DOCUMENT CONTROL SYSTEM - CORRESPONDENCE FILE

WELDON SPRING SITE REMEDIAL ACTION PROJECT
MK-FERGUSON CO., INC. WO 3589 (314) 441-8086
7295 Highway 94 South
St. Charles, MO 63303

Document Number: _____

Document Type: LR-DOE-EPA

Originators DCN: _____

SUBJECT Storage of Land Disposal Restricted Waste

AUTHOR McCracken, S.H. TO Will, Dian DATE 3/30/92

SUBJECT CODE/WORK PACKAGE NUMBER 1 05100

REFERENCED DOCUMENT(S) _____

THIS IS A RESPONSE TO COMMUNICATION: NUMBER _____ DATED _____

ACTION ITEM TRACKING

INITIATE ACTION ITEM

INDIVIDUAL ASSIGNED TO ACTION _____ DEPARTMENT _____

ACTION REQUIRED _____

DUE DATE / / _____ ACTION ITEM LOG NUMBER _____

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY? _____

CLOSE ACTION ITEM

IS THIS A RESPONSE TO AN ACTION ITEM? NO ____ YES ____

ACTION ITEM LOG NUMBER _____ CLOSING DOCUMENT DIN _____

COMPLETION DATE _____ APPROVAL _____

COMMENTS _____

DISTRIBUTION	ATTACH W	ATTACH W/O	APPRVL. ROUTE ORDER	APPRVL. ROUTE INITIAL	DISTRIBUTION	ATTACH W	ATTACH W/O	APPRVL. ROUTE ORDER	APPRVL. ROUTE INITIAL	DISTRIBUTION	W	W/O
J.R. Powers					W.J. Putnam					DOE		
R.R. Tucker					C.C. Reith					S.H. McCracken		
D.E. Steffen					J.E. Williams					J.S. VanFossen		
S.D. Anderson										G.A. Newtown		
C.R. Bowers										W.K. Love		
J.A. Cooney										J.E. Enright		
R.D. Ferguson										K.D. Lawver		
S.W. Green										A. Gibson		
K.M. Greenwell										J.M. Richmond		
P.D. Cate					Admin. Record					B.B. Bailey		
K.D. Jenkins					Tech Editor					B. Richardson		
J.E. Nelson												
R.E. Nelson												
P.S. Newton					ORIGINATOR:					DOCUMENT CONTROL	X	

Mr. Dan Wall
Remedial Project Manager
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Wall:

STORAGE OF LAND DISPOSAL RESTRICTED WASTE

The U.S. Department of Energy (DOE) is remediating the Weldon Spring Site (WSS) under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). The WSS is located in St. Charles County, Missouri, and is included on the CERCLA National Priorities List.

When the WSS chemical plant closed in 1966, substantial quantities of chemicals were abandoned in both process and non-process buildings. During remediation of the site, chemicals have been consolidated, containerized, and placed in storage in Building 434. Building 434 is in compliance with substantive Resource Conservation and Recovery Act (RCRA) and Toxic Substances Control Act (TSCA) requirements.

During ongoing characterization of these chemicals, many have been identified as RCRA wastes subject to the land disposal restrictions (LDRs). Most of the wastes are hazardous due to characteristic properties and fall into the Third Third mixed waste category under the LDRs. Approximately 20 containers of LDR California List waste have also been identified thus far.

Third Third mixed wastes are subject to a National Capacity Variance until May 8, 1992, and the DOE is pursuing a case-by-case extension to extend this variance for an additional year. however, there is no guarantee this extension will be granted, and the variance does not include California List Wastes.

The land disposal restrictions prohibit storage of LDR waste unless the storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal. Due to the radioactive component of the mixed wastes stored at the WSS, there are currently no commercial facilities providing treatment and disposal capacity for them. Treatment and disposal of the

CONCURRENCES
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE
RTG SYMBOL
INITIALS/SIG.
DATE

DOE F 1325.10
(7-79)

OFFICIAL FILE COPY

hazardous wastes stored in Building 434 is being addressed in the final remediation of the chemical plant area.

The DOE is requesting that the limitations on storage time for LDR waste stored in Building 434 be waived under the provisions of Section 121 (d)(4)(A) and Section 121 (d)(4)(C) of CERCLA since the schedule for final disposition of the wastes is controlled by the decision making process for remediation of the chemical plant area. It is not technically feasible to comply with the time limitations since a remedy for the chemical plant area will not be selected in the required time frame. If a waiver is not deemed appropriate please accept this as notification of noncompliance with the limitations on storage time for LDR waste stored on site.

If you have any questions please contact Alan D. Gibson at (314)441-8978.

Sincerely,

ORIGINAL SIGNED BY
STEPHEN H. McCRACKEN

Stephen H. McCracken
Project Manager
Weldon Spring Site
Remedial Action Project

cc: Dave Bedan, MDNR
Terri Uhlmeyer, PMC
Jim Wagoner, EM-421
Bill Adams, EW-90
Linda Synnott, CC-10

EW-94:AGibson:x850:emh:3/26/92 (m:LandDisp.let)

CONCURRENCES

RTG SYMBOL	INITIALS/SIG.	DATE
EW-94	AGibson	3/26/92
EW-94	JV[illegible]sen	3/27/92
EW-94	SMc[illegible]cken	3/30/92