



November 14, 2003

03-RF-01715
03-DOE-01568

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Compliance Unit
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO. 80246-1530

TERMINATION LETTER FOR THE MIXED RESIDUE COMPLIANCE ORDER ON CONSENT
- KN-143-03

In accordance with the requirements of Paragraph 19 of the Mixed Residue Compliance Order on Consent (Number 99-09-24-01) (Consent Order), the Department of Energy, Rocky Flats Field Office (DOE, RFFO) and Kaiser-Hill LLC (K-H) are hereby notifying the Colorado Department of Public Health and Environment (CDPHE) that all of the commitments required by the Mixed Residue Compliance Order have been completed. Although the Consent Order is self-terminating, K-H is requesting concurrence from CDPHE that all of the commitments of the Consent Order and the Mixed Residue Tank Plan have been completed and the Consent Order can be terminated.

All actions pertaining to the management of mixed residues have been completed. Closure of all tank systems identified in Table 1 of the Mixed Residue Tank Plan has been completed or closure requirements have been transferred to another enforceable Rocky Flats Cleanup Agreement (RFCA) decision document. Treatment of all solid mixed residues identified in Appendix A of the Consent Order has been completed. Table 1 of the Mixed Residue Tank Plan has been updated to reflect the completion status of all tanks and include the following changes:

1. The closure requirements for Building 371 mixed residue tank systems are being conducted in accordance with the Decommissioning Operations Plan for this project.
2. All mixed residue tank systems have been closed and removed from Building 771 Project. Table 1 has been updated to reflect this status.
3. All mixed residue tank systems have been closed and removed from the Building 776/777 Project thereby completing the final enforceable commitment of the Mixed Residue Tank Plan. Table 1 has been updated to reflect this status.

ADMIN RECORD

Kaiser-Hill Company, L.L.C.

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

1/36

SW-A-006127

November 13, 2003
Mr. Joe Schieffelin
KN-143-03
Page 2 of 2

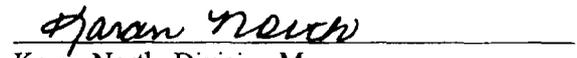
A copy of the updated Mixed Residue Tank Plan and the Table 1 inventory are included as attachments to this concurrence letter.

If you have any questions or need additional information please contact Mark Hesel at 303-966-2238.

U.S. DEPARTMENT OF ENERGY
ROCKY FLATS FIELD OFFICE

KAISER-HILL COMPANY, LLC


Joseph A. Legare
Assistant Manager
for Environment and Stewardship


Karan North, Division Manager
Environmental Systems & Stewardship

MAH/jcm

Enclosures (2):
As Stated

cc w/Enc:
Sean Bell - DOE, RFFO
Dave Maxwell - DOE, RFFO

Rocky Flats Environmental Technology Site

**Mixed Residue Tank Plan
FY2004 Completion Update**

November 14, 2003

MIXED RESIDUE CONSENT ORDER
Number 99-09-24-01

1/36

"

FY2004 Mixed Residue Tank Update Plan

1. Introduction

The Mixed Residue Tank Plan (the Plan) describes the management of mixed residue liquids at the Rocky Flats Environmental Technology Site (the Site). This Plan has been prepared pursuant to the Compliance Order On Consent 99-09-24-01 (Consent Order) and replaces The Mixed Residue Tank Systems Management Plan dated 7-12-94. The parties to the consent order are the Colorado Department of Public Health and Environment (CDPHE), the United States Department of Energy (DOE), and Kaiser-Hill Company, LLC (K-H).

2. Objective

This Plan's objective is to identify activities for managing mixed residue liquids remaining in mixed residue tank systems until the tank system is managed pursuant to a CDPHE approved Closure Description Document (CDD) or a Rocky Flats Cleanup Agreement (RFCA) decision document (DD). This Plan also identifies enforceable commitment dates by which mixed residue tank systems will be physically empty. Physically empty is the condition of a tank or ancillary equipment in which no liquid remains after verification from personnel familiar with the tank system or a proven technology. For example, verification can be done by draining at low points or by non-destructive testing. The activities described herein are designed to protect human health and the environment, fulfill the Defense Board's Recommendation 94-1, and Consent Order requirements.

3. Current Status

To date, all mixed residue tanks identified in Table 1 have been drained to a physically empty status. Any mixed residue liquids remaining in the ancillary equipment and piping are being collected and stored in approved storage areas. The mixed residue solutions will be treated on-site using an approved treatment process or treated off-site at a K-H approved treatment facility. Small amounts of actinide-bearing solutions remain as holdup in the bottoms of some tanks and ancillary equipment.

4. Purpose

The Plan's purpose is to describe the activities to manage the tank systems until the remaining solutions are removed, and the tanks are physically empty or closed. The activities are designed to protect human health and the environment. The parties acknowledge that Raschig Rings cannot be removed from tanks without exposing workers to radiation. Therefore, to implement As Low As Reasonably Achievable

(ALARA) principles, Raschig Ring tanks will be considered physically empty so long as the residuals remaining after the liquids are drained present no significant risk to human health or the environment. Justification for the physically empty status will be submitted to CDPHE's project manager.

5. Assumptions

A number of assumptions have been made in formulating specific project plans and schedules for activities included in this Plan. If any of these assumptions are not met certain projects and or tasks may be delayed or suspended pending resolution of the issue with CDPHE's project manager. Either DOE's or K-H's project manager will promptly notify CDPHE's project manager if any of the assumptions listed below are found to be invalid and result in impacts to the schedule which cannot be recovered by employing reasonable measures.

