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**DOTY & ASSOCIATES**

GEOTECHNICAL ENVIRONMENTAL AND GROUND WATER ENGINEERS

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August 18, 1989  
1801-07

Mr. Thomas C. Greengard  
RCRA/CERCLA Programs  
Rockwell International Corporation  
P.O. Box 464  
Golden, CO 80402-0464

Subject: Inactive Solid Waste Management Units

Dear Mr. Greengard:

I enclose a revised version of the draft Inactive Solid Waste Management Unit (SWMU) listing prepared by Roy F. Weston.

Inactive SWMU units at the Rocky Flats Plant are currently numbered 101 through 208. I spoke to Brent Lewis, Allen Schubert and Mike Arndt of Rockwell to ensure that all inactive SWMU's were included in this table. Responses to specific questions and issues that you raised follow. Total number of inactive SWMU's is 167. This number, and all following numbers were developed by counting every individual unit. Therefore, SWMU's like 142, which includes 12 ponds, was counted as twelve SWMU's rather than one.

Division of SWMU's based upon contaminants likely present:

- 11 strictly radioactive SWMU's (these are SWMU's 133.1 through 133.6, 164.1, 164.2, 164.3, 184, and 199),
- 50 strictly hazardous constituent SWMU's (see Attachment 2),
- 106 mixed waste SWMU's (see Attachment 3), and
- SWMU's counted as mixed waste areas for this work, but probably identified earlier as strictly radioactive, are 122, 124.1, 124.2, 124.3, 125, 127, 130, 131, 132, 141, 144, 146.1 through 146.6, 147.1, 147.2, 148, 156.1, 156.2, 160, 161, 162, 163.1, 163.2, 165, 173, 186, 200, 201 and 202.

The above determination of radioactive, hazardous or mixed was made with information available on each SWMU coupled with

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ADMIN RECORD

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knowledge of operations at the Plant. For instance, process waste was generally a mixed waste rather than strictly radioactive. So, if a unit contained process waste it was listed as a mixed waste unit regardless of narrative statements. Similarly, releases and potential releases of materials that should have been neither radioactive nor hazardous were listed in the hazardous category.

Current breakdown of method of addressing SWMU's:

- 49 SWMU's to be addressed through RCRA closure, three of these closure plans are under preparation and have not yet been submitted to the regulatory authorities,
- 29 SWMU's to be addressed through CERCLA actions,
- 78 SWMU's to be addressed through RCRA Corrective Action,
- one SWMU, SWMU 198 (VOC's in Ground-water), is addressed by the entire ERP program,
- 10 SWMU's are not addressed in any document to date. These are SWMU's 127, 135, 142.12, 147.2, 150.2, 150.3, 150.4, 170, 205 and 208. It is suggested that these SWMU's be addressed in the following manner.

127	This SWMU should be included for RCRA Corrective Action. Although near the Solar Ponds this line is in an area not currently contaminated by the Solar Ponds.
135	This SWMU, once its location is more firmly identified, should be included for RCRA Corrective Action.
142.12	This SWMU, first added to the SWMU list the week of 8/14/89, should be included for RCRA Corrective Action.
147.2	This SWMU should be included for RCRA Corrective Action.
150.2	This SWMU should be included for RCRA Corrective Action.
150.3	This SWMU should be included for RCRA Corrective Action.
150.4	This SWMU should be included for RCRA Corrective Action.
170	This SWMU should be included for RCRA Corrective Action. Alternatively, this SWMU could also be handled under RCRA Closure since the two sites of SWMU 174 are

circumscribed by SWMU 170. However, it appears preferable to handle the area through RCRA Corrective Action since this program has fewer mandated requirements.

205 This unit requires a RCRA Interim Status Closure Plan.

208 The regulatory status of this unit may be subject to a different interpretation. However, my evaluation indicates that the site should be considered a RCRA Corrective Action Site. This appears reasonable since the site was the plot of ground over which a cargo container with secondary containment was located. This cargo container required interim status for operations. Shortly thereafter the storage area was no longer needed, and the cargo container was moved. No releases due to operation of the unit were noted. The RCRA closure plan should apply to the cargo container and not the soil over which it was placed. The soil over which the cargo container was located should be clean so action may not be required. However, at least one screening sample should probably be taken under RCRA Corrective Action since contamination from other units may exist at that location.

