structure.

An evaluation was performed by the Facility Manager/Designee which states that the cause of the event was failure of the primary transfer pipe. All the spilled liquid was contained in secondary containment provided by the floor of the pumphouse 308B. Since the Central Sump is unlined, it is not allowed to hold RCRA Regulated liquids and thus the RCRA contingency plan was implemented (technically the liquid being pumped out of the central Sump, which is the identical waste that leaked back in, is not regulated under RCRA until it leaves the sump).

Several units within WA&S do not have adequate secondary containment. This compliance issue is being addressed by Facility Management, Building 771.

Roof repair to Building 664 is to begin the week of August 23, 1993. The RTR system may be shut down while individuals are on the roof. Alternatives to continue operations are being addressed.

Environmental drums containing soil samples have been received in 664 with hazardous waste and To Be Determined (TBD) labels pending characterization. Drums are being RTR and sent directly to Hazardous Waste Operations to be stored.

5.8 Residue Operations

The sight gauge on tank D1811, Room 180A, leaked on July 28, 1993. The leak was less than reportable quantity for nitric acid. The leak was immediately contained and the tank placed out of service.

Surveillances revealed seven uncharacterized wastes in Room 179A and seven uncharacterized wastes in Room 180F. These wastes were labeled and logged in accordance with 1-23000-WMM-001, Miscellaneous Waste Materials Management. Actions to analyze and disposition these wastes were placed into PATS.

During a surveillance of Room 181A it was discovered that backlog drums of IDC 331, Ful-Flo filters, may contain incompatible liquids, i.e., acids and bases. (Note that each filter is double-bagged in plastic and sealed in a plastic container such that a reaction cannot take place.)

Seventeen drums of IDC 331 were evaluated by RTR and 15 were subsequently determined to contain free liquids. A plan is being established for disposition of these drums.

5.9 400 Operations

There was a waste surveillance conducted July 12 & 13, 1993 and there were 32 findings mainly concerning minor labeling and misspelled words. Eight issues have been submitted; two ICOC and six FCOC. Other issues are pending.

There was an Automatic Transmission Fluid (ATF) spill in Room 112 on August 12, 1993. HAZMAT was notified by the Shift Manager. Per direction from HAZMAT building personnel cleaned up the ATF spill of approximately one to one and a half quarts.

Building 460 - The deficiency in Room 140 secondary containment crack in paint reported last month has been corrected.

The SAA assessment that was in process has been completed. This was for deletions and combining satellite areas that did not meet regulatory requirements. (Completed July 29, 1993)

On July 12 and 13, 1993, Building 444 was inspected by the Environmental and Waste Surveillance Group for compliance with RCRA and OSHA regulations. Twenty-nine issues, two recommendations, and one observation were noted during this inspection. The findings were as follows:

1 1 Failure to make a hazardous waste determination.

3 Inadequate signs

3 Incomplete/inaccurate log sheets

2 Unauthorized use of a process waste drains

2 Obstructed walkways

1 1 Other Miscellaneous OSHA and RCRA findings include:

- missed fire extinguisher inspection,
- insufficient secondary containment,
- abandoned waste.
- unauthorized consumable in a RCA,
- inappropriate use of an absorbent,
- flammable liquids not stored properly,
- a ventilation hood being used while it was tagged "out" for deficiencies in ventilation,

- safety glasses not being used by building personnel,
- proper protective clothing not being worn by building personnel,
- and a release of a substance under RCRA tanks 40.02 and 40.06.

CDH tour July 27, 1993. Highlights from CDH meeting. Items requested by CDH July 27, 1993. Submit to CDH within five days of the inspection: UIS - sample of new sludge (submitted); information concerning the management of the chromium contaminated liquid stored in tank in Building 460 (profile expected from OSCO August 2, 1993), method of disposal will be destructive incineration, cost will be available on return of profile (work package is being worked); analytical for used oil filters (samples were taken April 13, 1993 and results have not yet returned); status of analysis of the sodium vapor and metal halide lamps (sample was taken approximately the week of July 19, 1993 and results are on a standard eight week turnaround; and letter of guidance for management of light bulb crusher filters (submitted).

5.10 Facilities Management (Building 371)

Waste Surveillance verifications for compliance were conducted for these rooms to meet the RCRA Permit Modification requirements: 3412, 3187B, 2202. Findings in Room 3412 included lack of agreement between WSRIC and WEMS inventory, errors on the Unit Information sheet and lack of hazardous waste labels on two gloveboxes. All deficiencies were corrected. No deficiencies were detected in Rooms 3187B or 2202.

The 20 nickel-cadmium wet cell batteries in storage, as suspect RCRA hazardous waste, have been confirmed to be RCRA hazardous and non-usable. They will be moved to a permitted storage area outside the Protected Area (PA).

A section of piping (D-292 tank overflow line) that runs through Room 1117, cannot be inspected because of high contamination in Room 1117 that requires supplied air for entry. A Shift Order was issued which specifies remedial actions: inspect the room from the entrance or from the floor above it to check for spilled liquid, and check level indicators on the D-292 and D-293 tanks for changes in liquid level.

The redeveloped 371 WSRIC manual was received by 371 on August 13, 1993, one week ahead of schedule, to enable implementation prior to the NTS audit. Extensive redevelopment was necessary in light of the changed mission of 371 from production to maintenance and extended compliance.

371 met all commitments for corrective maintenance and other compliance issues for the RCRA Permit Modification application by August 13, 1993, including work in supplied breathing air to complete ancillary equipment evaluations and secondary containment installations in approximately six rooms.

371 Maintenance performed size reduction on a total of 76 uncontrolled waste containers in the process area, including shoe cover bins that are normally kept unlocked. This action meets the

low level waste compliance requirement that there shall be no uncontrolled containers in the process area. An exception is allowed to meet health and safety requirements for which no alternative exists but to allow an uncontrolled container in the process area (e.g., bins of uncontaminated shoe covers for use by personnel with contaminated shoe covers, so as not to spread contamination).

