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Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

95-DOE-11187

MAR 29 1995

Mr. Joe Schieffelen
Unit Leader
Colorado Department of Public Health and the Environment
Hazardous Materials and Waste Management Division
HMWMD-HWC-B2
4300 Cherry Creek Drive South
Denver CO 80222-1530

Dear Mr. Schieffelen,

Reference: Operable Unit (OU) 9 Dispute and Colorado Department of Public Health and Environment (CDPHE) Request for Information

The United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) is submitting this response to the letter dated March 7, 1995 from Mr. Joe Schieffelen, CDPHE, addressed to Mr. Steven W. Slaten, DOE, RFFO requesting existing sampling and analysis data and subsequent waste management information on the Building 887 process waste system.

The analytical results for the sludge in tanks 40.21 and 40.22 in Building 887 (tank numbers T-184 and T-185, respectively) are enclosed. The sampling of the sludge in these two tanks was performed by personnel from the EG&G Field Sampling Office following procedure L-3306, *Waste Sampling Procedure for Inside the Protected Area.* The physical sampling was performed by opening the manway to the tank and taking the sample using a sampling dredge. One dredged sample was taken per tank.

The analytical results for the sludge in tank 40.22 shows the presence of radionuclides and RCRA metals. The analytical results for the sludge in tank 40.21 indicate the presence of radionuclides and methylene chloride and carbon tetrachloride in the low parts per billion range (see attached sample results). Also, sampling requests have been submitted for volatile organic analysis and the radiation screen for tanks 40.23, 40.24, 40.25, 40.26 (tank numbers T-802A, T-802B, T-802C, and T-802D, respectively). These are the analytes of concern for acceptance by Building 374 and the results will be forwarded to CDPHE within five (5) working days after the compiling of all of the data.

As a waste management practice for the sludge in the tanks in Building 887, EG&G Inc. proposes to slurry the sludge in tanks 40.21-40.26 and transfer the water/sludge suspension to Building 374 for treatment. The slurry process will be achieved by the use of a portable electric mixer and trisodium phosphate, as needed, as a suspending agent. Since the sludge in tank 40.22 meets the requirements for treatment in Building 374, it is also proposed that this tank be used as a trial to determine the effectiveness of the slurry process.

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If the analytical results of the sludge in any tank preclude treatment in Building 374, the sludge in that tank or tanks will be containerized. Also, should the slurry test in tank 40.22 indicate that slurrying of the sludge cannot be achieved, the sludges in these six tanks will be containerized, characterized through analytical results and process knowledge, and managed appropriately.

Tank 40.20 (tank number T-183) contains a residual of organic material, primarily oils from previous machining processes. This residual material will be containerized and managed as RCRA hazardous. The containerized, residual material will be analyzed, and final RCRA characterization will be based upon the analytical results and process knowledge.

Any crust affixed to the walls or bottom of these tanks will be addressed at final closure of the tank system. The RCRA Part A Closure Plan will be submitted to the Colorado Department of Public Health and Environment (CDPHE) within 75 days of March 15, 1995 as agreed to facilitate the change from interim status to generator status managed under the 90 day accumulation rules.

Please contact me at 966-7490 if you have any questions or need additional information.

Sincerely,

Gary N. Huffman
Laboratory Program Manager
Site Support Division

cc w/o Enc:
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Enclosures