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WASTE MANAGEMENT '97

RCRA PART B PERMIT MODIFICATIONS
FOR COST SAVINGS AND INCREASED FLEXIBILITY
AT THE ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

by

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October 1996

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ABSTRACT

With shrinking budgets and downsizing, a need for streamlined compliance initiatives became evident at the Rocky Flats Environmental Technology Site (RFETS). Therefore, Rocky Mountain Remediation Services (RMRS) at the RFETS successfully and quickly modified the RFETS RCRA Part B Permit to obtain significant cost savings and increased flexibility. This was accomplished by requesting operations personnel to suggest changes to the Part B Permit which did not diminish overall compliance and which would be most cost beneficial. The U.S. Department of Energy (DOE) subsequently obtained approval of those changes from the Colorado Department of Public Health and the Environment (CDPHE).

BACKGROUND

In the fall of 1995, the RFETS received significant reductions in the amount of funding available for site operations, hazardous waste management and compliance activities. Hundreds of personnel left the RFETS; however, the waste management compliance workload did not decrease. In fact, more waste was expected to be generated because of plans to accelerate certain risk reducing activities such as facility decommissioning. As a result, the RFETS began to seek ways to obtain streamlined, but focussed compliance and relief from unnecessary or redundant requirements.

OBTAINING THE CHANGES

The RMRS permitting organization requested operations personnel to identify requirements in the RCRA Part B Permit which seemed unnecessarily burdensome or which could be performed in a more cost effective manner. A request for written input was sent to affected RMRS organizations. Recognizing that some operations personnel were overloaded with day-to-day compliance responsibilities, RMRS permitting personnel visited operations personnel at their work stations and at the RCRA units, and documented verbal suggestions for changes, walking the affected areas to assure that specific regulatory requirements would still be implemented.

A variety of changes were identified through this survey process. Over twenty-five cost savings changes were identified and agreed on by the RFETS integrating management contractor and the DOE office. Specific examples of those changes and estimations of the resultant cost savings include the following:

- a. In areas where all the containers held the same type of waste, it was suggested that a single label be posted at the entrance to the area to identify hazardous waste containers, instead of labelling each container.
- b. Operations personnel proposed to maintain specific information such as EPA waste codes in the RFETS' waste database system rather than on labels because they deteriorated over time, fell off, or changed as waste characterizations were refined.

Changes made due to items a and b above saved approximately \$200,000 per year primarily in labor costs.

- c. Operations personnel also requested a treatment option which would enable them to add absorbent or to compact waste within a permitted storage unit, to avoid shipping containers to areas permitted for treatment in order to perform these functions. This also resulted in a reduced volume of waste to be managed. Over \$50,000 per year in costs were avoided by making these changes.
- d. Operations personnel requested to use "fingerprint testing" in the field for characterization rather than requiring the tests to be performed in a laboratory. Avoidance of sample packaging, preserving and transportation costs, as well as reduction in laboratory fees resulted in an overall cost savings of approximately \$1,000,000 per year.
- e. Several changes were proposed to allow more flexibility to store different waste types within the existing permitted storage units at the RFETS. For example, storage of liquids was requested in areas which were previously allowed for solids storage only. Also, we requested approval to store low-level and TRU mixed waste in areas which were previously allowed to store only one of these waste types. This increased flexibility resulted in a reduced need to construct new facilities to store newly generated wastes. Each new storage facility would have cost approximately \$1,000,000.

More than twenty-five cost savings permit modifications were proposed within a single permit modification request. The proposed changes were transmitted in draft form to CDPHE for initial feedback. Not all of the changes were initially acceptable.

A series of meetings were conducted to discuss the requested changes, and operations personnel were invited to help defend some of the proposals. The meetings included the RFETS' integrating management contractor, the local DOE office, and the CDPHE. This greatly facilitated negotiations, as all parties were able to hear concerns "straight from the horse's mouth." Some proposals were dropped and or modified as a result of CDPHE's concerns.

Using this cooperative process, temporary approval was obtained within weeks of the official request, and final approval was obtained for twenty-five of the proposed changes.

FUTURE ACTIONS

RFETS is currently in the middle of the reapplication process for its Part B Permit. The same technique discussed above is being used to help obtain a greatly streamlined permit. This should result in even greater flexibility in the permit to support the RFETS' clean-up mission in light of continued shrinking budgets.

Also, each RCRA permit section was completed separately using the integrated team method. In this way, the CDPHE began reviewing the new permit application before the entire application had been completed, thus saving time and providing for timely feedback on each section.



**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

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November 12, 1996

96-RM-TA-0211-KH

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PAPER FOR WASTE MANAGEMENT '97 CONFERENCE - CCJ-305-95

This letter documents the RMRS review of the paper intended for submittal to the Waste Management '97 conference in Tucson, AZ. The paper entitled, "RCRA Part B Permit Modifications for Cost Savings and Increased Flexibility at Rocky Flats Environmental Technology Site" was prepared by myself, and a former member of my staff, Mr. Kirk Ticknor. It followed the modifications documented in RCRA Permit Modification No. 52 submitted to Kaiser-Hill on April 2, 1996 and approved by CDPHE by August of 1996. The RCRA permit modification and the state's approval letter are part of the public reading room documentation on the RFETS RCRA permit.

The content of the paper deals with regulatory negotiations and contains no patentable equipment descriptions nor intellectual property. The success of the cost savings came as a result of regulatory and RFETS personnel's openness to consider eliminating activities which did not have significant compliance merit. With all parties in agreement, including DOE, the modification was approved by CDPHE.

If you have any questions concerning the review or the conclusions, please contact me at extension 2461 or DP1592.

Candice C. Jierree, Vice President
Performance Assurance

cc:
L. Guinn, RMRS
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