

Final

Meeting Minutes Transmittal/Approval  
 Unit Manager's Meeting: General Topics  
 450 Hills St., Room 47, Richland, Washington  
 April 22, 1992

FROM/APPROVAL: Robert K. Stewart Date 5/27/92  
 Robert K. Stewart, R.I. Coordinator, RL (A6-95)

APPROVAL: Doug Sherwood Date 5/27/92  
 Douglas R. Sherwood, Representative, EPA (B5-01)

APPROVAL: Larry Goldstein Date \_\_\_\_\_  
 Larry Goldstein, CERCLA Unit Supervisor, Washington Dept. of Ecology

The purpose of this meeting was to discuss general topics which are common to all past practices operable units.

Meeting Minutes are attached. Minutes are comprised of the following:

- Attachment #1 - Summary of Meeting and Commitments and Agreements
- Attachment #2 - Agenda for the Meeting
- Attachment #3 - Attendance List
- Attachment #4 - Action Item Status List
- Attachment #5 - Analytical Services Status
- Attachment #5B - Frequency of Data Validation
- Attachment #6 - Expedited Response Actions
- Attachment #7 - Updated Unit Manager's List, Ecology Memo
- Attachment #8 - EII 4.3, Rev. 0, Investigations and Site Characterization Manual
- Attachment #9 - EII 4.3 Information/Requirements Specific to Unit Managers



Prepared by: Bill Mallio, Suzanne Clarke, GSSC Date: \_\_\_\_\_

Concurrence by: Hal Downey Date: \_\_\_\_\_  
 Hal Downey, WHC Coordinator

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## Attachment #1

## Summary of Meeting and Commitments and Agreements

Unit Manager's Meeting: General Topics  
April 22, 1992

## 1. SIGNING OF THE MARCH GENERAL TOPICS UNIT MANAGER'S MEETING MINUTES:

Minutes from the March General Topics Unit Manager's Meeting were reviewed and approved after changes/corrections were made.

2. ACTION ITEM UPDATE: (Attachment 4 (normal text) shows the status of the action items before the April 22 meeting; the updates to Attachment 4 are listed below and highlighted in bold text on Attachment 4.)

GT.113            Dick Fox will update site listings.  
Dick Fox

GT.118A            Closed (4/22/92).

GT.122            Closed (4/22/92).

GT.128            Eric Goller will give status of item at May UMM (4/22/92).  
Eric Goller

GT.129            USGS will contact Nancy Werdel to determine DOE position  
W. Staubitz        and describe scope of low cost solutions (4/22/92).

GT.132        Closed (4/22/92).

## 3. NEW ACTION ITEMS:

GT.133            Donna Wanek (DOE-RL) and Joan Kessner (WHC-OSM) will supply  
Donna Wanek        information on the methodology by which turn around times for  
Joan Kessner        sample analyses are calculated (based on the elapsed time  
                          between sample collection and the transmittal of validated  
                          data to EDMC).

GT.134            Joan Kessner (WHC-OSM) will provide information to Doug  
Joan Kessner        Sherwood (EPA) and Billie Mauss (Ecology) on the results of QA  
                          evaluations of first quarter (1992) performance evaluation  
                          samples.

GT.135            Bob Stewart (DOE-RL) will clarify policy concerning Hanford  
Bob Stewart        site access to areas off paved roads to persons without  
                          Radiation Training.

GT.136            Laura Russell (WHC) will give a progress report in a few  
Laura Russell        months on how the IDW work is going.

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3. INFORMATION ITEMS:

- J. Kessner (WHC) presented the update of laboratory status (see attachments 5 and 5B).
- W.L Johnson (WHC) presented an ERA update (see attachment 6).
- L. Russell (WHC) discussed the implementation of EII4.3, Unit Manager responsibilities (see attachments 8 and 9 in addition to the first 3 bullets of Informal Agreements, listed below).
- Doug Sherwood (EPA) announced that EPA would conduct an audit of an on-site laboratory in May. Rich Hibbard (Ecology) indicated that Ecology would have a representative participating in the audit.

4. INFORMAL AGREEMENTS:

- The regulatory approval will be changed to show signature of head regulatory agency only for the "Waste Control Plan" (page 21 of EII 4.3, attachment 8).
- It was agreed that the text on page 20 of the "Waste Control Plan" in EII 4.3 (attachment 8) would be changed from "Methods of Validating Field Screening Data" to "Methods of Verifying Field Screening Data".
- Insert "or other project meetings" after Unit Manager meetings (attachment 9, paragraph 6.10).
- Hal Downey (WHC) will arrange with Didi Fox to update new sites added to WIDS in addition to clarifying what was added and how.

5. QUICK STATUS ITEMS:

- NEPA - no change.
- Inspection Protocols - to be released next month.
- Site Background Study - document in preparation.
- Site surveying - meeting between contractors and WHC health physicists to make contractors aware of Hanford HP and health requirements. Activity is on schedule.
- Risk Assessment Methodology - regulatory comments due to RL on May 15, 1992 for Hanford Site Specific Risk Assessment Methodology document
- Geophysics - handled by Geophysics Working Group.
- D. Teel (Ecology) distributed the updated list of Ecology Unit Managers (see attachment #7). RL agreed to send documentation to both offices (Lacey/Kennewick). Contacts at Ecology: Kennewick Office - Darci Teel, Lacey Office - Larry Goldstein.

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Attachment #2

Agenda

April 22, 1992

9:00 - 9:05

Approval of March General Topics Meeting Minutes

9:05 - 9:20

Update on Laboratory Status - Joan Kessner

9:20 - 9:35

Update on NEPA - Sue Weissberg

9:35 - 9:50

Update on ERAs - Wayne Johnson

9:50 - 10:15

Quick Status Items:

- Update on Inspection Protocols - Bob Holt
- Site Background Study - Fred Ruck
- Site Surveying Task - John Jacobson
- Risk Assessment Methodology - Eric Goller
- Geophysics - Allan Harris
- Lacey versus Olympia Responsibility - Darci Teel

10:15 - 10:30

Break

10:30 - 11:00

Implementation of EII 4.3, Unit Manager Responsibilities - Laura Russell

11:00 - 11:15

Action Item Status

11:15 - 11:30

General Topics Meeting Recap - Suzanne Clarke

11:30 - 11:45

Agenda Items for May General Topics Unit Managers Meeting

11:45 - 12:15

Special Discussion - Regulator Feedback on New Operable Units

12:15 - 1:00

Lunch

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## Attachment #3

General Topics Unit Managers Meeting  
 Official Attendance Record  
 April 22, 1992

Please print clearly and use black ink

PRINTED NAME	SIGNATURE	ORGANIZATION	O.U. ROLE	TELEPHONE
Paul Beaver	<i>Paul Beaver</i>	EPA	Unit Manager	376-8665
MICHAEL BAENTLE	<i>M. Baentle</i>	USACE	ESM	376-4275
Laurence Gadbois	<i>Laurence Gadbois</i>	EPA	Unit Manager	376-9884
Ward Staubitz	<i>Ward Staubitz</i>	USGS	EPA Support	(206) 5936511
PAMELA INNIS	<i>Pamela Innis</i>	EPA	UNIT MANAGER	376-4919
Richard Hibbard	<i>Richard Hibbard</i>	Ecology	CO SUPPORT	206) 493-9367
RICH MULLEN	<i>Rich Mullen</i>	Parametrix	Ecology Support	(206) 455-2550
RALPH PATT	<i>Ralph Patt</i>	OREGON WRD	OBSERVER	503-378-8455
Donna Warner	<i>Donna Warner</i>	DOE-RL	SUPPORT	509-376-5770
John H. Kessner	<i>John H. Kessner</i>	WHL	OSM	(509) 373-3507
Don Sprecher	<i>Don Sprecher</i>	BPC	Ecology Support	(503) 244-7005
Steve Coops	<i>Steve Coops</i>	E-CO	Unit Mgr	206 4596675
CAROL GAWSTON	<i>Carol Gawston</i>	Ecology	Unit Supervisor	(206) 438-7018
Charles Clive	<i>Charles Clive</i>	"	O.U. Mgr	(206) 438-7550
Suzanne Clarke	<i>Suzanne Clarke</i>	SWEC	GSSC	(509) 932-0630
Bob Stewart	<i>Robert K. Stewart</i>	DOE-RL/ERL	Chair, GT	509-376-6190
William J Mallio	<i>William J Mallio</i>	SWEC	GSSC	509-376-6995
Doug Sherwood	<i>Doug Sherwood</i>	EPA	Unit Manager	509-376-9529
Dennis Faulk	<i>Dennis Faulk</i>	EPA	Unit Manager	509-376-8631
HOWARD CHAPMAN	<i>H. L. Chapman</i>	DOE	Support	509-376-0649
Jerky Shuster	<i>Jerky Shuster</i>	PRC	EPA Contractor	206-624-2690
BILL FRYDE	<i>Bill Fryde</i>	SWEC	GSSC	509-376-9830
DAVE ROBERTS	<i>Dave Roberts</i>	WHL	100 Areas	509-376-7600