Please note that many of the SWMU units listed as covered by RCRA closure plans are included in the Original Process Waste Line (OPWL) Closure Plan by inference only. These SWMU's are not specifically identified in the OPWL closure plan. Appendix 2 of the OPWL closure plan should be modified to reflect the SWMU's that are contiguous or immediately adjacent to the OPWL pipes and tanks.

Discussions with Rockwell personnel identified a number of sites that are potentially new SWMU's. However, the majority of these sites are already identified as SWMU's for similar reasons. The narrative description of the existing SWMU's in these areas should be revised to include the more recent event. A new SWMU, presumably SWMU 209, exists somewhere north and east of the Solar Ponds. Sediment dredged from ponds on the Rocky Flats drainages was placed in this SWMU. Similar to the drainages and ponds, this SWMU is a possible mixed waste site. This new SWMU will be added to the list as

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soon as more information can be found regarding its location and operations.

I trust that this information is adequate for your needs. Please call if you have any questions or comments.

Sincerely,  
Doty & Associates



Frank J. Blaha

cc: M. B. Arndt, Rockwell International

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT

DRAFT LIST

OTHER REFERENCE NUMBER	REFERENCE NUMBER	BLOG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
			207 SOLAR EVAPORATION PONDS	Inactive RCRA Unit, Post Closure	Closure Plan Submitted
101				Care Required	
102			OIL SLUDGE PIT	CERCLA Unit	Phase II RI Complete
103			CHEMICAL BURIAL	CERCLA Unit	Phase II RI Complete
104			LIQUID DUMPING	CERCLA Unit	Phase II RI Complete
105			OUT OF SERVICE FUEL TANKS	CERCLA Unit	
105 1			WESTERNMOST TANK	CERCLA Unit	Phase II RI Complete
105 2			EASTERNMOST TANK	CERCLA Unit	Phase II RI Complete
106			OUTFALL	CERCLA Unit	Phase II RI Complete
107			HILLSIDE OIL LEAK	CERCLA Unit	Phase II RI Complete
108			TRENCH T 1	CERCLA Unit	Phase II RI Work Plans Submitted
109			TRENCH T 2	CERCLA Unit	Phase II RI Work Plans Submitted
110			TRENCH T 3	CERCLA Unit	Phase II RI Work Plans Submitted
111			TRENCHES T 4 TO T-11	CERCLA Unit	Phase II RI Work Plans Submitted
111 1			TRENCH T 4	CERCLA Unit	Phase II RI Work Plans Submitted
111 2			TRENCH T 5	CERCLA Unit	Phase II RI Work Plans Submitted
111 3			TRENCH T 6	CERCLA Unit	Phase II RI Work Plans Submitted
111 4			TRENCH T 7	CERCLA Unit	Phase II RI Work Plans Submitted
111 5			TRENCH T 8	CERCLA Unit	Phase II RI Work Plans Submitted
111 6			TRENCH T 9	CERCLA Unit	Phase II RI Work Plans Submitted
111 7			TRENCH T 10	CERCLA Unit	Phase II RI Work Plans Submitted
111 8			TRENCH T 11	CERCLA Unit	Phase II RI Work Plans Submitted
112			903 DRUM STORAGE AREA	CERCLA Unit	Phase II RI Work Plans Submitted
113			MOUND AREA	CERCLA Unit	Phase II RI Work Plans Submitted
114			PRESENT LANDFILL	Inactive RCRA Unit, Post Closure	Closure Plan Submitted
				Care Required	
115			ORIGINAL LANDFILL	CERCLA Unit	Investigation Work Plan Submitted
116			MULTIPLE SOLVENT SPILLS	CERCLA Unit	