- No limitation in operations staff will occur. Sufficient numbers of personnel qualified in all crafts necessary to perform operations described in this Plan will be available through completion.
- Facilities and equipment necessary to support the removal and stabilization of liquid mixed residues will be available at a rate of 80%.
- No unanticipated breakage or accident to machinery, equipment or lines of pipe will occur.
- The facility's Authorization Basis covers all conditions encountered.

When a potential delay is identified, DOE's or K-H's project manager shall notify CDPHE's project manager in accordance with the terms of the Consent Order. The parties will mutually agree on the necessary action to be taken and, if applicable, determine any schedule impacts. A Corrective Action Plan will then be developed in accordance with the Site's procedures to document and track completion of the corrective actions agreed to by the parties.

6. Management Strategy

Once drained, the Site's mixed residue tank systems will be closed in accordance with the Interim Status Closure Plan, which provides several options for closing hazardous waste management units. Specific activities to achieve closure will be described in an approved CDD or DD. Some tank systems or system components will be physically removed (ripped and stripped) during building disposition activities, which will include placing openings in pipes at low points and draining liquids (tap and drain) to eliminate the

remaining solutions from tanks and associated piping. Once drained, the tank systems will be managed pursuant to the CDD or DD until closed, and will no longer be subject to the Consent Order.

Mixed residue tank systems may be closed using a phased approach. Phased closure begins when a tank system becomes physically empty and is completed when the system is closed pursuant to a CDD or a DD. A tank system may be closed immediately following its being physically empty status or closure may be scheduled pursuant to the RFCA budget planning process, and prioritized and integrated with other Site closure activities. Completion of specific closure activities will be documented in the Master List of RCRA Units, which will be maintained and updated in accordance with the Site's Part B RCRA Operating Permit.

Mixed residue liquids generated from tap and drain activities will be treated on-site using an approved treatment process or treated off-site at a K-H approved treatment facility.

Tank system components (pipes, valves, pumps, tanks, etc.) and secondary wastes (personnel protective equipment, wipes, tools, etc.) generated will be managed as remediation waste if the activities are governed by a DD.

7. Management Practices

7.1. Inspections.

Inspections will vary based upon the closure status and particular hazards associated with individual tank systems. Operationally, empty tanks are typically inspected on a daily basis, and physically empty tanks are typically inspected quarterly. Other inspection frequencies may be determined appropriate on a case-by-case basis. Tanks will be inspected to verify the absence of a release and to ensure no new liquid or hazardous waste has been added to the tank system. For physically empty tanks, inspections will also verify physical or administrative controls are in place. In the event additional inventory is discovered in a tank, the responsible building manager will be notified and an action plan will be developed to determine the source of the liquid, or schedule a sampling event or other appropriate action to make a hazardous waste determination. If appropriate, the action plan may include draining the liquid from the system. K-H's project manager will notify CDPHE's project manager of intended corrective actions.

7.2. Release Response.

Building-specific Health & Safety Plans contain pre-planning requirements for responses to possible releases from mixed residue tank systems. Pre-planning activities include identification of vital components of the tank system, identification of locations of

primary shut-off valves capable of isolating feed to a tank, and a pre-release plan which specifies the recommended method to drain the tank system (e.g., hot tapping at a low spot, draining into bottles, or draining into another tank system). Building operations personnel are trained to implement the pre-release plan and accompanying shut-off procedures. In the event of an actual release from a mixed residue tank system, the Site's RCRA Contingency Plan will be followed.

7.3. Storage Provisions.

During tap and drain and closure activities, solutions may be transferred from tank to tank, drained into four-liter bottles and stored in gloveboxes for short periods of time, or drained into a portable collection cart and staged in various locations, pending transfer to Building 371, Building 374, or Building 774 for processing or other appropriate unit for treatment. Prior to transfer or draining of liquids, a request for authorization to temporarily store mixed residue solutions will be submitted to CDPHE's project manager, if the information has not been previously provided in a CDD or DD. The request will identify the tanks, gloveboxes and/or portable cart staging locations needed to support liquid removal activities. During liquid transfer and draining activities, appropriate controls will be established to prevent the unauthorized mixing of incompatible wastes, including sampling, if necessary.

7.4. Reporting and Record Keeping.

Inspection log sheets are maintained in the Operating Records of the buildings containing the mixed residue tanks and ancillary equipment. Inspection frequencies for these tank systems will be documented in the Operating Record. Tank systems managed pursuant to a DD will be managed in accordance with the requirements of that document.

8. **Schedule**

The mixed residue tank systems listed in Table 1 will be physically emptied and/or closed in accordance with building deactivation and/or RFCA cleanup planning schedules. These planning schedules are not enforceable under this Consent Order. Tanks listed in Table 1 that are physically empty or closed will be documented as such in the Master List of RCRA Units. During annual updates to this Plan, physically empty or closed tanks will be removed from Table 1.

Enforceable Commitment Dates:

Building 776/777 – Mixed residue tank systems will be physically empty by February 28, 2005.

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

Date Routed: 11-14-03

CORRESPONDENCE APPROVAL ROUTE SHEET AND BUCKSLIP
(information may be handwritten)

Originator: Mark Heser
Department: ESS
Typist: Jake Mead
Extension: x5766
Location: 460, Rm 115-01

Letter No.: KN-143-03

Reply To: Mark Heser Action Due Date: 11-20-03

Subject: Termination Letter for the Mixed Residue Compliance Order on Consent

For Signature By: Joe Legare

Reviewed and approved by:

Route To:	Department	Approved: (initial)	Date
<u>Joe Legare</u>			
<u>Karan North</u>			
<u>Mark Heser</u>			

Letters being forwarded for approval and/or signature should include any pertinent references and properly labeled attachments/enclosures.