## Attachment #4

**Action Items Status List**  
**Unit Manager's Meeting: General Topics**  
**April 22, 1992**

Item No.	Action/Source of Action	Status
GT.38	If possible, at the May Unit Managers Meeting a presentation on the approved, preferred alternative method for disposal of the reactors will be given. Action: Jim Goodenough (4/18/90, GT-UMM)	Open The EIS will be reviewed by Admiral Watkins' office and Nuclear Safety (4/16/91). The RL program at DOE/HQ has written a letter to EH urging EH to quickly approve the final EIS and allow it to be published (6/19/91). Waiting for action from headquarters (8/8/91). Waiting for status (11/20/91). Jim Goodenough to give an update on status at February 1992 UMM (2/25/92). Awaiting Headquarter's approval 3/25/92). The distribution package for the final EIS is in preparation (4-17-92).
GT.108	Protocols are to be developed to facilitate conduct of regulatory inspections and site visits at past practice sites. Action: Eric Goller (DOE) (6/19/91)	Open The unofficial draft was provided to the regulators on 10/16/91 (10/16/91). Internal comment resolution in process (2/24/92). DOE will transmit status document to regulators for review and/or comments (3/25/92).
GT.113	Provide an explanation of how information, including supplementary documents, on new sites and on sites that have been cleaned up is included in WIDS. Examples will be provided for illustration. The explanation is to be provided by the first week of October. Action: Nancy Werdel (9/18/91)	Open Dick Fox (WHC) provided the information on WIDS to Nancy Werdel on the 8th of October (10/16/91). Awaiting an update from Nancy Werdel (11/20/91). Dick Fox will update site listings (4/22/92).

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- GT.114 Determine where the macro engineering study is in the approval process of DOE. A presentation will be contingent on DOE management approval. Action: Allan Harris (9/18/91)Open
- WHC gave a presentation to DOE at the unit manager level, then to upper management (Mr. Bixby and Mr. Little) on 10/10/91. A presentation to DOE-HQ will be scheduled before it is given to EPA and Ecology. The document is currently under DOE-RL review (10/16/91). Need to present to project managers, possible December or January (11/20/91). (2/26/92) (3/25/92). Has not yet been approved (4-17-92).
- GT.117 A working group shall be formed to identify parameters for the groundwater and radionuclide background determination. The regulators shall appoint representatives to a working group and provide the names to Fred Ruck, who will be the coordinator. Action: Fred Ruck (11/20/91)
- Open. Deferred to May. (2/26/92) (3/25/92).
- GT.118 A committee is to be formed to review the barrier development program. Membership will include Jerry Cammann (WHC) as Chair, Jim Goodenough (DOE), Rich Hibbard (Ecology), Pam Innis(EPA). Action: Jim Goodenough (11/20/91)
- Closed. ISV barrier to be discussed at February UMM as far as formalizing a committee (2/19/92). Paul Pak is now responsible for this activity (3/25/92).
- GT.118A A technology coordination group is to be formed. Action: Paul Pak, Doug Sherwood, Rich Hibbard and Joan Woolard (2/26/92)
- Closed (4/22/92). Rich Hibbard will be the Ecology representative; Randy Chong is the USACE representative and Joan Woolard (WHC) is the WHC coordinator (2/35/92). Rather than form a group, WHC will provide the regulators with updates of the status of technology development activities at Hanford on a regular (i.e., monthly) basis (4-21-92).

- GT.122 A list of individuals or organizations that need the attachments to the UMM minutes is to be generated. Action: Hal Downey and Bob Stewart. (1/22/92) Closed (4/22/92). WHC will provide attachments for EDMC, the Program office, TPA office, the OU coordinator (4-17-92).
- GT.125 A schedule of the peer review that Action Item GT.114 is to be provided to the regulators. Action: Bob Stewart. (1/22/92) Open. This action has been transferred to Allan Harris (3/25/92). This action will be contingent upon approval from DOE-HQ of GT.114 (4-17-92).
- GT.128 Provide information on the date when CLP versus SW 846 information will be provided to Ecology and EPA. Action: Eric Goller. (2/26/92) Open. To remain open pending outcome of meeting on 3/26/92 (3/25/92). Eric Goller will give status of item at May UMM (4/22/92).
- GT.129 Provide information regarding DOE plans for development of site base maps. Action: Bob Stewart. (2/26/92) Open. This activity has been reassigned to Mike Thompson and Bob Henckel (3/25/92). This action item to be assigned to Nancy Werdel and Dick Fox (4-21-92). USGS will contact Nancy Werdel to determine DOE position and describe scope of low cost solutions (4/22/92).
- GT.132 DOE will take the lead in setting up a meeting to develop priorities for new operable units for work plan preparation. Participants are: Doug Sherwood, Chuck Cline, Darci Teel, Tom Wintczak, and Rich Carlson. Action: Bob Stewart. Closed (4/22/92).

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# **ANALYTICAL SERVICES STATUS**

**Joan Kessner  
April 22, 1992**

## COMMERCIAL CONTRACTS

- **Contract extensions awaiting DOE approval.**
- **Roy F. Weston, Incorporated, Lionville Laboratory will be on-site to meet with the Office of Sample Management and the Vice President of Facility Operations on April 22-23, 1992.**
  - **Teledyne deliverables for radiochemistry.**
- **Maxwell Laboratories, Incorporated, S-Cubed Division met with the Office of Sample Management on-site on April 2, 1992.**

## RFP STATUS

- **Strategy changes.**
  - **Multiple awards.**
  - **Contingent award placement prior to facility assessment.**
- **Negotiations in progress.**
  - **Completed by end of April.**
  - **Five Offerors involved.**
- **Mid-summer anticipated award date.**

## DOE-HQ/EPA National SMO

- VIAR and Company (Environmental Protection Agency Sample Management Office) met with the Office of Sample Management on April 1-3, 1992.
  - Information gathering/exchange.
  - Very productive.
- VIAR and Company to follow-up with second visit.

## TURNAROUND TIMES BY ANALYSES FOR SAMPLE DATA RECEIVED IN MARCH FY '92\*

LAB A	VOA	SEMI-VOA	PEST/PCB's	WET CHEM	METALS
NUMBER OF ANALYSES RECEIVED	-	-	-	9	4
AVERAGE TURNAROUND TIME	-	-	-	21	33

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LAB B	VOA	SEMI-VOA	PEST/PCB's	WET CHEM	METALS
NUMBER OF ANALYSES RECEIVED	16	14	15	16	14
AVERAGE TURNAROUND TIME	10	10	10	10	10

LAB C	VOA	SEMI-VOA	PEST/PCB's	WET CHEM	METALS	RAD CHEM
NUMBER OF ANALYSES RECEIVED	103	79	89	70	132	29
AVERAGE TURNAROUND TIME	51	56	53	49	49	198

LAB D	VOA	SEMI-VOA	PEST/PCB's	WET CHEM	METALS	RAD CHEM
NUMBER OF ANALYSES RECEIVED	130	16	108	110	154	65
AVERAGE TURNAROUND TIME	68	69	73	66	69	171

AGGREGATE TURNAROUND TIME	CHEMICAL ANALYSES				RADIOCHEMICAL ANALYSES	
	LAB A	LAB B	LAB C**	LAB D**	LAB C	LAB D
25	10	51	69	198	171	

\* ALL TIMES REFLECT DAYS  
\*\* EXCLUDES RADIOCHEMISTRY ANALYSES

## FREQUENCY OF DATA VALIDATION

All data packages will be verified and reviewed at a minimum level as required by the OSM procedures. The various types of RI/FS, LFI, and IRM analytical data packages will be validated according to the following frequencies.