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT  
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REFERENCE NUMBER	OTHER REFERENCE NUMBERS	BLDG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
116 1			WEST LOADING DOCK AREA	CERCLA Unit	Investigation Work Plan Submitted
116 2			SOUTH LOADING DOCK AREA	CERCLA Unit	Investigation Work Plan Submitted
117			CHEMICAL STORAGE		Inactive
117 1			NORTH SITE		Investigation Work Plan Submitted
117 2			MIDDLE SITE		Inactive
117 3			SOUTH SITE		Investigation Work Plan Submitted
118			MULTIPLE SOLVENT SPILLS		Inactive
118 1			WEST OF BUILDING 730		Investigation Work Plan Submitted
118 2			SOUTH END OF BUILDING 776		Investigation Work Plan Submitted
119			MULTIPLE SOLVENT SPILLS		Phase II RI Complete
119 1			WEST AREA		Phase II RI Complete
119 2			EAST AREA		Investigation Work Plan Submitted
120			FIBERGLASSING AREAS		Investigation Work Plan Submitted
120 1			NORTH OF BUILDING 664		Investigation Work Plan Submitted
120 2			WEST OF BUILDING 664		Closure Plan Submitted
121			ORIGINAL PROCESS WASTE LINES	Inactive RCRA Unit Post Closure Care Required	Included in OPWL Closure Plan
122			UNDERGROUND CONCRETE TANK		Closure Plan in Operating Permit
123			VALVE VAULT 7		Included in OPWL Closure Plan
123 1	40 56		VALVE VAULT 7	Interim Status	Closure Plan Under Preparation
123 2			VALVE VAULT WEST OF BUILDING 707		Closure Plan Under Preparation
124			RADIOACTIVE LIQUID WASTE STORAGE TANKS		Closure Plan Under Preparation
124 1	55 16		30,000 GALLON TANK (#68)	Inactive RCRA Unit	Closure Plan Under Preparation
124 2	55 14		14,000 GALLON TANK (#66)	Inactive RCRA Unit	Closure Plan Under Preparation
124 3	55 15		14,000 GALLON TANK (#67)	Inactive RCRA Unit	Closure Plan Under Preparation
125			HOLDING TANK (Same as Unit 124 2)		Included in OPWL Closure Plan
126			OUT OF SERVICE PROCESS WASTE TANKS		Included in OPWL Closure Plan
126 1			WESTERNMOST TANK	Inactive RCRA Unit	Inactive
126 2			EASTERNMOST TANK	Inactive RCRA Unit	Inactive
127			LOW LEVEL RADIOACTIVE WASTE LEAK		Inactive

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT

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REFERENCE NUMBER	OTHER REFERENCE NUMBERS	BLDG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
128			OIL BURN PIT NO 1	CERCLA Unit	Investigation Work Plan Submitted
129			OIL LEAK	Inactive RCRA Unit	Included 443 Tank Closure Plan
130			RADIOACTIVE SITE 800 AREA SITE #1	CERCLA Unit	Phase II RI Complete
131			RADIOACTIVE SITE 700 AREA SITE #1	CERCLA Unit	Investigation Work Plan Submitted
132			RADIOACTIVE SITE 700 AREA SITE #4	Inactive RCRA Unit	Included in OPWL Closure Plan
133			ASH PITTS		
133 1			ASH PIT 1 1	CERCLA Unit	Investigation Work Plan Submitted
133 2			ASH PIT 1 2	CERCLA Unit	Investigation Work Plan Submitted
133 3			ASH PIT 1 3	CERCLA Unit	Investigation Work Plan Submitted
133 4			ASH PIT 1 4	CERCLA Unit	Investigation Work Plan Submitted
133 5			INCINERATOR		Investigation Work Plan Submitted
133 6			CONCRETE WASH PAD		Investigation Work Plan Submitted
134			LITHIUM METAL DESTRUCTION SITE		Investigation Work Plan Submitted
135			COOLING TOWER BLOWDOWN		Investigation Work Plan Submitted
136			COOLING TOWER PONDS		Investigation Work Plan Submitted
136 1			NORTHEAST CORNER OF BUILDING 460		Investigation Work Plans Submitted
136 2			WEST OF BUILDING 460		Investigation Work Plans Submitted
136 3			S OF BLDG 460, W OF BLDG 444		Investigation Work Plans Submitted
137			COOLING TOWER BLOWDOWN - BLDG 774	Inactive RCRA Unit	Included in OPWL Closure Plan
138			COOLING TOWER BLOWDOWN BLDG 779	Inactive RCRA Unit Post Closure Care Required	Included in Solar Pond Closure Plan
139			CAUSTIC/ACID SPILLS		
139 1			HYDROXIDE TANK AREA		Investigation Work Plan Submitted
139 2			HYDROFLUORIC ACID TANKS		Investigation Work Plan Submitted
140			REACTIVE METAL DESTRUCTION SITE		Phase II Works Plan Submitted
141			SLUDGE DISPERSAL		Investigation Work Plan Submitted
142			RETENTION PONDS (A,B,C SERIES)		
142 01			A 1 POND		Investigation Work Plan Submitted
142 02			A 2 POND		Investigation Work Plan Submitted
142 03			A 3 POND		Investigation Work Plan Submitted

