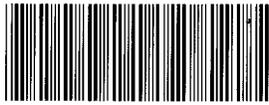


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RMRS Corres Control
080



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

INTEROFFICE MEMORANDUM

DATE: June 10, 1996

TO: Distribution

FROM: Partha Chatterji, Project Management, T130F, X4521 *Phutty*

SUBJECT: BUILDING 707 D & E MODULE WASTE MANAGEMENT PLAN - PC-007-96

Action: None

PURPOSE

The purpose of this correspondence is to distribute the subject plan.

DISCUSSION

Attached for your information and files is the Building 707 D & E Module Waste Management Plan. The applicable Non-routine Waste Origination Logs (NRWOLs) are also attached to identify specific IDCs for each waste stream.

RESPONSE REQUIREMENTS

No response is required. Questions concerning this Waste Management Plan should be addressed to Mary T. Aycock at X5309.

MTA:dlu

Attachments:
As Stated

Distribution:

DynCorp
D. Clark - - 770

SSOC
K. Bates - 441
T. Davidson - 441
M. Klein - 750
H. Mason - 750
S. Scott - T883B
M. Stark - T883B
G. Trieste - 750

K-H
K. Bentzen - -T130F
C. Conger - -T130F
R. E. Williams - -T130F

RMRS
M. Aycock - T130F
G. Bracken - T130B
C. Guthrie - T130F
S. Garcia - T664
W. Simons - T130F
P. Tourighy - T439D
RMRS Corres Control

ADMIN RECORD



B707-A-000033

1/22



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

**Building 707
Dry Combustible Repack & Ash
Stabilization Projects
Building 707 Modules D & E**

**Waste Management Plan
Rocky Flats Environmental Technology Site**

Prepared by

Rocky Mountain Remediation Services, L. L. C.

REVISION 1

JUNE 1996

2

**DRY COMBUSTIBLE REPACK & ASH STABILIZATION PROJECTS
BUILDING 707, MODULES D & E**

WASTE MANAGEMENT PLAN

This Waste Management Plan has been reviewed and approved by:

Gary J. Bracken 6/5/96
Gary Bracken, Programs & Operations Support Date

P. Chatterji 6/5/96
P. Chatterji, Project Manager Date

This Waste Management Plan was prepared by:

Mary T. Aycock 6/5/96
Mary T. Aycock, Environmental Engineer Date

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DRY COMBUSTIBLE REPACK & ASH STABILIZATION PROJECTS BUILDING 707, MODULES D & E

WASTE MANAGEMENT PLAN

1.0 SCOPE

The processes of decontamination, dismantlement, and demolition of the Rocky Flats Environmental Technology Site (RFETS) facilities may result in the generation of solid and liquid radioactive waste, mixed waste, and hazardous waste which must be managed in accordance with applicable State and Federal regulations. The purpose of this document is to address the applicable requirements for waste management activities associated with the Dry Combustible Repack and Ash Stabilization Project (Stripout of Modules D & E) and describe the program which will be implemented to insure that these requirements are met. Waste generating activities, waste characterization, and waste certification requirements (contingent upon the disposal Waste Acceptance Criteria [WAC]), identified during project assessment, will be used to develop requirements for waste processing, packaging, storage, and transportation as well as to satisfy the WAC for final disposal. The technical basis for development of the Waste Management Plan (WMP) is outlined in the *U.S. Department of Energy (DOE) Office of Environmental Management Decommissioning Resource Manual*, dated August 1995, and the Draft Decommissioning Program Plan.

Buildings 707 and 779 are managed by Safe Sites of Colorado (SSOC). The Dry Combustible Repack and Ash Stabilization Project (Stripout of Modules D & E) is a subproject to the Residue Elimination Project. Rocky Mountain Remediation Services, L. L. C. (RMRS) is providing a subcontract service to Kaiser-Hill Company, L. L. C. (Kaiser-Hill) Project Management for the site preparation portion of the Project. SSOC Residue Stabilization provides for overall Residue Program Management. In this role, SSOC Residue Stabilization is Kaiser-Hill Project Management's customer. In addition, Buildings 707 and 779 are SSOC operated buildings.

The following is a summary of the Dry Combustible Repack and Ash Stabilization Project (Stripout of Modules D & E):

The work to be performed in the preparation of gloveboxes for use in the Dry Combustible Repack and Ash Stabilization projects shall consist of, stripping out all loose materials and unnecessary equipment inside the gloveboxes, and the removal of all unnecessary equipment and services attached to each glovebox. The Integrated Work Control Program (IWCP) includes a list of those items and services identified to be removed at this time. All services identified to be removed, shall be stripped back to the nearest and most convenient location and terminated.

The following is a list of those gloveboxes which are to be stripped in preparation for the Ash Stabilization and Dry Combustible Projects.

