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ORRES CONTROL
UTGOING LTR NO

ORDER# 4700, 1
S R F 02027

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT, P O BOX 464, GOLDEN COLORADO 80402 0464 • (303) 966 7000

February 27, 1995

95-RF-02027

Margaret A Witherill
Environmental Restoration Division
DOE, RFFO

OPERABLE UNIT SEVEN (OU 7) DISPOSITION OF IDM FROM THE PHASE I FIELD INVESTIGATION - LJP-008-95

Action Propose to the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency (EPA), disposal of all Phase I Field Investigation-Derive Material (IDM) in the present landfill

During the OU 7 Phase I Field Investigation, 227 drums of investigation derived material (IDM) were generated The objective of this letter is to request a decision on the final disposition of these drums

Of the 227 drums, 171 drums contain IDM that is non-hazardous (i e it contains no RCRA hazardous waste constituents or CERCLA hazardous substances), 64 drums contain RCRA hazardous IDM and 2 drums contain IDM with CERCLA hazardous substances

We propose that the 171 drums of non-hazardous IDM be disposed in accordance with the site procedure 4-F99-ENV-0PS-FO 23

The decision on the two drums of IDM containing CERCLA hazardous substances should be made in a formal decision document so that the drums can be incorporated into the planned response actions We suggest that this IDM be returned to the landfill before the cap is put in place The IDM has the same constituents as the waste already in the landfill, so special handling would not be justified This is protective and cost-effective The decision can be documented in the IM/IRA decision document for OU 7

The 64 drums of RCRA hazardous IDM are designated as RCRA hazardous solely because they contain FO39 waste and because the RCRA risk analysis carcinogenic risk is greater than 1 This risk evaluates the human exposure pathways of direct ingestion of soil, dermal absorption of constituents from soil, inhalation of suspended (airborne) soil, and ingestion of food grown in contaminated soil None of the drums have any other associated waste code and all of the drums meet the LDR treatment standards Because the OU 7 landfill is undergoing a RCRA closure, and because this waste came directly from characterizing the landfill, we propose returning this waste also to the landfill before the landfill is capped

By returning the IDM to the landfill, both the RCRA and CERCLA constituents in that IDM will be controlled to the same extent as the waste already there Once the landfill is capped, the soil pathway will not longer exist and the disposition is protective of human health and the environment In addition, this solution is cost effective and provides waste minimization by avoiding the introduction of different constituents to a new disposal site

ADMIN RECORD

DIST	LTR	ENC
ARAL, M E		
FLINGAME, A H		
SBY W S		
ANCH, D B		
RNIVAL, G J		
VIS J G		
RRERA D W		
AY, R E		
IS J A		
OVER W S		
LAN P M		
NNI, B J		
RMAN L K		
ALY, T J		
DAHL, T		
BIG, J G		
ITCHINS, N M		
CKSON, D T		
LL R E		
ESTER, A W		
VRX G E		
DONALD, M M		
KENNA, F G		
NTROSE, J K		
RGAN R V		
YTTER G L		
ZUTO V M		
SING, T L		
NDLIN, N B		
HWARTZ, J K		
TLOCK, G H		
EWART, D L		
IGER, S G		
BIN, P M		
RORHEIS, G M		
LSON, J M		
L. QUINN	✓	✓
J. MASTON	✓	✓
G. FROST	✓	✓
J.P.W	✓	✓
ORRES CONTROL	X	X
MN RECORD/080	✓	
AFFIC		
TS/T130G		

CLASSIFICATION

UNCLASSIFIED	
CLASSIFIED	✓
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE
DOCUMENT CLASSIFICATION
VIEW WORKER PER
CLASSIFICATION OFFICE

REPLY TO RFP, CC NO
N/A

ATTENTION ITEM STATUS
PARTIAL/OPEN N/A
 CLOSED
R APPROVALS

DATE & TYPIST INITIALS
WSP-W/EB

Margaret A Witherill
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Enclosed is a summary of the drummed IDM proposed to be put back in the landfill and each drum's characterization information. For further information or if you wish copies of the IDM classification forms for each drum of IDM, please feel free to contact me at extension 8553