Investigation Work Plan Submitted  
FJB  
8/18/89

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT  
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REFERENCE NUMBER	OTHER REFERENCE NUMBERS	BLDG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
142 04			A 4 POND	CERCLA Unit	Investigation Work Plan Submitted
142 05			B 1 POND	CERCLA Unit	Investigation Work Plan Submitted
142 06			B 2 POND	CERCLA Unit	Investigation Work Plan Submitted
142 07			B 3 POND	CERCLA Unit	Investigation Work Plan Submitted
142 08			B 4 POND	CERCLA Unit	Investigation Work Plan Submitted
142 09			B 5 POND	CERCLA Unit	Investigation Work Plan Submitted
142 10			C 1 POND	CERCLA Unit	Investigation Work Plan Submitted
142 11			C 2 POND	CERCLA Unit	Investigation Work Plan Submitted
142 12			Flume Pond	CERCLA Unit	Investigation Work Plan Submitted
143			OLD OUTFALL		Investigation Work Plan Submitted
144			SEWER LINE BREAK	Inactive RCRA Unit	Included in OPWL Closure Plan
145			SANITARY WASTE LIME LEAK	CERCLA Unit	Phase II RI Complete
146			CONCRETE PROCESS WASTE TANKS		
146 1			7,500 GALLON TANK (#31)	Inactive RCRA Unit	Included in OPWL Closure Plan
146 2			7,500 GALLON TANK (#32)	Inactive RCRA Unit	Included in OPWL Closure Plan
146 3			7,500 GALLON TANK (#34W)	Inactive RCRA Unit	Included in OPWL Closure Plan
146 4			7,500 GALLON TANK (#34E)	Inactive RCRA Unit	Included in OPWL Closure Plan
146 5			3,750 GALLON TANK (#30)	Inactive RCRA Unit	Included in OPWL Closure Plan
146 6			3,750 GALLON TANK (#33)	Inactive RCRA Unit	Included in OPWL Closure Plan
147			PROCESS WASTE LEAKS		
147 1			MAAS AREA	Inactive RCRA Unit	Included in OPWL Closure Plan
147 2			OWEN AREA	Inactive RCRA Unit	Included in OPWL Closure Plan
148			WASTE SPILLS	CERCLA Unit	Investigation Work Plan Submitted
149			EFFLUENT PIPE	Inactive RCRA Unit Post Closure Care Required	Inactive
150			RADIOACTIVE LIQUID LEAKS (8)		
150 1			NORTH OF BUILDING 771	Inactive RCRA Unit	Included in OPWL Closure Plan
150 2			WEST OF BUILDING 771		Inactive
150 3			BETWEEN BUILDINGS 771 AND 774		Inactive
150 4			EAST OF BUILDING 750		Inactive

