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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 8, 2001

Mr. Joel B. Hebdon, Director
Regulatory Compliance and Analysis Division
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

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EDMC

Dear Mr. Hebdon:

Re: Contained-In Determination Request for Tri-Party Agreement (TPA) Milestones M-24-00L/M Drilling Waste Generated During Installation of Groundwater Monitoring Wells around the S-SX and T-TX-TY Tanks Farms.

References:

1. Letter, S. H. Wisness, U.S. Department of Energy (USDOE) to J. A. Hedges, Washington State Department of Ecology (Ecology), "Contained-In Determination Request for the Resource Conservation and Recovery Act (RCRA) Drilling Waste Generated During Installation of Groundwater Monitoring Wells around the S-SX and T-TX-TY Tanks Farms." DOE-RL 01-GWVZ-006, dated January 9, 2001. 54329
2. E-mail, J.V. Borghese, Bechtel Hanford Inc. (BHI) to J. Price, Ecology, "Contained-In Determination for RCRA Drilling Wastes – Additional data." Dated January 12, 2001. ✓
3. E-mail, J.V. Borghese, Bechtel Hanford Inc. (BHI) to J. Price, Ecology, "Additional Data for RCRA Drilling Waste Contained-In (set 2)." Dated February 5, 2001. ✓
4. E-mail, J.V. Borghese, Bechtel Hanford Inc. (BHI) to B. Becker-Khaleel, Ecology, "Contained-In Determination for RCRA Drilling Wastes – Additional data C3123 and C3339." Dated March 2, 2001. ✓

The Washington State Department of Ecology (Ecology) has received and reviewed the above referenced request (reference 1), and associated data (references 2, 3, and 4). The information was evaluated to determine if the drilling wastes should be managed as dangerous waste in accordance with the principles of the "contained-in" policy.

Mr. Joel B. Hebdon
Page 2
March 8, 2001

Ecology understands that these data are representative of the contamination in the drill cuttings collected during the installation of wells C3112, C3113, C3114, C3115, C3116/C3242, C3117, C3118, C3119, C3120, C3121, C3122, C3123, and C3339. It is Ecology's understanding that the drill cuttings do not designate as dangerous waste under federal or state characteristics and criteria. Based on the information received, the drill cuttings collected from these wells are contaminated with the following waste solvents, which are listed dangerous wastes:

- F001 – 1,1,1-trichloroethane, carbon tetrachloride
- F002 – methylene chloride
- F003 – acetone, methyl isobutyl ketone
- F004 – O-cresol, P-cresol, cresylic acid
- F005 – methyl ethyl ketone

These waste solvents were detected at concentrations that are below Model Toxic Control Act health-based levels. Under Ecology's current "contained-in" policy, contaminated media may be determined to no longer contain hazardous waste when the hazardous constituents in the media fall below site-specific, risk-based levels and the media do not exhibit a characteristic. Ecology has made the determination that the concentration of hazardous constituents in the drill cuttings does not warrant management of the material as a hazardous or dangerous waste. Therefore, Ecology will not require the USDOE to dispose of the drill cuttings as a listed waste at a dangerous waste treatment, storage and disposal facility (TSD). Ecology recommends that these drill cuttings be managed in such a manner that does not impact surface and/or groundwater quality.

Please note that this application of the "contained-in" policy is specific for the drill cuttings for which data were submitted and reviewed. It does not apply to any drill cuttings from other drilling operations (e.g., other groundwater well locations or vadose zone well installations), soils, or other sites. Sampling and analyses data from any additional well drilling waste for TPA Milestones M-24-00L/M must be submitted to Ecology for review and approval.

If you have any questions regarding the "contained-in" policy or this determination, please feel free to contact Brenda Becker-Khaleel at (509) 736-3003.

Sincerely,



Jane Hedges, Section Manager
Nuclear Waste Program

JH:BB:lkd

By certified mail

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