### Investigation and Remediation Data

At least 10% of all samples will receive "full validation" as defined in OSM's validation procedures. Remaining data packages will at least be reviewed and verified at the level defined in the OSM validation procedures. Selection of the data packages will be at the discretion of the RI coordinator. Additional data validation may be requested after review and evaluation of validated sample results. The rationale for sample selection will be as follows:

1. Those samples determined to be critical samples such as samples from a borehole placed in a potential source area which does not have a "surrogate" unit for comparison purposes. An example of this would be samples from a borehole placed in a single crib when other similar cribs in the same operable unit are not being sampled.
2. Those samples identified by the RI coordinator to be those which potentially define the extent of contamination such as the first sample collected just beyond the detectable (using field screening) zone of contamination.

### Verification Data

When samples are collected at the conclusion of a clean-up action or other remedy, "full validation" will be conducted on 100% of the data packages in accordance with the OSM validation procedures.

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**EXPEDITED RESPONSE ACTIONS**

**W. L. Johnson**

**Westinghouse Hanford Company**

**April 22, 1992**

ATTACHMENT #6

## **ITEMS TO BE COVERED**

- **Status of ongoing projects**
- **New initiatives**
- **Process for candidate evaluation**
- **Questions & Answers**

## **618-9 BURIAL GROUND ACCOMPLISHMENTS**

- **The exhumation was successful - but required a great deal of flexibility to deal with changing field conditions.**
  - **120 drums were uncovered, 42 contained liquids**
  - **1600 gallons of liquid were recovered**
  - **Other debris was packaged for disposal**
- **Engineering Evaluation completed**
  - **No further actions required**
- **800 gallons of waste shipped - rest still awaiting disposition**

## **316-5 PROCESS TRENCHES ACCOMPLISHMENTS**

- **ERA Proposal was reviewed and approved**
- **Field work was accomplished two months ahead of schedule**
  - **6000 cubic yard of material moved and stabilized**
- **Final report currently undergoing WHC review**

## 200 WEST CCL<sub>4</sub> PLUME ACCOMPLISHMENTS

- **Site characterization and soil vapor extraction tests successfully accomplished**
  - 200 feet radius of influence
  - 300 lbs. CCl<sub>4</sub> removed
- **ERA Proposal reviewed and approved**
- **First system operational on February 26, 1992**
  - Currently operating at 150 cfm, 450 ppm (~1.4 lbs/hr), 5 hrs/day
  - Will be going to 24 hr/day operations in May (design basis 500 lbs/day)
- **Numerous procurement activities are ongoing**
- **Will be an iterative process**

**NEW ERA INITIATIVES**

- **Sodium Dichromate Barrel Site**
- **North Slope 2,4-D Site**
- **Pickling Acid Crib**
- **Riverland Rail Wash Pit & Munitions Dump**
- **100 Area Reactor Effluent Pipelines**
- **618-11 Burial Ground**

## PROCESS FOR CANDIDATE EVALUATION

- **Candidate site identification (AAMSRs, LFIIs, RIs, etc.)**
- **ERA candidate database and fact sheets**
- **Identify priority sites**
- **Planning Proposal (short list)**
- **Prioritize short list**
- **Initiate Projects**
  - **Site characterization**
  - **EE/CA**
  - **ERA Proposal**
  - **Design/Implementation/Monitoring**
  - **Reporting**



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

April 21, 1992

TO: Dave Nylander  
FROM: Darci Teel *DT*  
SUBJECT: Updated Unit Manager's List

Attached please find the updated Unit Manager's List for the Washington State Department of Ecology, Nuclear and Mixed Waste Management's Hanford Project staff. If you have any questions or comments, please let me know.

Thank you. •

DT:mf

Attachment

cc: Dave Jansen  
Larry Goldstein

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UNIT MANAGER'S LIST  
April 21, 1992

<u>Operable Unit</u>	<u>Ecology Unit Manager</u>
100-BC-1 Operable Unit	Rich Hibbard/Dib Goswami
100-BC-5 Operable Unit	Dib Goswami
100-DR-1 Operable Unit	Darci Teel/Dib Goswami
100-FR-1 Operable Unit	Dib Goswami
100-HR-1 Operable Unit	Darci Teel/Dib Goswami
100-HR-3 Groundwater Operable Unit	Chuck Cline
100-KR-1 Operable Unit	Dib Goswami
100-KR-4 Groundwater Operable Unit	Dib Goswami
100-NR-1 Operable Unit	Steve Cross
100-NR-2 Operable Unit	Chuck Cline
200-BP-1 Operable Unit	<del>DARCI TEEL</del> <del>Larry Goldstein</del> (TBD)
200-UP-2 Operable Unit	Darci Teel (TBD)
300-FF-1 Operable Unit	Rich Hibbard
300-FF-5 Groundwater Operable Unit	Dib Goswami
1100-EM-1 Operable Unit	Rich Hibbard
U Plant	Darci Teel/Larry Goldstein
S Plant	Billie Mauss
PUREX	Darci Teel/Tom Tebb (TBD)
Semi-Works	Darci Teel (TBD)
Risk Assessment Methodology	Steve Cross
Hanford Soils/Groundwater Background Study	Chuck Cline

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200-W Groundwater AAMSR

Dib Goswami

200-E Groundwater AAMSR

Dib Goswami

Quality Assurance

Billie Mauss

Laboratory Issues

Billie Mauss

Sampling

Billie Mauss

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WESTINGHOUSE HANFORD COMPANY

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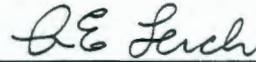
WHC-CM-7-7  
EII 4.3, REV 0\*  
1 of 25  
May 8, 1992  
RR/Environmental  
Division

ENVIRONMENTAL INVESTIGATIONS AND  
SITE CHARACTERIZATION MANUAL

TITLE:

Approved by

CONTROL OF CERCLA AND OTHER  
PAST-PRACTICE INVESTIGATION  
DERIVED WASTE



R. E. Lerch, Manager  
Environmental Division

1.0 PURPOSE

This Environmental Investigations Instruction (EII) establishes a system to control the containment, labeling, and tracking of waste generated during Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and other past-practice waste site environmental investigation, site characterization, and well maintenance activities.

2.0 SCOPE

This EII applies to waste generated during CERCLA and other past-practice waste site environmental investigation, site characterization, and well maintenance activities (e.g., drilling operations). This EII governs the handling and storage of wastes unless otherwise specified in working/planning documents approved by the U.S. Department of Energy, Richland Field Office (RL) and regulatory agencies. This EII does not address characterization and investigation activities involving trenching, backhoe excavations, or surface sampling. Material handling from trenching, backhoe operations, or surface sampling will be determined on a case-by-case basis.

Purgewater, as defined in this EII and EII 10.3, shall be managed in accordance with EII 10.3. Residual solids generated from purgewater transfer operations shall be managed in accordance with Sections 6.3 and 6.7 of this EII.

3.0 DEFINITIONS

Centralized Waste Container Storage Area. Operable unit-specific, centralized location(s) where contained waste, managed in accordance with this EII (Sections 6.7, 6.7.1, 6.7.2) is stored pending final disposal.

\*This is an EPA-approved approach for management of IDW for EPA-managed sites.

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Field Screening. Utilization of field instruments and/or field test kits for the purpose of segregating potentially hazardous or radioactive waste from unknown waste. Field screening will include the monitoring of drill cuttings, soils, and slurries for radioactivity, organic vapors, corrosivity, reactivity, and combustibility utilizing the following instrumentation/methodologies:

- RAD - Radiation detection instruments (e.g., count-rate meters, Micro-R meters)
- Organic Vapors - Organic Vapor Monitors
- Corrosivity - pH meter (reference WAC 173-303-090[6])
- Reactivity - Process knowledge and instrument/test kit detections
- Combustibility - Combustible gas meter if OVM/HNU readout capabilities are exceeded.

NOTE: Instruments and/or tests other than those identified above may be utilized as appropriate.

Generated Waste. Waste, other than purgewater (as defined in EII 10.3), that exists as a result of active field characterization or well maintenance activities.