Module D: D30, D35, D40, D45, D75, D90, and D95

Module E: E20, E25, E30, E55, E60, E65, E70, E95, E105, E110, E115, and E125

The stripout of the gloveboxes shall be performed in the following sequence. To complete the stripout of the gloveboxes, in an orderly fashion, the gloveboxes have been separated into individual series. Stripout shall start with the first glovebox in each series and upon completion of its stripout, shall proceed to the next glovebox in its series. The stripout of the first glovebox in each series for Module E shall commence at the same time. Therefore, there shall be four gloveboxes being worked, at any one time, in this module. In Module D, the stripout of the first glovebox, in each series, shall commence at the same time with the exception of series 3 which shall commence upon the completion of the first glovebox in series 4.

4

Series	Module D
1	D30--->D40
2	D35--->D45
3	D75
4	D95--->D90

Series	Module E
1	E30--->E60--->E20--->E115
2	E55--->E65
3	E70--->E110--->E95
4	E105--->E125--->E25

The stripout sequence has been set up to minimize interference of crews working on different gloveboxes. All material inside the gloveboxes shall be bagged out through the available bagout ports. Those items too large to fit through the bagouts shall be size reduced inside the glovebox using an appropriate method.

All stripout required in the interior of each glovebox shall be completed prior to initiating the exterior stripout of the gloveboxes. Each successive glovebox stripout shall be initiated upon completion of the preceding glovebox stripout. It is assumed that all liquids will have been drained prior to initiation of work by building operations. Some sampling of the liquids will be required prior to draining as described in the Characterization Plan written for Modules D & E. If material is present or suspected in the oils to be drained, SSOC will be responsible for draining the oils under existing building Criticality Operational Safety Limits.

The schedule calls for the Site Preparation project to begin June 18, 1996 with a completion date of January 2, 1997. Currently, there are drums and crates being stored in the hallways of the building which should be removed to allow movement of equipment, crates, waste containers, etc. through the hallways and in and out of the building.

This project will result in the generation of hazardous, Low Level Waste (LLW), and Transuranic (TRU) wastes and will require that a pre-job assessment be conducted to identify hazardous and radiological contaminants that may be present within the module during the equipment removal process. Projected volumes and types of wastes to be generated are discussed in Section 3.0 and are based on preliminary planning and characterization activities. Project scope includes permanent disposition (i. e., disposal, recycle, etc.) of all waste (or its equivalent) generated during project activities.

2.0 RESPONSIBILITIES/POINTS OF CONTACT

This section of the WMP presents a management overview of the organization which will be in place to address waste management for this project. Key personnel who act as points of contact are identified in this section of the plan. An example of a Project Specific Organization Breakdown Structure for a typical decommissioning project is shown in Figure 1. The key responsibilities related to waste management are outlined below:

2.1 PROJECT MANAGER (P. Chatterji)

The Project Manager is responsible for overall management of the project including overall management of wastes generated by his specific project. These responsibilities include assuring adequate and timely characterization/projection of waste to be generated, to assure that plans are in place and coordinated to deal with the type and quantities of waste to be generated and dispositioned, to prepare cost estimates and fund for disposition of waste, and coordinate all project-specific waste management issues including preparation of the WMP and assuring its implementation. The Project Manager coordinates activities with the Waste Management Liaison,

Project Specific Organization Breakdown Structure (OBS)

