



000018528

INTEROFFICE CORRESPONDENCE

DATE: January 10, 1991

rsh.3.91

TO: A. L. Schubert, Permitting and Compliance, T130C, X5251

FROM: *M. B. Arndt*
R.T. Ogg M. B. Arndt, Environmental Monitoring & Assessment Division, T130B, X4294,
and R. T. Ogg, Remediation Programs Division, T130B, X7079

SUBJECT: MANAGEMENT OF ENVIRONMENTAL RESTORATION FIELD RELATED ACTIVITIES

Reference: A. L. Schubert ltr. to T. C. Greengard and M. B. Arndt, P&C Guidance-90, Guidance
and Regulatory Interpretation for Issues Raised by the Remediation Programs and
EMAD Groups, October 17, 1990

The Environmental Restoration Department (ER) is in receipt of the above-referenced letter dated October 17, 1990. The ER Department is generally in agreement with the interpretations/guidance provided by the Permitting and Compliance group. However, there are some issues that ER does not concur with that need to be addressed.

MANAGEMENT OF BOREHOLE CUTTINGS

The plant will be segmented into areas which are potentially contaminated and areas which are considered uncontaminated. All drilling waste generated in areas considered potentially contaminated will be drummed. During all drilling activities, cuttings will be monitored with field instrumentation designed to detect volatile organics and radioactivity. All drill cuttings and associated waste, such as personal protective equipment and field trash, will be contained as follows:

<u>Area</u>	<u>Results of Field Monitoring</u>	<u>Drum Type</u>
Potentially Contaminated Areas	1) No Contamination Detected 2) Positive HNu Reading 3) Ludlum Above 250 dpm 4) Both 2 and 3	Gray Black and White White White with Hazardous Label
Uncontaminated Areas	1) No Contamination Detected 2) Positive HNu Reading 3) Ludlum above 250 dpm 4) Both 2 and 3	Discharge to Ground Black and White White White with Hazardous Label

All drums generated during field operations will be managed consistent with the intent of RCRA regulations.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

A-SW-001719

In accordance with direction from Colorado Department of Health (CDH) and Environmental Protection Agency (EPA), Rocky Flats Plant (RFP) will not be required to obtain a permit for storage areas related to Environmental Restoration field activities. During a meeting at EPA in Denver, Colorado, on November 19, 1990, EPA and CDH informed DOE and EG&G that a permit would not be required for drum storage for remediation-related activities. However, the storage area must comply with the physical requirements of 40 CFR Part 264 that are applicable to drum storage facilities.

For additional information on management of drill cuttings, please refer to the draft Standard Operating Procedure (SOP), volume one (1). The SOP is scheduled to be submitted to EPA and to CDH and is currently being finalized.

DISPOSAL OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

The same criteria shall apply to PPE in relation to areas uncharacterized/suspected to be contaminated with hazardous constituents.

In areas known to be non-hazardous, based on historical analytical data, a random sampling event will be conducted for the PPE to determine waste management/handling objectives. If the PPE is characterized as non-hazardous, it will be disposed of within the Present Landfill OU 7. However, if the PPE is determined hazardous, it will be drummed and managed appropriately.

PERMITTING OF DECON PADS AND OTHER REMEDIATION PROCESSES

In accordance with EPA and CDH direction, permitting of the Environmental Restoration Decontamination Facility will not be required. This determination was provided to DOE and to EG&G at the agency meeting November 19, 1990. However, the decon pad will be required to comply with the physical intent of RCRA, i.e., secondary containment, applicable above-ground storage tanks codes, inspections, etc. The decon pad will be utilized for CERCLA investigatory/remediation and RCRA monitoring purpose.

DISPOSAL OF PURGE WATER/DECON WATER TO BUILDING 374

Building 374 Evaporator will continue to treat waste water generated at the decon facility, purge water from RCRA ground water monitoring activities, well development water from newly constructed ground water monitoring wells, and surface water sampling activities. In accordance with EPA and CDH direction, this is an acceptable mechanism of treatment for this type of medium. However, the regulatory agencies requested DOE and EG&G to develop "action levels" for organic constituents present in the waste water treated at the 374 Evaporator. Once the action levels are established, a sampling and analysis plan for organic constituents will be developed and implemented for the waste water generated by ER field activities. Organic constituents below the action levels will be treated at the 374 Evaporator, and organic constituents above the action levels will require pre-treatment prior to treatment at the 374 Evaporator.

STORAGE OF HAZARDOUS WASTES FROM REMEDIATION PROJECTS

A drum storage facility will be required for the drill cuttings generated during ER field activities. EPA and CDH will not require permitting of the drum storage facility, however; physical compliance will be required in accordance with 40 CFR Part 264.

It is expected that Waste Operations will provide ER with an appropriate location for drum storage of the drill cuttings generated during remedial investigations. In addition, regulatory guidance may be required from the Permitting and Compliance group to assist ER in fully complying with all applicable RCRA requirements.

RTO: rsh

cc:

P W. Edrich
J. E. Evered
D. R. Ferrier
L. J. Q. Frick
T. C. Greengard
F. D. Hobbs
J. M. Kersh
G W. Litus