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DISPOSAL OF LABORATORY EQUIPMENT

08/31/90

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LETTER**



Department of Energy

FMPC Site Office

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Cincinnati, Ohio 45239-8705

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AUG 31 1990
DOE-1762-90

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Mr. Paul Pardi, Group Leader
D.S.H.W.M.
Ohio Environmental Protection Agency
40 S. Main Street
Dayton, OH 45402

Dear Mr. Pardi:

DISPOSAL OF LABORATORY EQUIPMENT

This letter outlines proposed sampling methods for testing obsolete laboratory equipment (e.g. - lab benches, fume hoods, fixtures, etc.) and construction rubble which will be generated during the remodeling of our analytical facility.

Renovation of our analytical laboratory, which was originally constructed in 1952, is underway. We have performed preliminary radiological monitoring of the facility and determined it to be radiologically contaminated. We have also prepared a plan of action to determine if the construction rubble and equipment is a RCRA hazardous waste. Below is a description of that plan.

To determine if the fume hoods, associated fans and duct work are a RCRA waste, all equipment will be visually inspected. If a dry residue exists, it will be collected and analyzed by the Toxicity Characteristic Leaching Procedure (TCLP) for all 39 constituents. The rinseate from decontaminating the sampling equipment will also be collected and analyzed for ignitability, corrosivity, and reactivity (cyanide and sulfide); and by TCLP.

Due to the age of the facility, lead-based paint may have been used on walls, floors, and windows. A representative sample of the debris will be collected and analyzed for TCLP lead.

To determine if the traps, drains, and associated piping are a RCRA hazardous waste, all piping will be visually inspected. Once again, if residue exists it will be sampled and analyzed by TCLP. Rinseates from the piping and decontamination of sampling equipment will also be collected and analyzed for ignitability, corrosivity, and reactivity (cyanide and sulfide); and by TCLP.

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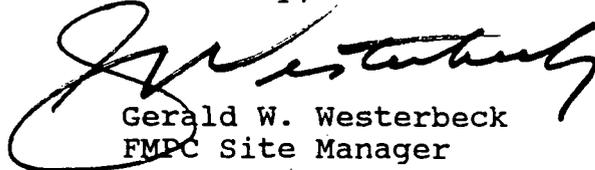
Finally, all lab benches and shelving will be visually inspected. If residue exists it will be collected and analyzed by TCLP. The rinseate from decontamination of sampling equipment will be collected and analyzed for ignitability, corrosivity, reactivity, (cyanide and sulfide); and by TCLP.

Due to the radiological contamination, this construction rubble and outdated laboratory equipment will not be sent to a demolition or sanitary landfill. If, after following the above plan, the analyses indicate the material to be non-RCRA, then the debris will be packaged in accordance with DOT regulations and site procedures. It will then be shipped to the Nevada Test Site for disposal as low level waste. If, however, the results show RCRA characteristics, the material will then be packaged in accordance with site procedures and held on site until a means of disposal is determined.

If you agree with the above described sampling plan, please respond with written concurrence by September 15, 1990. [Fax Number (513) 738-6650.]

If you have any questions or require further information, please contact David Rast, at (513) 738-6322.

Sincerely,



Gerald W. Westerbeck
FMPC Site Manager

DP-84:Rast

cc:

E. D. Savage, WMCO
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bcc:

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