

FORRES CONTROL  
OUTGOING LTR NO

ORDER #

97-RF-4053

DIST	LTR	ENC
ENSUSSEN, STAN		
RAILSFORD MARV		
JHL TONY		
JRDGE LARRY		
ARDING WYNN		
ARD, BOB		
LL JOHN		
ARTINEZ LEN		
GG BOB		
ARKER ALAN		
LLER ROBERT		
JOR NANCY		
JORHEIS GARY		

dahl, T G	X	
derson Scott		
yd Russ		
owe, Steve		
tamore, Drew		
rr, Kent		
hn, Steve		
kle Gordon		
nnedy, Colburn		
houd Russ		
ters Mike		
ben Ann	X	
land Jennifer		

LOOKS, L	X	
ZUSCH, M	X	

FORRES CONTROL X X  
 MIN RECORDS X  
 TS/T130G

CLASSIFICATION	
NI	
CLASSIFIED	
CONFIDENTIAL	
CRET	

AUTHORIZED CLASSIFIER  
SIGNATURE

empt per CEX-266 95

REPLY TO RFP CC NO

ACTION ITEM STATUS

PARTIAL/OPEN  
 CLOSED

LTR APPROVALS

*AKS*

IG & TYPIST INITIALS  
 AKS bag

16469 (Rev 3/97)



July 29, 1997

97-RF-04053

Norma Castaneda  
 ES&H Program Assessment  
 DOE, RFFO

**EXTENSION FOR PATS COMMITMENT FOR 95-001131 MODIFICATIONS TO THE FO 29 PROCEDURE ENTITLED "DISPOSITION OF SOIL AND SEDIMENT INVESTIGATION DERIVED MATERIAL (IDM)" - AKS-031-97**

In a letter dated March 26, 1997 Kaiser-Hill (K-H) requested a three-month extension of the PATS commitment requiring modification of the FO 29 procedure for Disposition of Soil and Sediment Investigation-Derived Materials. At that time, RMRS was preparing a framework for Investigation Derived Materials/soil (IDM/soil) management to be included in the Implementation Guidance Document (IGD) for RFCA. The framework would have first identified, where appropriate, the IDM/soil that contains listed RCRA hazardous waste. The IDM/soil containing RCRA listed hazardous wastes would have then been evaluated using the CDPHE Conservative Screen and managed accordingly. In contrast, IDM/soil that does not contain listed hazardous waste would have been evaluated using the RFCA Action Level Framework and managed accordingly.

Since that time, K-H has become aware of language in the proposed RFCA errata that contradicts the approach that was proposed in March. The RFCA errata uses RFCA Tier 1 values as put-back levels for hazardous constituents regardless of whether the IDM/soil contains listed hazardous waste. In addition, the RFCA errata is limited in that it does not address IDM/soil that is moved to a different location. As a result, the March proposal to modify the FO 29 procedure was withdrawn from the Draft IGD.

K-H is requesting an extension to the PATS commitment until January, 1998. K-H is proposing to form a working group to evaluate and streamline the FO 29 procedure so that a practical, consistent approach to managing IDM/soil may be implemented. A single workable approach to IDM/soil management will be vital to achieving long-term RFETS decommissioning and remedial action goals in a protective and cost effective manner.

K-H is hopeful that consensus on a unified IDM/soil management strategy can be achieved. Important objectives of the strategy include:

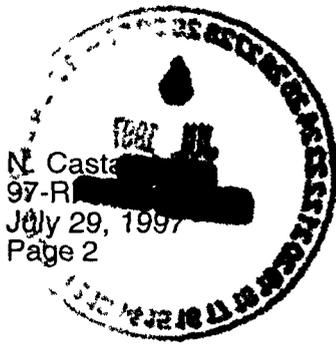
- eliminating the need for contentious determinations of the listed versus non-listed status of IDM/soils through an RFETS-specific contained-in determination
- providing more protective, consolidated, cost effective management of IDM/soils that might otherwise end up in "put-back" piles scattered around the site
- better integrate IDM/soil management with the RFCA ALF and other planned remedial/closure activities (especially OU7)
- disposition the 3000+ drums of marginally contaminated IDM/soils that are currently consuming budget

Kaiser-Hill Company, L L C

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ADMIN RECORD

A-SW-002510



With DOE approval, K-H will form a working group and begin developing a new unified soil management strategy. The intent will be to reach consensus, and to document and implement the strategy by January 1998. If you have any questions, please call Ann Sieben at x9886.

A. K. Sieben  
Waste & Remediation Operations

bag

Orig and 1 cc - N Castaneda