5.11 Environmental and Quality Training

An Emergency Response Technician course, #019-474-01, is now being offered by Performance Based Training (PBT). This course prepares responders to mitigate hazardous materials spills and prepare site safety plans associated with the incident, as per CFR 1910.120.

Toxic Substance Control Act (TSCA) Awareness will no longer be offered. This course is superseded by a PCBs Awareness Course #068-124-01.

COURSE NAME	COURSE #	PRIMARY DRIVER	#STUDENTS 7/19-8/16	#STUDENTS FYTD
40 Hour Haz Wst Ops	018-691-03	29CFR 1910.120	33	328
24 Hour Haz Wst Ops	018-691-02	29CFR 1910.120	32	280
8 Hour Haz Wst Ops Mgmt	018-691-01	29CFR 1910.120	0	39
8 Hour Haz Wst Ops Refr	018-691-05	29CFR 1910.120	178	1958
Responder Awareness	062-472-01	29CFR 1910.120	11	70
Responder Operations	062-471-01	29CFR 1910.120	7	70
Resp Awareness Refr	019-471-01	29CFR 1910.120	0	13
Responder Ops Refr	019-472-01	29CFR 1910.120	0	15
Incident Command	021-370-01	29CFR 1910.120	5	38
Incident Command Refr	019-370-01	29CFR 1910.120	0	16
Responder Technician	019-474-01	29CFR 1910.120	0	0 New Course
SCBA	019-170-01	29CFR 1910.134	41	284
SCBA Refresher	019-171-01	29CFR 1910.134	0	0
Haz Com Workshop, Mgrs.	090-754-01	29CFR1910.1200	0	80

COURSE NAME	COURSE #	PRIMARY DRIVER	#STUDENTS 7/19-8/16	#STUDENTS FYTD
Lab Chem Hygiene Wkshop	031-183-01	29CFR 1910.1450	0	0
Waste Generator - PA	067-285-01	40CFR Part 264/265	49	1191
Waste Generator-NonPA	067-285-02	40CFR Part 264/265	35	415
Waste Generator-NonRad	067-575-01	40CFR Part 264/265	90	1067
WSRIC	125-574-01	40CFR Part 264/265	0	0 In Development
RCRA Custodian	018-863-01	40CFR Part 264/265	41	681
RCRA Tank Custodian	016-863-01	40CFR Part 264/265	0	448
Confined Space Entry	068-741-01	29CFR 1910.146	228	1371
TSCA	016-936-01	40CFR	0	272 Closed
Asbestos Awareness	056-352-01	AHERA-40CFR	143	524
Line Control Program	019-974-01	DOE 5483.XX	18	199
Safety Monitor	019-975-01	DOE 5483.XX	44	102
Environmental Laws & Regs	016-100-01		0	0 In Development
PCB Awareness	068-124-01	40CFR	0	0 New Course
Emer. Mgmt. Org. (EMO)	021-101-01	DOE 5500.3A	38	38 New Course
Emer. Mgmt. Refresher	032-102-01	DOE 5500.3A	33	33 New Course
TOTAL			916	10,072

6.0 ENVIRONMENTAL WASTE AND MANAGEMENT PROGRAMS

6.1 Waste Programs

6.1.1 Resource Conservation and Recovery Act

RCRA, as amended, is one of the most far-reaching environmental statutes effecting RFP. RCRA Regulatory Programs provides programmatic oversight guidance, and permitting documentation on all hazardous waste management activities to ensure compliance with applicable federal and state laws.

Following are tables showing RFP permits, modifications or revisions, and other miscellaneous submittals and guidance requests.

RCRA PART A PERMIT (INTERIM STATUS)

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	DATE	COMMENTS
PART A PERMIT (INTERIM STATUS):		
Revision 12 of Combined Part A (Revision which is currently in effect)	May-93	
Request for change to Interim Status for various EPA waste codes	8/13/91	Awaiting final CDH approval
Contractor Cleanout Operations	8/10/92	Submitted to CDH for approval - currently on hold
Request for change to Interim Status for 904 Pad Waste Pile	5/18/93	Denied

RCRA PART B PERMIT

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	PERMIT MOD NUMBER	APPLICATION DATE	DATE	COMMENTS
PART B PERMIT:				
Original Permit			9/30/92	
Modification for Miscellaneous Corrections	Request #1	10/28/91	4/30/92	
Modification for Miscellaneous Corrections	Request #2	11/6/91	N/A	CDH approval not required
Modification for Training Compliance Request	# 3	12/31/91	N/A	CDH approval not required
Modification for Counters and Waste Codes	Request #4	1/15/92	6/9/92	
Modification for Training Section Revision	Request #5	1/29/92	TBD	Awaiting CDH approval
Modification for Part 3 Reformat	Request #6	2/25/92	N/A	CDH approval not required
Modification for Reformat Remainder of Permit	Request #7	3/20/92	N/A	CDH approval not required
Modification for Mixed Residues	Request #8	6/30/92	TBD	Awaiting CDH approval
Modification for Centralized Waste Storage	Request TBD	1/31/92		In preparation
Modification for Phase I of Building 374 Evaporator Upgrade	Request #9	8/26/92	TBD	Awaiting CDH approval
Modification for Phase II of Building 374 Evaporator Upgrade	Request #13		TBD	On hold
Modification for Contingency Plan and Code Additions	Request #10			In preparation
Modification for Oxidation Treatment	Request #11			Cancelled
Modification for Interim Status Units Request	# 12	11/6/92	TBD	Awaiting CDH approval
Modification for NOID and TRU Units	Request # TBD			On hold
Revised Permit	Request #14	6/16/93	TBD	Awaiting CDH issuance
Mixed Residue	# 15	Aug-93		