Left side of the folder:

Right side of the folder:

- Correspondence Approval Route Sheet and Buckslip (buckslip)
- Additional copies, e.g., blind copies with appropriate sign-off signatures
- References (if any)
- Original letter
- Attachment(s)/Enclosure(s)

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: April 27, 2005 / 3:00 p.m.
Site Contact(s): Chris Gilbreath/Randy Leitner
Phone: 303-966-7355/3537
Regulatory Contact: Denise Onyskiw, Harlen Ainscough
Phone: 303-966-6687
Agency: CDPHE

Purpose of Contact: Closure of remaining RCRA Mixed Residue Units – Building 371
Addendum to Contact Record dated December 21, 2004

Discussion

A previous Contact Record dated December 21, 2004, outlined the process agreed to by CDPHE for closure of specific units in Building 371/374, and documented how closure of the majority of these units was completed. At that time, closure activities for mixed residue vaults in Rooms 2317, 3549, 3553, 3558, and 3563 had not yet been completed. Specifically, these rooms were to be closed in accordance with the requirements of the B371 DOP for abrasive mechanical decontamination. This activity has since been completed. Completion of this activity was documented in a Professional Engineer Certification letter dated March 31, 2005. This letter and survey documentation indicating that these areas contain less than 20 d/m removable Pu was submitted to CDPHE on April 27, 2005. This completes the RCRA closure activities for the Building 371/374 project. This determination will be reflected in the final Building 371 PDSR prior to demolition of phases IV and V of Building 371.

Contact Record Prepared By: Randy Leitner

Required Distribution:

M. Aguilar, USEPA
B. Birk, DOE-RFPO
C. Deck, K-H Legal
S. Garcia, USEPA
C. Gilbreath, K-H 771/774
S. Gunderson, CDPHE
S. Johnson, K-H ESS
D. Kruchek, CDPHE
K. Lavorato, K-H MS
J. Legare, DOE-RFPO

R. Leitner, K-H 371/374
D. McCranie, DOE-RFPO
G. Morgan, DOE-RFPO
S. Nesta, K-H RISS
M. Roy, DOE-RFPO
R. Schassburger, DOE-RFPO
D. Shelton, K-H ESS
J. Walstrom, K-H RISS
C. Zahm, K-H Legal

Additional Distribution:

H. Ainscough CDPHE
D. Onyskiw, CDPHE
W. Seyfert, DOE-RFPO

WASTE CHEMICAL CONSENT ORDER
Number 97-08-21-02



KAISER ♦ HILL
COMPANY

Rocky Flats Environmental Technology Site

May 29, 2002 JUN 18 2002

Mr. Joe Schieffelin
Federal Facilities Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO. 80246-1530

02-RF-01215
02-DOE-00803

TERMINATION OF WASTE CHEMICAL CONSENT ORDER - KN-067-02

Dear Mr. Schieffelin:

In accordance with Paragraph 59 of the Waste Chemical Compliance Order on Consent (Number 97-08-21-02) (Order on Consent), the U.S. Department of Energy – Rocky Flats Field Office (DOE-RFFO) and Kaiser-Hill Company, LLC (K-H) are hereby notifying the Colorado Department of Public Health and Environment (CDPHE) that all commitments required by the Order on Consent have been completed. This letter will document the termination of the Order on Consent.

Paragraph 59 states:

Except as to Excluded Chemicals, this Order on Consent shall terminate for each Facility Group when the work contemplated in the Waste Chemical Plan for that Group is completed. As to Excluded Chemicals, this Order on Consent shall terminate when each chemical is transferred into another enforceable regulatory mechanism (e.g., Compliance Order, permit, etc.) or when all Excluded Chemicals are managed, stored or disposed of in accordance with the requirements of the Act and Regulations.

All actions have been completed for the original 21 Facility Groups described in the Chemical Management Plan. Please reference letter 99-DOE-03459 (Attachment 1).

At this time, there are two remaining active Chemical Exclusion areas (Attachment 2) whose management requirements have been transferred to another enforceable regulatory mechanism. Of the two exclusion areas, one is located in Building 776 and one is located in Building 777. The management requirements for the two Exclusion areas have been transferred to the Building 776/777 Closure Project Decommissioning Operations Plan. All of the remaining Chemical Exclusion areas have been closed.

Joe Schieffelin
KN-067-02
Page 2 of 2

Although the Order on Consent is a self-terminating agreement, DOE-RFFO and K-H request CDPHE's written concurrence that the Order on Consent has been closed. If you concur, please sign below. We look forward to your written response regarding this request.

If you have any questions or need additional information please contact Mark Hesel at 303-966-2238.

U.S. DEPARTMENT OF ENERGY
ROCKY FLATS FIELD OFFICE

KAISER-HILL COMPANY, LLC



Joseph A. Legare
Assistant Manager
for Environment & Stewardship



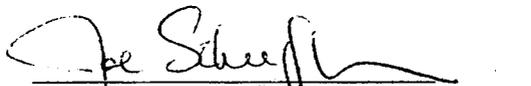
Karen North
Division Manager
Environmental Systems & Stewardship

MH/jcm

Enclosures (2):
As Stated

cc w/Enc:
Nancy Newell - CDPHE
Sandi MacLeod - DOE, RFFO
Sean Bell - DOE, RFFO

Concurrence:



Joe Schieffelin, Unit Leader
Hazardous Waste Compliance Unit
Federal Facilities Program
Colorado Department of Public Health and
Environment

**IDLE EQUIPMENT AND HAZARDOUS WASTE TANK
CONSENT ORDER
Number 97-08-21-01**

Revised 09/05

CORRES. CONTROL
INCOMING LTR NO.