Site Preparation for Ash & Dry Residue Stabilization & Repack Subproject

Auth. No. 368410

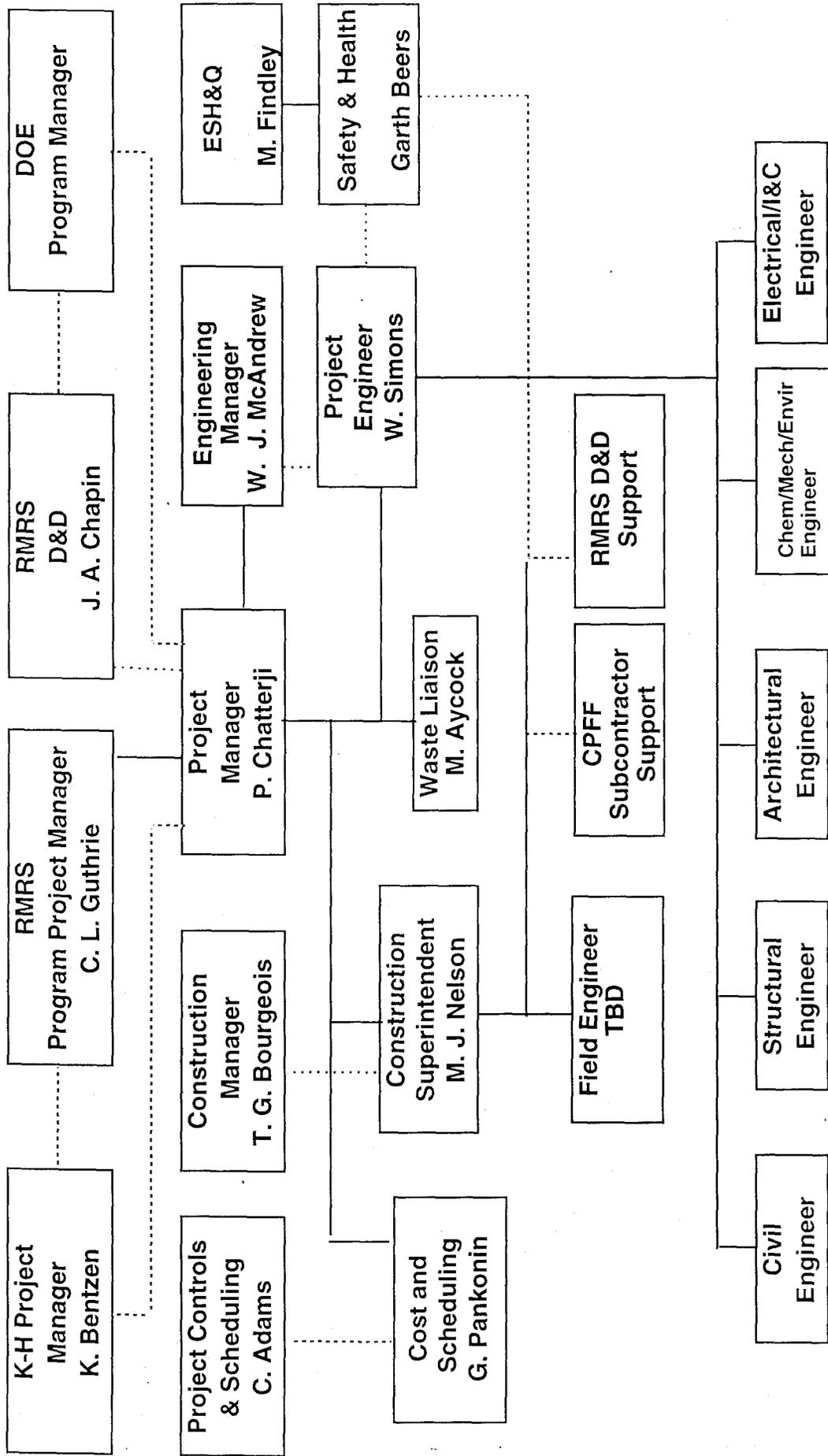


Figure 1

Project Engineer, and Construction Superintendent to insure that issues associated with waste generation are addressed.

2.2 WASTE MANAGEMENT LIAISON (Mary T. Aycock)

The Waste Management Liaison reports to the Project Manager and is responsible for coordination of waste management activities across organizational lines which may involve the Waste Generator Services group, the Waste Operations group for treatment, storage and disposal, the Transportation group, the building Environmental Coordinator, and other groups such as Nuclear Safety which may become involved in the process of waste management for the project. Representatives from the various management groups involved are designated at the onset of the project and participate in routine meetings to discuss issues associated with waste management for the project.

2.3 WASTE OPERATIONS SUPPORT (General)

Waste Operations provides services to the project, including characterization of waste, receipt of waste and other materials from the project, treatment, disposal, and recycle as available, and storage of waste. Day-to-day support to the project includes waste packaging, assay, collection of waste, certification, and special services such as size reduction, decontamination, and other treatments as necessary.

2.3.1 Decommissioning Support Manager (Gary Bracken)

Support to decommissioning projects is coordinated through a management level position under the title of "Decommissioning Support Manager." Waste management aspects of pre-project planning, assignments of responsibility for decommissioning related actions within Waste Operations, development of cost-effective strategies to address unique waste issues, and management follow-up to assure effective overall support to decommissioning are the responsibility of the Decommissioning Support Manager.

2.3.2 Solid Waste Operations — Waste Generator Services (Shirley Garcia)

Routine waste operations services are coordinated and provided through Waste Generator Services. Day-to-day support to the project, such as packaging of waste, completing characterization documents, arranging for on site transportation, and responding to project developments are the responsibility of this organization.

2.3.3 Solid Waste Operations — Waste Treatment (Scott Kranker)

Receipt and size reduction of large components (gloveboxes and EB welder chambers) from the project are the responsibility of Waste Treatment. In addition, any large scale movement of existing waste to free-up space for project activities would be performed by this organization.