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT

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REFERENCE NUMBER	OTHER REFERENCE NUMBERS	BLDG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
150 5			WEST OF BUILDING 707	Inactive RCRA Unit	Included in OPWL Closure Plan
150 6			SOUTH OF BUILDING 779	Inactive RCRA Unit	Included in OPWL Closure Plan
150 7			SOUTH OF BUILDING 776	Inactive RCRA Unit	Included in OPWL Closure Plan
150 8			NORTHEAST OF BUILDING 779	Inactive RCRA Unit Post Closure Care Required	Included in Solar Plan Closure Plan
151			FUEL OIL LEAK		Investigation Work Plan Submitted
152			FUEL OIL TANK		Investigation Work Plan Submitted
153			OIL BURN PIT NO 2	CERCLA Unit	Investigation Work Plan Submitted
154			PALLET BURN SITE	CERCLA Unit	Investigation Work Plan Submitted
155			903 LIP AREA	CERCLA Unit	Investigation Work Plan Submitted
156			RADIOACTIVE SOIL BURIAL		Investigation Work Plan Submitted
156 1			BUILDING 334 PARKING LOT	CERCLA Unit	Investigation Work Plan Submitted
156 2			SOIL DUMP AREA	CERCLA Unit	Investigation Work Plan Submitted
157			RADIOACTIVE SITE		Investigation Work Plan Submitted
157 1			NORTH AREA	CERCLA Unit	Investigation Work Plan Submitted
157 2			SOUTH AREA	CERCLA Unit	Investigation Work Plan Submitted
158			RADIOACTIVE SITE BLDG 551	CERCLA Unit	Investigation Work Plan Submitted
159			RADIOACTIVE SITE BLDG 559	CERCLA Unit	Investigation Work Plan Submitted
160			RADIOACTIVE SITE BLDG 444 PK LOT	Inactive RCRA Unit	Included in OPWL Closure Plan
161			RADIOACTIVE SITE BLDG 664	CERCLA Unit	Investigation Work Plan Submitted
162			RADIOACTIVE SITE 700 AREA SITE #2	CERCLA Unit	Investigation Work Plan Submitted
163			RADIOACTIVE SITE 700 AREA SITE #3	CERCLA Unit	Investigation Work Plan Submitted
163 1			WASH AREA		Investigation Work Plan Submitted
163 2			BURIED SLAB		Investigation Work Plan Submitted
164			RADIOACTIVE SITE 800 AREA SITE #2		Investigation Work Plan Submitted
164 1			CONCRETE SLAB		Investigation Work Plan Submitted
164 2			BUILDING 886 SPILLS		Investigation Work Plan Submitted
164 3			BUILDING 889 STORAGE PAD		Investigation Work Plan Submitted
165			TRIANGLE AREA		Investigation Work Plans Submitted
166			TRENCHES	CERCLA Unit	Investigation Work Plans Submitted

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT

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REFERENCE NUMBER	OTHER REFERENCE NUMBERS	BLDG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
166 1			TRENCH A	CERCLA Unit	Investigation Work Plans Submitted
166 2			TRENCH B	CERCLA Unit	Investigation Work Plans Submitted
166 3			TRENCH C	CERCLA Unit	Investigation Work Plans Submitted
167			SPRAY FIELDS THREE SITES		
167 1			NORTH AREA	Inactive RCRA Unit	Included in Landfill Closure Plan
167 2			POND AREA	Inactive RCRA Unit	Included in Landfill Closure Plan
167 3			SOUTH AREA	Inactive RCRA Unit	Included in Landfill Closure Plan
168			WEST SPRAY FIELD	Inactive RCRA Unit Post Closure Care Required	Closure Plan Submitted
169			WASTE DRUM PEROXIDE BURIAL	CERCLA Unit	Investigation Work Plan Submitted
170			P U & D STORAGE YARD WASTE SPILLS		Inactive
171			SOLVENT BURNING GROUND		Investigation Work Plan Submitted
172			CENTRAL AVENUE WASTE SPILL	CERCLA Unit	Investigation Work Plan Submitted
173			RADIOACTIVE SITE 900 AREA	CERCLA Unit	Investigation Work Plan Submitted
174			P U & D CONTAINER STORAGE FACILITIES (2)	Inactive RCRA Unit	Closure Plan Submitted
175			S&W BLDG 980 CONTAINER STORAGE FACILITY	Inactive RCRA Unit	Closure Plan Submitted
176			S&W CONTRACTOR STORAGE YARD	Inactive RCRA Unit	Closure Plan Submitted
177			BUILDING 885 DRUM STORAGE AREA	Inactive RCRA Unit	Closure Plan Submitted
178			BUILDING 881 DRUM STORAGE AREA	Inactive RCRA Unit	Closure Plan Submitted
179			BUILDING 865 DRUM STORAGE AREA	Inactive RCRA Unit	Closure Plan Submitted
180			BUILDING 883 DRUM STORAGE AREA	Inactive RCRA Unit	Closure Plan Submitted
181			BUILDING 334 CARGO CONTAINER AREA	Inactive RCRA Unit	Closure Plan Submitted
182			BUILDING 444/453 DRUM STORAGE AREA	Inactive RCRA Unit	Closure Plan Submitted
183			GAS DETOXIFICATION AREA	CERCLA Unit	Phase II RI Work Plans Submitted
184			BUILDING 991 STEAM CLEANING AREA	CERCLA Unit	Investigation Work Plan Submitted
185			SOLVENT SPILL		Investigation Work Plan Submitted
186	40 61		VALVE VAULT 12	Active	Closure Plan in Operating Permit
187			ACID LEAKS (2)		Investigation Work Plan Submitted
188			ACID LEAK		Investigation Work Plan Submitted
189			MULTIPLE ACID SPILLS		Investigation Work Plan Submitted

