

000043710

DATE September 28, 1994		
TO Shirley Garcia	DEPT. RWO	BLDG. T130B
FROM L. A. Gregory-Frost	DEPT. EOM/FO	BLDG. 080
<i>L.A. Gregory-Frost</i>		PHONE X8570

ROCKY FLATS PLANT

**MEMORANDA**

"SAY IT IN WRITING"

SUBJECT: HAZARDOUS WASTE DETERMINATION FOR A SOIL SAMPLE

- Ref: 1. AVO from S. Singer to S. Garcia dated August 31, 1994  
 2. Internal Correspondence from C. Moynihan to R. Dearen dated August 31, 1994 (CMM-253-94)

At the request of Roy Dearen, I have re-evaluated the hazardous waste determination on a sample of soil which he described as a fine brown powder which was discovered in a drum containing borehole samples. The following hazardous waste determination supercedes all previous hazardous waste determinations for the soil sample in Container #298816 which is now packaged in a 5-gallon can with WEMS #X00629. Analytical sample number SMO#A4011, Lab ID #94G0424 (results attached), was used along with plant process knowledge to characterize the soil. General plant process knowledge was used, because the exact soil sampling location is not known.

Constituent	Concentration	EPA Code	Rationale
Acetone	450 µg/l	F003	Acetone is used on plantsite as a solvent. Therefore, in accordance with the "Contained-in" policy, the soil is a hazardous waste because it "contains" an F003 hazardous constituent.
2-Butanone	140 µg/l	F005	2-Butanone (or methyl ethyl ketone) is used as a solvent on plantsite. Therefore, in accordance with the "Contained-in" policy, the soil is a hazardous waste because it "contains" an F005 hazardous constituent.
Cresols (total)	77 µg/l	None	0.077 mg/l is less than the TCLP regulatory concentration level of 200 mg/l; therefore, the soil is not a D026 RCRA-regulated hazardous waste. Cresols are not used on plantsite as solvents; therefore, the F004 EPA hazardous waste code is not applicable. Cresols are commonly present in soils located adjacent to power poles, soils located in power pole storage yards, and in coal tar pitches and roofing tars. ERPD has sampled areas which contain contamination from these types of sources in the past.

The initial determination was made on August 31, 1994; therefore, this date has been identified as the accumulation start date.

If you have any questions or require additional information, please contact me at extension 8570 or on digital pager 3036.

cc:  
 M. C. Broussard  
 R. K. Dearen  
 T. K. Lockhart

C. M. Moynihan  
 K. G. Peter  
 S. H. Singer

DOCUMENT CLASSIFICATION  
 REVIEW WAIVER PER  
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ADMIN RECCRD  
 SW-A-003512

FLASH-FAX	TO: Shirley Garcia	FROM: L. A. GREGORY-FROST	DATE: 9/28/94	TOPS 14850
	FAX #: 8048	FAX #: 8556	PHONE #: 8570	

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1B SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

42405

Lab Name: GLASS Contract:   
 Lab Code: GLASS Case No.: SAS No.: 94G SDG No.: 0424   
 Matrix: (soil/water) WATER Lab Sample ID: 50065   
 Sample wt/vol: 200. (g/mL) ML Lab File ID: AUG1505   
 Level: (low/mad) LOW Date Received: 7/28/94   
 % Moisture: not dec.100. dec. 0. Date Extracted: 8/12/94   
 Extraction: (SepF/Cont/Sonc) CONT Date Analyzed: 8/15/94   
 GPC Cleanup: (Y/N) N pH: 0 Dilution Factor: 1.00

CAS NO. COMPOUND CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L

110-86-1	Pyridine	200.	U
106-46-7	1,4-Dichlorobenzene	200.	U
1319-77-3	Total Cresols	77.	U
67-72-1	Hexachloroethane	53.	U
98-95-3	Nitrobenzene	160.	U
87-68-3	Hexachlorobutadiene	150.	U
88-06-2	2,4,6-Trichlorophenol	210.	U
95-95-4	2,4,5-Trichlorophenol	260.	U
121-14-2	2,4-Dinitrotoluene	44.	U
118-74-1	Hexachlorobenzene	42.	U
		200.	U

FORM I SV-1

1/87 Rev.

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1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

Name: GLAB

Contract:

42401

Code: GLAB

Case No.:

SAB No.: 9400

SDS No.:

Matrix: (soil/water) WATER

Lab Sample ID: 891-0-0

Sample wt/vol: 5. (g/mL) ML

Lab File ID: AUG0906

RI: (low/med) LOW

Date Received: 8/ 5/94

Disturbance: not dec. 100.

Date Analyzed: 8/ 7/94

Container: (pack/cap) CAP

Dilution Factor: 10.00

CAS NO.

COMPOUND

CONCENTRATION UNITS:  
(ug/L or ug/kg) UG/L

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/kg) UG/L	
74-87-3	Chloromethane	100.	IU
74-83-9	Bromomethane	100.	IU
75-01-4	Vinyl Chloride	100.	IU
78-00-3	Chloroethane	100.	IU
78-09-8	Methylene Chloride	100.	IU
67-64-1	Acetone	50.	IU
75-15-0	Carbon Disulfide	450.	I
78-35-4	1,1-Dichloroethane	50.	IU
78-34-3	1,1-Dichloroethane	50.	IU
840-89-0	1,2-Dichloroethane (total)	50.	IU
67-66-3	Chloroform	50.	IU
107-06-2	1,2-Dichloroethane	50.	IU
78-73-0	n-Butanone	50.	IU
71-55-6	1,1,1-Trichloroethane	140.	I
56-23-8	Carbon Tetrachloride	50.	IU
78-27-4	Bromodichloromethane	50.	IU
78-27-5	1,2-Dichloropropane	50.	IU
10041-01-5	cis-1,3-Dichloropropane	50.	IU
79-01-6	Trichloroethene	50.	IU
124-48-1	Dibromochloromethane	50.	IU
79-00-8	1,1,2-Trichloroethane	50.	IU
71-43-2	Benzene	50.	IU
10061-02-6	trans-1,3-Dichloropropane	50.	IU
78-25-2	Bromoform	50.	IU
108-10-1	4-Methyl-2-Pentanone	50.	IU
84-78-4	2-Hexanone	100.	IU
127-18-4	Tetrachloroethane	100.	IU
79-34-8	1,1,2,2-Tetrachloroethane	50.	IU
108-88-3	Toluene	50.	IU
108-90-7	Chlorobenzene	50.	IU
100-41-4	Ethylbenzene	50.	IU
100-42-5	Styrene	50.	IU
1777-61-2	Xylene (m,p)	50.	IU
60-29-7	Ethyl Ether	50.	IU
75-69-4	Trichlorofluoromethane	50.	IU
76-13-1	Trichlorofluoromethane	50.	IU
141-78-6	Ethyl Acetate	50.	IU
95-47-6	Xylene (o)	50.	IU
105-46-7	1,4-Dichlorobenzene	50.	IU

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