

ROCKY FLATS ENVIRONMENTAL  
TECHNOLOGY SITE

EMD OPERATING  
PROCEDURES MANUAL  
VOL I: FIELD OPERATIONS

Manual No.: 5-21000-OPS-FO  
New Manual No.: 4-11000-ER-OPS-FO  
Procedure No.: Table of Contents, Rev 70  
Page: 1 of 3  
Effective Date: 08/16/94  
Organization: Environmental Management

THIS IS ONE VOLUME OF A SIX VOLUME SET WHICH INCLUDES:

VOLUME I: FIELD OPERATIONS (FO)  
VOLUME II: GROUNDWATER (GW)  
VOLUME III: GEOTECHNICAL (GT)  
VOLUME IV: SURFACE WATER (SW)  
VOLUME V: ECOLOGY (EE)  
VOLUME VI: AIR (AP)

**EG&G  
SUPERSEDED  
DOCUMENT**

VOLUME I: FIELD OPERATIONS

<u>Procedure No.</u>	<u>Title</u>	<u>Rev. No.</u>	<u>Effective Date</u>
FO.01	Air Monitoring and Dust Control	2	05/12/92
FO.03	General Equipment Decontamination	2	05/12/92
94-DMR-001021	Section FO.03 Text Addition	2	05/26/94
94-DMR-001010	LIMITED SCOPE		
	Section FO.03 Text Modification	2	06/01/94
94-DMR-001224	Equipment Decontamination Location Adjustment	2	07/15/94
FO.04	Heavy Equipment Decontamination	2	05/12/92
94-DMR-001009	LIMITED SCOPE		
	Section FO.04 Text Modification	2	06/01/94
FO.05	Handling of Purge and Development Water	2	05/12/92
94-DMR-000278	Groundwater Monitoring Modifications	2	02/25/94
FO.06	Handling of Personal Protective Equipment	2	05/12/92
FO.07	Handling of Decontamination Water and Wash Water	2	05/12/92
94-DMR-001175	LIMITED SCOPE - Decontamination Water Disposal Location Changes	2	06/20/94
FO.08	Handling of Drilling Fluids and Cuttings	2	05/12/92
FO.09	Handling of Residual Samples	2	05/12/92

DOCUMENT CLASSIFICATION REVIEW WAIVER  
PER R.B. HOFFMAN, CLASSIFICATION OFFICE  
JUNE 11, 1991

A-SW-001297

**ROCKY FLATS ENVIRONMENTAL  
TECHNOLOGY SITE**

**EMD OPERATING  
PROCEDURES MANUAL  
VOL I: FIELD OPERATIONS**

**Manual No.:**  
**New Manual No.:**  
**Procedure No.:**  
**Page:**  
**Effective Date:**  
**Organization:**

**5-21000-OPS-FO**  
**4-11000-ER-OPS-FO**  
**Table of Contents, Rev 70**  
**2 of 3**  
**08/16/94**  
**Environmental Management**

<u>Procedure No.</u>	<u>Title</u>	<u>Rev. No.</u>	<u>Effective Date</u>
FO.10	Receiving, Labeling, and Handling Environmental Materials Containers	2	05/12/92
93-DMR-000677	DMR	2	11/01/93
94-DMR-000244	Drying Agent Modification	2	03/14/94
94-DMR-000558	Form Modification	2	04/15/94
FO.11	Field Communications	2	05/12/92
FO.12	Decontamination Facility Operations	2	05/12/92
FO.13	Containerization, Preserving, Handling and Shipping of Soil and Water Samples	2	05/12/92
93-DMR-000530	Section FO.13 Modification	2	11/04/93
93-DMR-000667	Section FO.13 Modification	2	11/20/93
94-DMR-000143	Composite Sampling Clarification	2	02/11/94
FO.14	Field Data Management	2	05/12/92
DCN 93.05	Replacement of Form 14 C	2	10/06/93
FO.15	Photoionization Detectors (PIDs) and Flame Ionization Detectors (FIDs)	2	05/12/92
FO.16	Field Radiological Measurements	2	05/12/92
FO.18	Environmental Sample Radioactivity Content Screening	1	05/12/92
FO.19	Base Laboratory Work	2	05/12/92
FO. 23	Management of Soil and Sediment Investigative Derived Materials (IDM)	0	01/11/94
94-DMR-000137	Training Requirements Clarification	0	01/28/94
94-DMR-000148	Section FO.23 Modifications	0	02/09/94
94-DMR-001108	Buried Instrumentation and Existing Soil	0	06/14/94
•94-DMR-001350	Various Text Additions and Deletions Regarding Drums and Use of SOP FO.29	0	08/16/94