RCRA MISCELLANEOUS SUBMITTALS AND GUIDANCE

PERMIT/COMPLIANCE ACTIVITY DESCRIPTION	DATE	COMMENTS
DESCRIPTION OF SUBMITTAL/GUIDANCE REQUEST		
Closure Plans for Interim Status Units	TBD	In preparation
Supplement to Part B Application for Organic Air Emissions	2/27/92	Awaiting EPA approval
Request to delete Organic Air Monitoring		In preparation
Change to Interim Status Closure Plan	7/12/93	Awaiting CDH approval
Management of out-of-service RCRA units		In preparation
Alternate Containment in cargo containers		In preparation
Ancillary Equipment Clarification		In preparation
Request for RTR Exemption for Heat Exchanger Storage		Awaiting CDH response

6.1.2 Toxic Substances Control Act

TSCA was enacted to regulate chemical substances and mixtures which present an unreasonable risk of injury to health or the environment, and to take action with respect to chemical substances and mixtures which are imminent hazards. At this time, the only substance used at RFP which is regulated under TSCA is Polychlorinated Biphenyls (PCBs). Therefore, the TSCA regulations which govern chemical manufacturing, selling, and distribution for use are not applicable to RFP.

TSCA regulates PCB manufacturing, processing, distribution in commerce, and provides for use prohibitions. PCB regulations govern generators, users, storers, transporters, or disposers and requires an identification number for regulated facilities. RFP's ID number is CO7890010526. Note that most PCB waste are regulated under TSCA not RCRA. However, some PCB wastes contain both RCRA and TSCA regulated constituents.

RFP is currently in the process of trying to eliminate the use of all PCBs. One transformer in Building 991 contains approximately 700 ppm PCB and one transformer in Building 865 contains 900,000 ppm PCB. Regulatory requirements for these two transformers include notification to the Fire Department of the use of these transformers, their PCB concentration and location. Additionally, the transformers are marked with the 6 inch by 6 inch M_L PCB label as are the entries to the rooms the transformers are in. Combustible materials cannot be stored within 5 meters of the transformers or the transformer enclosures. Documented inspections are also required for both transformers. The Building 865 transformer requires quarterly inspections and the Building 991 transformer requires annual inspections.

Both PCB transformers currently meet the TSCA requirements as described. The Building 991

transformer is to be retrofilled (fluid replacement) which will allow for reclassification of the transformer to either contaminated PCB equipment, or non-PCB equipment depending on the results of the retrofill. Plans for the Building 865 transformer include removing it from service and placing it into storage for disposal. Both of these actions are to be completed during FY94.

PCBs at RFP are also contained in older fluorescent light ballasts. Although these light ballasts are not regulated for use and storage, there are restrictions on disposal of PCB light ballasts under CERCLA. RFPs current policy is to collect PCB light ballasts for disposal by incineration at a Permitted TSCA incinerator. A concern with the older light ballasts containing PCBs exists when leaks occur. Leaking PCB ballasts must be managed as PCB wastes in accordance with TSCA regulations for spill cleanup, storage and disposal.

6.1.3 Medical Waste

The State of Colorado, in 1989, amended its statutes by adding a new Part entitled Infectious Waste wherein certain requirements are imposed of facilities that generate the defined infectious waste. This statute uniquely directs that no implementing regulations will be promulgated. Thus, regulated facilities must implement the statute directly. The statute calls for a generator management plan indicating the components that must be present in all such plans. The statute became effective at signing, on April 23, 1989.

EPA has promulgated regulations under RCRA Subtitle J addressing the issue of handling and disposal of infectious wastes, but it does not yet apply to the State of Colorado. However, EPA anticipates promulgating an expansion that will apply to this facility, probably beyond FY94.

RFP has written its Medical/Infectious Waste Generator Management Plan (1-10000-MWM) as required, but has not implemented the plan fully. Two tasks remain including: 1) finalization of a procedure drafted by Occupational Health, and 2) updating and implementation of the requisite training program. While the procedure is not final, written guidance is in place to mitigate any non-compliance that might occur. Also, a training program exists for Bloodborne Pathogens which includes waste management, but does not provide the detail required in the statute. The training program is currently being revised to include the necessary changes.

6.1.4 Excess Chemicals

Waste Regulatory Programs has established the lead to facilitate the implementation of a plant-wide Excess Chemical Management Program. This effort is being coordinated with the support of several other EG&G organizations. At this time, approximately 2300 excess chemicals are pending evaluation for disposition.

The program recently developed and issued a level one procedure which outlines the specific requirements for the management of excess chemicals. This procedure, coupled with the information published in the Excess Chemical Envirogram, provide the foundation for excess chemical management. In addition, a detailed action plan has been developed for the identification and subsequent disposition of excess chemicals plant-wide. This action plan has been entered in the Plant Action Tracking System to

ensure accountability on behalf of the specific task managers.

Waste Regulatory Programs has identified and received approval of funding to address the current backlog of chemicals. A subcontractor has been procured to disposition the backlog.

At this time, Waste Regulatory Programs is focussing its efforts on the excess chemicals located in Building 865. This effort, in conjunction with the plant Transition Team, is a pilot project for the demonstration of the TSIP management process. At this time, this project is on schedule.

6.1.5 Contingency Plan

The RCRA Contingency Plan has been implemented seven times during this calendar year, the most recent implementation occurring on July 20, 1993. This release is documented in RCRA CPIR 93-007 transmittal on August 4, 1993 to DOE RFO.

A spill of approximately 4700 gallons of hazardous waste from the ancillary equipment associated with the Temporary Modular Tanks and Building 910 Treatment System. These tanks store liquid that is collected by the Solar Evaporation Pond Interceptor Trench System (ITS). The released material filled the secondary containment pipe causing hazardous waste to spill from the secondary containment pipe into the modular tank pumphouse secondary containment and into the ITS sump. In the tanks, treatment system and ancillary equipment are a part of RCRA Unit No. 38. The RCRA Contingency Plan was implemented as a precautionary measure due to a release of RCRA regulated hazardous waste to an unlined concrete sump. In addition, some of the released hazardous waste was not removed from the secondary containment within 24 hours.

