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INTEROFFICE CORRESPONDENCE

DATE December 21, 1993

TO M. L. Crossett, Transportation Dept , Bldg. 331, X4529

FROM *NSD* N S Demos, Environmental Operations Management, Bldg. 080, X6938

SUBJECT POTENTIALLY CONTAMINATED CONCRETE AND MISCELLANEOUS DEBRIS ASSOCIATED WITH INDIVIDUAL HAZARDOUS SUBSTANCE SITES (IHSSs) - NSD-016-93

Per your request of December 8, 1993, this letter is in regard to miscellaneous debris which has been deemed non-Resource Conservation and Recovery Act (RCRA) hazardous by a qualified hazardous waste generator but must remain within the IHSS due to other potential Comprehensive Environmental Response, Compensation & Liability Act (CERCLA) contaminants.

Since concrete, asphalt, and other related debris associated with construction projects within IHSS(s) are generally not suitable for use as backfill and they cannot be graded, mounded, or stockpiled (for aesthetic reasons), Environmental Restoration Management (ERM) requires that such materials be placed into crates, boxes, or grey drums (if applicable) The containerization of such debris is an appropriate method for managing non-hazardous IHSS spoils/materials and should be labeled "Non-Hazardous" All containers must remain within the IHSS(s) until characterization studies have demonstrated through analytical methods that the materials do not pose an unacceptable risk to the workplace and/or the environment Such determinations will be made through the Record of Decision (ROD) subsequent to the completion of the RCRA [Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation (RFI/RI) process

If you have any questions concerning this matter, please contact me at your earliest convenience.

lmw

cc
R N Bell
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