

CORRES. CONTROL
LTR. NO.



**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

CH Corres. #

Originator Ltr Log #

MW-105-97

Rocky Flats Environmental Technology Site
P.O. Box 464
Denver, Colorado 80402-0464
Phone: (303) 966-7000

RF -

DIST.	LTR	ENC
ARTHEL, J.M.		
ENSON, C.A.		
ARMEAN, C.H.		
RAWFORD, A.C.		
AWSON, D.		
DWARDS, J.D.		
INDLEY, M.E.		
ITZ, R.C.		
UINN, L.A.		
UTHRIE, C.L.		
UGHES, F.P.	X	
VERLID, T.W.		
RICE, K.		
FEED, A.B.		
YNSON, A.M.		
MAGNER, M.J.		
HEELER, M.	X	

July 23, 1997

George Dancik
EPA Region VIII
999 18th Street
Denver, Colorado 80202

REQUEST FOR CERCLA OFFSITE DISPOSAL DETERMINATION - MW-105-97

HOPKINS, T.	X	
KIDD, D.	X	
ANNISTER, R.	X	
JOHNSON, L.	X	
SCHMUCK, J.	X	

Rocky Mountain Remediation Services (RMRS) is responsible for waste management at the Rocky Flats Environmental Technology Site (RFETS). Recently, RMRS entered into a contract with USA Waste of Colorado for offsite disposal of non-radioactive, non-hazardous, solid sanitary wastes generated at RFETS. Offsite disposal is required because the RFETS onsite landfill is reaching capacity.

A portion of the solid waste will be generated pursuant to the CERCLA authorities embodied in the Rocky Flats Cleanup Agreement. These "CERCLA wastes" will be generated during decommissioning and demolition of RFETS buildings. For example, non-friable asbestos floor tile and roofing materials, and lead-based paint on brick or cinder block would contain CERCLA hazardous substances and would be within the definition of CERCLA wastes. It is important to understand that although these materials are within the definition of CERCLA wastes, these solid sanitary wastes would not meet the definition of a listed Resource Conservation and Recovery Act (RCRA) hazardous waste and would not exhibit a RCRA hazardous waste characteristic where only low levels of contaminants are present.

RECORDS	X	X
CONTROL	X	X
OFFICE		
TS/1130G		

As part of the procurement process, the USA Waste Front Range Landfill (FRL) was evaluated by RMRS and determined to be acceptable for disposal of RFETS solid sanitary wastes. Regardless, prior to disposal of RFETS CERCLA wastes at the FRL, RMRS understands that EPA must independently make a determination of facility acceptability pursuant to the CERCLA Offsite Rule (40 CFR §300.440). This letter is a request that EPA make an acceptability determination for the FRL. RMRS believes that the FRL is an exceptional candidate for an acceptability determination in light of the design of the facility and the fact that the facility has been in operation for less than one year.

CLASSIFICATION:	
UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE:

ie

REPLY TO RF CC NO.:

STATUS ITEM STATUS:
 PARTIAL/OPEN
 CLOSED

APPROVALS:


REGISTRAR INITIALS:



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RMRS also understands that pursuant to the terms of the Offsite Rule, there is an obligation to update the status of the disposal facilities. Initially, RMRS will require that verbal updates be obtained from you as a part of each project. As the pace of work increases, we can discuss other approaches to obtaining updates that are less burdensome but still satisfy the regulatory requirements.

Thank you very much for your consideration. If you have questions or comments, please do not hesitate to call John Schmuck at 966-4092.



Martin Wheeler
Vice President, Waste Management Operations
Rocky Mountain Remediation Services

cc:
J. A. Detamore - Kaiser-Hill
T. G. Hedahl - Kaiser-Hill
M. J. McMahan - Kaiser-Hill