Laurie J Peterson-Wright
Operable Unit 7 Project Manager
OU 5, 6, & 7 Closures

LJP cb

Orig and 1 cc - M A Witherill

Attachment
As Stated

Drum Number	Analytes exceeding Mean +2SD? (background)	Constituent Concentration > TCLP?	Cummulative RCRA Risk Analysis Cacinogenic	Cummulative RCRA Risk Analysis Non-carcinogenic	Cummulative Inclusive Risk Analysis Cacinogentc	Cummulative Inclusive Risk Analysis Non-carcinogenic
2600ST	Yes, barum and cadmium	No	0 0002841	0 0003047		2 4028971
2951ST	No	No		0 0001522		1 593834
3027ST	Yes, lead	No	1 9794972	0 0022358		
3024ST	Yes, barum	No	2 3728237	1 0090047		
3023ST	Yes, barum	No	4 8161797	1 0363629		
2995ST	Yes, aroclor-1242	No	309 1144779	0 0060634		
2960ST	No	No	8 0673247	0 0070415		
2961ST	No	No	9 7424195	0 0076538		
2982ST	No	No	65 3414024	0 0840552		
2981ST	No	No	16 7714986	0 0045244		
2980ST	No	No	16 5822399	0 0048062		
2979ST	No	No	6 9874676	0 0056292		
2978ST	No	No	6 9872676	0 0056292		
2977ST	No	No	16 5822399	0 0048062		
2973ST	No	No	13 0347296	0 0009243		
2972ST	No	No	13 3984017	0 0041123		
2971ST	No	No	16 5822399	0 0048062		
2970ST	No	No	313 5164764	0 0060867		
2969ST	No	No	13 2305418	0 0010286		
2968ST	No	No	13 2305418	0 0010504		
2957ST	No	No	313 5164764	0 0060867		
2958ST	No	No	315 4597741	0 0070668		
2964ST	No	No	313 5164764	0 0060867		
2962ST	No	No	309 1144778	0 0060634		
3009ST	No	No	72 434237	0 0923276		
3008ST	No	No	72 434237	0 0923276		
3006ST	No	No	72 434237	0 0923276		
3005ST	No	No	99 1400973	0 1190696		
3004ST	No	No	65 3414024	0 0840552		
3003ST	No	No	65 3414024	0 0840552		
3002ST	No	No	65 3414024	0 0840552		

Drum Number	Analytes exceeding Mean +2SD? (background)	Constituent Concentration > TCLP?	Cummulative RCRA Risk Analysis Cacinogenic	Cummulative RCRA Risk Analysis Non-carcinogenic	Cummulative nclusive Risk Analysis Cacinogentc	Cummulative Inclusive Risk Analysis Non-carcinogenic
3001ST	No	No	65 3414024	0 0840552		
3000ST	No	No	65 3414024	0 0840552		
2999ST	No	No	156 2970154	0 0013494		
2998ST	No	No	156 2970154	0 0013494		
2997ST	No	No	313 516764	0 0060867		
2996ST	No	No	86 563774	0 0575454		
2994ST	No	No	16 5822399	0 0048062		
2983ST	No	No	65 3414024	0 0848552		
3067ST	No	No	20 7057041	0 005242		
3065ST	No	No	17 133327	0 0015034		
3064ST	No	No	17 121062	0 0018739		
3056ST	No	No	16 9285553	0 0009016		
3055ST	No	No	22 060146	0 0060402		
3050ST	No	No	11 4749234	0 0007487		
3042ST	No	No	9 026614	0 0093858		
3041ST	No	No	21 6498406	0 0055271		
3040ST	No	No	22 7065099	0 0057037		
3039ST	No	No	2 7411446	0 0036889		
3035ST	No	No	11 4749234	0 0007487		
3034ST	No	No	2 7411446	0 0036889		
3033ST	No	No	2 7411446	0 0036889		
3032ST	No	No	72 5136291	0 1811695		
3031ST	No	No	95 5090728	0 0240402		
3030ST	No	No	72 5136291	0 0181695		
3029ST	No	No	73 9829719	0 2		
3028ST	No	No	65 9862898	0 164059		
3026ST	No	No	1 9794972	0 0022358		
3025ST	No	No	1 931658	0 0036982		
3015ST	No	No	95 5090728	0 0240402		
3014ST	No	No	87 7178005	0 182668		
3013ST	No	No	162 1721428	0 0321178		
3012ST	No	No	2 2799068	0 0027754		
3010ST	No	No	87 7178005	0 0182668		

Drum Number	Analytes exceeding Mean +2SD? (background)	Constituent Concentration > TCLP?	Cummulative RCRA Risk Analysis Carcinogenic	Cummulative RCRA Risk Analysis Non-carcinogenic	Cummulative inclusive Risk Analysis Carcinogenic	Cummulative inclusive Risk Analysis Non-carcinogenic
3011ST	No	No	65 9862898	0 16059		