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

Rocky Flats Environmental Technology Site
P.O. Box 464
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August 18, 1999

99-RF-03260

CORRES. CONTROL	
LTR. NO.	
Originator Ltr Log #	
URS-014-99	
RF-03260	
DIST.	LTR ENR
ANDERSON, C.A.	
ARMSTRONG, C.H.	
BYRNE, D.W.	
DAWSON, A.C.	
DEWILEY, M.E.	
FIZ, R.C.	
GILPIN, L.A.	
GROGAN, F.P.	
HALL, J.E.	
HALL, S.	
HEWITT, T.	
HUTCHINSON, J.	
JACOBSON, R.	
JONES, S.R.	
KOPEL, K.	X
LEWIS, M.	
LONG, K.	
OPKINS, T.	X
ROSSER, R.	X
SMITHSON, B.	X
WILSON, J.	X
MRS (T130G)	X
FCCORRES.	
CONTROL	
RAFFIC	
ATS/T130G	

John W. Whiting
886 Cluster Project Manager
Kaiser-Hill
Rocky Flats Environmental Technology Site

**REQUEST FOR A FIELD MODIFICATION TO THE INTERIM MEASURE/INTERIM
REMEDIAL ACTION PLAN FOR THE BUILDING 886 CLUSTER - WRS - 014 - 99**

The purpose of this correspondence is to request notification to the Colorado Department of Public Health and Environment (CDPHE) of a Field Modification to the approved Interim Measure/Interim Remedial Action (IM/IRA) Plan for the Building 886 Cluster. This modification, which was prepared pursuant to the Rocky Flats Cleanup Agreement (RFCA), Part 10, Paragraph 130, allows for the storage of Polychlorinated Biphenyl (PCB) bulk product waste in approved Department of Transportation (DOT) containers beyond the 180-day maximum storage time.

A variety of PCB bulk product wastes are being generated by on-going activities within the Building 886 Cluster. Specifically, PCB containing paint was used within the Building 886 Cluster to coat tanks, electrical boxes, and conduit. PCB ballasts are also present within the Cluster Buildings. These materials are currently being removed and packaged for off-site disposal.

RMRS intends to temporarily store non-radioactive and radioactive PCB bulk product wastes, generated within the Building 886 Cluster, at the project site. We have had recent success in applying the Environmental Protection Agency's June 29, 1998, PCB "Megarule" allowances, which facilitate off-site disposal of non-radioactive PCB bulk remediation waste. We are currently working with our approved disposal facilities on acceptance of radioactive PCB bulk product wastes; however, this process is still on-going, and currently approved off-site disposal facilities for radioactive PCB bulk product wastes are limited. Therefore, the storage of PCB bulk product waste at the Building 886 Cluster may be required beyond the 180-day administrative time limit found in 40 CFR § 761.65. This Field Modification delineates the substantive requirements for PCB bulk product waste storage and allows for longer on-site storage, if such storage eventually proves necessary.

Section 761.65(c)(9) of 40 CFR allows PCB bulk product waste to be stored in stockpiles, if certain conditions mitigating dispersion are in place. The use of containers meeting DOT performance specifications for PCB bulk product waste PG III that are lidded or sealed at all times, except when being filled (at no time will the container be left open so as to collect precipitation), would comply with the substantive requirements of 40 CFR § 761.65 (c) (9) for liners, covers, and run-on control systems.

Non-radioactive PCB bulk product waste and PCB ballasts will be placed in a DOT specification container for PCB bulk product wastes. The containers will be maintained at the project site pending shipment to a currently approved solid waste disposal site. It is expected that shipment of this non-radioactive PCB bulk product waste will occur well within the 180-day maximum storage time.

Radioactive PCB bulk product waste and radioactive PCB ballasts will be placed in DOT specification radioactive material containers for short-term storage before these wastes are shipped to an off-site

CLASSIFICATION:

CNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER SIGNATURE:

Date: _____

REPLY TO RF CC NO.:

ACTION ITEM STATUS:
PARTIAL/OPEN
CLOSED

TR APPROVALS:

PROJECT MANAGER INITIALS: _____

ADMIN RECORD

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

B886-A-000071

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John W. Whiting
WRS - 014 - 99
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Inspections of the DOT containers will be performed and documented weekly. If spills and leaks are not observed and documented during these inspections, the storage areas will be regarded as not having any impacts derived from the PCB bulk product wastes.

If you have any questions, please contact me at extension 5790 or Richard Lesser at extension 2298.



Wayne Sproles
B886 Closure Project Director

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