Hazardous Waste. Hazardous Waste (Environmental Protection Agency [EPA] Term)/Dangerous Waste (Washington State Department of Ecology [Ecology] Term:) Nonradioactive solid waste as defined in 40 CFR 261, "Identification and Listing of Hazardous Waste," as requiring special handling, transportation, and/or disposal methods; and as defined in WAC 173-303-040, "Dangerous Waste," as those solid wastes designated as dangerous or extremely hazardous waste in accordance with WAC 173-303-070 through 173-303-103.

NOTE: The Toxicity Characteristic Leaching Procedure (TCLP) has replaced the Extraction Procedure Toxicity test for the identification of hazardous wastes. (reference 55 FR 26986)

NOTE: The WHC Solid Waste Engineering Analysis Group's "Dangerous Waste Designation" procedure will be used to appropriately classify and manage all Investigation-Derived Waste (IDW) solid wastes (e.g., personal protective equipment, soil, etc.) subject to the TCLP.

Mixed Waste. Radioactive waste that is also hazardous, dangerous, or toxic.

Process Knowledge. A scientific determination, based on the examination of available types of published data that would lead an individual knowledgeable with regard to the pertinent science or engineering disciplines to believe there is a strong probability that hazardous waste

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exists at a site or area. Examples of published data that may provide site specific information include, but are not limited to:

1. Previous chemical or biological discharges.
2. Soil or water analysis results.
3. Scoping study results (i.e., soil gas measurements, air measurements, walking reconnaissances, geophysical studies).
4. Operations reports.
5. Unplanned events or accident reports.
6. Drawings or other documents.
7. Data collected from ongoing characterization activities.

NOTE: The Waste Information Data System (WIDS) is a source of this information.

NOTE: Process knowledge shall be used in field determination in accordance with Sections 6.0, 6.3, 6.4, and 6.5 of this EII.  
(40 CFR 262.11, WAC 173-303-070)

Purgewater. As defined in EII 10.3, water removed from within the water table from groundwater monitoring well drilling, development, aquifer testing, sampling, maintenance, or remediation activities.

Radioactive Waste. Solid, liquid, or gaseous material that contains radionuclides regulated under the Atomic Energy Act of 1954, as amended, and of negligible economic value considering costs of recovery (WHC-CM-7-5).

Suspected Hazardous Waste. Nonradioactive solid waste that meets the criteria for Suspected Hazardous Waste as defined in Section 6.4 of this EII.

Suspected Mixed Waste. Radioactive solid waste that meets the criteria for Suspected Hazardous Waste as defined in Section 6.4 of this EII.

Unknown Waste. Drill cuttings, decontamination fluids, materials, cloths, wipes, grab samples, and well maintenance soils/slurries from a hazardous waste site having no indications from initial field investigations that hazardous or radioactive material is present at the time of placement within the drum.

Unknown waste containers are those with known physical characteristics (solid, liquid, slurry, etc.) but unknown chemical characteristics; differentiating from unfamiliar (orphan) containers with unknown physical and chemical characteristics, such as ones found at abandoned waste sites.

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CONTROL OF CERCLA AND OTHER  
PAST-PRACTICE INVESTIGATION DERIVED WASTE

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Waste. Material that is discarded, abandoned, inherently waste-like, or not exempted by regulations.

Waste Management. For the purpose of this document, waste management means the generation, characterization (analysis), storage, surveillance, record keeping, and reporting of CERCLA, or other past-practice waste site waste.

Waste Site. Any past-practice facility or location where waste was disposed. These sites may include burial grounds, cribs, ditches, ponds, tanks, storage facilities, and other units used for the intentional or unintentional disposal or management of wastes (WHC-CM-7-5). Utilizing process knowledge, the Project/Remedial Investigation (RI) Coordinator, in concurrence with the lead agency, will determine, on a case-by-case basis, waste site boundaries within an operable unit. Activities within the boundaries of a waste site would be governed by the site-specific Hazardous Waste Operations Plan (HWOP) or other safety documentation. The purpose and authority for HWOPs are defined in EII 2.1.

#### 4.0 RESPONSIBILITIES

See Waste Management Responsibilities Diagram (Figure 1).

#### 4.1 PROJECT/REMEDIAL INVESTIGATION COORDINATOR

The Project/RI Coordinator for characterization activities shall coordinate all activities for characterization and proper disposition of waste associated with projects on CERCLA and other past-practice waste sites. The Project/RI Coordinator shall determine, in concurrence with the lead agency, RL, Health and Safety Officer, and participating construction organizations, the boundaries of waste sites and locations for waste storage within each operable unit. The Project/RI Coordinator is responsible for initiating development of the Waste Control Plan (Figure 2). The Project/RI Coordinator shall make available to EPA and Ecology all validated laboratory analytical data collected pursuant to the Tri-Party Agreement, with copies to the IDW Coordinator, within fifteen days of receipt of the data.

#### 4.2 FIELD TEAM LEADER/COGNIZANT ENGINEER

The Field Team Leader/Cognizant Engineer (FTL/CE) shall:

1. Ensure drill cuttings and well maintenance soils/slurries are monitored in accordance with the Description of Work or Sampling and Analysis Plan.
2. Minimize waste by segregating drill cuttings and well maintenance soils/slurries based on field determination criteria outlined in Sections 6.0, 6.3, 6.4, and 6.5 of this EII.
3. Collect and containerize unknown, suspected hazardous, hazardous, radioactive, suspected mixed, and mixed waste.

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4. Have adequate supplies (e.g., drums/containers, liners, markers, forms, labels) to handle anticipated needs (unknown, suspected hazardous, hazardous, radioactive, suspected mixed, or mixed waste).
5. Obtain unique container tracking numbers from the IDW Coordinator.
6. Initiate the Interim Control of Unknown, Suspected Hazardous, Suspected Mixed, and Radioactive Waste form (IC form), Figure 3, securing the plastic, weatherproof form to drum, and submitting the paper copy of the IC form to the IDW coordinator in accordance with Section 6.6.4 of this EII.

NOTE: The IC form is used as both a plastic, weatherproof label and as a paper form. The plastic form is to be attached to the drum; the paper form is to be submitted to the IDW Coordinator for tracking purposes.

7. Move waste from the point of generation to the Centralized Waste Container Storage Area during active field operations.
8. Set up container storage areas in accordance with Section 3.0 of this EII.
9. Notify the IDW Coordinator once active field operations have concluded.
10. Coordinate with the Health Physics Technician (HPT) on movement of radioactive and mixed waste drums to a properly marked location as identified by the HPT in accordance with WHC-CM-4-10, Section 7. Mixed waste shall be moved in accordance with Section 6.5 of this EII.

#### 4.3 INVESTIGATION-DERIVED WASTE COORDINATOR

The IDW Coordinator shall:

1. Provide unique container tracking numbers to the FTL/CE.
2. Review the IC forms provided by the FTL/CE and inspect the waste to confirm that the storage area and containers have been managed in compliance with this EII. The IDW Coordinator will notify the FTL/CE of any necessary corrective actions required to negate noncompliant conditions identified during the waste inspection. When noncompliant conditions have been corrected, the IDW Coordinator will sign and date the IC form, and assume full responsibility for the waste.
3. Enter, update and retrieve information using the generator waste tracking database for all containerized waste generated during environmental investigation, site characterization, and well maintenance activities.

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4. Maintain a controlled logbook for use in the field to document container activity.
5. Submit a Request for Hazard Identification Form (Figure 4) and sample lab analyses to Solid Waste Engineering for interpretation and hazard identification of waste managed by this EII.
6. Inspect containers of suspected hazardous, radioactive, or mixed liquid waste weekly; inspect all other waste containers monthly; and complete the Waste Inspection Log (Figure 5).
7. Coordinate the storage and segregation of radioactive, hazardous, and mixed waste containers based on the laboratory sample analysis and in accordance with this EII.
8. Maintain records as specified in Section 6.11 and submit records to the Field File Custodian (FFC) for permanent retention processing in accordance with EII 1.6.
9. Report any deviations from normal operations to their cognizant manager.
10. The IDW Coordinator is the emergency contact and must be notified immediately in the event of a spill or unplanned release. The IDW Coordinator would then follow proper notification steps in accordance with WHC-CM-7-5, Part B.

