



**FIELD MODIFICATION TO PAM FOR T-1 PROJECT**

The movement and storage of T-1 remediation wastes into the Rocky Flats Environmental Technology Site's (SITE) RCRA Unit 15B requires a field modification to the Trench 1 (T-1) Decision Document (Final Proposed Action Memorandum for the Source Removal at Trench 1, IHSS 108, March 5, 1998, Revision 5).

This correspondence documents discussions held April 29, 1999 with Chris Gilbreath of the Colorado Department of Public Health and the Environment (CDPHE), and Ted Hopkins and Bob Griffis of Rocky Mountain Remediation Services LLC (RMRS). They agreed that the T-1 remediation wastes can be stored in a segregated portion of the SITE's RCRA Unit 15B. The portion of RCRA Unit 15B to be utilized for storage of the T-1 remediation wastes is CERCLA Temporary Unit (TU) 2545. Followup discussions were held with Carl Spreng of CDPHE, Gary Kleeman and Jean Lillich of EPA, Norma Castaneda of DOE and Tom Greengard of Kaiser-Hill/SAIC on May 20, 1999. Verbal notification of the field modification was provided at that meeting.

The PAM provides for the establishment of Temporary Units (TUs) for the storage of remediation wastes. This correspondence provides the written justification for the modification to the PAM and lists the requirements needed for environmental protection while storing the wastes in Temporary Unit (TU) 2545. The waste is being moved into the TU because the T-1 weather structure has been dismantled as part of project demobilization. The waste will be managed in accordance with the RCRA Part B permit application requirements for Unit 15B. The SITE's personnel considered the following factors identified in the PAM:

**1. Length of time the unit operates:**

*Although time requirements are administrative, not substantive ARARs, the SITE plans to operate the TU for at least one year inasmuch as no off-site disposal options currently exist.*

**2. The type of unit:**

*The unit will be a temporary unit.*

**3. The volumes of remediation waste:**

*Approximately 415 cubic yards of waste from Trench 1 will be stored within the TU.*

**4. The physical and chemical characteristics of the remediation waste:**

*The Trench 1 wastes are CERCLA remediation wastes carrying the RCRA waste codes F001, F002, F006, F008, and D006. They also include PCB bulk product wastes, bulk PCB remediation wastes, and PCB remediation wastes. The materials also contain thorium as well as depleted uranium (U-238) chips and turnings, radiologically contaminated hazardous soils and debris, and cemented cyanide wastes.*

**5. The potential for releases:**

Storage of waste materials in a permitted RCRA unit in compliance with permit requirements adequately addresses concerns for potential releases.

**6. The conditions at the site that will influence migration:**

*The remediation wastes will be subjected to permit requirements, which should thereby address concerns for migration.*

**7. The potential for exposure if release occurs:**

*The wastes will be managed in accordance with permit requirements, which already address this issue.*