**ROCKY FLATS ENVIRONMENTAL  
TECHNOLOGY SITE**

**EMD OPERATING  
PROCEDURES MANUAL  
VOL I: FIELD OPERATIONS**

**Manual No.: 5-21000-OPS-FO  
New Manual No.: 4-11000-ER-OPS-FO  
Procedure No.: Table of Contents, Rev 70  
Page: 3 of 3  
Effective Date: 08/16/94  
Organization: Environmental Management**

<u>Procedure No.</u>	<u>Title</u>	<u>Rev. No.</u>	<u>Effective Date</u>
FO.25	4-B11-ER-OPS-FO.25 Shipment of Radioactive Materials Samples	0	12/01/93
FO.27	4-BO1-ER-OPS-FO.27 Collection of Floor/Equipment Hot Water Rinsate Samples	0	07/26/93
DCN 93.02	Fresh Water Samples	0	08/30/93
FO.29	4-H46-ENV-OPS-FO.29 Disposition of Soil and Sediment Investigation-Derived Materials	0	06/24/94
94-DMR-001226	Allowance of Procedural Use for Waste Piles	0	07/15/94
FO.32	4-I50-ENV-OPS-FO.32 Treated Effluent Discharge Operable Unit 1, Building 891	0	04/13/94

DOCUMENT MODIFICATION REQUEST (DMR)

Refer to 1-A01-PPG-001 for Processing Instructions.  
 Print or Type All Information (Except Signatures)

1. Date: 6/29/94  
 25. DMR No. 94-DMR-001350

2. Existing Document Number/Revision 4-F99-ENV-OPS FO.23, Rev. 0			3. New Document Number or Document Number if it is to be changed with this Revision N/A		
4. Originator's Name/Phone/Page/Location Susan L. Myrick/6971/D4343/080			5. Document Title Management of Soil and Sediment Investigative Derived Material		
6. Document Type <input checked="" type="checkbox"/> Procedure <input type="checkbox"/> Other		7. Document Modification Type (Check only one) <input type="checkbox"/> New <input type="checkbox"/> Revision <input checked="" type="checkbox"/> Intent Change <input type="checkbox"/> Nonintent Change <input type="checkbox"/> Editorial Correction <input type="checkbox"/> Cancellation			
8. Item	9. Page	10. Step	11. Proposed Modifications		
1	9	Flowchart	Change decision box "Leave drums at the drill site pending characterization" to "move drum from the field and manage as NON-HAZ".		
2	9	Flowchart	Remove all "Pending Characterization" verbage from decision boxes that contain such verbage.		
3	9	Flowchart	Replace Decision Box "Results of analysis" to "Perform FO.29 SOP".		
4	9	Flowchart	Replace Decision Box "Are organics above MDL or are metals above UTL?" with Contact EOM representative to determine storage requirements".		
5	9	Flowchart	Remove Decision Box "move drums to interim/permitted storage pending ROD". It is located to the left of Item 7.		
6	9	Flowchart	Remove Decision Box "Was point of generation in PA?" This box is located to the right of Item 7.		
<del>7</del>	<del>9</del>	<del>Flowchart</del>	<del>Remove Decision Box "RCRA listed constituents"</del> <i>see summary 8/11/94</i>		
8	10	6.2.2	Strike "Otherwise, the drum will remain in the drilling area pending characterization" and replace with "move the drum from the field and manage as Non-hazardous." <i>If the soil or sediment is not suspected to contain RCRA listed constituents, see summary 8/11/94</i>		