No injuries occurred and the spill/leak did not result in an additional threat to human health or the environment.

6.1.6 Federal Facility Compliance Agreement Program

A compliance order on consent was signed on Sept 19, 1989 by DOE, EPA Region VIII, and the State of Colorado to provide a 1-year period for DOE to work towards compliance with the land disposal restrictions of the Hazardous and Solid Waste Amendments of 1984 for mixed wastes. The FFCA covers radioactive wastes that were prohibited as of the FFCA effective date, which includes wastes containing solvents and dioxins that do not meet the treatment standards specified by EPA or "California List" wastes containing hazardous constituents above the applicable allowable levels for land disposal. During the period of the original agreement, DOE was to take all reasonable steps to ensure the accurate identification, safe storage, and minimization of restricted waste prohibited from land disposal.

A new agreement, commonly referred to as FFCA-II, was signed on May 10, 1991, by representatives from EPA and DOE. This new agreement was a replacement of the original September 1989 agreement, and again provided the mechanism for DOE to achieve compliance with the LDR portion of the RCRA regulations. FFCA-II was valid for a period of 2 years, during which DOE continued to put in place those physical and administrative controls necessary to demonstrate compliance with LDR. Specific milestones and schedules were prepared to demonstrate that proposed activities are planned to bring

RFP into compliance with LDR regulations. The FFCA II expired on May 10, 1993. A new agreement is currently under negotiation between DOE, EG&G, EPA and CDH.

As with the original agreement, FFCA-II required submittal of a variety of reports and plans for the development and implementation of various treatment technologies to treat mixed wastes before disposal at offsite locations. Submittal of the reports and plans constitutes the primary milestones under the current agreement. Under the terms of the agreement, most of these documents were subject to review and/or approval by EPA. These reports and plans are briefly described as follows:

Comprehensive Treatment and Management Plan (CTMP). This document will describe the justification, selection, and applicability of treatment technologies to LDR wastes at RFP. It will include schedules and milestones for developing and implementing chosen technologies. The milestones set forth in the CTMP become enforceable milestones upon approval of the document by EPA.

Waste Minimization Plan. This annual document will discuss current and future initiatives undertaken by RFP to eliminate or minimize the generation of mixed waste.

Annual LDR Progress Report (APR). The document will provide an update and status on the scope and magnitude of LDR mixed waste issues at RFP including quantities of waste in storage, storage locations, progress in LDR determinations and characterization efforts, and treatment technology implementation.

Residue Management Report. This document will describe the plans for bringing the management of mixed residues into compliance with the LDR requirements as a companion document to the Residue Management Plan being prepared under terms of the Residue Compliance Order.

Nonradioactive Hazardous Waste Shipping Schedule. This document will identify the methods and schedules by which existing nonradioactive hazardous wastes can be shipped offsite for disposal.

Waste Stream and Residue Identification and Characterization (WSRIC) Report. This annual document will be a revision to the existing WSRIC prepared in 1990.

The CTMP was submitted in June 1992 and the APR was submitted in March 1993. These documents together describe the commitments made by the Plant toward achieving compliance with the LDR regulations. The primary and secondary milestones are listed below.

EPA PRIMARY AND SECONDARY MILESTONES

MILESTONES	Waste Treatment Systems					
	1A. LLM Solvent Contaminated Wastes Treatment System - Thermal	1B. LLM Solvent Contaminated Wastes Treatment System - Non-Thermal	2. LLM Solidified Bypass Sludge Treatment System	3. LLM Miscellaneous Waste Forms Treatment System	4. LLM Building 374/774 Treatment System	5. LLM Surface Organics Removal, Leaded Gloves, Bulk Lead Treatment System
1. Start Treatability Study Exemption (TSE) preparation	N/A	Jul-94	Jul-94	Jan-95	Oct 92 Completed	Dec 92 Completed
2. <i>Submission of the Treatability Study Exemption</i>	N/A	Aug-94	Aug-94	Feb-95	Nov 92 Completed	Feb 93 Completed
3. Start Non-radioactive (Cold) Experimental Phase	N/A	Oct-94	Oct-94	Apr-95	Jan 93 Completed	Apr 93 Completed
4. Decide to Proceed with FI&D Permit Application	Oct 92 Completed	Oct-97	N/A	N/A	May 93 Completed	Apr-94
5. Start Preparation of R&D Permit Application	Nov 92 Completed	Nov-97	N/A	N/A	June 93 Completed	May-94
6. <i>Submission of the R&D Permit Application</i>	May 93 Completed	May-98	N/A	N/A	Dec-93	Jun-94
7. Start Cold Demonstration Phase	Nov-93	Nov-98	N/A	N/A	Dec-94	Jan-95
8. Decide to Proceed with Part B Permit Application Modification	Jun-94	Nov-00	Jul-95	Aug-95	Oct-95	Nov-96
9. Start Part B Permit Application Modification Approval	Jul-94	Jan-01	Aug-95	Sep-95	Dec-95	Jan-97
10. Complete Title II Engineering	Dec-96	Jan-03	Jul-97	Nov-96	Dec-96	Jun-98
11. <i>Submission of the Part B Permit Application Modification*</i>	Jan-97	Feb-03	Aug-97	Dec-96	Jan-97	Jul-98
12. Receive Part B Permit Application** Modification Approval	Jan-99	Feb-05	Aug-99	Dec-98	Jan-99	Jul-00
13. Complete Construction	Jan-03	Feb-09	Feb-03	Dec-01	Jan-03	Jul-03
14. <i>Initiation of Systems Op. Testing on Production System/Facility</i>	Jan-04	Feb-10	Feb-04	Dec-02	Jan-04	Jul-04
15. Complete Operational Readiness Review (ORR)	Jan-05	Aug-11	Aug-05	Jun-04	Jul-05	Jul-06
16. Start Cold Startup Phase	Feb-05	Sep-11	Sep-05	Jul-04	Aug-05	Feb-06
17. Start Radioactive (Hot) Startup Phase	Dec-05	Oct-12	Oct-06	Aug-05	Sep-05	Mar-07
18. <i>Submission of a Waste Processing Schedule</i>	Jan-06	Nov-12	Nov-06	Sep-05	Oct-05	Apr-07

Note: Italicized entries represent primary milestones.

