

QUARTERLY UPDATE

For April 1993 through June 1993

IDM HANDLING AND STORAGE

PREPARED BY

ENVIRONMENTAL RESTORATION
FACILITIES OPERATIONS MANAGEMENT

EG&G ROCKY FLATS, INC.

JULY 23, 1993

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INTRODUCTION

Facility Operations Management/Environmental Restoration provides safe and proper handling and storage of filter cake (FC), a low level mixed waste from the Rad Removal System (RRS), Soil/Sediment (SS) from the Decontamination Facilities, 903A Pad and PA Pad, and drill cuttings generated through Environmental Restoration (ER) R/RFI investigations. These drums are stored in the Interim Status Units 18.03 and/or 18.04.

REPORTS/CORRESPONDENCE

IDM is currently being managed per EMD Operating Procedures 5-21000-OPS-FO, Vol. 1, Procedures NO. FO. 8 and FO. 10, both of these procedures are scheduled to be revised starting August 10, 1993 and will be completed September 30, 1993. Negotiations continue with the Colorado Department of Health and the Department of Energy on finalization of FO 23., "Management of Soil and Sediment Investigative Derived Materials". FO. 23 was transmitted to DOE on July 1, 1993.

Weekly Inspections on the 90-day accumulation area, located in the EG&G contractors yard were completed on time and documented on the Waste Management 90-day Area Weekly Inspection Log Sheet. All weekly inspection for RCRA Unit 18.04 and 18.03 were completed on time and documented on the Environmental/Hazardous Waste Management Container Storage Area Weekly Inspection Log Sheets.

Correspondence letters are attached in the work package and include necessary support requests from the following EG&G organizations: Radiological Engineering, Industrial Safety/Hygiene, Waste Operations, and 881 General Laboratories. All requests for IDM support have been granted. Other correspondence letters referenced as attachments in the IDM Handling & Storage work package are:

1. Memorandum from R. L. Benedetti ERD: to ERD distribution, dated November 30, 1992, subject: "Re-baseline of Environmental Restoration Work Packages 'A' of the Plant Work Breakdown Structure".
2. Letter from Gary Baughman, Colorado Dept. of Health: to Frazer Lockhart DOE/RFO, dated June 12, 1992, subject: "Storage and Handling of Investigative Derived Waste (IDW) and Hazardous Investigation Derived Waste (HIDW)".
3. Memorandum from M. C. Broussard FOM to J. A. Ciucci, RWO, dated January 21, 1993, subject: "Memorandum of Understanding (MOU) for Management of RCRA Storage Areas".

Sample

No sampling and analysis of IDM under spill/spill clean up situations at RCRA storage was performed during this quarter.

Problems/Maintenance

Outstanding Work Control Forms:

1. A 50 - 60 ft. section of fence still needs to be erected to enclose RCRA Unit 18.03. A work control form was submitted on Dec. 7, 1992
2. Painting and banding of drums for on going drilling projects as needed.
3. Build water diversion system outside of tent one.
4. Asphalt patching for degraded areas as required within tent one. Planned completion date: September 30, 1993
5. An Engineering Job Order was submitted June 23, 1993 to Plant Paving to do a complete overly within tent one.

Anticipated Operation for next Quarterly

Completion of all maintenance activities is expected prior to submittal of the next quarterly report. Finalization of SOP FO. 23 is anticipated and revisions to both FO. 8 and FO. 10 will be completed. SOP, Training Records, and the Health and Safety Plan milestones are anticipated to be met by their designated dates.

Evaluation of the immediate and long term needs for storage has prompted the re-proposal of a building for storage at Unit 18.04. A walk down of existing buildings on plantsite scheduled for transition to Environmental Management has been completed and a recommendation to permit one of these for IDM storage has been made.

FOM will continue to manage the IDM from the Environmental restoration-drilling, sampling, soil, surface water and groundwater remediation for OU-11, OU-9, and OU-7. As buildings 891 and T900D proceed with OU support to CERCLA remediation activities FOM will manage their waste. Other projects currently operating which require support include: Decontamination Pad, Well Abandonment and Replacement Program (WARP), and Systematic Evaluation Program (SEP).

Environmental Compliance

There are currently 17 cargo containers in place at 18.04 Unit. The boundaries for the unit consists of 15 cargo containers. Arrangements are being made to have two cargos moved to 18.03.

Progress towards complying with the Colorado Department of Health's request to manage IDM carries on through the completion of tasks from the Action Plan For Improper Labeling of Hazardous Waste-Finding #93-WM-00S-891-005-008. Significant Action Plan Tasks completed to comply with the finding:

- Task 3, June 7, 1993-ER/FOM meets with CDH and DOE for final FO. 23 and applicability of RCRA management of IDM.

- Task 2, July 1, 1993-Finalize FO. 23 for submittal to DOE and the Agencies requesting approval.
- Task 4, June 24, 1993-Written guidance provided by Waste Technical Support to ER/FOM as to applicable EPA codes and compatibility codes in order to complete On-Site Hazardous Waste Labels.
- Task 5, July 15, 1993-If hazardous waste label exemption not received, drums currently in the 90-day area and new drums entering RCRA management will be labeled first under the guidance of Waste Technical Support.
 - *Per agreement at the Waste Managers meeting July 15, 1993, Joe Wienand concurred that for economic and regulatory reasons this issue needed to be raised at the previously scheduled July 23 meeting with the Agencies. Based on this decision, EG&G/ERM was given approval to extend the due date from July 15, 1993 to July 30, 1993.
- Task 7, July 1, 1993-Secondary containment will be initiated for drums in the 90-day units based on the field liquid determination of drum.
 - *A Document Change Notice (DCN) was submitted June 29, 1993 for FO. 10, Receiving, Labeling, and Handling Environmental Materials Containers. The DCN states, "Drums generated as of July 1, 1993 are marked with respect to free-liquid content and managed accordingly in the 90-day area. This does not apply to drums generated prior to July 1, 1993.
- Task 8, August 1, 1993-Tarps will be ordered to cover drums in the RCRA 90-day units to prevent precipitation accumulation on the drums.

Summary/Conclusions

As of July 2, 1993, the current inventory of drums distributed in the field, 90-day area and at the decontamination pad is 2549. Of the drums in the field 1701 are on a schedule to come into the storage units as expeditiously as possible.

In addition to the above actions, field determination of free liquid content has been initiated to alleviate the need for Real Time Radiography (RTR). Hence, currently generated IDM can go directly into storage.

As of July 23, 1993, Unit 18.04 has 135 FC drums and Unit 18.03 has 939 drums of IDM and Soil/Sediment.

There are 100 drums which have been procured to support ER activities. A requisition has been submitted for a forklift which can be utilized inside a facility and will operate the hydraulic rotator. Of the 10 cargos procured in April FOM has received 2, with the remaining 8 expected to arrive in July.