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CORRES. CONTROL
OUTGOING LTR NO.

92RF2890

ST.	LTR	ENC
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
BURLINGAME, A.H.		
CARNIVAL, G.J.		
COPP, R.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	
FERRERA, D.W.		
GOODWIN, R.		
IANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HILBIG, J.G.		
IDEKER, E.H.		
KERSH, J.M.	X	
KIRBY, W.A.		
KUESTER, A.W.		
KRIEG, D.		
LEE, F.M.	X	
MAJESTIC, J.R.		
MARX, G.E.		
McDONALD, M.M.		
MORGAN, R.V.	X	
POTTER, G.L.	X	
PIZZUTO, V.M.		
SANDLIN, N.B.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
TALLMAN, K.G.		
WIEBE, J.S.		
WI[illegible]ON, R.B.	X	
WI[illegible] J.M.		
YOUNG, E.R.		
ZANE, J.O.		
Allhoff, FH	x	
Kennedy, CE	x	
[redacted]		
Jemison, EA		
Johnston, LD	X	
Smith, TA		
Gee CB	X	
Crossed MC	X	
Bunge PS	X	
E&WM Track'g		
CORRES CONTROL	x	x
TRAFFIC		

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AUTHORIZED CLASSIFIER SIGNATURE
not applicable per classification office exemption.

DATE

IN REPLY TO LTR NO.

CC#

LTR APPROVALS:
CBG
PSB:

ORIG & TYPIST INITIALS
CBG/dmf

EG&G ROCKY FLATS

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

March 18, 1992

92-RF-2890

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: F. R. Lockhart

PROCESS KNOWLEDGE IN WASTE DETERMINATIONS - JEE-0195-92

Ref: J. E. Evered ltr, JEE-0178-92, to R. M. Nelson, Jr., Storage and Handling of Hazardous Waste Generated during Remedial Investigation at RFP, March 10, 1992

In response to the Department of Energy's (DOE's) request for further discussion on the use of previous process knowledge in waste determinations for drummed drill cuttings, EG&G does not feel that adequate process knowledge exists on any of the drums generated to date to realistically characterize a particular drum as "hazardous". The vast majority of drums have come from background/buffer zone characterization where there is no reason to anticipate contaminants. The individual hazardous substance sites (IHSSs) are poorly defined. Real-time monitoring during drilling has shown only sporadic instances of detectable contaminants.

Process knowledge would dictate that the drums were non-hazardous. Without more definitive knowledge, a hazardous characterization is premature and inappropriate. However, we believe a more conservative approach is to make a determination based on the validated lab results of the drilling.

If you have questions regarding this matter, please call C. B. Gee of Remediation Programs at extension 5910.

J. E. Evered, Director
Environmental Management

ADMIN RECORD

CBG:dmf

Orig. and 1 cc - R. M. Nelson, Jr.

cc:
B. R. Lewis - DOE, RFO

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