



Rockwell International

Internal Letter

Date . March 11, 1987

No. .

TO (Name, Organization, Internal Address)

FROM (Name, Organization, Internal Address, Phone)

. W.F. Weston
 . Plutonium Operations
 . Building 111

. C.E. Wickland
 . Waste Management Programs
 . Building 750
 . x4294

SUBJECT - MINUTES OF MEETING WITH CDH ON RCRA REGULATORY RELIEF



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A meeting was held on March 9, 1987, with the following people in attendance:

CDH

Peter Bierbaum
 Mary Gearhart
 Fred Dowsett

Rockwell

Ed Naimon
 Chuck Wickland
 Ann Ficklin
 Gary Potter

Exemption from RCRA regulation of pond crete, salt crete, and sewage sludge as mixed waste was explored by Rockwell with CDH representatives.

The operation of the Building 995 sewage treatment facility under a NPDES permit qualifies the plant for a wastewater treatment plant RCRA exemption. The input streams to the sewage treatment plant will have to be in compliance with the RCRA regulations in order to define the sewage sludge as low level waste instead of hazardous mixed waste.

The modification of the Rocky Flats NPDES permit to include the Building 374 Liquid Waste Treatment Plant as a "zero discharger" would involve assuring all streams entering Building 374 are wastewater as defined under RCRA. This would then qualify salt crete as low level radioactive waste instead of mixed waste.

Rockwell assured CDH that this evaluation is now underway. Process changes will be made, where necessary, and the modified waste streams re-analyzed. Operating records will be checked to assure no listed constituents, such as cyanide, have been added since September 1986, when salt crete was first stored.

The pond crete will probably not be exempt from RCRA regulation because listed constituents have been introduced in the past, even though the analytical results of the pond crete do not show the presence of these constituents. The CDH and Rockwell will review the pond sludge results to see if any listed constituents have been detected. If so, pursuing a delisting petition or waiting approval to ship mixed waste to NTS are the only remaining viable options.

ADMIN RECORD

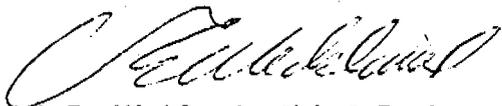
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Rockwell pointed out that this system (the pond) is now closed and has been analytically characterized. Regardless of what has been added in the past, the pond crete exhibits no RCRA hazard except trace amounts (ppb levels) of solvents in 1500-pound blocks of cemented waste.

A meeting will be held with the CDH and EPA to review the waste stream inputs to Buildings 374 and 995 to assure RCRA compliance to qualify these facilities as wastewater treatment plants regulated under the Clean Water Act.

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



C.E. Wickland, Chief Engineer
Waste Management Programs

cc:
P. Bierbaum (CDH)
F. Dowsett (CDH)
A.C. Ficklin
M. Gearhart (CDH)
J.F. McNett
E.R. Naimon
G.M. Pinson
G.L. Potter
J.B. Whitsett (DOE/RFAO)

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