

Internal Letter



Rockwell International

Date · 10 August 1987

No. ·

TO (Name, Organization, Internal Address)

· G. L. Potter
· HSE Operations Management
· Building 123

FROM (Name, Organization, Internal Address, Phone)

· A. J. Petrocchi
· Hazardous Materials Control
· Building T452F
· 7007

SUBJECT · LANDFILL INCIDENT

At your request, this is a presentation of pertinent facts surrounding the landfill incident discovered on 5 August 1987. These comments are the result of an on-site investigation at the landfill, interviews with landfill and HS&E personnel, in addition to a meeting with Ken Freiberg on 7 August 1987 in which landfill, HS&E, and Waste Operations personnel were present.

WHAT HAPPENED AT LANDFILL

About two months ago, landfill personnel excavated the surface soil from an area south and east of the new landfill where solid waste management units (SWMU) 166.1, 166.2, and 167.2 (see enclosures 1&2) had been identified. The surface soil was excavated unevenly in a triangular cross section beginning at the ridge four feet deep and proceeding downslope to surface level toward and near the pond--an area of roughly 200 X 300 feet. This was done to build a soil stockpile to draw from since each layer of refuse needs to be layered over with a soil cover. When the excavation was discovered last Wednesday, several layers of refuse and soil from the SWMU soil stockpile had already been laid down in addition to a large remaining SWMU soil stockpile.

HOW IT HAPPENED

As the new landfill moves eastward, soil cover is excavated and stockpiled for later layering as mentioned above. Soil is moved from both the north and south end stockpiles of the landfill toward the middle. Apparently, landfill personnel were unaware of the existence of the SWMUs southeast of the new landfill although survey stakes placed every 60 feet were in place as investigation markers for the SWMUs. No excavation permit could be found as required by HSE 6.01 "Excavation Permit" although there was some discussion during the meeting of the applicability of this requirement to routine landfill operations. A document entitled Decontamination and Decommissioning Plan for Inactive Waste Sites at the Rocky Flats Plant prepared by Facilities Engineering and dated January 1987 does identify the SWMUs which were excavated. However, this document was apparently never in the possession of landfill personnel. In addition, the SWMUs are identified in RCRA Appendix 1, 3004 (u) Waste Management Units, Volume 1 of the RCRA Part B Permit Application (see enclosure 2).

ADMIN RECORD

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REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. I. Ostleck 620
DATE	7-12-93

A-DU07-000132

SWMU 166.1 AND 166.2 IDENTIFICATION

There is some question of the validity of the documentation used to identify SWMUs 166.1 and 166.2. The RCRA Part B Permit Application identifies these two SWMUs as originating from sanitary and laundry waste sludge which may have contained low levels of uranium and plutonium due to laundry operations. James Adams (Trucking & Labor), a Rocky Flats employee for over thirty years and associated with landfill operations, mentioned that when surface water diversion trenches were being dug around the landfill, clay slurry used to line the trenches was discharged on the hillside where the SWMUs in question are now identified. The presence of the clay slurry on the hillside may have caused that area to be misidentified as SWMU sites. Additionally, a phone conversation with Chuck Hilsley took place during the meeting with Chuck Hilsley, another long-time employee now retired, who had contributed to the identification of the SWMUs in question as recorded in the documentation associated with these SWMUs. Chuck could not remember any sludge being dumped on the hillside in the area of the 166.1 and 166.2 SWMUs. His recollection now is that liquid sludge was dumped by truck tankers on the level ground just south of the SWMU area in question to let it dry out. All of this raises the possibility that these SWMUs may have been misidentified.

IDENTIFICATION OF SWMU 167.2

According to the RCRA Part B Permit Application, this SWMU was a spray field for landfill pond water to evaporate excess pond water. This should present problems, if any, of a significantly lower order of magnitude than the 166.1-2 SWMUs. And since soil from this SWMU is now intermixed with soil from the other SWMUs, no further consideration will be given to this SWMU.

ACTIONS TO RESOLVE INCIDENT

1. Use uncontaminated north half of new landfill to keep plant operating.
2. Temporarily discontinue use of south half of landfill (enclosure 1, crosshatched) pending results of soil analyses. This will be roped off and posted with signs together with the soil stockpile and the excavated SWMUs.

Responsible: Mike Gard with landfill personnel help.

Status: Staking with six inch stakes completed 7 August 1987.
Roping and warning signs pending.

3. Take soil samples from the SWMU soil stockpile, landfill (south end), and excavated SWMUs for uranium and plutonium analyses.

Responsible: Frank Blaha with HS&E Lab help.

Status: Completed 7 August 1987.

4. Analyze soil samples for uranium and plutonium isotopes.

Responsible: HSE Labs.

Status: Analyses started 7 August 1987. Results expected within one week.

5. Take soil samples from SWMU stockpile (core samples), landfill (south side), and excavated SWMUs for full complement of Hazardous Substances List analyses.

Responsible: Frank Blaha and Brent Lewis.

Status: Pending availability of drill rig--anticipated week of 10 August 1987.

6. Analyze soil samples for full complement of Hazardous Substance List.

Responsible: 881 Labs.

Status: Analyses pending delivery of samples. Results within 4-6 weeks after sample delivery.

7. Recheck validation documentation (aerial photos and interviews) for identification of SWMUs 166.1-2.

Responsible: Tom Greengard and Mike Gard.

Status: In progress.

8. Brief DOE/RFAO.

Responsible: Kirk McKinley and Tom Greengard.

Status: Completed 7 August 1987.

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9. Brief Bill Weston.

Responsible: Tom Greengard.

Status: Completed 7 August 1987.



A. J. Petrocchi, Program Administrator
Hazardous Materials Control

Enc. (2)

cc:

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