WASTE MANAGEMENT UNITS AT ROCKY FLATS PLANT

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REFERENCE NUMBER	OTHER REFERENCE NUMBERS	BLDG NUMBER	UNIT NAME	REGULATORY STATUS	CURRENT STATUS
190			CAUSTIC LEAK		Investigation Work Plan Submitted
191			HYDROGEN PEROXIDE SPILL		Investigation Work Plan Submitted
192			ANTIFREEZE DISCHARGE		Investigation Work Plan Submitted
193			STEAM CONDENSATE LEAK		Investigation Work Plan Submitted
194			STEAM CONDENSATE LEAK		Investigation Work Plan Submitted
195			NICKEL CARBONYL DISPOSAL		Investigation Work Plan Submitted
196			WATER TREATMENT PLANT BACKWASH POND		Investigation Work Plan Submitted
197			SCRAP METAL SITES	CERCLA Unit	Investigation Work Plan Submitted
198			VOCS IN GROUND WATER	Covered by ER Program	Covered by ER Program
199			CONTAMINATION OF THE LAND'S SURFACE	CERCLA Unit	Investigation Work Plan Submitted
200			GREAT WESTERN RESERVOIR		Investigation Work Plan Submitted
201			STANDLEY RESERVOIR		Investigation Work Plan Submitted
202			MOWER RESERVOIR		Investigation Work Plan Submitted
203	1		INACTIVE HAZARDOUS WASTE STORAGE AREA	Inactive RCRA Unit	Closure Plan Submitted
204	45		ORIGINAL URANIUM CHIP ROASTER	Interim Status Until Closure is Certified	Closure Plan Submitted
205	1278		BLDG 460 SUMP #3 ACID SIDE	Inactive RCRA Unit	Inactive
206	42 14		INACTIVE D 836 HAZARDOUS WASTE TANK	Inactive RCRA Unit	Included in OPHL Closure Plan
207	4		INACTIVE 444 ACID DUMPSTER	Interim Status Until Closure is Certified	Closure Plan Submitted
208	3		INACTIVE 444/447 WASTE STORAGE AREA	Interim Status Until Closure is Certified	Inactive

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Strictly Hazardous SWMU's

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105.1, 105.2  
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116.1, 116.2  
117.1, 117.2, 117.3  
118.1, 118.2  
120.1, 120.2  
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167.1, 167.2, 167.3  
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Mixed Waste SWMU's

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111.1 through 111.8  
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119.1, 119.2  
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123.1, 123.2  
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126.1, 126.2  
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132  
136.1, 136.2, 136.3  
139.1, 139.2  
141  
142.1 through 142.12  
143  
144  
146.1 through 146.6  
147.1, 147.2  
148  
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150.1 through 150.8  
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156.1, 156.2  
157.1, 157.2  
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163.1, 163.2  
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166.1, 166.2, 166.3  
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