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Mr. David Shelton
Director, Hazardous Materials
and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, CO 80220

Dear Mr. Shelton:

The U S. Department of Energy, Rocky Flats Area Office (RFAO), is in receipt of your letter dated July 25, 1988, which transmitted the inspection report for the June 13-17, 1988 Hazardous Waste Inspection performed at the Rocky Flats Plant. Actions were taken in response to the inspectors' observations which were made at the time of the inspection and in the July 25, 1988 letter. The RFAO is herewith transmitting a documented summary of the actions which were taken in response to the inspectors' observations and probable findings.

Questions concerning the attached actions can be directed to Ms. Candice C. Jierree of my staff at 966-4888.

Sincerely,

Albert E. Whiteman
Area Manager

Enclosure

cc:

R. L. Duprey, EPA

C. C. Jierree, RFAO w/o enc
K. B. McKinley, Rockwell w/o enc
A. L. Scubert, Rockwell w/o enc.

ENCLOSURE 1

SUMMARY OF ACTIONS

FINDING 1

The facility's operating record does not accurately track hazardous waste. Storage logs and the hazardous waste database do not always agree. The storage logs do not always accurately record the waste in storage (i.e., the log for unit 1, cargo container no. 10). The computerized hazardous waste database does not record the date of storage, compatibility codes or radioactivity data. Unit 15 had a cargo container with drums of roaster oxide, and one drum did not have a WPR number on it. Unit 1, cargo container no. 6 had one drum in the log with a date of 7-29-88.

RESPONSE

The storage logs for Unit 1 and Unit 15 serve as the facilities' official operating record for those units. The computerized hazardous waste database serves only as a summary of all the storage logs. Due to the time necessary to transfer the data from the storage logs to the computer database; the computer database, the storage logs, and the storage area contents may not always agree at any one time. As an aside, at your inspector's suggestion, we have added the data elements enumerated in the inspection report to the database.

FINDING 2

Some incompatible wastes were stored together in the same cargo container in Unit 1. A drum of lead acid gel was marked with the wrong compatibility code, and a drum of oxoat was also marked with a wrong compatibility code. In addition, a drum labeled as "tritium" was being stored in unit 1, a non-mixed waste storage area.

RESPONSE

The individuals responsible for assigning compatibility codes to hazardous wastes when they are received at a storage unit have been retrained in the proper identification of wastes and assignment of compatibility codes. Additionally, our weekly inspection of the storage units now includes a check of the assignment of the proper compatibility codes to hazardous wastes received and stored. Furthermore, it was determined that the drum labeled "tritium" did indeed contain tritium contaminated liquid scintillation fluids. However, the storage of these materials in Unit 1 is appropriate since the concentration of tritium in this waste is considered "nonradioactive" for the purpose of disposal (see 10CFR 20.306).

FINDING 3

Unit 13, Building 884 had drums in storage without accumulation start dates. Upon closer examination, it was determined that these drums came from satellite accumulation area in Building 441 and should have had accumulation start dates marked on them when they reached the 55 gallon level.

RESPONSE

We do not believe the interim status regulations require the marking of accumulation start dates on satellite collection area containers destined for a storage unit. 6 CCR 1007.3, Subpart 262.34(c)(2) states the "generator must mark the container with the date on which the container begins storage under 262.34(a), which for the purposes of this paragraph is the date on which the 55 gallons or one quart limit is exceeded." The containers transferred from satellite collection areas to storage areas never exceed 55 gallons because it's physically impossible to put more than 55 gallons in a 55 gallon drum, (6 CCR 1007-3 262.34(c)(2)). Consequently we ~~have~~ not marked the accumulation start date on these containers.

FINDING 4

Building 778, a 90 day storage area for pondcrete, had containers of pondcrete dated over 90 days in storage. According to the facility personnel, they had moved these containers of pondcrete from the 904 pad as part of the contingency plan action.

RESPONSE

Historically, boxes of pondcrete were never stored in Building 788 for over 90 days. However, when we discovered the pondcrete destabilization problem on May 23, 1988, we moved a number of boxes of destabilized pondcrete to 788 for evaluation and protection from the weather. We informed you of this action on June 7, 1988 when we filed RCRA Contingency Implementation Plan Report No. 88-001.

On August 2, 1988 we requested a change to interim status to allow greater than 90-day storage of pondcrete in Building 788.

FINDING 5

Building 964 had 868 drums of vacuum filter sludge in storage. The approval for interim status storage was for containers of saltcrete.

RESPONSE

In early 1987, it was determined that vacuum filter sludge, originally thought to be transuranic mixed waste, was in fact, low-level mixed waste. The decision was made to move these wastes to Building 964. Since the Part A Application does not require a facility to indicate

where waste from a particular waste stream will be stored and in which particular storage area, we assumed that as long as the waste was stored in an approved interim status storage unit, it met interim status requirements.

On August 2, 1988, we requested a change to interim status to allow the storage of vacuum filter sludge in Building 964

FINDING 6

Inspection records were not maintained on file for three years as required. Some locations had records only back to April 1988 and other had records back to May 1987 with some dates missing.

RESPONSE

Inspection records for a number of storage units were not maintained for a period of three years. However, according to the CDH inspectors, all storage units were observed to have adequate inspection records at least several months prior to the June 13-17, 1988 inspection. This indicates that RFP has implemented the necessary controls to ensure that inspection records will be maintained in a proper fashion for the future

FINDING 7

Buildings 964 and 884 may have inadequate aisle space. The aisle space is the width of a 55 gallon drum and may not be wide enough to get emergency equipment to a leaking container.

RESPONSE

We believe both Building 964 and 884 have sufficient aisle space to permit inspection of the drummed waste and emergency equipment access. All of the hazardous wastes stored in these buildings are solid and are protected from the weather. Therefore degradation of the containers due to its contents or the weather is nil. Contrary to your suggestion, "leaking" is not a foreseeable hazard insofar as these drums contain solid material. Nevertheless, each building is provided with approximately a ten-foot aisle space to permit the use of a fork truck to remove a single row of drums in the event that one drum in the row is found to be in a degraded condition, (see the attached photograph). We continue to believe the requirements of 6 CCR 1007-3 Subpart 265.35 are being fully met.

FINDING 8

Annual training is not accomplished as required. A spot check of training records by the inspectors found two persons who had not received the required annual training.

RESPONSE

The two individuals successfully completed this training by June 17, 1988. Copies of the training computer print-outs were provided to the inspectors during the inspection close-out meeting. As of this date, approximately 8,800 individuals have received annual RCRA refresher training with another 50 individuals due to be trained by September 30, 1988.

