



000024557

CORRES. CONTROL
OUTGOING LTR. NO.
87 RF 2134



Rocky Flats Plant
North American Space Operations
Rockwell International Corporation
P.O. Box 464
Golden, Colorado 80402-0464
(303) 966-7000

Rockwell
International

Contractor to U.S. Department of Energy

file Nevada Test Site

April 8, 1987

87-RF-2134

Albert E. Whiteman
Area Manager
DOE, RFAO

RCRA LAND DISPOSAL RESTRICTIONS

Ref: Letter dated March 5, 1987, P.K. Fitzsimmons to E.R. Naimon, Resource Conservation and Recovery Act (RCRA) Land Disposal Restrictions

This reply is in response to the referenced letter.

LOW LEVEL WASTE STREAM REVIEW AND WASTE ANALYSIS PLAN

Comment:

We request that all waste generators review their waste streams and assure the U.S. Department of Energy (DOE), NV, that each stream of radioactive waste destined for the NTS does not or will not contain those hazardous wastes listed in 40 CFR 261. A plan combining sampling and administrative controls should be included.

Response:

The characterization analyses of all low level, hazardous and mixed waste streams is the basis for segregating the waste streams into these three distinct categories:

1. **LLW Streams:** Based upon ongoing sampling plans and/or process knowledge and control, Rocky Flats certifies the contents of these streams are in compliance with NVO 185 prior to shipment to NTS for disposal.
2. **Mixed Waste Streams:** LLW streams which have been identified as containing hazardous components are segregated and stored.
3. **Hazardous Waste Streams:** Non-radioactive hazardous waste streams are identified, collected and disposed of in accordance with the current regulations.

All Rocky Flats hazardous and mixed waste streams were characterized according to a Waste Analysis Plan submitted in the RCRA Part B Permit Application, November 1986.

DIST.	LTR	ENCL
SANCHINI, D. J.		
BADER, C. P.		
CAMPBELL, G. W.	X	
HOOD, R. C.		
KINZER, J. E.		
KIRBY, W. A.		
LANGHEIM, G. R.		
MCNETT, J. F.		
PETERSON, R. G.		
SHANNON, W. M.		
SMITH, R. E.		
VEJVODA, E.		
WEIONER, C. W.		
WESTON, W. F.	X	
WILSON, G. L.		
WOZNAK, B. D.		
YODER, R. E.		
YOUNG, E. R.		
BETCHER, D. H.		
CHANDA, R. N.		
FREIBERG, K. J.		
HARMAN, L. K.		
HEBERT, J. L.		
HOEY, J. B.		
HOFFMAN, R. B.		
KREIG, D. M.		
LIM, S. W.		
LOUDENBURG, G. E.		
NAIMON, E. R.	X	
NEWBY, R. L.		
TURNER, H. L.		
VELASQUEZ, R. N.		
WICKI, A. M. CEV		
CORRES. CONTROL	X	X
W.D. Reinhardt	X	
J.A. Hayden	X	
Potter	X	
Ficklin, A	X	
CLASSIFICATION		
UNCLASSIFIED	X	
CONFIDENTIAL		
SECRET		
AUTH. CLASSIFIER SIG.		
DATE	4-8-87	
IN REPLY TO LTR. NO.	0465-RF-87	
DEC #		
LTR. APPROVALS		
ORIG. & TYPIST INITIALS		
ACF:skg		

ADMIN RECORD
SW-A-003606



A.E. Whiteman
Page 2
April 8, 1987

87-RF-2134

Waste Operations will administer a Waste Analysis Plan based upon ongoing sampling and process knowledge and controls. This plan will provide all information needed to properly dispose of this waste in accordance with RCRA requirements.

MIXED WASTE STREAM INFORMATION TABULATION

Comment:

NV has submitted a Part B RCRA application to EPA and the State of Nevada for a radioactive mixed waste facility. A draft format for tabulating the information on each waste stream, if the NTS were to accept mixed waste, is being considered by this office. For your information and comments, we are enclosing a copy of the draft format.

Response:

The draft formats for tabulating the information on each mixed waste stream have been reviewed.

Rocky Flats will be able to comply with all information requested on the Waste Stream Characterization Data Sheet, Waste Stream Disposal Forecast, and Waste Certifying Official Authorization forms for each of its mixed waste streams.

If you have any questions, please call Ann Ficklin, extension 4293.

E.R. Naimon

E.R. Naimon, Manager
Waste Operations

Orig & 1 cc - A.E. Whiteman