2.3.4 Waste Disposal — Disposal Projects (Dean Lobdell)

Off site shipment of project wastes and materials for disposal, treatment, and recycling is the responsibility of Disposal Projects. This organization has the responsibility to prepare loads for off site shipment, maintain arrangements with off site capabilities for receipt of RFETS materials, and schedule these activities as necessary to support project requirements.

2.5 ENVIRONMENTAL COORDINATOR (EC) (Building 707: Jeff Widney)

The EC has the responsibility to coordinate with the Waste Management Liaison to handle building-specific issues related to environmental compliance and waste management. The EC works primarily in the field with the other designated Waste Management division personnel, such

as technicians and inspectors, to insure that waste management activities are scheduled in a timely manner.

2.6 TRANSPORTATION MANAGER/REPRESENTATIVE (David Bryan)

The D & E Module Waste Generator Services personnel will coordinate waste transfer and pick-up schedules with a Transportation Representative assigned to the project. The Transportation Representative works with the Waste Management Liaison, Construction Superintendent, Waste Operations Representative, and EC to ensure that waste packages are transported in a timely manner to the appropriate treatment, storage, or disposal location. In some cases, wastes may be shipped directly off site for disposal. The Transportation group is responsible to insure that waste packages meet the requirements of the Department of Transportation (DOT) (49 CFR) for shipping of waste off site. This group is also responsible for the safe shipment of wastes on site from the point of generation to temporary staging or storage areas.

3.0 WASTE GENERATION

This section of the WMP includes a detailed description of the wastes that are to be generated by the project. Below is an outline of the volumes and types of wastes to be generated to include hazardous constituent characterization as well as radioisotope composition. Volumes for the amounts of hazardous, LLW, TRU, recyclables, and clean waste are listed below based on preliminary estimates for the project, which can change due to site conditions or changes in decommissioning techniques. This section of the plan also includes a description of methods for segregation of wastes into appropriate Item Description Code (IDC) and possible methods of decontamination for some wastestreams.

The attached Non-Routine Waste Origination Log (NRWOL) outlines a total of 24 wastes (Attachment A) which will potentially be generated as a result of the strip-out. Containers will be established within or near Modules D and E to segregate wastes by IDC. Half-crates will be set up to receive large pieces of granite slabs and other debris such as ducting and conduit, which will be surveyed and packaged as LLW.

Classified Shapes will be managed in accordance with the attached memorandum dated April 16, 1996 (Attachment B) and have been included in the waste volume projections. The quantity and type of wastes that are expected to be generated as a result of this project are listed below:

MODULE D: Dry Combustible Repack

<u>TRU Waste</u>	3 drums	.63 cu. yards	.48 cubic meters
<u>Low Level Waste*</u>	17 drums	3.6 cu. yards	2.7 cubic meters

MODULE E: Ash Stabilization

<u>TRU Waste</u>	7 drums	1.5 cu. yards	1.1 cubic meters
<u>Low Level Waste*</u>	35 drums	7.4 cu. yards	5.6 cubic meters
<u>Low Level Waste*</u>	3 half-crates	6.2 cu. yards	4.8 cubic meters

*A strippable paint will be used to decontaminate the contents of the gloveboxes in an attempt to reduce contamination levels to a point where the items removed from the gloveboxes can be classified as LLW. Oils (non-hazardous) and Fulflo-Filters and pipes will be removed and segregated, as necessary, from the gloveboxes prior to the actual clean-out.

4.0 WASTE CHARACTERIZATION

This section of the WMP describes the characterization requirements for the decommissioning project to meet requirements established by the RFETS *Hazardous Waste Requirements Manual*, the *Low-Level Waste Management Plan* and procedures, and the *RMRS Waste Acceptance Criteria*. Waste characterization is being accomplished by several methods including:

4.1 VISUAL INSPECTIONS

Facility walk-downs were conducted on April 16, 22, and again on May 2, 1996 to identify areas where samples would be taken for characterization and waste management purposes. The sampling and analysis requirements have been outlined in the Modules D & E Characterization Plan (see references).

4.2 USE OF PROCESS KNOWLEDGE

Information regarding process knowledge for the wastestreams associated with Modules D & E is found in the RFETS Waste Stream and Residue Identification and Characterization (WSRIC) Manual. A total of 24 potential IDCs have been identified from the process descriptions which were included in the attached NRWOL (Attachment A).

4.3 CHARACTERIZATION SAMPLING

As described above, a Characterization Plan addressing required sampling and analysis for the gloveboxes has been completed. In addition, sampling of the liquid process lines associated with each box is being coordinated with the Analytical Projects Office (APO) and the Waste Operations group. Additional samples which have not been previously identified in the plan, may be required for further characterization as the project proceeds. Results of all sampling conducted will be compiled into a final characterization completion report for the project.

