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ROY ROMER
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Interim Executive Director

February 10, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928



**RE: Storage and Handling of Hazardous Waste Generated during
Corrective Action Activities at the Rocky Flats Plant**

Dear Mr. Lockhart,

Rocky Flats Plant has already generated a substantial volume of material during the implementation of the RFI/RI investigations which is currently awaiting hazardous waste characterization. Since sample results from these materials should have already begun returning to DOE, the Division is providing this letter as guidance on the proper procedures for handling and storage of any corrective action (CA) waste determined to be hazardous.

The State has approved a "Change to Interim Status" for two new hazardous waste storage area where only corrective action wastes would be stored (CDH, August 30, 1991 to David P. Simonson). These areas (Units 18.03 and 18.04), and the waste storage protocols used therein, must meet the requirements of 6 CCR 1007-3 (Colorado Hazardous Waste Regulations), Part 265, as well as the specific protocols outlined in the CDH Interim Status approval.

According to SOP FO.8, the gray drums that are currently placed beside the new boreholes and monitoring wells have been sampled for a hazardous waste determination. Some of these drums have been in their present position since the beginning of OU 1 and OU 2 field work in early September, 1991. The Division believes the five-month time period since September, 1991 should be sufficient for hazardous waste determination analytical results to be returned and analyzed. We strongly urge DOE to expedite this process.

When waste material is placed into a gray drum, DOE may use "process knowledge" to make a tentative hazardous waste determination. This allows DOE to leave waste material from areas not expected to contain hazardous constituents in gray drums at the

ADMIN RECORD

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point of generation until analysis is returned. However, in areas where "process knowledge" would indicate hazardous waste constituents, the material must be managed as a hazardous waste from the moment of generation. This means that, among other things, an analytical hazardous waste determination must be completed within 90 days of generation. If the results from the waste determination are not returned within 90 days, the drums must be moved to the interim status storage area. They must remain there until the waste determination results are returned and analysis of the results indicates that no hazardous waste is present.

To understand more completely how DOE is accomplishing waste characterization, the Division requests that DOE provide us with the following by March 10, 1992:

- 1) The date that each gray drum was sampled
- 2) When and where the sample was sent to be analyzed
- 3) The current status of the analysis
- 4) The tentative "process knowledge" waste determination for each drum
- 5) The date that waste material was first placed in each drum

If you have any questions regarding these matters, please call me at 331-4847 or Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Paul Bunge, EG&G
Daniel S. Miller, AGO
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