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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-DCN-MDNR

Originators DCN:

SUBJECT Waiver To State Regulation 10 CSR 25.5.262(2)(C) & DOT Requirements During Storage of Hazardous Waste

AUTHOR Van Fossen, J TO Bedan, D DATE 8/13/92

SUBJECT CODE/WORK PACKAGE NUMBER 05130

REFERENCED DOCUMENT(S) 20065

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. ORDER	ROUTE INITIAL	DISTRIBUTION	ATTACH W	ATTACH W/O	APPRVL. ORDER	ROUTE INITIAL	DISTRIBUTION	W	W/O
J.R. Powers					M.R. Lewis					DOE		
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D.E. Steffen										J.S. VanFossen		
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C.R. Bowers										W.K. Love		
J.A. Cooney										J.E. Enright		
R.D. Ferguson										K.D. Lawver		
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K.M. Greenwell					Reading File					E.R. Valdez		
P.D. Cote					Admin. Record/Env Comp					J.M. Richmond		
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J.D. Newton					ORIGINATOR:					DOCUMENT CONTROL	✓	

AUG 1 3 1992

Dr. David E. Bedan
Division of Environmental Quality
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Dear Mr. Bedan:

WAIVER TO STATE REGULATION 10 CSR 25.5.262 (2)(C)1 DOT REQUIREMENTS DURING STORAGE OF HAZARDOUS WASTE

One of the issues discussed during the coordination meeting among DOE, EPA, and MDNR representatives held on June 10, 1992, at Weldon Spring site was compliance with the State regulation 10 CSR 25.5.262 (2)(c)1, which requires that hazardous waste stored prior to off-site shipment be in compliance with the packaging, marking, and labelling requirements of the DOT during the entire on-site storage period. As stated in the discussion, our basis for the waiver request is that the site inventory of hazardous waste is not scheduled for off-site shipment and is expected to remain in storage for several years due to the lack of mixed waste TSD facilities. To meet the requirement would not only be costly, but moreover, the requirement to repackage the waste creates a situation that could result in personnel exposure to hazardous materials.

Enclosed per your request we have compiled a cost estimate and schedule for the activities required to achieve compliance with the requirement. Please note that our original estimate of 400 containers has been revised and the current estimate is 500 containers.

Sincerely,

"ORIGINAL SIGNED BY
JERRY VAN FOSSEN"

Jerry S. Van Fossen
Deputy Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

CONCURRENCES
RTG SYMBOL
INITIALS/SIG.
DATE
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COST ESTIMATE FOR HAZARDOUS MATERIAL CONTAINER TRANSFER

The following is a cost estimate and schedule for compliance with 49 CFR 171.14. Part one represents the total task estimate and part two represents estimated cost compliance per deadline.

PART ONE

Estimated number of containers	500	
New Container Cost		
- 5 gal		$ 170
-10 gal		$ 172
-15 gal		$ 581
-30 gal		$ 160
-55 gal open top		$ 16,640
-55 gal bung top		$ 14,210
-85 gal poly overpack		$ 1,488
-B-12 box		$ 4,200
-B-25 box		$ 5,400
TOTAL		$ 43,021
New Label Cost		
-Hazardous Waste labels		$ 250
-Hazard Class labels		$ 200
-Radioactive labels		$ 175
-Arrow up labels		$ 75
-Paint		$ 70
-Extras		$ 100
-First time relabel of 100 containers		$ 174
TOTAL		$ 1,044
Material Transfer		
-Transfer tools est.		$ 2,000
-Labor (4p X 1250hr X $20hr)		$100,000
TOTAL		$102,000
Personal Protective Equipment		
-Tyvek (1248 pairs x $3ea)		$ 3,744
-Boot covers (1248 pairs X $2ea)		$ 2,496
-Nitrile gloves (1248 pairs X $4.50ea)		$ 5,616
-Respirator cartridges (1248 pairs X $5.83ea)		$ 7,276
TOTAL		$ 19,132
Relabel Cost		
-Obliterate old labels		$ 5,000
-Update and apply new labels		$ 5,000
-First time relabel of 100 containers		$ 2,000
TOTAL		$ 12,000

CONCURRENCES

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Old Container Disposal

-Decontamination labor (2p X 250hr X $20hr)	$ 10,000
-Transportation to decon to Building 434	$ 2,000
-Container compaction (2p X 125hr X $20hr)	$ 5,000
-Transport to MSA	$ 3,000
TOTAL	$ 20,000
Misc. cost	$ 5,000
TASK TOTAL	$202,197

PART TWO

The following 1993 and 1994 deadlines represent 100 of the 500 containers which were not filled prior to 1 October, 1991 and are not exempt per 49 CFR 171.14.

Communications on 100 containers required by October 1, 1993

New Labels	$ 174
Relabel cost	$ 2,000
Misc. cost	$ 250
TOTAL	$ 2,424

New packaging on 100 containers required by October 1, 1994

New containers	$ 11,487
Material transfer cost	$ 20,400
Personal protective equipment	$ 3,826
New labels	$ 174
Relabel cost	$ 2,000
Old container disposal cost	$ 4,200
Misc. cost	$ 750
TOTAL	$ 42,837

The following 2001 deadline represents the remaining 400 containers.

Full compliance by October 1, 2001

New containers	$ 31,534
Material transfer cost	$ 81,600
Personal protective equipment	$ 15,306
New labels	$ 696
Relabel cost	$ 8,000
Old container disposal cost	$ 16,800
Misc. cost	$ 4,000
TOTAL	$157,936

CONCURRENCES

RTG SYMBOL	INITIALS/SIG.	DATE
EW-94	JEnright	8/5/92
EW-94	JVanOrsen	8/7/92
EW-94	SMcCracken	8/ /92

EW-94:JEnright:x7006:emh:8/5/92 (m:DOTRqMTS)