

NOTICE:

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DOCUMENT ARE ILLEGIBLE**

3) Hazardous Waste Storage

Before alternative use of plant-site buildings can be considered, DOE's waste management practices will need attention. Much of the current storage capacity is marginal in terms of management, on-site safety, potential on-site radiation exposure, and compliance with hazardous waste requirements. In addition, significant amounts of mixed waste at RFP is currently stored without a permit.

Given the existing waste management problems at RFP, the Division is very concerned that these problems will worsen in the future if adequate planning is not implemented. ~~D&D and environmental restoration activities will continue to~~ generate substantial volumes of wastes that will require storage, treatment, or disposal. The volume of these wastes will exceed existing interim status and permitted storage capacity in a very short time. To compound this problem, few, if any, new storage locations are presently available that can provide efficient, safe, and compliant storage. Large surplus buildings that become available during plant transition could present DOE with a very good opportunity to upgrade their waste storage. Regardless, until the needs for waste storage are defined, other uses of plant buildings would be precluded.

Summary

This guidance represents the beginning of the Division's efforts to guide DOE through the regulatory process necessary for re-use of on-site facilities. Unfortunately, the Division believes considering interim re-use of on-site buildings by non-DOE entities to be premature, and probably not possible (and maybe not necessary), until DOE develops the following:

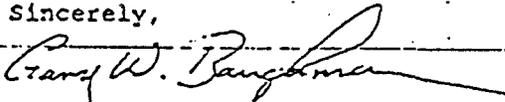
- 1) an accurate assessment of present and future DOE waste management needs at the site (including manpower estimates),
- 2) plans, schedules, and budgets for satisfying waste management needs which must include compliance with regulatory requirements,
- 3) plans and schedules which ensure that future use of on-site buildings will not impair DOE's ability to meet cleanup and waste management commitments in the IAG and other agreements, and
- 4) plans, schedules, and budgets that ensure that DOE has implemented compliant management or closure of all hazardous waste units or sites within buildings.

Per the Division's conditional approval of the "Mixed Residue Reduction Report" as part of Consent Order 93-04-23-01, DOE is required, by October 1, 1994, to develop a report "including an inventory of the available and potential storage space for all mixed waste at the Plant, and an evaluation of the adequacy of such space to comply with the requirements of the CHNA." This report will make significant progress on, but not necessarily complete, items 1 and 2 above. Until DOE has developed other necessary plans, schedules, and budgets for all of the activities, both regulatory and DOE-initiated, that must take place before and during on-site building re-use, the Division does not believe that further discussions of on-site interim re-use or on-site economic development through the forum of the Regulatory Task Force on Interim Re-use would be valuable. These plans and other information are DOE's responsibility to develop and are critical to, and must precede, informed and compliant interim re-use decisions. The Division does see value, however, in continuing efforts on off-site economic development and DOE/EG&C re-use of existing facilities.

Additionally, we strongly believe that DOE needs to clarify the interim re-use issues and timeframes to the public, Rocky Flats employees, and other stakeholders, in light of the job losses (or gains) that could occur at Rocky Flats before on-site economic development or interim re-use become a realistic possibility.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 692-3356.

Sincerely,



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