12. Justification (Reason for Modification, EJO#, TP#, etc.)

- CDH has directed all drums be removed from the field after generated.
- IDM will have a hazardous waste Determination made prior to generation of waste.
- All analysis is performed in FO.29.
- All analysis is performed in FO.29.
- Once analysis has been performed by FO.29 the project manager and the EOM contact will make a decision as to the storage requirements.
- This decision will be made by the project manager and the EOM contact. This box is not required.
- ~~Analysis issues are now in FO.29.~~ *see summary 8/11/94*
- Drums can not be left in the field.

If modification is for a new procedure or a revision, list concurring disciplines in Block 13, and enter N/A in Blocks 14 and 15. If modification is for any type of change or a cancellation, organizations are listed in Block 13, then Concurrer prints, and signs in Block 14, and dates in Block 15.

13. Organization	14. Print and Sign (if applicable)	15. Date (if applicable)
DM&RS	<i>D. G. Brown for Kaye Bentley</i>	8/2/94
EOM-SME	Susan Myrick <i>Susan J. Myrick</i>	7/22/94
Sample Mgmt.	<i>J.M. O'Quinn R.S. Luker</i> <i>Steph...</i>	8-11-94
OU1 Closure: 1, 3, 11, 15, 16	Annette Primrose <i>A. P...</i>	8/2/94
OU4 Closure:	Steve Keith <i>A.R. Keith</i>	7/28/94
OU2 Closure:	Wanda Busby <i>W. Busby</i>	7/28/94
OU5, 6, 7:	Ed Mast <i>Ed Mast</i>	7/26/94
D&D, Indust OU	Bruce Peterman <i>B. Peterman</i>	
RAD Health & Engineering	<i>J.L. Anderson</i>	8/10/94
Indust. Hygiene	<i>J.M. Brooks</i>	8/10/94
Occupation Safety	<i>G.W. Beers</i>	8/10/94
DOB - 10-94	<del>G.W. Beers</del>	

16. Originator's Supervisor (print/signature)  
 L.A. Gregory - Frost *L.A. GREGORY-FROST, L.A. Gregory - Frost* 7-21-94

17. Assigned SME/Phone/Page/Location: Susan L. Myrick/6971/D4343/080  
 18. Cost Center: 0248  
 19. Change Number: ENV-FO  
 20. Requested Completion Date: 6/29/94  
 21. Effective Date: 8/16/94

22. Accelerated Review? Yes  No   
 23. ORC Review: ORC Review Not Required; This Nonintent Change is being processed as an Intent Change to expedite the DMR process.

24. Responsible Manager (print, sign, date)  
 M.C. Broussard *L.A. Gregory - Frost for M.C. Broussard* 7-21-94

REVIEWED FOR CLASSIFICATION/UCN

BY: NA  
 DATE: NA

PER R.B. HOFFERMAN, CLASSIFIED BY 07  
 JUNE 11 2001  
 DOCUMENT CLASSIFIED BY 07

Refer to 1-A01-PPG-001 for Processing Instructions.  
Print or Type All Information (Except Signatures)