*EPA approval of location may be needed prior to submission of Part B Permit Application Modification.

**Completion of these milestones by the projected dates is not within DOE's control. Permit approval received beyond these dates will result in a comparable slip to subsequent milestones.

6.2 ENVIRONMENTAL PROTECTION

6.2.1 National Environmental Policy Act

NEPA is a short, general statute that declares a national environmental policy and promotes consideration of environmental concerns by federal agencies. It requires no permits, but requires that federal agencies conduct an impact analysis of major federal actions for environmental concerns. Such an analysis results in an Environmental Impact Statement (EIS). While preparation of an EIS is a multi-year task, there are preliminary steps to determine whether or not an EIS is actually required. Such steps include various levels of project review up to and including an Environmental Assessment (EA). An EA concludes that either an EIS is required or there is a Finding Of No Significant Impact (FONSI).

Following is a schedule of NEPA reviews based upon upcoming plant projects:

PROJECT UNDER REVIEW	START DATE	END DATE	RESULT	COMMENTS
Bldg. 707 Thermal Stabilization EA	Jun-93	Aug-93		
Stockpile Reliability Evaluation Program Transfer	Jul-93	Nov-93	Eliminated	This project has been transferred to Las Alamos for inclusion in its similar EA
Surface Water Structures EA	Jul-93	Nov-93		
Sitewide EIS		Dec-96		

Building 707 Thermal Stabilization Environmental Assessment: EG&G has been tasked with preparing an EA prior to the resumption of thermal stabilization activities in Building 707. This EA is of extremely high priority. The documentation process began in early June resulting in a draft EA on August 2, 1993.

Surface Water Structures Environmental Assessment: This project involves the performance of maintenance activities on surface water structures such as dams, spillways, gates, channels, etc., due to excessive vegetation and sedimentation. The documentation process for this project is underway and a draft EA was completed in July 1993. A FONSI is anticipated in November 1993.

Sitewide EIS: The sitewide EIS is expected to be completed in FY96.

6.2.2 Clean Water Act

The CWA, as amended, focuses on rigorous control of conventional and toxic water pollutants by providing:

- a system of minimum national effluent standards for each industry;
- water quality standards;

-
- a discharge permit program where these standards are translated into enforceable limitations; (NPDES)
 - provisions for special problems such as toxic chemicals and oil spills; and
 - a revolving construction loan program (formally a grant program) for publicly-owned treatment works.

RFP is subject to, and maintains an NPDES permit which it obtained in 1984. The permit expired on June 30, 1989, but was administratively continued until such time as EPA approves a renewal. That renewal is still pending.

DOE, RFO entered into a Federal Facilities Compliance Agreement (FFCA) for its alleged NPDES violations on March 25, 1991. The FFCA is still in effect and incorporates long-term projects including the Tank Management Plan, Drain Identification Study and specified improvements to the wastewater treatment plant. Tasks associated with these long-term projects are tracked within PATS.

New Storm Water regulations were promulgated by the EPA in 1990 requiring a Storm Water Permit application be filed by November 1, 1991. Subsequent to the 1990 rule, EPA extended the permit application deadline to October 1, 1992 by which date DOE, RFO filed its application. The rule includes two different types of storm water permits - an individual permit that allows for site specificity, and a general permit that is generic and includes provisions for Best Management Practices (BMPs). In lieu of a general permit application, a permittee would have to submit a Notice of Intent which is not required for an individual application. DOE applied for an individual permit so that it could benefit from existing good control practices. However, EPA underestimated the amount of effort with which it would be faced as facilities began submitting applications. Thus, EPA is contemplating granting general permits including RFP.

Although the ramifications of being issued a general permit rather than an individual permit are not fully known, operating under the general permit may result in some duplication of effort and additional requirements. In addition to the permit application, certain planning documents are required by the storm water regulations and under the NPDES permit. EG&G is currently preparing separate Spill and BMP Plans as well as the storm water Pollution Prevention Plan.

Following is a list of permits/plans in a table format for quick reference:

PERMIT/PLAN	EFFECTIVE DATE	EXPIRATION DATE	COMMENTS
National Pollutant Discharge Elimination System (NPDES) Permit	12/26/84	6/30/89	By EPA letter of 6/6/89 the NPDES Permit was administratively extended until renewed
NPDES Federal Facilities Compliance Agreement	3/25/91	None	
NPDES Storm Water Discharge Permit			Application Submitted 10/1/92
Spill Prevention Control and Countermeasures/Best Management Practices (SPCC/BMP) Plan	9/30/92		
Separate Spill and BMP Plans			To meet requirements under the Oil Pollution Prevention Act and NPDES regulations Next Revision: Approx. 9/1994
Pollution Prevention Plan			In Preparation: Anticipated Storm Water Permit Requirements; must be developed within 6 months of permit issuance

6.2.3 Clean Air Act

The CAA, as amended, is administered by the CDH where it has obtained primacy, and to a lesser degree by the EPA. Thus, permitting/requirements under the CAA can be confusing. Further, the 1990 Amendments to the CAA are far reaching and, as implementing rules are promulgated first by EPA and subsequently by CDH, lines of authority will change back and forth. This section will contain information about changing requirements as they occur.

