

RES. CONTROL
 JTGONG LTR NO.
 E ORDER 5400.1
 94 RF 04062



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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
 ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.	INITIALS	DATE
ARAL, M.E.		
IMAN, H.S.		
INCH, D.B.		
ANIVAL, G.J.		
PP, R.D.		
IS, J.G.		
TERA, D.W.		
NI, B.J.		
MAN, L.K.		
LY, T.J.		
DAHL, T.		
BIG, J.G.		
CHINGS, N.M.		
L, R.E.		
E, W.A.		
ESTER, A.W.		
HAFFEY, J.W.		
IN, H.P.		
RK, G.E.		
DONALD, M.M.		
KENNA, F.G.		
NTROSE, J.K.		
GAN, R.V.		
TER, G.L.		
UTO, V.M.		
ING, T.L.		
DLIN, N.B.		
LOCK, G.H.		
WART, D.L.		
GER, S.G.		
LIVAN, M.T.		
ANSON, E.H.		
KINSON, F.B.		
SON, J.M.		
ANT, R.D.		

April 8, 1994

94-RF-04062

F. R. Lockhart
 Environmental Restoration Division
 DOE, RFO

INFORMATION ON DECANT OPERATION ON 750 PAD - SRK-069-94

DOE ORDER: 5400.1

The attachment provides information on the decant operation underway at the 750 Pad as requested by your staff in the weekly Solar Ponds Subproject meeting. Per our agreement at that meeting, we have delayed the next decant operation until you have found this information to be satisfactory. Since delays in decanting are likely to have impacts on the cost and schedule for emptying Pond 207-B, please inform me by phone as soon as you have reviewed the information.

If you would like to discuss this further, please contact Joe Mellen, extension 8607, or Kathy London, extension 8585.

KCL:clh

Attachment
 As Stated (1)

S. R. Keith

S. R. Keith
 Director
 Solar Pond Projects

Orig. and 1 cc - F. R. Lockhart

S. Howard - DOE, RFO
 S. R. Surovchak - DOE, RFO

Hen J.B. X
 J.H. J.R. X
 Nelson K.C. X
 Te (Z) X
 PRES CONTROL X
 IN RECORD/ORD X
 EFFIC
 TS/T130G

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EG & TYPIST INITIALS
 RK:CLH

ADMIN RECORD

DOCUMENT CLASSIFICATION
 REVIEW WAIVER PER
 CLASSIFICATION OFFICE

Attachment

RFO requested the logic used to determine that no treatment permit under RCRA was needed to perform the decanting operation.

Decanting is performed in the following manner. Pond waste, consisting of sludge and water which have been characterized separately, is vacuumed into a tanker truck, transported to the new tank farm on the 750 Pad, and pumped into a tank. This transfer mixes the sludge and water. The sludges settles to the bottom of the tank naturally, by gravity. Operations staff then decant the water off the top of the tank into a metal container. The metal container is used as an opportunity to visually examine the water to ensure that sludge is not being drawn off. The water is sent to Building 374 for treatment.

Regulations in 6 CCR 1007-3, §260.3, defines "Treatment" when used in connection with an operation involved in hazardous waste management, as any method, technique, or process, including neutralization or incineration, designed to change the physical, chemical, or biological character or composition of a hazardous waste, so as to neutralize such waste or to render such waste less hazardous, safer for transport, amenable for recovery or reuse, amenable for storage, or reduced in volume.

The decant operation fails to meet the definition for treatment, and therefore no treatment permit is required. The decant operation is compared to the treatment definition as follows:

- *An operation involved in hazardous waste management, as any method, technique, or process, including neutralization or incineration*

The decant operation is used for waste management, so the definition must be examined further. No neutralization nor incineration is involved.

- *Designed to change the physical character or composition of a hazardous waste*

The physical character and composition of the waste is not changed. To decant is

to draw off without disturbing the sediment or the lower liquid layers¹, thus the decant operation specifically avoids causing any physical change to the water or to the sludge.

- *Designed to change the chemical character or composition of a hazardous waste*

No change to the chemical character or composition occurs.

- *Designed to change the biological character or composition of a hazardous waste*

No change to the biological character or composition occurs.

Although the above analysis explains why the decant operation does not meet the definition of treatment, the remainder of the definition is presented below for completeness:

- *So as to neutralize such waste*

The decant operation has no effect on pH and no neutralization occurs.

- *So as to render such waste less hazardous*

The waste's status as "hazardous" is unaffected. The degree of hazard, as estimated by the level of contamination, is considered to be unchanged from the characterization that was performed previously.

- *So as to render such waste safer for transport*

No effect on the transport safety is attempted nor realized, and no change to the characterization of the waste occurs.

- *So as to render such waste amenable for recovery or reuse*

¹ Webster's Ninth New Collegiate Dictionary.

The pond water is not recovered or reused (reuse is found at §261.2(e)). There is no BTU value to the waste, so no energy-recovery is possible. The water is treated in Building 374 to a reused-distillate and a concentrated waste salt. Building 374 is the treatment facility routinely used to treat this waste stream.

- *So as to render such waste amenable for storage*

No change to the ease of storage occurs. The decanted waste is transported to an existing storage tank at Building 374.

- *So as to reduced the waste in volume.*

The volume of the waste remains unchanged; the exact volume removed from the tank is placed into the truck and subsequently into the Building 374 tank.

SUMMARY

The decant operation does not meet the definition of treatment. No treatment permit is, therefore, required.