25. <sup>4</sup>lar  
DMR. No. 98-DMR-001350 7-27

2. or 3. Document Number/Revision			3. Document Title
4-F99-ENV -DPS-FO-23, R0			Management of Soil and Sediment Investigation
8. Item	9. Page	10. Step	11. Proposed Modifications
9	11	6.2.3	Change last sentence to read: "If the field screening results are below background, the drum will remain at the drill site pending characterization." Then drums will be moved from the field and managed as NON-HAZ.
10	12	1st sentence	Strike "pending characterization" from sentence.
11	13	6.3.2	Strike, "and Contamination Characterization Form, Form 10C" from sentence.
12	13	6.3.3	Change Form 10C to Form 10A.
13	15	6.5.1	Add "validated" before "analysis" in the 1st sentence.
14	15	6.5.1	Add the following statement after 6.5.1: "Sample Management is responsible for contacting the Project Manager and the EOM RCRA Coordinator when the results from analytical lab are available to the EG&G project manager."
15	15	6.5.2	Strike entire sentence.
16	15	6.5.3	Strike entire sentence.
17	15	6.5.4	Strike entire paragraph.
18	15	6.5.5	Strike entire paragraph.
19	15	6.5.6	Strike entire paragraph.
20	15	6.5.7	Strike entire paragraph.
21	16	6.5.8	Strike entire paragraph and Note.
22	17	7.0	Strike from Note FO.23B.
23	17	7.1	Strike Form FO.23B.
24	18	Form	Form FO.23A - change subcontractor to Program Generator in the sentence above #7.
25	19	Form	Delete Form FO.23B.
12. Justification (Reason for Modification, EJO#, TP#, etc.)			
<p>9. Drums can not be left in the field.            10. Drums can not be left in the field.            11. Form 10C has been deleted.            12. Form 10C has been deleted.            13. Validation is required before performing FO.29.            14. To ensure a waste determination is made according to RCRA regulations.            15-21 All references to analysis is to be removed due to FO.29.            22. Form FO.23B is to be deleted.            23. Form FO.23B is to be deleted.            24. Subcontractors may not be the only personnel filing out form.            25. Form was replaced by procedure FO.29 forms.</p>			

**MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)**

**EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL**

**Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:**

**4-F99-OPS  
FO. 23, Rev. 0  
2 of 19  
8/16/94  
Environmental Restoration**

**Category 3**

7.0	DOCUMENTATION .....	16
7.1	FORMS .....	17

LIST OF FIGURES

FIGURE FO.23-1	Additional Areas of Concern .....	4
FIGURE FO.23-2	IDM Management Flow Chart .....	9

**LIST OF EFFECTIVE PAGES**

<u>Pages</u>	<u>Effective Date</u>	<u>Change Number</u>
1	02/09/94	94-DMR-000148
2	08/16/94	94-DMR-001350
2	01/26/94	94-DMR-000137
3	06/14/94	94-DMR-001108
5	01/26/94	94-DMR-000137
5	02/09/94	94-DMR-000148
9	08/16/94	94-DMR-001350
7-9A	02/09/94	94-DMR-000148
10-13	08/16/94	94-DMR-001350
13-16	02/09/94	94-DMR-000148
15-18	08/16/94	94-DMR-001350
19	02/09/94	94-DMR-000148
19	08/16/94	94-DMR-001350