There are currently no permits issued by EPA. Following is a list of air emission permits that have been issued by CDH. When a permit application is submitted to CDH, a permit number is assigned that represents the year of submission, the county where the facility resides and the order of receipt of the application. The letters "AP" following the permit number in the following table indicates permit applications for which no permit has been issued. An initial permit is issued upon approval of the permit application. The initial permit contains permit conditions and requirements with which RFP must comply prior to obtaining the final permit. A final permit will be issued to a facility after a CDH inspection to ensure compliance with the initial permit.

A permit is required if air emissions from a source are anticipated to exceed a given threshold of a regulated pollutant. Whenever an RFP activity results in a regulated pollutant emission, it must be examined to determine whether or not a pollutant will exceed the threshold and, thus whether or not the activity will require a permit. A permit application may result in an exemption determination if the activity is specifically listed in the regulation as exempt from permit requirements and/or will not significantly impact ambient air quality or the environment. This information is cursory because a thorough discussion of air regulations would be too lengthy for this Report. Note that in addition to permit requirements, CDH also requires APENs for all sources emitting air pollutants above established *de minimis* reporting levels. An APEN is a facility emission inventory which is used by CDH for overall

state planning purposes. APENs must also be filed when a source makes a change (i.e. operations, ownership, etc.) and periodically for all sources so that CDH can maintain up to date records.

CLEAN AIR ACT PERMITS

BUILDING/EMISSION SOURCE	PERMIT #	PERMIT STATUS	COMMENTS
Bldg. 122 Incinerator (3/25/82)	C-12-931	Final Permit (Inactive Source)	To be cancelled Fall 1993
Bldg. 771 Incinerator (8/28/85)	12JE832	Final Permit (Inactive Source)	To be cancelled Fall 1993
Bldg. 776 Incinerator (3/25/82)	C-13-022	Final Permit (Inactive Source)	To be cancelled Fall 1993
Fugitive Dust Renewed (12/26/91)	87JE084L	Final Permit	Expires 12/31/94
Bldg. 776, Supercompactor and Repackaging Facility (SARF) Transuranic Waste Shredder HEPA filter	91JE)47	Initial Permit Issued 12/91	Awaiting Final Permit
Bldg. 333 paint spray booth	51JE300-1	Initial Permit Issued 7/31/92	Awaiting Final Permit
Bldg. 333 grit blaster	91JE300-2	Initial Permit Issued 7/31/92	Awaiting Final Permit
Bldg. 910, 3 nat. gas generators	91JE316-1	Initial Permit Issued 7/31/92	Awaiting Final Permit
Bldg. 910, 1 nat. gas water htr.	91JE316-2	Final Permit 2/18/93	
Bldg. 995 nat. gas fired sludge dryer	91JE430	Initial Permit Issued 2/11/92	Awaiting Final Permit
Bldg. 440 paint spray booth	91JES37-1	Final Permit 5/12/92	
Bldg. 440 paint spray booth	91JE537-2	Final Permit 5/12/91	
Bldg. 373, Vent 1, Detroit diesel engine pump	92JE473	Initial Permit Issued 3/9/93	Awaiting Final Permit
Bldg. 460, Machining and product inspection processing/high bay vents	92JE1247	Initial Permit Issued 3/11/93	Awaiting permit cancellation in process of revising APEN for these operations. VOC emission now less than 1 ton/year. Below threshold for permit and APEN.
Open Burn Permit	1140-08-1001	Final Permit	Permit expires 10/31/93
Steam Plant - 4 Boilers	92JE833	Initial Permit Pending	Under review for initial permit
Bldg. 702 - 4 nat. gas engines	92JE833	Initial Permit Pending	Under review for initial permit
Bldg. 776 - 4 nat. gas engines	92JE833	Initial Permit Pending	Under review for initial permit
Bldg. 374 - Salt Spray Dryer	93JE542	Initial Permit Pending	Under review for need for permit
Emergency Generators: (Bldg. 120, 566, 708(B), 708(C), 715A, 776, 881G, 820, 762A (PACS-1), 372A (PACS-2), 792A (PACS-3), Portables A and B.	92JE473 (AP) #s 1-15	Initial Permit Pending	The permit application for these generators is currently under review for issuance of an initial permit.
Bldg. 708 & 711 diesel pumps and emergency generators: Bldgs. 124, 127, 371, 427, 443, 559, 562, 708(A), 715, 727, 729, 779, 827, 989.	5ZJE833(AP) #s 1-29	Initial Permit Pending	The permit application for these units is currently under review for issuance of an initial permit.
Bldg. 886 Uranium Solution Evaporator	90JE045(AP)	Permit Exempted	Determined by CDH no permit is required (8/21/91)
Bldg. 881 spray paint booth	91JE481(AP)	Permit Exempted	Determined by CDH no permit is required (8/8/91)
Bldg. 991-1: spray paint booth	91JE538(AP)	Permit Exempted	Determined by CDH no permit is required (8/23/91)
Bldg. 442 filter test penetrometers (Q-76 & Q-107) and Bldg. 556 plasmas arc cutter	92JE1247(AP)	Permit Exempted	Determined by CDH no permit is required (3/12/93)
OU2 generator	N/A	Application submitted to CDH 8/17/93	Permit to be issued pending CDH review
Bldg. 928 diesel pump	N/A	Application submitted to CDH 8/7/92	Permit to be issued pending CDH review
Davey Diesel Air Compressor	N/A	Application submitted to CDH 6/30/93	Permit to be issued per CDH review

6.2.4 Superfund Amendment and Reauthorization Act

Section 312 of the Emergency Planning and Community Right-To-Know Act of 1986 (EPCRA) requires RFP to submit an emergency and hazardous chemical inventory form to the Local Emergency Planning Committee (LEPC); Boulder and Jefferson Counties, the State Emergency Planning Committee (SEPC) and the RFP fire department. The inventory form (known as a Tier II reporting form) must include chemicals for which Material Safety Data Sheets (MSDS) are required under Occupational Safety and Health Administration's (OSHA) Hazardous Communication Standards and that were present at the facility at any time during the previous calendar year above specific thresholds.