00493 RF05

RECEIVED

2005 OCT 11 A 10:28

STATE OF COLORADO

DUE DATE

ACTION

Bill Owens, Governor
Douglas H. Benevento, Executive Director

CORRESPONDENCE
CONTROL

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

http://www.cdphe.state.co.us

October 4, 2005

John J. Rampe, Director
Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

David C. Shelton, Vice President
Environmental Systems & Stewardship
Kaiser-Hill Company
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit B
Broomfield, Colorado 80021-2583

RE: Close-out of Idle Equipment and Hazardous Waste Tank Consent Order No. 97-08-21-01 for the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr. Rampe and Mr. Shelton:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has reviewed the letter dated September 12, 2005 from Kaiser-Hill requesting concurrence that all of the requirements of Consent Order Number 97-08-21-01 (the "Order") have been completed. In a September 27, 2005 letter, the Division accepted the Closure Summary Report for Interim Status Units 43.01 and 43.02 (Tanks 231A and 231B). Tanks 231A and 231B were the last units remaining under the Order. Based on your September 12, 2005 letter and our oversight of the work conducted at the RFETS facility, the Division hereby concurs that all elements of the Order have been completed. Thus, the Order is hereby terminated. If you have any questions regarding these matters, please contact James Hindman of my staff at (303) 692-3345.

Sincerely,

David Kruchek

David A. Kruchek
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
Administrative Record, Mountain View

S. Garcia, City of Broomfield
David Ward, K-H



Colorado Department
of Public Health
and Environment

DIST.	LTR	ENC
BERARDINI, J.H.	X	
BOGNAR, E.S.	X	
BROOKS, L.	X	
CROCKETT, G. A.	X	
DECK, C. A.	X	
DEGENHART, K. R.	X	
FERRERA, D. W.	X	
GIACOMINI, J. J.		
GLPIN, H.		
LINDSAY, D. C.	X	
LONG, J. W.		
NESTA, S.		
SHELTON, D. C.	X	
TUOR, N. R.	X	
WARD, D.	X	
WATTS, K.	X	

COR. CONTROL	X
ADMIN. RECORD	X

Reviewed for Addressee
Corres. Control RFP

10/11/05
Date By

Rd

DOE ORDER #

5400.1

CORRESPONDENCE CONTROL
OUTGOING LETTER NO.

ORDER #
05-RF-00852



DIST	LTR	ENC
VECCHIO, D.		
RRERA, D.W.		
COMINI, J. J.		
PIN, H.E.		
DSAY, D. C.		
VG, J. W.		
CKETT, G.		
ELTON, D.C.	X	
OR, N.R.		

September 12, 2005

05-RF-00852

ARDINI, J.		
RD, DAVID	X	
SON, JODY		
LAGEL, DOUG		
K, CAROL	X	
NGER, R		
TA, STEVE	X	

Ms. Joyce Williams
 Permitting and Compliance Unit Leader
 Federal Facilities Program
 Colorado Department of Public Health and Environment
 4300 Cherry Creek Drive South
 Denver, Colorado 80246-1530

TERMINATION LETTER FOR THE IDLE EQUIPMENT AND HAZARDOUS WASTE
 TANK CONSENT ORDER #97-08-21-01 - DCS-046-05

The Closure Report for Tanks 231 A & B, which are the last two tanks subject to the Idle Equipment and Hazardous Waste Tank Compliance Order on Consent Order # 97-08-21-01 (Consent Order), was submitted on August 31, 2005 (05-RF-00827). Therefore, in accordance with the requirements of Paragraph 62 of the Consent Order, the Colorado Department of Public Health and Environment (CDPHE) acceptance of this closure certification will complete all the requirements of the Consent Order. Therefore the Department of Energy, Rocky Flats Project Office and Kaiser-Hill L.L.C. are hereby providing this notice to CDPHE that all the comments of the Consent are completed. Although the Consent Order is self-terminating, Kaiser-Hill is requesting concurrence from CDPHE that all of the commitments of the Consent Order and the Hazardous Waste Tank Management Plan have been completed and the Consent Order is terminated.

Sincerely,

David C. Shelton
 Vice President
 Environmental Systems & Stewardship

DAW/ph

CONTROL	X
IN RECORD	
ITE REC.	
EFIC	
3/130	
CLASSIFICATION	
CLASSIFIED	
IDENTIFIED	
RET	

AUTHORIZED
 CLASSIFIER
 exempt from class
 per CEX-105-01

REPLY TO RFP CC

ON ITEM STATUS

RTIAL/OPEN

OSSED

APPROVALS:

& TYPIST

LS
PL

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
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<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

September 27, 2005

John J. Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

Mr. Stephen Nesta
Environmental Manager
Kaiser-Hill Company, RISS
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit B
Broomfield, Colorado 80021-2583

RE: Acceptance, Closure Summary Report for Closure of RCRA Interim Status Units 43.01 and 43.02; Tanks 231A and 231B and Ancillary Equipment.

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report dated August 31, 2005. The Division, in a letter dated November 14, 2003, granted conditional approval of the Closure Description Document (CDD) for the units as submitted on October 8, 2003. After reviewing the report, and clarification from Mr. Nesta, the Division has determined that the conditions of approval have been met.

Although the letter of August 31 2005 continued to refer to the 1997, rather than 2000 version of the *Closure Plan for Interim Status Units at RFETS*, the closure was not affected. The waste derived from the unit was properly coded to include U103 and U108 wastes. Further, closure by removal and disposal as Low Level Mixed Waste (LLMW) of all components and containment structures previously in contact with LLMW, an acceptable departure from the approved CDD, negated the need to meet clean closure performance standards for cyanide and acetonitrile. Portions of the secondary containment structure not in contact with LLMW were properly disposed as "sanitary" waste.