**TOTAL NUMBER OF PAGES: 21**

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

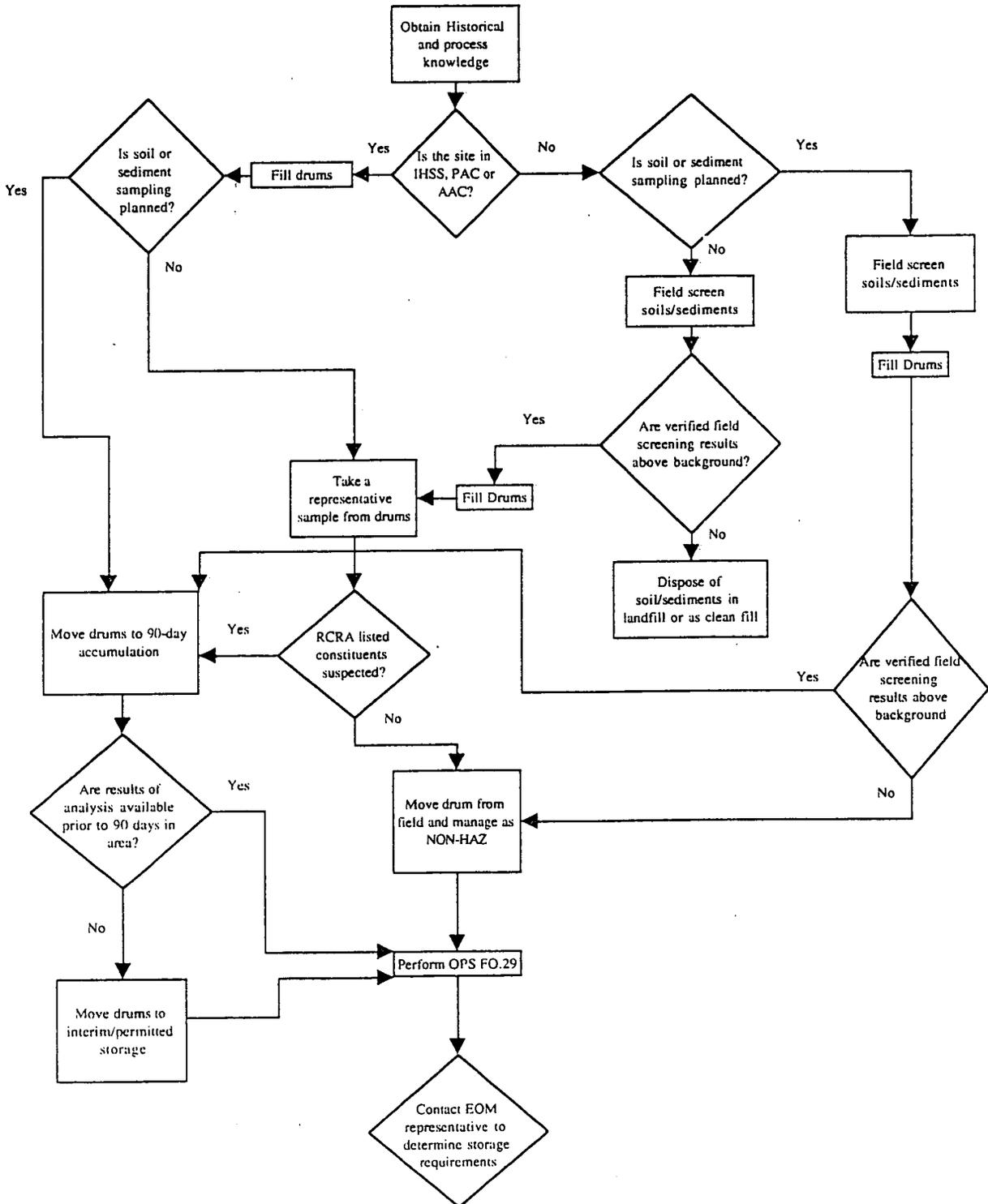
EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
9 of 19  
8/16/94  
Environmental Restoration

Category 3

Figure FO.23-2  
IDM Management Flow Chart



94-AsMR-001350

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
10 of 19  
8/16/94  
Environmental Restoration

Category 3

The process for handling residual soils and sediments generated during environmental activities specified within the Inter-Agency Agreement (IAG) is summarized on the IDM Management flowchart (Figure FO.23-2) and will be performed by RFP subcontractor and EG&G personnel. Drums may be filled with IDM from four areas: known IHSSs, PACs, AACs or background areas. This procedure, although specific for drums, may be extended to other media/containers such as crates or half crates.

Drill cuttings from all IHSS, PAC, and AAC wells and boreholes will be drummed. Drill cuttings from each well will be containerized in accordance with FO.8, Handling of Drilling Fluids and Cuttings and labelled in accordance with FO.10, Receiving, Labeling and Handling Environmental Material Containers.

6.2.1 Any drum filled within an IHSS, PAC, or AAC for which sampling of drilled or cored material is planned for characterization purposes will be transported to a 90-day accumulation area immediately after it is filled in accordance with FO.8, Handling of Drilling Fluids and Cuttings and labelled in accordance with FO.10, Receiving, Labeling and Handling Environmental Material Containers. Results of the characterization sampling will be used to characterize the drum.

