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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 62303

Document Number: \_\_\_\_\_

Document Type: LR-DOE-EPA

Originators DCN: \_\_\_\_\_

SUBJECT Storage of Land Disposal Restricted Waste

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

SUBJECT CODE/WORK PACKAGE NUMBER 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 1/1 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 \_\_\_\_\_



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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/ORG.

DATE

Storage of Land Disposal  
Restricted Waste

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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 Uhlmeier, 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

RTS SYMBOL  
EW-94

INITIALS/NO.  
AGibson  
DATE  
3/26/92

RTS SYMBOL  
EW-94

INITIALS/NO.  
JV Gibson  
DATE  
3/27/92

RTS SYMBOL  
EW-94

INITIALS/NO.  
SM McCracken  
DATE  
3/30/92

RTS SYMBOL

INITIALS/NO.

DATE

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