



March 31, 1993

93-RF-3414

J. K. Hartman
Assistant Manager
DOE, RFO

**REDIRECTION FOR HANDLING OF INVESTIGATIVE DERIVED MATERIAL (IDM) -
RLB-123-93**

This letter is in confirmation of a meeting held in Building 116 on February 12, 1993 with Jen Pepe and Fred Gerdeman of your staff, Cathy Alstatt and Joe Schefflin of CDH, and Marla Broussard and Ed Keil of EG&G concerning handling of ER investigative material in gray drums. The stated intent of the meeting was to confirm ER practices for IDM handling would not violate RCRA.

As an outcome of the meeting, CDH redirected DOE to change the scope of the IDM Handling Procedure (FO.23) to include not only drums originating from IHSSs and PACs, but to also include four other large areas that the State feels have need for management (see enclosed map).

The impact of this redirection is that hundreds of additional gray drums must now be placed into interim storage pending analytical results for characterization. The current RCRA units do not have the capacity to hold all of these drums. A future noncompliance is very possible. At Unit 18.03, cargo containers are being added around the existing tent (Tent 1) to increase the current holding capacity. Cargo's have also been added to 18.04 and a request to modify the current permit will be completed by September 22, 1993. Current permit capacities are sufficient through FY93 only. Another result is the cost of handling the drums per the Hazardous Requirements Manual and of storage in a RCRA unit. The average cost per drum has been calculated at \$1,000 per year.

Work continues on developing a risk assessment method to apply under CERCLA to remove appropriate drums from the RCRA management requirement. However, this process will not be completed in the near-term. In the meantime, EG&G is proceeding with changing the procedure and will be submitting it to DOE for review by April 30, 1993. If you need further information please contact Marla Broussard at extension 8517.

R. L. Benedetti
Associate General Manager
Environmental Restoration Management

MCB:la

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. T. Ostliek <i>GT</i>
DATE	8-9-93

ADMIN RECORD

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If you need further information, please contact Marla Broussard at extension 8517.

Orig. and 1 cc - J. K. Hartman

Enclosure:
As Stated

cc:
F. W. Gerdeman - DOE,RFO
J. L. Pepe - DOE,RFO

FIGURE 2

East ROCKY FLATS PLANT, INC.
ROCKY FLATS PLANT
COUDR, COLORADO

ADDITIONAL AREAS OF CONCERN

Outline of Addition
Areas of Concern