The APO coordinates the sampling requests with two (2) on site laboratories. Where Resource Conservation and Recovery Act (RCRA) characterization is required, *Test methods for Evaluating Solid Waste, Physical/Chemical Methods, U.S. Environmental Protection Agency (EPA) SW-846, 1986, Third Edition* (or current version) is used for sampling and analysis. Process knowledge, quality control procedures, waste characterization, and WAC certification procedures are integrated into field procedures used to support characterization requirements. The specifics of the locations, types, and analysis requirements for the sampling activity is outlined in the Building 707 Characterization Plan for Modules D & E.

4.4 NONDESTRUCTIVE EXAMINATION/NONDESTRUCTIVE ASSAY

During the progression of the project, various instruments will be utilized to perform "Hold Up" measurements on the gloveboxes to estimate quantities of radioactive contamination present prior to and following decontamination of the boxes. Measurements will be performed on the gloveboxes (if there is material present when it is opened) and lateral duct work connecting the gloveboxes to the main header. A strippable paint will be used to decontaminate the boxes in an attempt to reduce contamination levels to a point where they can be classified as LLW. Note that the waste volumes listed in Section 2.0 reflect successful decontamination to low-level.

Once the waste is packaged for disposal, it is assayed prior to being stored on site. RFETS utilizes Non-Destructive Assay methods (Gamma Spectroscopy) to assay drums and crates prior to shipment to determine levels of radioactivity for waste classification purposes. When the radionuclides in a volume of bulk material, typically contained in a drum, box, or tank emit gamma radiation, direct external measurements can identify and/or quantify the radioactive material inside. Gamma radiation is detected using plastic scintillators, sodium iodide crystals, or germanium

crystals. RFETS has two (2) active units, a drum assay unit which is located in Building 371 and a crate assay unit, located in Building 569.

Real-Time Radiography (RTR) is also utilized to examine the contents of drums prior to shipment. The container to be examined is placed between an X-ray tube and a detector (screen, image intensifier, and television camera). The image formed is viewed on a real-time basis so that motion, such as free liquids, can be detected by viewing the container. RTR provides additional information to assist in certification of the contents of a waste container prior to shipment.

4.5 RADIOCHEMISTRY

Radioactive analysis will be conducted for surface materials and liquids contained in the process lines, such as oil lines associated with pumps. The requested analyses consist of a radioactive scan for total activity, gross alpha/beta, and isotopics analysis for Plutonium 239. The results of the analysis will be received prior to the start of equipment and line removal. These results will also be used to further characterize the wastes generated.

5.0 DECOMMISSIONING PROJECT WASTE VERIFICATION

Waste verification activities are conducted by Waste Operations Inspectors assigned to the job. Waste characterization data and packaging requirements for LLW meet the requirements of the Nevada Test Site's WAC (NVO-325). Procedures and policies for managing LLW are outlined in the RFETS LLW Management Plan.

Waste verification for TRU wastes is conducted by the Waste Operations group in accordance with the RFETS TRU WMP. Wastes are certified in accordance with the Waste Isolation Pilot Plant WAC and the TRU Package Transporter-II Authorized Methods for Payload Control Compliance Plan. Waste Inspectors are assigned to inspect waste packages generated from Building 707 Module D & E will be required on all shifts while the waste is "in process".

6.0 WASTE TREATMENT AND PACKAGING

Liquid wastes drained from process lines may result in mixed wastes, if radioactive contamination is detected. These wastes will be treated in accordance with the treatability groupings for mixed wastes which have been established to support the RFETS Proposed Site Treatment Plan (Rev. 3, March 30, 1995). It is most likely that aqueous wastes, if contaminated, would be sent to Building 374 for treatment on site.

Release of clean material, debris, equipment, and facilities from a site contaminated with hazardous materials is accomplished by demonstrating that the wastes or materials do not exhibit any of the characteristics of hazardous waste under subpart D of 40 CFR 261 (6 CCR 1007-3264) or is excluded under the provisions of subpart D. Process knowledge and operating history related to the facilities can also be used to segregate hazardous contaminant areas from unaffected areas.

Further sampling and analysis may be required during the project for various wastes to also determine if the wastes will be regulated as Land Disposal Restricted wastes, or if the wastes can be exempted under the "hazardous debris rule." Under this provision, and in accordance with the debris treatment standards (40 CFR 268.45), treated hazardous debris is excluded from the definition of hazardous waste, provided that the debris is treated to the performance or design and operation standards by an extraction or destruction technology and the treated debris does not exhibit the characteristic of a hazardous waste. The excluded debris can be disposed in an industrial landfill (subtitle D) rather than a RCRA permitted landfill (subtitle C). (Note that these exemptions apply to disposal of certain low-level radioactive mixed wastes, if they meet the receiving site's WAC for hazardous debris).