EPCRA and SARA Title III are synonymous. Note that there is a regulatory bridge between RCRA law (amended by SARA) and OSHA law where implementing regulations for OSHA (called the Hazardous Communications Standards) and implementing regulations for SARA Title III refer to each other via the MSDS's. The purpose of SARA Title III is to establish the presence of "toxic or hazardous" chemicals at a particular site with various community emergency response authorities. In so doing, the community is better protected from exposure should a disaster occur at a regulated site (i.e. fire which could cause an entrainment of hazardous constituents into the air). Emergency response teams know what chemicals are present and can be appropriately prepared to handle an emergency.

A Tier II report covering approximately 20 chemicals and chemical products was filed in February, 1993 to meet the March 1 reporting deadline. An amendment to the report was filed in July, 1993.

EPCRA also requires that facilities that use listed toxic chemicals in excess of 10,000 pounds in a calendar year file a Toxic Chemical Release Inventory Form (known as Form R) by July 1, 1993 each year. A Form R was filed for 3 chemicals; hydrochloric acid, sulfuric acid and nitric acid in June. The Report was amended July 1, 1993 to reflect sources that were not accounted for in the original filing.

The amendments to both submittals were required because chemicals used in the buffer zone area around on the plantsite by contractors performing the work were not included in the original filing.

6.2.5 Federal Insecticide, Fungicide, and Rodenticide Act

FIFRA is the federal environmental regulation that covers the use of chemicals that are used to control unwanted pests, insects, and microbes. FIFRA controls the use of these types of chemicals is by controlling their manufacture. Although RFP does not manufacture these chemicals, a FIFRA program exists to monitor and reduce their use. The program is in the development stage and the final FIFRA Management Plan is in the process of being completed.

At RFP, FIFRA is managed as part of the Watershed Management program under the supervision of the Surface Water Division (SWD) of the Environmental Protection Management Department. The goal of the program is to develop Best Management Practices for the use and storage of FIFRA regulated chemicals on plantsite. To ensure that pesticides do not enter the watershed, SWD tracks their use, storage and disposal. SWD also studies developing alternative methods of pest control, such as biological release programs and physical trapping of pests. There are no state permits required for RFP to use FIFRA.

Currently, pesticide use on plantsite is limited. A preventive pest control program is in effect for the food service areas, in which pesticides are applied in food service areas once a month by contractor applicators. These applicators are licensed and certified by the Colorado Department of Agriculture. Contractors are responsible for providing the chemicals used, applying them, and disposing of the waste. The other main plantsite source of pesticides is Plant Services. Plant Services keeps a small quantity of pesticides (including ant bait, rodent bait, and wasp spray) in Building 331, and applies and distributes them upon request from Building and Operations Managers. The algacides used in the small water treatment towers and air conditioning units around plantsite are also covered under FIFRA.

6.3 Environmental Restoration

6.3.1 Comprehensive Environmental Response, Compensation, and Liability Act

DOE Surveillance Audits - Finding #93-WM-OOS-891-005-002, "Failure to make a hazardous waste determination or characterize waste". dated January 1, 1992. The finding identified approximately 12 containers (drums) of AccuVac vials which needed a waste determination and proper disposal. An Action Plan has been completed to comply with the findings: Draft of Standard Operating Procedure FO.21, "Disposal of Residual AccuVac Reagent Vials". (Completed August 9, 1993)

At present, Environmental Restoration/Facility Operations is at or near the permitted storage capacity with no additional space available at this time in the Interim Status storage units. Field projects are ongoing which continue to generate Investigative Derived Material (IDM). The curtailment or discontinuation of field activities will impact the Interagency Agreement (IAG) schedule.

Following is a table taken from the *Environmental Restoration Monthly Report* for July 1993. The ER report provides comprehensive information about ER activities and is produced monthly for DOE, RFO.

IAG MILESTONES THROUGH FISCAL YEAR 1994

<u>OU#</u>	<u>Milestone Description</u>	<u>Date Due to EPA/CDH</u>	<u>Status</u>
2	Submit Draft Phase II RFI/RI Report	12 Mar 93	Delinquent
2	Submit Draft Treatability Test Report	18 May 93	extended to 13 Jul 93
4	Submit Draft Phase I RFI/RI Report	21 May 93	extended to 14 Sep 93
2	Submit Subsurface Test Plan Site #2	24 June 93	Complete
2	Submit Final Treatability Test Report	13 Jul 93	extended to 8 Sep 93
3	Submit Draft Phase I RFI/RI Report	16 Jul 93	extension requested
6	Submit Draft Phase I RFI/RI Report	4 Aug 93	extension requested
2	Submit Final Phase I RFI/RI Report	9 Aug 93	*
7	Submit Draft Phase I RFI/RI Report	12 Oct 93	*
4	Submit Final Phase I RFI/RI Report	18 Oct 93	extended to 14 Feb 94
2	Submit Draft CMS/FS Report	4 Nov 93	*
1	Submit Final Phase III RFI/RI Report	04 Jan 93	extended to 15 Nov 93
5	Submit Draft Phase I RFI/RI Report	30 Nov 93	*
3	Submit Final Phase I RFI/RI Report	13 Dec 93	extension requested
1	Submit Draft Proposed Plan	27 Sep 93	extension requested