6.2.2 Drums filled within an IHSS, PAC, or AAC for which sampling of drilled or cored material is not planned for characterization purposes will be filled and labelled in accordance with SOP FO.10, Receiving, Labeling and Handling Environmental Material Containers. If the soil or sediment is suspected based on verified field detections, process knowledge or historical data of containing Colorado Hazardous Waste Regulations (CHWR) listed constituents per 6 CCR Part 261 subpart D, Appendix VIII, the associated drum(s) will be transported to a 90 day accumulation area immediately after it is filled, and managed as hazardous. If the soil or sediment is not suspected to contain RCRA listed constituents, move the drum from the field and manage as Non-hazardous. Otherwise, the drum will remain in the drilling area pending characterization. A representative sample of material in the drum will be collected in accordance with FO.20, Sampling of Liquids and Solids from Environmental Materials

94-NMR-001350

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
11 of 19  
8/16/94  
Environmental Restoration

Category 3

Containers and analyzed for appropriate constituents based on historical and process knowledge as defined in the site-specific field sampling plan. Results of these analyses will then be used to characterize the drum.

NOTE:

If sampling is not planned and if verified radiation field readings are observed, composite confirmation samples will be taken from the associated drum only.

6.2.3 Drums filled outside an IHSS, PAC, or AAC for which sampling of the drilled or cored material is planned and verified field screening results are above background as defined in SOPs FO.8, Handling of Drilling Fluids and Cuttings, and FO.16, Field Radiological Measurements, will be drummed in accordance with FO.8, Handling of Drilling Fluids and Cuttings and labeled in accordance with FO.10, Receiving, Labeling and Handling Environmental Materials Containers and will be moved to the 90-day accumulation area. If the field screening results are below background, the drum will remain at the drill site pending characterization. Then drums will be moved from the field and managed as NON-HAZ.

6.2.4 Residual soil or sediments generated outside an IHSS, PAC, or AAC for which sampling of the drilled or cored material is not planned and verified field screening results are above background as defined in SOPs FO.8, Handling of Drilling Fluids and Cuttings, and FO.16, Field Radiological Measurements, will be drummed in accordance with FO.8, Handling of Drilling Fluids and Cuttings and labeled in accordance with FO.10, Receiving, Labeling and Handling Environmental Materials Containers and a representative sample will be collected in accordance with SOP FO.20, Sampling of Liquids and Solid Environmental Materials Containers and analyzed for appropriate constituents based on historical and process knowledge as defined in the site specific field sampling plan. Results of this analysis will be used to characterize the drum.

94-DMR-201350

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
12 of 19  
8/16/94  
Environmental Restoration

Category 3

97-AMK-001350

Drums analyzed for CHWR listed constituents as defined in subsection 6.2.2 will be moved to the 90-day accumulation area. ~~pending characterization.~~

**NOTE:**

Characterization data from drill sites within 20 linear feet of the point of generation will be used if available to characterize these residual soils or sediments. The EG&G and DOE project managers will together determine if characterization data from greater than 20 linear feet from the point of generation will be used on a case-by-case basis.

- 6.2.5 Residual soils and sediments derived from operations outside an IHSS, PAC, or AAC where soil or sediment sampling is not planned and where no verified field screening results were above background as defined in SOPs FO.8, Handling of Drilling Fluids and Cuttings, and FO.16, Field Radiological Measurements, will be disposed of in the landfill or as clean fill on site. These materials will be dispersed and leveled within the disturbed area and reseeded following guidance in the RFP Watershed Management Plan.

**NOTE:**

EG&G Ecology Department will be contacted for guidance regarding reseeded.

- 6.2.5.1 Cuttings from alluvial boreholes or wells that contained less than 20 feet of bedrock will be accumulated at the drill site and will be leveled after drilling operations at the site have concluded. Bedrock cuttings, if any, will be covered by alluvial materials.
- 6.2.5.2 Cuttings from bedrock boreholes/wells with more than 20 feet of bedrock will be containerized and taken to the landfill by EG&G Trucking for disposal in accordance with the On-Site Transportation Manual, 1-947000. The containers will then be decontaminated in accordance with SOP FO. 3, General Equipment Decontamination.