We therefore accept the Closure Summary Report for Unit 43.01 and 43.02. If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

David A. Kruchek
Acting Rocky Flats Oversight Unit Leader

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
Administrative Record, Mountain View

S. Garcia, City of Broomfield
David Ward, K-H

C:\Documents and Settings\Hainscou\My Documents\RFETS\Unit Closures-Closure pLan\CSR, Unit 43.01, 43.02 (Tanks 231A&B) Acceptance.doc

CORRES. CONTROL
OUTGOING LTR. NO.



KAISER-HILL
COMPANY

DOE ORDER #

Rocky Flats Environmental Technology Site

4 RF 00916

SEP 21 2004

September 15, 2004

04-RF-00916
04-DOE-00663

DIST.	LTR	ENC
DIETER, T. J.		
FERRERA, D.W.		
FERRI, M.S.		
GIACOMINI, J. J.		
LINDSAY, D. C.		
MARTINEZ, L.A.		
PARKER, A.M.		
POWERS, K.		
SHELTON, D.C.		
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
VOORHEIS, G.M.		

Mark Hesser	X	X
Andrew Rosenman		
Jody Nelson		
Doug Schiesel		
John Ciucci		
Art Gels		
Fran Ito		
Jerry Long		

Tom Bell	X	X
Wanda Hickman	X	X
Ron Schmeiburger	X	X
Joe Legars	X	X

COR. CONTROL	X	X
ADMN. RECORD		
WASTE REC. CTR.		
TRAFFIC		
PATS/130		

CLASSIFICATION:		
CLASSIFIED		
IDENTICAL		
SECRET		

AUTHORIZED CLASSIFIER

Exempt from Class
Per CEX-105-01

Date

IN REPLY TO RFP CC
NO:

ACTION ITEM STATUS

- PARTIAL/OPEN
- CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS

Ms: Joyce Williams
Permitting and Compliance Unit Leader
Federal Facilities Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO. 80246-1530

FISCAL YEAR 2004 (FY04) ANNUAL STATUS REPORT TO THE HAZARDOUS WASTE
TANK MANAGEMENT PLAN - KN-133-04

In accordance with Paragraph 26 of the Idle Equipment and Hazardous Waste Tank Compliance Order on Consent (Number 97-08-21-01), the Department of Energy, Rocky Flats Project Office (DOE, RFPO) and Kaiser-Hill Company, LLC (K-H) are hereby submitting the Fiscal Year 2004 update to the 1997 Hazardous Waste Tank Management Plan (Attachment 1).

The only tanks still managed under this Plan are the 231A and 231B tanks. The management requirements listed in Section 6.0 for the 231 tanks include performing a tank integrity assessment every two years and conducting visual surveillances. Tank 231A was taken to a Resource Conservation and Recovery Act (RCRA) stable configuration in July of 2003 and is inspected on a quarterly basis. Tank 231B was tested in August 2003 and was recertified for continued use thereby meeting the biennial-testing requirement. The next integrity test for Tank 231B is scheduled to be completed by September 30, 2005. All interim status tanks identified in the original 1997 Tank Management Plan have been closed.

The 231B tank will remain in service and continues to be used to receive newly generated waste from RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities. The newly generated wastes are collected and stored in the 231B tank

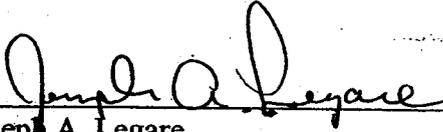
September 15, 2004
Ms. Joyce Williams
KN-133-04
Page 2 of 2

prior to shipping offsite to the Aqueous Waste Treatment System at Envirocare. The 231B tank will continue to be managed as Interim Status tanks under the requirements of this Tank Management Plan and the Consent Order.

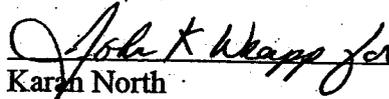
If you should have any questions, or need additional information please contact Mark Hesel, 303-966-2238.

U.S. DEPARTMENT OF ENERGY
ROCKY FLATS FIELD OFFICE

KAISER-HILL COMPANY, LLC



Joseph A. Legare
Assistant Manager
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Enclosures (1):
FY04 Annual Status Report to the Hazardous Waste Tank Management Plan

cc w/Enc:
Harlen Ainscough - CDPHE
Sean Bell - DOE/RFPO
James Hindman - CDPHE
Richard Schassburger - DOE/RFPO

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

**FY2004 ANNUAL STATUS REPORT
TO THE HAZARDOUS WASTE
TANK MANAGEMENT PLAN**

September 10, 2004

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1.0 INTRODUCTION

This Tank Management Plan (Plan) governs the management of the remaining interim status tanks located at the Rocky Flats Environmental Technology Site (the Site). These tanks are required to be closed pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), and the Colorado Hazardous Waste Act and its implementing regulations the Colorado Hazardous Waste Regulations (CHWR). Until the tanks are closed or transferred to another enforceable regulatory mechanism, the management of the tank will be governed by this Plan. This Plan provides a description, the current operating status and the management requirements for the 231A & B tank system until RCRA closure is accomplished.

2.0 SCOPE

This Plan identifies the management requirements for the interim status, RCRA-regulated tank systems at the Site that are operating for the management of RCRA regulated hazardous waste and will continue to be used. Specifically, this plan covers the management of Tanks 231 A & B, which are the only remaining active interim status tanks on Site. This Plan no longer covers any of the interim status RCRA regulated tanks that have been closed or taken to a RCRA stable configuration with the exception of the reduced inspection frequencies identified in Section 6.0. Tank 231A (Unit 43.01) was taken to a RCRA Stable configuration in July of 2003 and is being inspected on a quarterly basis in accordance with the requirements of this Tank Management Plan. The 231B tank will remain in service; and will be used to receive newly generated waste from RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities. A Closure Description Document (CDD) for final closure for both Tanks 231A and 231B was submitted to the Colorado Department of Public Health and Environment (CDPHE) on October 8, 2004 and subsequently approved on November 14, 2004.