1	Submit Final Proposed Plan	4 Jan 94	extension requested
6	Submit Final Phase I RFV/RI Report	7 Jan 94	extension requested
1	Submit Draft CMS/FS Report	03 Mar 94	extended to 11 Feb 94
8	Submit Draft Phase I RFV/RI Report	14 Feb 94	*
7	Submit Final Phase I RFV/RI Report	16 Mar 94	*
9	Submit Final Phase I RFV/RI Report	11 Apr 94	*
4	Submit Draft Phase I Proposed IM/IRA Decision Document	14 Apr 94	*
12	Submit Draft Phase I RFV/RI Report	20 Apr 94	*
4	Submit Draft Phase II Work Plan	22 Apr 94	*
5	Submit Final Phase I RFV/RI Report	3 May 94	*
1	Submit Draft Responsiveness Summary	6 May 94	*
2	Submit Final CMS/FS Report	10 May 94	*
2	Submit Draft Proposed Plan	10 May 94	*
8	Submit Final Phase I RFV/RI Report	12 Jul 94	*
15	Submit Draft Phase I RFV/RI Report	1 Aug 94	on schedule
1	Submit Final CMS/FS Report	3 Aug 94	*
1	Submit Final Responsiveness Summary	3 Aug 94	*
1	Submit Draft CAD/ROD	3 Aug 94	*
13	Submit Draft Phase I RFV/RI Report	8 Aug 94	*
2	Submit Final Proposed Plan	9 Aug 94	*
10	Submit Draft Phase I RFV/RI Report	25 Aug 94	*
9	Submit Final Phase I RFV/RI Report	6 Sep 94	*
4	Submit Draft Phase I Proposed IM/IRA Decision Document	14 Apr 94	*
7	Submit Draft Phase II RFV/RI Work Plan	13 Sep 94	*
12	Submit Final Phase I RFV/RI Report	15 Sep 94	*
4	Submit Final Phase II RFV/RI Work Plan	19 Sep 94	*
11	Submit Draft Phase I RFV/RI Report	20 Sep 94	*

*Behind original IAG schedule; extension required.

APPENDIX A

TABLE 2

Cumulative ENVIRONMENTAL DEFICIENCIES Deficiency Summary

253	Potential environmental deficiencies identified as of 11/9/92
	SOURCE: H.P. Mann ltr., 92-RF-13195, to R.M. Nelson, Environmental Deficiencies - HPM-074-92, November 9, 1992
-69	Items removed as potential deficiencies identified as of 1/5/93
	SOURCE: 1) G.L. Potter ltr., 92-RF-14705, J.K. Hartman, Regulatory Compliance Report - GLP-212-92, December 21, 1992 2) D.S. Tallman ltr., DST-001-93 A.L. Schubert, January 5, 1993
184	TOTAL CONFIRMED ENVIRONMENTAL DEFICIENCIES
1857	Deficiencies re-categorized as Environmental Deficiencies in the Plant Action Tracking after 11/9/92
2041	(see "Deficiencies Added" for details concerning sources of these deficiencies) TOTAL DEFICIENCIES IDENTIFIED as of 8/16/93
-1759	Environmental Deficiencies corrected as of 8/16/93
282	TOTAL ENVIRONMENTAL DEFICIENCIES REMAINING FOR CORRECTION
Of the 282 deficiencies:	
	Correction in Progress 216* Plans due 6
	Overdue 16 Tasks complete/
	Hold 3 final paperwork due 41
	282
*38 referenced to other plans	

8/16/93

Original ENVIRONMENTAL DEFICIENCIES Deficiency Summary

253	Potential environmental deficiencies identified as of 11/9/92															
	SOURCE: H.P. Mann ltr., 92-RF-13195, to R.M. Nelson, Environmental Deficiencies - HPM-074-92, November 9, 1992															
-69	Items removed as potential deficiencies identified as of 1/5/93															
	SOURCE: 1) G.L. Potter ltr., 92-RF-14705, J.K. Hartman, Regulatory Compliance Report - GLP-212-92, December 21, 1992 2) D.S. Tallman ltr., DST-001-93 A.L. Schubert, January 5, 1993															
184	TOTAL CONFIRMED ENVIRONMENTAL DEFICIENCIES															
8	ENVDEF #38 added 7 plans ENVDEF #168 added 1 plan															
192	TOTAL DEFICIENCIES TRACKED															
-106	Deficiencies corrected as of 8/16/93															
86	DEFICIENCIES REMAINING FOR CORRECTION															
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Of the 86 deficiencies:</td> <td style="width: 35%;">Correction in Progress</td> <td style="width: 15%; text-align: right;">76*</td> <td style="width: 15%;">Plans due</td> <td style="width: 20%; text-align: right;">1</td> </tr> <tr> <td></td> <td>Overdue</td> <td style="text-align: right;">0</td> <td>Tasks complete/ final paperwork due</td> <td style="text-align: right;">9</td> </tr> <tr> <td></td> <td colspan="3">* 25 plans are referenced to existing plans</td> <td style="text-align: right; border-top: 1px solid black;">86</td> </tr> </table>		Of the 86 deficiencies:	Correction in Progress	76*	Plans due	1		Overdue	0	Tasks complete/ final paperwork due	9		* 25 plans are referenced to existing plans			86
Of the 86 deficiencies:	Correction in Progress	76*	Plans due	1												
	Overdue	0	Tasks complete/ final paperwork due	9												
	* 25 plans are referenced to existing plans			86												

ENVIRONMENTAL DEFICIENCIES ADDED AFTER 11/9/92

Number
Environmental
Deficiencies

Source	Number Environmental Deficiencies
Environmental Deficiency #38 added 7 plans	8
Environmental Deficiency #168 added 1 plan	100
Tank Assessments	34
DOE Waste Surveillances	1
July 1989 Environmental Assessment Study (EAS) Finding	32
EG&G Surface Water Division	1647
EG&G Waste Surveillances	2
EG&G ORR 707	11
Self-Assessments	1
RCRA Contingency Plan	6
DOE Surveillance (Non-Waste)	15
Miscellaneous	1857
Environmental Deficiencies Added After 11/9/92	8/16/93

TABLE 4

REGULATORY ENVIRONMENTAL DEFICIENCY STATUS 1993