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
13 of 19  
8/16/94  
Environmental Restoration

Category 3

6.3 DRUM FILLING PROCESS

- 6.3.1 Fill drums in accordance with SOP FO.8, Handling of Drilling Fluids and Cuttings and SOP FO.10, Receiving, Labelling and Handling Environmental Material Containers.
- 6.3.2 Record data on the Drum Field Log, Form FO.10A. ~~and Contamination Characterization Form, Form FO.10C.~~
- 6.3.3 When the drum is full, close properly and seal the drum with custody tape and/or tamper indicator device (TID) and complete Form FO.10A documentation.
- 6.3.4 A determination of the presence of free liquid in the drum will be made by the field crews and documented on the Drum Field Log. The free liquid determination will also be documented on the Waste Residue Traveler (RF 47386). This information is required for storage at the 90-day accumulation area and ~~interim/permitted~~ storage facilities. In addition to the standard drum labeling, the words Free Liquids or No Free Liquids will be written in paint pen above each of the drum labels on each drum. Free liquids are defined as "Liquids which readily separate from the solid portion of a waste under ambient temperature and pressure" in accordance with 40 CFR 260.10 subpart B.
- 6.3.5 The EOM RCRA Coordinator will update the EOM drum tracking database to log individual drum point of generation, generator, and disposition. The Waste Environmental Management System (WEMs) Coordinator will update the WEMs database to include the date the drum was filled and the date the drum was placed into the 90-day accumulation area and ~~interim/permitted~~ storage.

94-DNR-001350  
94-DNR-001350  
94-DNR-001350  
94-DNR-001350  
94-DNR-001350

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
15 of 19  
8/16/94  
Environmental Restoration

Category 3

6.5 VERIFICATION DRUM HANDLING

94-AMR-00135D

6.5.1 The EG&G Project Manager is responsible to contact EOM with results of validated analysis within 30 days of availability. Sample Management is responsible for contacting EOM RCRA Coordinator when the results from analytical lab are available to EG&G project manager.

94-AME-00135D

6.5.2 The final disposition of soils and sediments will be documented by the EG&G Project Manager on Form FO 23B, Final Drum Disposition Form.

94-AME-00135D

6.5.3 List the Rocky Flats project, date, EG&G Project Manager, soil sample location, and soil depth interval as required by FORM FO 23B.

94-AME-00135D

6.5.4 List the detected organics or metals with their associated concentration on Form FO 23B for the referenced soil sample. If an organic or metal is not detected, it will not need to be listed.

94-AMR-00135D

6.5.5 For each metal detected, find its corresponding Upper Tolerance Limit (UTL) value in the Background Geochemical Characterization Report. For each organic detected, find its corresponding Method Detection Limit (MDL) from the validated data report. Put this value in column 3, "Upper Tolerance Limit or MDL," of Form FO 23B. Computer print outs of data will be attached to Form FO 23B.

94-AME-00135D

6.5.6 If the analyte concentration is above the UTL or MDL or if no UTL was listed, put a "YES" in column 4, "Analyte Above Background," on Form FO 23B. Otherwise, put a "NO" in this column.

94-AMR-00135D

6.5.7 If there are only "NOs" in column 4, check the box titled "No Metal or Organics Above Background" and have Form FO 23B reviewed, approved, and signed by the RFP Project Manager and the Environmental Operations Manager. These drums may be disposed of at the landfill or if outside the PA as clean fill on site.

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
16 of 19  
8/16/94  
Environmental Restoration

Category 3

6.5.8 For organics and metals with corresponding yes in column 4, list the associated drum number in column (5), check the box labelled "Organics or Metals Present," and have Form FO 23B reviewed, approved, and signed by the EG&G Project Manager or designee and the Environmental Operations Manager or designee before proceeding. These drums will be managed in interim/permitted storage pending the Record of Decision (ROD).