3.0 OBJECTIVE

The primary objective of this Plan is to define the management strategy for the 231 A & B tanks, the only remaining tank system identified as an interim status hazardous waste tanks using best management practices that are protective of human health and the environment until RCRA Closure is achieved. This strategy is intended to:

- Minimize the risks of spills;
- Ensure that RCRA Closure is accomplished in accordance with the CHWR's; and
- Reduce operating costs through improved management techniques.

4.0 DEFINITIONS

RCRA Closure – The process described in the Closure Plan for Interim Status Units at the Site.

RCRA Stable – Placing out-of-service tank systems in a configuration that is protective of human health and the environment until final RCRA closure is completed.

5.0 PERFORMANCE STANDARDS

RCRA Stable – The performance standard for placing a tank or tank system in RCRA Stable configuration is as described in the Closure Plan for Interim Status tanks at the Site.

RCRA Closure – The criteria for RCRA Closure shall be the closure performance standard for clean closure by decontamination, debris rule decontamination, or unit removal, as these terms are defined in the Closure Plan for Interim Status Units at the Site.

6.0 MANAGEMENT REQUIREMENTS

The following is a listing of management requirements for the tank systems identified in this Plan until RCRA Closure is accomplished.

- Colorado Department of Public Health and Environment (CDPHE or Division) may conduct any tests necessary to ensure compliance with Order on Consent No. 97-08-21-01 requirements pursuant to which this Plan has been prepared and to verify data submitted by U.S. Department of Energy (DOE) or Kaiser-Hill Company, LLC (Kaiser-Hill or K-H). Concurrent with requesting services from a laboratory for sampling activities undertaken pursuant to this Plan, DOE's or K-H's Project Manager shall verbally notify the CDPHE Project Manager of the request. The CDPHE Project Manager shall promptly advise K-H if a split sample is to be collected. In such case, DOE or K-H shall ensure the CDPHE Project Manager is present when the laboratory sample is taken.
- Tank integrity assessments for Tank 231B shall be performed every two years with the next inspection due September 30, 2005 and shall meet the requirements specified in CHWR, 6 CCR 1007-3, Part 265.191, except that the tank integrity examination may be certified by an in-house qualified registered professional engineer.
- Once the tank system is in a RCRA stable condition, the only requirement is to conduct periodic RCRA inspections on a frequency agreed to with the Division on a case-by-case basis, and complete RCRA closure during D&D. However, if the tank system is used for the collection of non-RCRA regulated material after a RCRA stable condition is achieved, the CDPHE will be promptly notified. CDPHE and K-H Project Managers shall mutually agree on the management requirements (e.g., inspection frequencies, etc.) for that tank.
- If the status of a tank system (e.g., intended use, characterization) changes, the Division will be verbally notified and an agreement will be reached between the Project Managers on the management requirements to be initiated based on the change.
- DOE and K-H shall annually submit to the Division a written status report on the progress of the Plan's implementation, with the report due on October 1.

7.0 RESPONSIBILITIES

Kaiser-Hill

- Ensures implementation of this Plan and the K-H Project Manager provides program information for the K-H Team, the DOE/RFFO and CDPHE.
- Ensure compliance with the requirements and commitments identified in this Plan.
- Submits quarterly verbal updates to DOE and CDPHE.

8.0 TANK SYSTEM DESCRIPTIONS

DESCRIPTION OF THE 231 TANK SYSTEM

Tank 231A (Unit 43.01) was taken to a RCRA Stable configuration in July of 2003 and is being inspected on a quarterly basis in accordance with the requirements of this Tank Management Plan.

Tank 231B (RCRA Unit 43.02) is located south of Building 374 and is used to store hazardous process wastewater. This tank provides additional storage capacity for the Site's Aqueous Waste Treatment System (AWTS). Tank 231B is 49 feet in height and 59.5 feet in diameter and has a storage capacity of 950,000 gallons. The tank is constructed of carbon steel and was installed in 1987. Tank 231B is currently in service and contains hazardous wastewater. The tank will remain in service for future AWTS use. The tank is equipped with an electronic level-indicating device that transmits current level conditions to the building 231 Pump House. The daily RCRA surveillance includes the inspection of the monitoring device to ensure any leakage is identified quickly and appropriate response actions are taken.

The secondary containment system for this tank storage area includes a hypalon liner covered with 1.5 inches of river rock, and is designed to contain the volume of the largest tank plus precipitation from a 25 year, 24-hour storm. The secondary containment system is inspected once per day during the routine RCRA surveillance. Any precipitation that collects in the secondary containment system is removed within 24-hours or as soon as is practical. The precipitation is managed in accordance with the Incidental Water Program at the Site.

The sludge removal project for both tanks has been completed and the tanks have been cleaned of previously generated RCRA regulated wastes. The 231A tank is now in a RCRA stable configuration. The 231B tank will remain in service; and will be used to receive newly generated waste from RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities. The newly generated wastes will be collected and stored in the 231B tank prior to shipping off-site to the Aqueous Waste Treatment System at Envirocare. The 231B tank will continue to be managed as an Interim Status tank under the requirements of this Tank Management Plan and the Consent Order.