#### 4.4 SITE SAFETY OFFICER

The Site Safety Officer (SSO) ensures that all onsite investigative drilling and waste handling activities are conducted in a manner that is protective of human health and the environment. All personnel directly involved with onsite drilling or waste handling activities will defer any safety concerns (other than radiological) to the SSO.

#### 4.5 HEALTH PHYSICS TECHNICIAN

The HPT shall provide onsite radiation monitoring for all investigative drilling activities and waste handling operations in areas potentially contaminated with radionuclides. All personnel directly involved with onsite investigative drilling or waste handling activities will defer any radiological concerns to the HPT.

#### 4.6 ENVIRONMENTAL ENGINEERING AND GEOTECHNOLOGY POINT-OF-CONTACT

The Environmental Engineering and Geotechnology (EE&G) point-of-contact shall:

1. Issue unique container tracking numbers to IDW Coordinator(s).

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2. Report the status of containers to the cognizant manager on a monthly basis.

#### 4.7 SOLID WASTE ENGINEERING

Solid Waste Engineering shall review the Request for Hazard Identification Form and relevant laboratory sample analyses provided by the IDW Coordinator and provide the IDW Coordinator with documented hazard identification of the subject waste. Hazard identification will include, when applicable, waste characteristics (corrosivity, ignitability, etc.), identification of constituent concentrations above regulated levels, and any additional packaging recommendations. Solid Waste Engineering shall maintain a file of the Request for Hazard Identification forms and accompanying sample lab analyses.

#### 5.0 REQUIREMENTS

##### 5.1 CONTAINERS/LINERS (DRUMS/PLASTIC LINERS)

Until an alternate storage container (approved by regulators) can be identified and approved, the following U.S. Department of Transportation (DOT) drums shall be used:

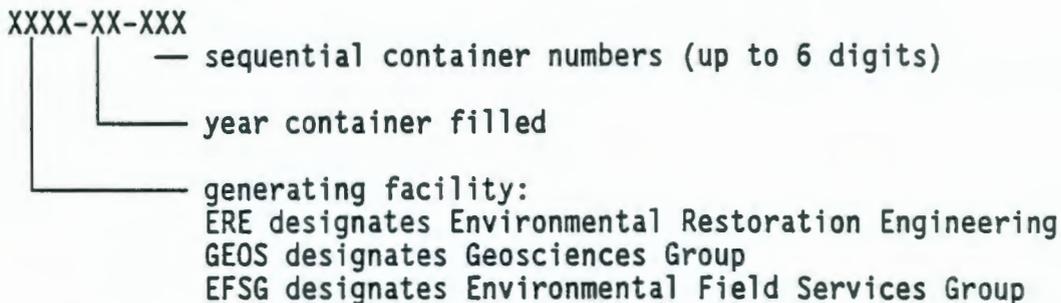
1. DOT specification 17-H, 17-C or 17-E steel drums shall be used to contain unknown or regulated waste. The 55-gallon drum size is generally used; however, 8-gallon, 30-gallon, 85-gallon, 95-gallon, and 110-gallon size containers of steel or other construction, meeting DOT specifications, may also be used for overpacking and salvage. Type 17-H or 17-C steel drums must have a gasket for the lid before containing wastes. Type 17-E drums must have bungs in good condition before containing fluids.
2. Prior to filling, the drum will be lined with a plastic liner at least 10 mil thick for all nonradioactive drill cuttings. All saturated radioactive drill cuttings shall be packaged in a drum lined with a plastic liner at least 90 mil thick.
3. When beta emitters are stored in metal drums, the criteria for storage are outlined in WHC-EP-0063, in the sections entitled "Surface Dose Rates." These criteria limit surface dose rates of radioactive containers to <200 mrem/hr and <100 mrem/hr for mixed waste containers, including all energy emitting isotopes (beta, gamma, neutrons). Quantities of energy emitting isotopic IDW placed in containment will be limited to comply with this criteria.

##### 5.2 UNIQUE CONTAINER TRACKING NUMBER

The IDW Coordinator shall track containers of waste using the following numbering system. Unique container tracking numbers shall also be used to

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track laboratory samples that might be returned to the original site where generated.



### 5.3 ENTRIES AND CORRECTIONS

All entries on the IC forms shall be entered in permanent, reproducible black ink. Corrections shall be made by striking one line through the incorrect information, entering corrected data (when appropriate), initialing, and dating.

### 6.0 PROCEDURE

See Figure 6, Waste Determination Logic Diagram.

When unknown, suspected hazardous, hazardous, radioactive, suspected mixed, or mixed waste is placed in a waste drum, the drum shall be managed in accordance with this EII.

#### Outside a Waste Site Boundary - Dry/Moist Material

Soils/drilling cuttings that 1) originated outside the boundaries of a waste site (as identified at the Unit Managers Meetings and documented in the Waste Control Plan, Figure 2), 2) are dry (absent of moisture, dusty, dry to the touch) or moist (damp, but no visible water), and 3) originated above the water table shall not be drummed if field analytical screening protocol (as identified in Sections 6.4 and 6.5 of this EII) does not detect radioactive or hazardous waste and if there is no process knowledge of hazardous or suspect hazardous waste. Such material will be collected in soil piles near the point of generation and surveyed intermittently (a minimum of once each day) to verify the absence of radiological components as indicated by process knowledge. Soil piles will not normally require chemical sampling unless visual evidence or field screening indicate potential contaminants, or the unit managers identify a justified need for soil pile sampling. Soil piles requiring sampling will have staked boundaries. These piles will be analyzed for the constituents of concern as identified in the Waste Control Plan. Should the analyses indicate soil pile contamination not apparent via field screening, the soil pile and the soil surface to a depth of 2 inches below the soil pile will be drummed and transported to the Centralized Waste Container Storage Area for appropriate storage.

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Inside a Waste Site Boundary - Dry/Moist Material

All material generated inside a waste site boundary will be drummed upon generation and further dispositioned as identified in Section 6.3.

Saturated Soils/Drill Cuttings

All saturated soils/drill cuttings (generated inside or outside a waste site boundary) will be drummed upon generation and further dispositioned as identified in Section 6.3.

Decontamination Fluids

Decontamination fluids will consist of nonphosphate soap/water or potable water. Utilization of any decontamination agent other than nonphosphate soap will be assessed to insure that additional regulated constituents will not be added to the decontamination waste matrix. Utilization of the decontamination agent will be documented on the Equipment Decontamination Form (BC-6000-292) found in EII 5.4.

All decontamination fluids shall be managed as either nonhazardous or unknown waste. Decontamination fluids shall be collected as unknown waste when soil/slurries/drill cuttings are collected as suspected hazardous waste, suspected mixed waste, or radioactive waste. Otherwise, decontamination fluids will be nonhazardous and disposed of to the ground outside the exclusion zone.

Decontamination water from similar waste sites may be collected in the same container. A composite sample of decontamination water generated from similar waste sites shall be taken, analyzed, and used for determination. Sampling of the decontaminated fluids will be limited to the constituents of concern as identified in the Waste Control Plan.

All containerized decontamination water is to be overpacked in polyethylene drums and remain contained pending receipt of sample analyses.

Decontamination fluids found to be hazardous or mixed, as determined by the analyses results, will be stabilized (absorbed, solidified) and transported to the Centralized Waste Container Storage Area.

Decontamination fluids found to be or radioactive will either be managed as purgewater (in accordance with EII 10.3) or stabilized (absorbed, solidified) and transported to the Centralized Waste Container Storage Area.

Miscellaneous Solid Waste

Only materials (disposable personal protective equipment, rags, etc.) having potentially contacted hazardous, radioactive, or mixed waste will be considered potentially contaminated. These potentially contaminated materials shall be placed in a plastic bag, taped closed, marked as to the associated footage interval(s), and placed in DOT drums specific to each area of potential contamination (borehole, crib, etc.). Final waste status

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(nonhazardous, hazardous, etc.) will be identified utilizing the sample analyses data of the soil/slurries contacted. These materials will be dispositioned with the waste contacted. Materials from different boreholes shall not be placed in the same drum. All other materials will be considered nonregulated and disposed of as such.

