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INTEROFFICE CORRESPONDENCE

DATE: October 4, 1991

TO: E. D. Lesses, Radiological Engineering, Bldg. 750, X5726

FROM: ^{RJS.} R. J. Stevens, Surface Water Division, Bldg. B030, X3894

SUBJECT: DISPOSAL OF USED POND WATER TREATMENT FILTERS - RJS-003-91

In September 1990, a Waste Processing Request was submitted to dispose of the used filters that are generated as a result of treating the Rocky Flats terminal pond water before release offsite. The landfill manager required both a "waste determination" and approval from radiological engineering to comply with our request. In October 1990, Waste Compliance was requested to provide a "waste determination" for the used filters. Based upon the analyses of the pond water flowing through the filters, a "non-hazardous, non-radioactive waste" determination was anticipated.

Because the filters are basically a narrow fabric bag and cannot be readily smeared for contamination, representative samples of the filters were analyzed by our contract laboratories for both RCRA and radiological constituents per the guidelines provided by Waste Compliance. The radiological data show no levels above the CDH standards for soil. Copies of the analytical data are attached for your review.

In addition, a risk assessment for disposal of the material in the Rocky Flats sanitary landfill was performed using a very conservative approach. Results of the radiological analyses for the used filters showed that U-238 was the driving risk factor and the U-238 values for the used filters were below the background U-238 values of the landfill soil. The worst case analysis placed the risk in the 2×10^{-6} range.

The delay of waste disposal has reached an unacceptable level. There are approximately 460 cubic yards of used filters awaiting a final disposition. Radiological Engineering and Radiological Monitoring have been informally contacted in the past to provide input to the Waste Processing Request.

Your immediate attention to this matter is requested. To dispose of the filters, radiological engineering/monitoring must either approve the Waste Processing Request or provide a letter waiving that requirement. Please respond by October 11, 1991.

fm

Attachment:
As Stated

cc:
S. A. Buckie
J. E. Evered
F. D. Hobbs

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