STAGING OF AWTS WASTE PRIOR TO OFFSITE SHIPMENT

Tanker trucks will be used to collect and transport liquid waste off-site for treatment. The area required for the collection and transport of this liquid will be managed under this Tank Management Plan as a 30-day staging area. This staging area will be directly adjacent (just south) to the 231 tanks in the immediate vicinity. The staging area requirements include:

1. Staging areas will be identified by clearly marked signs, and delineated by a rope, tape boundary, or other appropriate identifier.
2. Tanker trucks will be configured to provide sufficient space for inspections, personnel egress, and access by emergency responders:
3. The start date for each tanker truck placed into the staging area, both empty and full will be recorded. Each tanker truck must be shipped off-site within 30 days of being loaded (normal

turn around is expected to be 2 to 5 days). The accumulation start date will be the first day
AWTS waste is loaded into the tanker truck.

4. The tanker truck(s) will be inspected weekly. The inspection logsheets are filed by date and
will be maintained as part of the operating record.

ATTACHMENT 1

Letter # 02-DOE-01454

2002 Update to the Idle Equipment Management Plan



KAISER ♦ HILL
COMPANY

Rocky Flats Environmental Technology Site

September 19, 2002

02-RF-02090
02-DOE-01454

Mr. James Hindman
Federal Facilities Project Manager
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO. 80246-1530

2002 UPDATE TO THE IDLE EQUIPMENT MANAGEMENT PLAN - KN-111-02

In accordance with the requirements of Paragraph 22 of the Idle Equipment and Hazardous Waste Tank Compliance Order on Consent (Number 97-08-21-01) (Consent Order), the Department of Energy, Rocky Flats Field Office (DOE) and Kaiser-Hill Company, LLC (K-H) are hereby submitting the Fiscal Year 2002 Annual Progress Report on the Implementation of the Idle Equipment Plan (Plan).

Enclosed is a copy of the 2002 Update to the Idle Equipment Management Plan, which includes an updated list of Idle Equipment containing Hazardous Materials Inventory (Appendix 1 of the Plan). No changes have been made to the plan this year. The inventory has been updated to reflect the continuing closure activities being performed at the Rocky Flats Environmental Technology Site in fiscal year 2002. The idle equipment inventories for buildings 371, 707 and 776/777 were removed from the Consent Order last year in accordance with paragraphs 21 and 62 of the Consent Order and are being managed under the Decommissioning Operations Plans for their respective projects.

The only proposed change to the inventory this year is the removal of Idle Equipment number 881-0026, the hydrofluoric acid scrubber, located in building 881. The residual material in the hydrofluoric acid scrubber was sampled and analyzed this year for characterization purposes. The analytical results indicate no RCRA hazardous constituents and the equipment can be removed from the inventory of idle equipment containing hazardous material.

The final approved Idle Equipment Management Plan and Inventory will be submitted once concurrence of this request has been received from CDPHE.

Rocky Flats Environmental Technology Site

**THE 2002 UPDATE TO THE IDLE EQUIPMENT
MANAGEMENT PLAN**

September 30, 2002

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1. **PURPOSE**

The Idle Equipment Management Plan (the Plan), prepared in accordance with Compliance Order on Consent 97-08-21-01 (the "Compliance Order"), addresses the management of RCRA regulated waste contained in equipment determined to be "idle" due to the change in the site's mission. The purpose of this revised Plan is to eliminate completed requirements and streamline the remaining management requirements based on completion of the commitment defined in paragraph 19 of the Compliance Order.

The original Plan, prepared in 1994 and approved in 1997, contained three phases. The first phase provided direction to identify, characterize, assess, and categorize the hazards of the regulated wastes in idle equipment and management of these regulated wastes. The first phase was completed prior to 1997. Phase two of the original Plan provided the actions required for draining, removing, disposing or storing the regulated wastes in the equipment identified in phase one. This phase is also completed for all pieces of idle equipment that have not been deferred to another program, such as Decontamination and Decommissioning. The final phase of the original Plan identified the actions necessary for the disposition of the equipment itself. This phase of the Plan is still on going and involves tracking the removal of regulated waste from idle equipment under one of the programs identified above.

2. **SCOPE**

This program applies to all Rocky Flats Environmental Technology Site (RFETS) employees and subcontractors who are involved with the process of identifying and managing RCRA regulated wastes contained in idle equipment, reservoirs, catch pans, product tanks, or product lines. The Plan addresses the management requirements applicable to idle equipment that have not been deferred to another regulatory enforceable document, newly identified idle equipment requiring management under the Compliance Order, and remaining reporting requirements as directed by the Compliance Order.

3. IDLE EQUIPMENT MANAGEMENT

3.1 Identifying Idle Equipment and the RCRA Regulated Waste Contained within It

Central to the Idle Equipment Management Plan is defining when equipment becomes "idle," or no longer in use. The 6 CCR - 1007-3, Section 261.4(c) states: "A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste-treatment-manufacturing unit, is not subject to regulation under Sections 262 through 266, Section 268, and Section 100 or to the notification requirements of Section 99 of these requirements until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of a product or raw materials."

In 1994, EG&G, inventoried the candidate population of idle equipment. The inventory of equipment includes product or raw material storage tanks, product or raw material pipelines, and manufacturing process units (lathes, mills, etc.). In 1998, the K-H Team completed removal of hazardous waste from all idle equipment, with the exception of those deferred to another enforceable mechanism such as a Decommissioning Operations Plan.

The Kaiser-Hill Idle Equipment Program Manager maintains the Idle Equipment with Hazardous Material Inventory. Facility Managers or their designees provide information concerning changes in the status of idle equipment identified on the Idle Equipment with Hazardous Material Inventory to the Idle Equipment Program Manager.