## 6.1 CONTAINER PREPARATION

1. The entire container shall be checked for damage. Damaged containers will not be used. They will be sent to Central Landfill as nonregulated trash or reconditioned as appropriate.
2. Prior to filling, all nonradioactive drill cuttings shall be packaged in a drum with a 10-mil thick reinforced plastic liner. All saturated radioactive drill cuttings shall be packaged in a drum with a 90-mil thick plastic liner.
3. Drum markings shall be durable and displayed on a background of sharply contrasting color.
4. The following information should be legibly written on the lid with indelible contrasting ink:
  - a. Project name
  - b. Borehole number
  - c. Footage (enter footage intervals)
  - d. Contents (enter contents of drum)
  - e. Beginning date (enter date material first placed in drum)
  - f. Date sealed (enter date material last placed in drum)
  - g. Unique container number (enter when sealed)
  - h. Name of person sealing the drum.
5. Secure the plastic, weatherproof IC form to side of container in accordance with Section 6.6(4) of this EII.

NOTE: Containers must be closed and secured except when material is being added or removed.

## 6.2 FIELD SCREENING DRILL CUTTINGS AND WELL MAINTENANCE SOILS/SLURRIES

1. Drill cuttings/soils/slurries shall be monitored in accordance with the Description of Work or Sampling and Analysis Plan. Field determination shall be based upon criteria identified in Sections 6.0, 6.3, 6.4, and 6.5 of this EII. The control, use, handling, maintenance, and calibration of monitoring equipment shall be in accordance with EII 3.2.
2. Chemical/radiological sampling of IDW originating from within the boundaries of a waste site will be conducted as identified in the work plan. Chemical sampling of the vadose zone IDW originating from outside the boundaries of a waste site will not normally be

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required unless visual evidence or field screening indicates potential contaminants, or the unit managers identify a justified need for sampling. Soil piles requiring sampling will be analyzed for the constituents of concern as identified in the Waste Control Plan. IDW originating from outside the boundaries of a waste site will be sampled at five foot intervals and analyzed for radiological constituents.

3. A sample analysis request shall be prepared to accompany the sample(s) to the analytical facility, to ensure that the correct analysis is performed. Some stationary analytical work can be eliminated by using an on-site mobile field screening facility. The Westinghouse Hanford Company (WHC) sample analysis request form (A-6000-406) is presented in EII 5.2. The Project/RI Coordinator may choose to use a different form depending on the analytical facility and project needs.

### 6.3 UNKNOWN WASTE DETERMINATION AND COLLECTION

1. Saturated soil, perched water, or groundwater that is generated inside or outside a waste site boundary, and does not meet the criteria outlined in Section 6.4(1) of this EII, shall be drummed and managed as unknown waste.
  - a. When generated outside a waste site boundary and only radiological analyses is required for release, the waste is to be contained pending receipt of analyses. If analyses indicate that radioactive contamination is present, the material will be solidified/absorbed or the free liquids decanted and managed as purgewater. The drum will then be transferred to the Centralized Waste Container Storage Area. If analyses indicate no radioactive contamination, the material will be returned to the ground at a location identified in the Waste Control Plan.
  - b. When generated inside a waste site boundary and subject to chemical sampling, the waste is to be contained pending receipt of analyses. Material will be solidified or absorbed upon containment.
2. Drill cuttings (dry soils) generated inside a waste site boundary shall be drummed upon generation. However, the material may be disposed of at the drill sites (exclusive of ponds, cribs, and ditches) when the material meets the following criteria:
  - a. The field survey does not indicate the presence of radioactive materials in excess of the minimum detectable activity levels (reference WHC-CM-4-10, Section 11, 4.6).
  - b. The field survey of expected contaminants does not indicate the presence of hazardous (chemical) materials above criteria defined in Section 6.4(1).

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- c. Further health physics screening confirms the activity of the material to be less than 200 pCi/gm beta/gamma and 60 pCi/gm pCi/gm alpha. Decontamination fluids generated in the intervals associated with materials described above may be disposed of outside the exclusion zone.
3. During the collection process, if the material meets the suspected hazardous waste criteria in Section 6.4(1), it shall be segregated, handled, and managed as suspected hazardous waste for the remainder of the borehole unless the criteria for unknown waste is again met.

#### 6.4 SUSPECTED HAZARDOUS WASTE FIELD DETERMINATION AND COLLECTION

1. Drill cuttings/soils/slurries shall be segregated, handled, and managed as suspected hazardous waste based on process knowledge of material known to have been discharged to the area under investigation and any of the following in support of this process knowledge:
  - a. Direct instrumentation reading of organic vapor in excess of 5 ppm above background levels 1 inch above freshly excavated soil.
  - b. pH less than 3 or greater than 12.
  - c. Results from field screening instruments and/or tests that indicate the presence of contaminants above dangerous waste threshold limits.
  - d. Laboratory analyses exceeding established limits as identified in the Waste Control Plan (Figure 2) for regulated waste determination.

NOTE: The above criteria are solely for the purpose of waste segregation and determination. Health and safety monitoring criteria will be detailed in the site-specific HWOP.

2. During the collection process, if the material no longer meets the suspected hazardous waste criteria in Section 6.4(1), it shall be segregated, handled, and managed as unknown waste for the remainder of the borehole unless the criteria for suspected hazardous waste is again met. Waste shall be segregated to meet the intent of EE&G's Waste Minimization Plan (WHC-SD-WM-EV-037).
3. The words "SUSPECT HAZARDOUS" shall be written on the top and sides of containers containing suspected hazardous waste. Each container must be marked to identify the major risks associated with the waste in the container (e.g., corrosive, reactive, etc.). To prevent mixing contaminated waste, only material from the same borehole should be placed in a container.

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4. All saturated soil, perched water, or groundwater field determined as suspect hazardous waste shall be absorbed or solidified upon generation.

#### 6.5 RADIOACTIVE WASTE/MIXED WASTE FIELD DETERMINATION AND COLLECTION

1. Drill cuttings/soils/slurries/decontamination fluid/miscellaneous solid waste identified as radioactive shall be segregated into DOT specified drums or an approved alternate container for radioactive material.
2. Radioactive waste also suspected of containing hazardous constituents shall be handled as suspected mixed waste and segregated into DOT specified drums or an approved alternate container for mixed waste. The words "SUSPECT MIXED" shall be written on the top and sides of the container, along with the major risks associated with the containers waste (e.g., corrosive, reactive, etc.).
3. All containers of saturated soil, perched water, or groundwater field determined as radioactive/mixed waste shall be absorbed or solidified upon generation.
4. Each container of radioactive and/or suspected mixed waste shall be labeled with a DOT radioactive hazard class label and managed in accordance with this EII.
5. Containers of radiological material shall be segregated from containers of nonradiological material.
6. Radioactive/mixed waste drums shall be moved to a properly marked field location within a radiologically controlled area in accordance with WHC-CM-4-10, Radiation Protection.

#### 6.6 SEALING CONTAINER

1. When the container is ready to be sealed, the opening of each plastic bag shall be twisted closed and secured with tape (when applicable). For drums, check to confirm a gasket is on the lid; then attach and secure with a locking ring and locking ring nut.
2. Upon sealing, the container lid shall be marked as identified in Section 6.1(4).

NOTE: For purposes of waste minimization, soils from different boreholes should not be placed in the same container.

3. When the container is sealed, a unique container tracking number shall be obtained from the IDW Coordinator. The unique container number shall be entered on the IC forms and on the container lid.

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4. All unknown, suspected hazardous, suspected mixed, and radioactive waste containers awaiting laboratory analysis shall have IC forms completed and signed by the FTL/CE. The FTL/CE shall print the name of the IDW Coordinator on the IC forms. The plastic, weatherproof IC form shall be attached to the side of the container (for drums, place between the ribs on the upper third of drum). Verification shall be made that the drum number is legible on the form.

The FTL/CE shall document any indications of contamination (organic, inorganic, radioactive), and list representative sample numbers in the Comments/Suspected Hazards section of the IC form. A paper copy of the IC form shall be submitted to the IDW Coordinator for review and processing. The IDW Coordinator shall sign the paper IC form upon completion of the review.

6.7 MANAGEMENT OF WASTE CONTAINERS

All containerized waste being stored at the well site while awaiting analyses results shall be placed on pallets in an appropriately established field storage area (i.e., signs, ropes, pallets, etc.).

