



THE DOW CHEMICAL COMPANY

ROCKY FLATS DIVISION
P. O. BOX 888
GOLDEN, COLORADO 80401



000024442

November 2, 1973

Mr. B. W. Colston
Area Manager
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SHIPMENT OF ADDITIONAL NON-CONTAMINATED WASTE
TO IDAHO FOR HOLDING AS CONTAMINATED WASTE

We understand that consideration is being given to requiring all waste from plutonium (700) areas be shipped to Idaho, whether contaminated or not. At present, a considerable amount of non-contaminated waste is being landfilled.

Before such a decision is made, we believe that a clear definition of the problem to be solved must be made. If the potential problem being solved is to landfill no significant radioactive material (significant above meaning that which can be detected by means of normal monitoring), then that is being accomplished at the present, and no changes are warranted. If the purpose is to provide absolute assurances, then all wastes of all kinds from almost every building must be boxed and sent to Idaho. To look only at the Pu areas falls short of an absolute no burial of radioactive substances philosophy.

The sewer sludge buried up to 1970 is the only very low level contaminated material known to be in the landfill and is the probable source of Pu and Am. Some building materials from the entire plant site probably have trace amounts of radionuclides. There is no data to link the reported slightly elevated ⁹⁰Sr. levels to the Pu areas; the point being that with the exception of the sewer sludge (excluding the Ti contaminated building materials) there is no known significant contamination in the landfill traceable to the burial of wastes from the 700 complex,

The costs in J. Seastone's letter of October 31, 1973, have to be viewed in light of the following:

- (1) Only the labor of Waste Management in inspecting and processing for shipment is included. The cost of the generator to handle and compact the wastes is additional.

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- (2) The period reported on may not be typical, but on the low side; i. e., large quantities of building materials (Roof repairs, etc. were not handled).
- (3) From a cost standpoint, the largest and most significant cost is never included, that being the cost of perpetual care at Idaho or some other location (after the 20-year grace period expires) of non-contaminated waste.

In summary, we recommend against adding additional uncontaminated waste to the AEC inventory for the following reasons:

- (1) The present system of monitoring materials leaving process areas, plus the recently added screening at the landfill, provides reasonable and practical assurances for landfill operations.
- (2) There is no data to support a theory that landfilling of material from cold areas in the 700 complex have contributed in any fashion to potential landfill contamination.
- (3) Adding to the AEC inventory of LSA material that is uncontaminated and must be handled, stored and protected as if it were contaminated is not justified. (We know that because of the conservatism of our present practice, some of the material currently being sent to Idaho is not contaminated).
- (4) To provide absolute assurance, uncontaminated wastes from almost the entire plant site would have to be considered as being contaminated and sent to Idaho.
- (5) A true cost is well above the data shown in Seastone's letter of October 31, 1973; perhaps so high that other means should be considered before a decision to box or barrel and ship is made.


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