7.0 TEMPORARY STORAGE, TRANSPORTATION, AND FINAL DISPOSITION

LLW and TRU wastes generated by the Building 707 Module D and E Site Preparation Project will be packaged on a daily basis. Full waste crates will be packaged and shipped to Building 569 for assay and drums to Building 371. Waste Operations will designate the storage location for LLW outside the Protected Area. It is expected that the majority of LLW and TRU will be shipped to Building 664, 440, and/or 991 for storage prior to off site shipment.

The RFETS Transportation group will be involved with developing the requirements for off site transportation of waste to the selected disposal or treatment site. Appropriate procedures will be used to address shipping requirements and insure that waste shipments meet on site requirements, DOT regulations, and the receiving site's WAC.

8.0 WASTE MINIMIZATION

The management of Building 707 Module D and E wastes will be accomplished in a manner that minimizes the generation of such wastes. Waste minimization will be accomplished through a hierarchical approach to waste reduction by first eliminating or reducing the generation of decommissioning wastes through application of source reduction methods (e.g., use of non-hazardous decontamination agents), including input material changes, operational improvements, process changes, and administrative steps. Those potential waste materials that cannot be eliminated or minimized through source reduction will be minimized by recycling through reuse (e.g., lead, metals) or reclamation activities, or treating through compaction and stabilization processes, or packaging through segmentation (size reduction), nesting, and void space management techniques during packaging.

9.0 COMPLETION REPORT

Once the project has been completed, a project completion report will be prepared. This report will include a listing of the wastes removed from the module or building, characterization data, and a description of the disposition of the wastes and all activities (e.g., size reduction, decontamination, or treatment) which contributed to the final forms and volumes of the wastes resulting from this project.

10.0 REFERENCES

DOE/EM-0142P Decommissioning Handbook, March 1994, U.S. DOE Office of Environmental Restoration.

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, U.S. EPA SW-846, 1986, Third Edition.

Transmittal of Final Data and Reports for Plutonium Holdup in Untoward Areas, Building 707-RDC-168-93, EG&G Rocky Flats, Inc. memorandum dated August 13, 1993.

Waste Stream and Residue Description and Characterization, Module B-H, Process Number 707-35, WSRIC Manual 707-V5.0 dated February 3, 1995.

IWCPs for Building 707; Work Control Numbers: 368410-01, 368410-02, and 368410-03.

Transmittal of Final Data and Reports for Plutonium Holdup in Untoward Areas, Building 707-RDC-168-93, EG&G Rocky Flats, Inc. memorandum dated August 13, 1993.

Standard Work Package: "Deactivate Gloveboxes and Portions of the Chainveyors in Module 'D', Building 707"; Work Control Number: TP077620.

ATTACHMENT A
NON-ROUTINE WASTE ORIGINATION LOGS

June 5, 1996

-10-

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A module, D mod, E mod, F mod, A

NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
 BUILDING _____ ROOM _____

PAGE _____ OF _____

WORK PERFORMED BY: _____

WORK PACKAGE TITLE: _____

OUT PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT./PAGER	WASTE CONTACT DATE
1	Glovebox glass	339		Y	24	—	NA	D008	4	Regulated waste (40-Day)	S.R. Garcia 5842/7224	
CHARACTERIZATION RATIONALE/COMMENTS Leaded glove box gloves contain lead above regulatory requirements of 5.0 ppm												
2	Glovebox windows	744		Y	04 04	—	NA	D005 D008	4	Regulated waste 90-day	Stone	
CHARACTERIZATION RATIONALE/COMMENTS Glovebox windows containing barium and lead above & equal to regulatory limits of 100ppm for Barium & 5.0 for lead ppm												
3.	Metal	480		N	NA	00	NA	NA	NA	Waste storage tank	same	
CHARACTERIZATION RATIONALE/COMMENTS Misc metal generated from non-lined generated equipment, pipes, etc. No solvents utilized with metals.												

* No Non-Routine Waste Origination Log is required if the waste is identified with a Process Number in the applicable WSRIC Building Book.