All containers of suspected hazardous, radioactive, or mixed liquid waste will be inspected weekly; all other waste containers will be inspected monthly by the IDW Coordinator or delegate. The Waste Inspection Log (Figure 5) will be completed to document the inspection. Drums showing signs of deterioration will be identified on the drum inspection log and immediately overpacked. A review and evaluation of deteriorating containers will be performed by DOE, EPA, Ecology, and WHC resulting in a decision, based on best management practices, regarding future storage.

Spills or releases will be reported in accordance with WHC-CM-7-5, Part B, "Non-Routine Releases." Appropriate immediate action will be taken to protect human health and the environment.

Waste drums will be segregated into the following categories: solid, liquid, radioactive, mixed, hazardous, and unknown waste. Additionally, waste suspected of or containing known hazardous constituents will be segregated based on characteristics (e.g., reactivity, corrosivity, etc.).

Centralized Waste Container Storage Area

Contained waste that has not been chemically/radiologically released will be transported to operable unit-specific Centralized Waste Container Storage Areas as soon as possible, within 3 months of the Office of Sample Management's (OSM) receipt of the waste sample analysis results.

The exact locations of the Centralized Waste Container Storage Areas will be determined and approved at the Unit Managers Meetings. All Centralized Waste Container Storage Areas will be located within the boundaries of the operable unit from which the stored waste was generated.

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The Centralized Waste Container Storage Area will have signs posted on two sides and a barrier surrounding the active portion of the facility. Drums will be elevated on pallets and otherwise protected from contact with accumulated liquids. Tape, pallets, and salvage drums will be available at the Centralized Waste Container Storage Area.

Extremely Hazardous Waste (EHW) (as determined by characterization data) will be stored at the Centralized Waste Container Storage Area and protected from the elements by means of a building or other protective covering. Interim storage/final disposal of EHW will be determined at the Unit Managers Meeting utilizing best management practices.

Only solid (non-liquid) waste will be stored in the Centralized Waste Container Storage Area.

#### 6.8 FINAL DISPOSAL

The final container waste status (non-regulated, hazardous, mixed, etc.) will be assigned by Solid Waste Engineering with the concurrence of the cognizant IDW Coordinator.

Any material determined to be nonhazardous and appropriate for return to the ground shall be disposed of at a locale that is mutually agreed upon by the unit managers. The disposal locale shall be identified in the Waste Control Plan.

Waste with a final container waste status of hazardous, radioactive, or mixed shall be transferred to the Centralized Waste Container Storage Area for eventual incorporation into the remedial action as identified in the operable unit-specific ROD.

Based on the laboratory sample analyses, waste containers shall be handled as follows:

- a. Dry soil that is not regulated as a hazardous, dangerous, or radioactive waste may be disposed of at the point of generation or outside the exclusion zone. Disposal locales will be recorded in the IDW Coordinator's field logbook and Waste Control Plan.
- b. Wet soils/slurries that are not regulated as a hazardous, dangerous, or radioactive waste may be disposed of on the soil surface outside the exclusion zone. Disposal locales will be recorded in the IDW Coordinator's field logbook and Waste Control Plan.
- c. Decontamination fluid that is not regulated as a hazardous, dangerous, or radioactive waste shall be disposed of on the soil surface outside the exclusion zone.
- d. The words "SUSPECTED HAZARDOUS" shall be removed (e.g. lined out, painted over, etc.) from any waste containers that are initially field determined as suspected hazardous or suspected mixed waste

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when sample analyses indicate the waste is nonregulated with regard to hazardous constituents.

- e. The word "HAZARDOUS" shall be written on any containers identified as hazardous or dangerous waste and the associated major risk(s) identified on the container. (Refer to Sections 6.4, 6.5, and 6.6 for hazardous determination criteria.)
- f. Decontamination water regulated as a hazardous, dangerous, or radioactive mixed waste will either be removed from the site for appropriate RCRA disposal or be absorbed/solidified and transferred to the Centralized Waste Container Storage Area, with the decision made on a case-by-case basis.
- g. Decontamination water found to be radioactive will either be managed as purgewater (in accordance with EII 10.3) or be absorbed/solidified and transferred to the Centralized Waste Container Storage Area, with the decision made on a case-by-case basis.
- h. Material that is regulated as a hazardous, dangerous, or radioactive waste will be transferred to the Centralized Waste Container Storage Area.
- i. Plastic bags of disposable personal protective equipment, foil, paper, gloves, etc., in drums identified as nonregulated material shall be collected and disposed of as trash (dumpster or central landfill). Regulated material will be dispositioned along with the IDW contacted.

## 6.9 REPORTING

The IDW Coordinator(s) shall report the status of containers to the cognizant manager on a monthly basis.

## 6.10 RECORDS

The IDW Coordinator shall maintain the following documents in record packages, as appropriate.

1. Paper copy of IC form(s). (Several IC forms may be grouped in one record package when a number of drums are represented by a single set of analyses, or when other related disposal criteria exist.)
2. Copy of the Request for Hazard Identification Form transmitted to Solid Waste Engineering.
3. Hazard Identification Response (original) received from Solid Waste Engineering.
4. Uniform Hazardous Waste Manifest (only applicable for regulated waste removed from the boundary of the operable unit).

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5. Correspondence regarding management of drums.
6. Copy of the Waste Control Plan.

The record packages will be submitted by the IDW Coordinator for processing and transmittal for permanent retention by the Field File Custodian in accordance with EII 1.6 when:

1. The IDW Coordinator receives the original Uniform Hazardous Waste Manifest back from the receiving facility's operator or
2. Other waste drums have been properly disposed and documented on the disposal analysis letter or
3. Waste drums have been properly stored and await disposal action based on the ROD.

Inspection logs for container storage areas will be maintained by the IDW Coordinator and submitted for permanent retention every 6 months or once the inspection area is no longer in use. Inspection logs will be submitted in grouped packages, i.e., by location, project, well number, etc. Copies of the inspection logs will be provided to the regulators at the monthly unit managers meetings.

## 7.0 REFERENCES

- 40 CFR 261, "Identification and Listing of Hazardous Waste."
- 40 CFR 262, "Standards Applicable to Generators of Hazardous Waste."
- 55 FR 26986, "Hazardous Waste Management System: Identification and Listing of Hazardous Waste; Toxicity Characteristic Revisions; Final Rule."
- DOE 90-ERB-073, "Strategy for Handling and Disposing of Purgewater on the Hanford Site."
- WAC 173-303, "Dangerous Waste Regulations."
- WHC-CM-4-3, Volume 4, Industrial Safety Manual, Health and Safety Programs for Hazardous Waste Operations.
- WHC-CM-4-10, Radiation Protection, Section 7, "Radiological Entry Requirements."
- WHC-CM-5-16, Hazardous Waste Management.
- WHC-CM-7-5, Environmental Compliance, Part B, "Non-Routine Releases."
- WHC-CM-7-7, Environmental Investigations and Site Characterization Manual.  
EII 1.6, "Records Management."  
EII 2.1, "Preparation of Hazardous Waste Operations Permits."

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- EII 3.2, "Health and Safety Monitoring Instruments."  
EII 4.2, "Interim Control of Unknown, Suspected Hazardous and Mixed Waste."  
EII 5.2, "Soil and Sediment Sampling."  
EII 5.4, "Field Decontamination of Drilling, Well Development and Sampling Equipment."  
EII 9.1, "Geologic Logging."  
EII 10.3, "Purgewater Management."

WHC-EP-0063, Hanford Site Radioactive Solid Waste Acceptance Criteria.

WHC-SD-WM-EV-037, Waste Minimization Plan - Environmental Engineering and Technology Function, 1989.

