



EG&G ROCKY FLATS

100593-15

11780

11000			
ERM			
11010			
PIR			
11100			
RPM			
11200			
ES&E			
11300			
SPP			
11400			
FOM			
11500			
RLD			
11600			
SM			
11700			
EQS			

INTEROFFICE CORRESPONDENCE



DATE September 30, 1993

TO Distribution

FROM T G Hedahl, Environmental and Waste Management, Bldg 111, 4111

SUBJECT EXCESS CHEMICAL/WASTE MANAGEMENT - TGH-566-93

- Refs. (a) H P Mann, HPM-543-93, to Distribution, Excess/Waste Chemical Disposition, September 17, 1993
- (b) Envirogram, ENV-3, Rev 1, Excess Chemical Management, September 17, 1993

Reference (a) identifies the actions required to disposition excess chemicals/wastes located within the buildings at Rocky Flats. In order to expedite this process, two teams have been created to assist the waste generators (building and tenant personnel) in characterizing and packaging the waste. Each team has a single point of contact responsible for resolving issues associated with the team. The team members, team responsibilities, and deliverables are listed in Attachment 1.

Attachment 2 identifies the overall flowpath for the disposition of excess chemicals/wastes identified on site. Timely disposition is dependent upon a detailed description of the chemicals/wastes including process knowledge available to support waste characterization, and an adequate radioactivity determination documented with a Property Release Evaluation (PRE) per HS&P 18.10. Additionally, an evaluation must be made by the building to verify the safety requirements to move, sample or package the waste. All reactive or potentially explosive chemicals must be stabilized prior to sampling or packaging for long term storage. This requirement shall be documented on the excess chemical waste disposition form (ECDF) as identified in Reference (b).

The Excess Chemical Program Manager, Dean R Pierson, extension 3190 or digital page 1369, is responsible for entering the ECDF into a computer tracking system for making the excess chemical/waste determination, coordinating the waste minimization efforts, and characterizing the excess chemicals based on the MSDS and label information. Dean will track all ECDFs until final disposition.

The Sampling and Characterization Team is responsible for establishing sampling requirements (both radiological and hazardous) for all unknown and unlabeled containers, scheduling the sampling, and characterizing the waste based on analytical data. John R Dick, extension 5217 or digital pager 4683, is the team leader for this team. He is responsible for all issues affecting the sampling and characterization of the chemicals/wastes.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

N 3RD

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The Waste Packaging and Storage Team is responsible for establishing all packaging requirements per Department of Transportation (DOT), RCRA Permit, and Rocky Flats Plant policies and procedures. John A Ciucci, extension 5841 or digital page 3042, is the team leader for this team. He is responsible for coordinating all packaging and storage issues. Packaging efficiencies must be pursued in order to minimize the impact on the low level mixed storage areas on site.

The deliverables of the buildings/tenants, required to make proper waste management and disposal determinations, are also listed in Attachment 1. The actual generator of the waste is included on each team to maintain accountability for waste generation. The building personnel will be responsible for packaging the waste. Guidance will be provided by the packaging and storage team to support proper waste packaging.

Successful implementation of this plan will severely stress the current waste management systems in place. Additional waste storage areas may be required to store the volume of waste which will be generated. If you have any questions concerning the management of excess chemicals/wastes, contact A A Church at extension 7825.

JAC mmr

Attachments
As Stated (2)

Distribution.

G M Aldrich
G L Aguero
S A Anderson
J M Bower
M C Broussard
J R Cable
A A Church
J A Ciucci
B M Clausen
S D Cooke
R C Cordova
N P Cypher
J R Dick
R P Dunn
F J Furman
J A Geis

R D Gillespie
D B Hensley
A J Holifield
D R Jackson
A W Kuester
D E Kunz
G H McElhinney
G P McGhee
R V Morgan
D R Pierson
G L Potter
J D Roberts
A L Schubert
C S Smith
S K Stovall

cc
H S Berman
R D Copp
J G Davis
D W Ferrera
N M Hutchins
W A Kirby
J W Mahaffey
G E Marx
F G McKenna
R B Wilkinson
J M Wilson

**REGULATED WASTE OPERATIONS
TEAM OUTLINE**

TEAM MEMBERS

Packaging/Storage Team
Lead John A Ciucci (5841)
 Alternate Dean R Lobdell (7905)

Sampling/Characterization Team
Lead John Dick (5217)
 Alternate Mark Peters (6733)

Building (To be established by OM)
 (Recommendations)

Primary Alternate
 W P Dean Pierson Debbie Peters
 RMO Shirley Garcia Ernie Bentsen
 Traffic Ken Lenarcic Jeannett Watkins
 Rad Prog Rick Turco Paul Weis
 WEMS Cheryl Love Tracy Yoshida

Primary Alternate
 WIC Virgene Church Celia Moynihan
 RMO Gislinde Engelmann Shirley Garcia
 Rad Eng Mark Richards Bruce Powell
 W P Dean Pierson Debbie Peters
 WEMS Cheryl Love Tracy Yoshida
 Generator Building Specific

Operators Manager
 Waste Generator/Owner
 Waste Technical Support
 Radiological Engineer
 Health and Safety Representative
 Environmental Coordinators

RESPONSIBILITIES

Identify DOT RCRA RFP packaging requirements

Identify sampling requirements to satisfy RCRA permit waste analysis plan

Identify and inventory all excess chemicals and waste containers

Verify WEMS
 Coordinate building packaging of waste

Pull samples and coordinate analysis

Perform a health and safety review establishing the safety of the container

Characterize the waste and assign EPA codes compatibility codes IDC and chemical constituent codes

Perform a radiological review of the excess chemical/waste HS&P 18 10 (Property Release Evaluation)

DELIVERABLES

Waste packaging requirements

Waste characterization documentation (letter ECDF form non routine waste origination form) to include EPA codes compatibility codes IDC and chemical constituent codes

Properly manage chemicals based upon disposition instructions
 Excess Chemical/Waste Disposition Form

Radiological screens (if applicable)
 Inventory List

Property Release Evaluations
 MSDS for all Excess Chemicals

EXCESS CHEMICAL WASTE MANAGEMENT