EC/EPM Review/Appro

RF 47637 (6/95)

pl of S.R. Garcia

A module, D mod, E mod, F mod

NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
 BUILDING _____ ROOM _____

PAGE _____ OF _____

WORK PERFORMED BY: _____

WORK PACKAGE TITLE: _____

OUT PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT./PAGER	WASTE CONTACT DATE
4	Metal	480		N	NA	00	NA	NA	NA	WASTE STORAGE TECH WASTE	SR 02/20/10 SR 10/17/21	
CHARACTERIZATION RATIONALE/COMMENTS MISC metal generated from lined generated equipment or gloveboxes with lead shielding removed.												
5	Lead	321		Y	24	NA	NA	DA05	YES	RCRA regulated same Storage		
CHARACTERIZATION RATIONALE/COMMENTS Lead removed from gloveboxes greater than regulatory limits of 5.0 ppm												
6	Plastic	337		N	NA	00	NA	NA	NA	WASTE STORAGE	same	
CHARACTERIZATION RATIONALE/COMMENTS Plastic generated from D&D work. No solvents utilized that carry RCRA codes												

* No Non-Routine Waste
 EC/EPM Review/Approval

RF 47637 (6/95)

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A Module, Dmod, E Mod, F Mod

NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
 BUILDING _____ ROOM _____

WORK PERFORMED BY: _____

PAGE _____ OF _____

WORK PACKAGE TITLE: _____

OUT PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT./PAGER	WASTE CONTACT DATE
7	COOLANT	544		N	NA	∞	4A	NA	NA	RAD STORAGE 5003	526666 580/724	
CHARACTERIZATION RATIONALE/COMMENTS COOLANT is to be fingerprinted to confirm waste stream along with MDA to confirm radioactivity. Analysis # _____ with performed to confirm waste stream. Analysis # _____ along with												
8	freon	544		TBD	TBD	TBD	4A	TBD	TBD	RAD STORAGE 5003		
CHARACTERIZATION RATIONALE/COMMENTS freon is to be fingerprinted to confirm type of freon along with MDA sampling to confirm radioactivity levels. Analysis # _____ was performed to confirm waste stream. pending type of freon, addendum to NRWOL will be completed prior to waste generation.												
9	GLASS	440		N	NA	∞	NA	NA	NA	RAD STORAGE	SAME	
CHARACTERIZATION RATIONALE/COMMENTS GLASS removed from gloveboxes that is line generated												

* No Non-Rou
 EC/EPM Review/
 RF 47637 (695)

p.3 of 89

A Module, D Mod, E Mod, F Mod

NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
 BUILDING _____ ROOM _____

PAGE _____ OF _____

WORK PERFORMED BY: _____

WORK PACKAGE TITLE: _____

OUT PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT/PAGER	WASTE CONTACT DATE
10	Glovebox windows	444		Y	04 04	NA	NA	D004 D005	Y	RCRA Storage Unit	SR Sawpny	
CHARACTERIZATION RATIONALE/COMMENTS glovebox windows contain lead above α = to regulatory limits of 5.0ppm and barium of 100ppm												
11	Hepa filters	335		N	NA	00	NA	NA	NA	TRU WASTE Storage	same	
CHARACTERIZATION RATIONALE/COMMENTS Hepa filters removed from gloveboxes in Mod A.												
B	Dry Combustibles	330		N	NA	00	NA	NA	NA	Waste Storage LLW	same	
CHARACTERIZATION RATIONALE/COMMENTS Dry combustibles generated from non-lined activities												

* No Non-Routine Waste Origination Log is required if the waste is identified with a Process Number in the applicable WSRIC Building Book.

EC/EPM Review/Approval

RF 47637 (6/95)

END AND
 P 4 of 59

A Module, D MOD, E MOD, F MOD

NONROUTINE WASTE ORIGINATION LOG

WORK PERFORMED BY: _____

WORK CONTROL # _____
 BUILDING _____ ROOM _____

WORK PACKAGE TITLE: _____

PAGE _____ OF _____

OUT. PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT/PAGER	WASTE CONTACT DATE
B	Dry Combustibles	330		N	NA	00	NA	NA	NA	TRU Waste Storage	SP Garcia 504/7724	
CHARACTERIZATION RATIONALE/COMMENTS Dry Combustibles generated from lined generated activities												
14	Scrap metal	NA		N	NA	00	NA	NA	NA	PuED Landfill	SP Garcia 504/7724	
CHARACTERIZATION RATIONALE/COMMENTS Storage cabinets that can be free-released will not be packaged, but disposed of at PuED or Landfill												
15	granite slabs	374		N	NA	00	NA	NA	NA	UDD Storage	same	
CHARACTERIZATION RATIONALE/COMMENTS Dense material, utilized 374 for NDA purposes.												