NOTE:

Data analysis reports may be used in place of form FO 23B

6.5.9 If drums placed in interim/permitted status storage are identified as not requiring waste management, as noted in Subsection 6.5, retrieve and dispose in the RFP landfill or other areas on RFP requiring clean fill, based on EG&G Project Manager direction.

NOTE:

Residual soils and sediments in drums characterized as having no RCRA-listed organics or metals above MDL or UTL, respectively, will be disposed of in the landfill or other areas on RFP requiring clean fill if outside the PA and dispersed within the disturbed area if within the PA. If dispersed at the point of generation, the disturbed area will be revegetated.

6.5.10 If drums placed in interim/permitted status storage are identified as requiring waste management, as noted in Subsection 6.5, continue to manage the drums under CHWR until the ROD has been reached directing final disposition and/or remediation.

NOTE:

Residual soils and sediments in drums characterized as having RCRA-listed organics or metals above MDL or UTL, respectively, will be placed in interim/permitted storage pending the ROD.

94-DMR-001350  
94-DMR-001350  
94-DMR-001350  
94-DMR-001350

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

EG&G ROCKY FLATS PLANT  
ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
17 of 19  
8/16/94  
Environmental Restoration

Category 3

7.0 DOCUMENTATION

The completed forms in this procedure will be kept as a permanent record of the implementation of this SOP. Data will be recorded with black waterproof (permanent) ink onto the forms referenced in this SOP (Section 6.0).

NOTE

Completed form (FO.23A and FO.23B) will be kept in the field files as a permanent record consistent with 2-11000-ADM-17.02, Quality Assurance Records Management.

7.1 FORMS

Form FO.23A - Soil and Sediment IDM Form

Form FO.23B - RCRA Final Drum Disposition Form

94-ADM-001350

94-ADM-001350

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**Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:**

**4-F99-OPS  
FO. 23, Rev. 0  
18 of 19  
8/16/94  
Environmental Restoration**

**Category 3**

**U.S. DEPARTMENT OF ENERGY ROCKY FLATS PLANT**

**FORM FO.23A**

**SOIL AND SEDIMENT IDM FORM**

**THIS PORTION WILL BE COMPLETED BY THE EG&G PROJECT MANAGER**

- 1. The Associated Well, Boring or Sampling Location
- 2. Origination Site
- 3. Suspected Contamination
- 4. Justification (Step 3 Selection)

IHSS/PAC/AAC/Background  
Hazardous/Radioactive/Mixed

- 5. Is Soil Sampling Planned Per Site-Specific Work Plan?
- 6. Preliminary Drum Disposition (check one only)

Yes/No

- 6.1 Leave drums at site pending characterization
- 6.2 Move drums to 90-day accumulation area pending characterization
- 6.3 Sample drum and either

\_\_\_\_\_  
\_\_\_\_\_

- 6.3.1 Move drums to 90-day accumulation area
- 6.3.2 Leave drums at site pending characterization

\_\_\_\_\_  
\_\_\_\_\_

- 6.4 Field screen soils and sediment

\_\_\_\_\_

**Note: Soils and sediments identified as potentially contaminated by field screening must be characterized.**

EG&G Project Manager \_\_\_\_\_ Date \_\_\_\_\_  
(Signature) must also initial any changes to Step 7

**THIS PORTION WILL BE COMPLETED BY PROGRAM GENERATOR**

**7. ASSOCIATED DRUM NUMBERS**

Drum No.	List Any Change From Original Determination (e.g., dispose at site)

Drum No.	List Any Change From Original Determination (e.g., dispose at site)

EG&G Project Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Environmental Operations Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Comments: \_\_\_\_\_

94-DMR-00135D

MANAGEMENT OF SOIL AND SEDIMENT INVESTIGATIVE DERIVED MATERIALS (IDM)

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ENVIRONMENTAL OPERATIONS  
PROCEDURES MANUAL

Manual:  
Procedure No.:  
Page:  
Effective Date:  
Organization:

4-F99-OPS  
FO. 23, Rev. 0  
19 of 19  
8/16/94  
Environmental Restoration

Category 3

Form FO.23B

This form has been deleted.

94-NMR-001350