3.2 Deferring the Removal of Hazardous Waste

During phase two of the original plan, idle equipment that contained waste was evaluated for risk to worker safety, health, the environment, and potential for release. In many instances, leaving material in place was determined to present minimal health risk to the workers, the public, and the environment because of currently effective containment systems and compensatory measures. Draining of the material has been deferred to avoid duplication of work resulting from partial or

4. RESPONSIBILITIES

4.1 Idle Equipment Program Manager

The Kaiser-Hill Idle Equipment Program Manager is responsible for the following:

- Overseeing implementation of this plan and act as a liaison for program information between the Subcontractors and the Department of Energy/Rocky Flats Field Office (DOE/RFFO) and CDPHE.
- Maintaining the Idle Equipment with Hazardous Materials Inventory and any status updates.
- Updating RFFO and CDPHE on a quarterly and on an annual basis about program status, including approved changes to the Idle Equipment with Hazardous Material Inventory.
- Submitting an annual report to CDPHE by October 1 of each year. The report will identify the significant accomplishments or problems encountered during the preceding year and any approved revisions to the Idle Equipment with Hazardous Material Inventory.

4.2 Facility/Area Manager

The Facility/Area Manager or designee is responsible for the following:

- Assigning a Program Team Representative(s) to oversee activities associated with this Plan and ensuring the implementation in the respective facilities or areas.
- Reviewing requirements of this Plan and initiating the identification, inventory, and management of regulated materials.
- Identifying and ensuring performance of inventories, inspections, and postings and maintain copies of building inventories and inspection checklists of idle equipment.
- Performing characterizations of materials, and initiate and ensure the cleanup of materials.
- Notifying Idle Equipment Program Manager of any idle equipment status changes, as waste removal actions are completed, and the return to service of any idle equipment.
- Verifying the proper management of the identified equipment and waste.

5. **ASSUMPTIONS**

- 1) RCRA-permitted or interim status tanks are not within the scope of this Plan.
- 2) Equipment still in use is not within the scope of this Plan.
- 3) If the material contained within the idle equipment is required for the preservation of that equipment and that equipment has an intended use, that equipment is not within the scope of this Plan.
- 4) The Idle Equipment inventory does not apply to material contained in the following equipment:
 - Any type of automotive vehicle.
 - Lead shielding used to reduce worker exposure.
 - Printed circuit boards.
 - Petroleum underground and above ground storage tanks.
 - Batteries, including lead acid, nickel cadmium, and lithium.
 - Equipment covered by other programs (e.g. Mixed Residue Tank Plan).
- 5) Non-hazardous waste contained in equipment.

6. **RECORDS**

The Program Manager will maintain records required by this plan for a minimum of three years and then transmit the records to records management in accordance with 1-V41-RM-001, Records Management Guidance for Records Sources.

7. **REFERENCES**

- 1) RCRA Part B Operating Permit
- 2) 6-CCR-1007-3, Colorado Hazardous Waste Regulations
- 3) Compliance Order on Consent 97-08-21-01
- 4) Rocky Flats Cleanup Agreement
- 5) Mixed Residue Tank Plan
- 6) Health and Safety Practices Manual

APPENDIX 3

Page 1 of 1

DUE DILIGENCE FORM

ID #

Building

Supervisor or Manager

Schedule Completion Date

CHECK ONE:

Easy to Clean

Moderate to Clean

Difficult to Clean

Rationale for Deferral until Decommissioning

(Note: lack of funding is not a valid rationale.)

Supervisor's or Manager's Signature

Print Name

Date

APPENDIX 4
Page 1 of 1

**MATERIAL CONTAINED IN IDLE EQUIPMENT
INSPECTION LOGSHEET
SAMPLE**

ID No.:	Building:	Room:
Date		
Name of Inspector		
Signature of Inspector		
Employee Number		
Supervisor or Manager signature (required if "no" answered on any question)		
Employee Number		

The logsheet must be filled out completely and accurately at the time of the inspection. If a question is answered "no," corrective actions must be noted.		
1.	Is the area posted as "This idle equipment contains material that if released could affect worker safety", or other equivalent?	
2.	Date of last inspection? Has the equipment been inspected within the correct frequency?	
3.	Is the equipment locked out and tagged out?	
4.	Is the external area free of spillage, leakage, or other accumulated liquid?	
5.	Is spill release response equipment accessible, adequate, and in good working condition?	
6.	Is the equipment in good condition, and free of corrosion?	
7.	A. Is the equipment subject to gas generation monitoring?	
	B. IF YES, when was the last date of equipment monitoring?	
	C. Is this within the required timeframe?	
Comments/Corrective Actions:		

SITE TREATMENT PLAN AND CONSENT ORDER
Number 95-10-03-01

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Colorado Department
of Public Health
and Environment

August 31, 2005

Mr. Richard Schassburger
Rocky Flats Cleanup Agreement Coordinator
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

RE: Closure of the Site Treatment Plan and Compliance Order 95-10-03-01; EPA Identification Number CO7890010526

Dear Mr. Schassburger:

This letter is to inform you that the Colorado Department of Public Health and Environment (the Department) has received your letter dated August 23, 2005. The referenced letter indicates that the final two containers of mixed waste were shipped from the Rocky Flats Environmental Technology Site (RFETS) for treatment or disposal on August 9, 2005. The shipment of this final inventory of waste from RFETS represents an incredible accomplishment that has taken ten years to achieve.

The Department is hereby closing Compliance Order 95-10-03-01 and the implementing Site Treatment Plan. All requirements of the reference order have been fulfilled and the Department does not intend to take any further action on this matter.

Please contact me at (303) 692-3386 if you have any questions regarding this matter.

Sincerely,

Edward Smith
Hazardous Waste Compliance Unit

cc: Dan Miller, Office of the Attorney General
Joyce Williams, HMWM Division
Ray Geimer, Kaiser-Hill
John Rampe, RFPO
Dave Hicks, RFPO

36/36