* No Non-Routine W

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RF 47637 (6/95)

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Mod A, 1. ed D, MODE, MP F

WORK PERFORMED BY: _____

NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
 BUILDING _____ ROOM _____

WORK PACKAGE TITLE: _____

PAGE _____ OF _____

OUT-PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT./PAGER	WASTE CONTACT DATE
16	dry combustibles w/ asbestos	330		N	NA	00	NA	NA	NA	6666	SR 6-21-11 58627227	
CHARACTERIZATION RATIONALE/COMMENTS <i>Wall board (dry combustibles) containing asbestos</i>												
17	light metal	480		N	NA	00	NA	NA	NA	6666	same	
CHARACTERIZATION RATIONALE/COMMENTS <i>file cabinets containing asbestos</i>												
18	(misc. neutral waste solution) photo developer	505		Y	TBD	00	9A	TBD	TBD	RCRA Unit D	same	
CHARACTERIZATION RATIONALE/COMMENTS <i>Waste has been sampled per ABO # _____ and contains the following EPA codes.</i>												

* No Non-Routine W

EC/EPM Review/Appro

RF 47637 (6/95)

Signature

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NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
 BUILDING _____ ROOM _____

WORK PERFORMED BY: _____

PAGE _____ OF _____

WORK PACKAGE TITLE: _____

OUT. PUT #	DESCRIPTION	IDC/WFC	PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT./PAGER	WASTE CONTACT DATE
19	Fluorescents Tubes	1928		Y	NA	NA	NA	D009	Y	Unit OR	SLB/STW 5/12/17/14	
CHARACTERIZATION RATIONALE/COMMENTS Fluorescents light tube containing Hg at limits greater than or = to 0.2 ppm												
20	mercury bulbs	1938		Y	NA	NA	NA	D008	Y	Unit OR	same	
CHARACTERIZATION RATIONALE/COMMENTS Fluorescent bulbs containing lead at limits greater than or equal to 5.0 ppm												
21	Film	330		Y	NA	NA	NA	D011	Y	UW Storage	same	
CHARACTERIZATION RATIONALE/COMMENTS Film containing silver \geq to 5.0 ppm												

* No Non-Routine Waste Origination Log is required if the waste is identified with a Process Number in the applicable WSRIC Building Book.

EC/EPM Review/Approval _____ Employee No. _____ Date _____ Ext. _____ Pager _____
 Print Name _____ Signature _____

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WORK PERFORMED BY: _____

NONROUTINE WASTE ORIGINATION LOG

WORK CONTROL # _____
BUILDING _____ ROOM _____

WORK PACKAGE TITLE: _____ PAGE _____ OF _____

OUT. PUT #	DESCRIPTION	IDC/ WFC	* PROCESS #	RCRA HAZARDOUS? (Y/N)	RCRA CCC	NON-RCRA CCC	COMP. CODE	EPA CODE(S)	LDR CODE(S)	WASTE DESTINATION	RCRA CUSTODIAN EXT./PAGER	WASTE CONTACT DATE
22	EXCESS CHEMICAL	544		N	NA	00	4A	NA	NA	884C	S. Garau 5.840/724	
CHARACTERIZATION RATIONALE/COMMENTS <i>Turben oil, not regulated per MSDS.</i>												
23	fire blanket	334		N	NA	00	NA	NA	NA	waste storage	same	
CHARACTERIZATION RATIONALE/COMMENTS												
24	+ w/flo filters	331										
CHARACTERIZATION RATIONALE/COMMENTS												

* No Non-Routine V
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ATTACHMENT B
CLASSIFIED SHAPES MEMORANDUM

June 5, 1996

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KAISER • HILL
COMPANY

Print

INTEROFFICE MEMORANDUM

DATE: April 16, 1996

TO: P. R. Bengel, Engineering Construction & Decommissioning, Bldg. T130F, X2535

FROM: *[Signature]*
R. E. Williams, Project Management, Bldg. T130F, X2192

SUBJECT: CLASSIFIED SHAPES IN MODULES A, D, E, F, AND THE NON DESTRUCTIVE TESTING VAULTS OF BUILDING 707 - REW-046-96

PURPOSE

The purpose of this correspondence is to convey to you the scope of your work as related to classified shapes currently in the subject locations.

DISCUSSION

Project Management and Building 707 management (Safe Sites of Colorado [SSOC]), have mutually agreed to a methodology for the removal of classified shapes in the gloveboxes within the subject areas. The work tasks are summarized as follows:

- Rocky Mountain Remediation Services (RMRS) will remove (bag out) classified shapes from existing gloveboxes.
- SSOC building personnel will appropriately document the classified shapes and place the shapes in drums.
- RMRS will relocate filled drums within rooms and modules to locations suitable to site preparation activities.
- SSOC will identify a suitable permanent storage location and/or final disposition of these drums/shapes.
- Should SSOC identify permanent storage/final disposition prior to the conclusion of RMRS' activities, RMRS will move these drums from the subject modules/rooms.

Please utilize the above approach in the planning and execution of your site preparation activities.

RESPONSE REQUIREMENTS

None required.

JKG:cmh

CONCURRENCE:

- cc:
- K. L. Bentzen
 - P. Chatterji
 - C. Conger
 - J. K. Goodell
 - J. R. Thomson

[Signature]
 A. J. Hoffield Date
 Operations Management
 Bldg. 707/991
 SSOC

5/2/96