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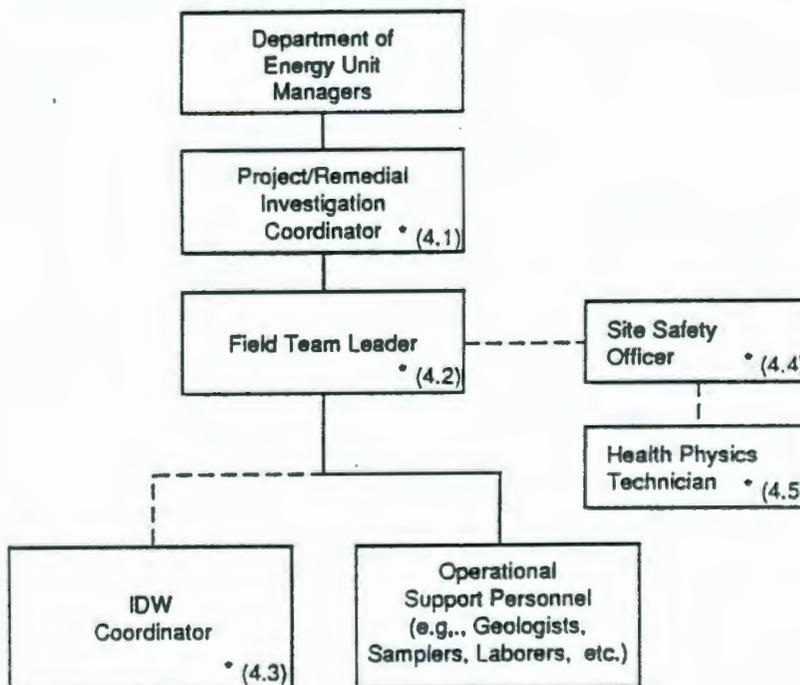
WHC-CM-2-14, Hazardous Material Packaging and Shipping.

WHC-CM-4-11, ALARA Program Manual.

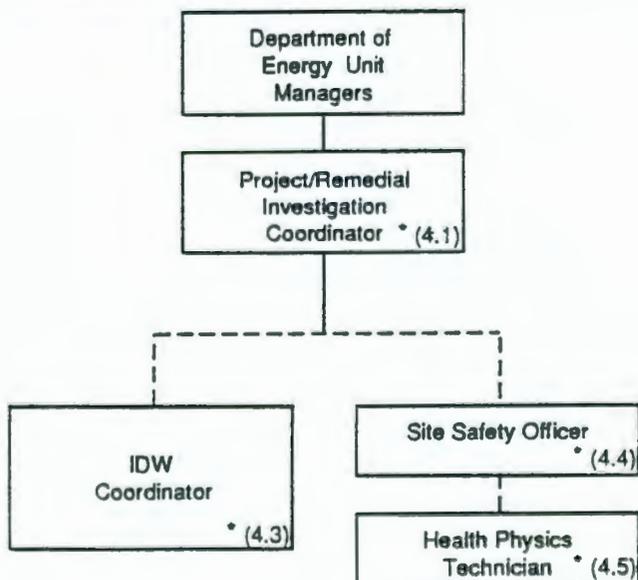
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Figure 1. Waste Management Responsibilities Diagram.

Active Field Operations



Inactive Field Operations



\* Denotes Section in Procedure that Details Specific IDW Management Responsibilities for Various Personnel.

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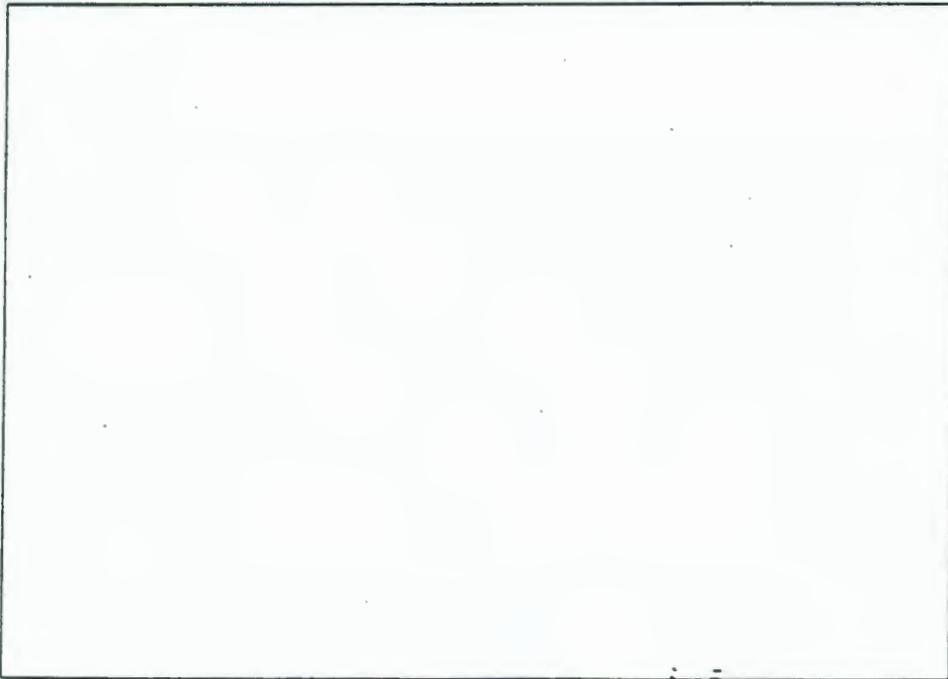
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Figure 2. Waste Control Plan. (sheet 1 of 2)

WASTE CONTROL PLAN				Page ____ of ____	
Work Scope Description _____ _____					
List constituents of concern _____ _____					
Site Description _____ _____					
Reference _____		Rev _____		Date Approved _____	
Preparer/ _____ Project /RI Coordinator			Date _____		Safety Class
Print/Sign Name			Impact Level		
Field Team Leader / Cognizant Engineer _____		IDW Coordinator _____			
Planned Drilling Start and Finish Dates: From _____ To _____					
Waste Storage Facility ID number(s) _____					
<b>Field Screening Methods</b>					
Method	Frequency	Reference Procedure	Threshold	Analyst	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
<b>Methods of Validating Field Screening Data</b>					
Method	Frequency	Reference Procedure	Threshold	Analyst	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
<b>APPROVALS (Print/Sign Name and Date)</b>					
_____			Quality Assurance (if required) _____		
Project/RI Coordinator			IDW Coordinator		
_____			Safety Function (if required) _____		
Field Team Leader/Cognizant Engineer					

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Figure 2. Waste Control Plan. (sheet 2 of 2)

WASTE CONTROL PLAN		Page ____ of ____
Waste site coordinate location _____ _____		
Waste container storage area(s) coordinate location(s) _____ _____		
Requirements for soil pile sampling (if any) _____ _____		
Nonregulated material disposal location(s) _____ _____		
Sketch of work site		
		
APPROVALS (Print/Sign Name and Date)		
_____	_____	
EPA	Ecology	
_____	_____	
DOE-RL	Project/RI Coordinator	

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CONTROL OF CERCLA AND OTHER  
PAST-PRACTICE INVESTIGATION DERIVED WASTE

Figure 3. Interim Control of Unknown, Suspected Hazardous,  
Suspected Mixed and Radioactive Waste. (BC-6000-329)

INTERIM CONTROL OF UNKNOWN, SUSPECTED HAZARDOUS,  
SUSPECTED MIXED AND RADIOACTIVE WASTE

<input type="checkbox"/> UNKNOWN <input type="checkbox"/> SUSPECTED HAZARDOUS		<input type="checkbox"/> SUSPECTED MIXED <input type="checkbox"/> RADIOACTIVE		UNIQUE DRUM NUMBER	DRUM TYPE/SIZE	LINER TYPE/THICKNESS
PROJECT NAME/PROJECT LOCATION				<input type="checkbox"/> CERCLA <input type="checkbox"/> RCRA <input type="checkbox"/> OTHER	WELL/BOREHOLE/EXCAVATION NUMBER	
FOOTAGE	<input type="checkbox"/> PERCHED WATER <input type="checkbox"/> VADOSE ZONE <input type="checkbox"/> WATER TABLE	BEGINNING DATE	DATE SEALED	DRUM STORAGE LOCATION		
CONTENTS:					ABSORBENT ADDED <input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/> SOIL	<input type="checkbox"/> HARD TOOL SLURRIES	<input type="checkbox"/> GROUNDWATER SLURRIES	<input type="checkbox"/> PPE	<input type="checkbox"/> DECON FLUID	<input type="checkbox"/> OTHER (SPECIFY) _____	

COMMENTS/SUSPECTED HAZARDS: (Any indications of contamination (organic, inorganic, radioactive) shall be documented in this space.)

FIELD TEAM LEADER:

FACILITY GENERATOR:

PRINTED NAME/SIGNATURE

DATE

PRINTED NAME/SIGNATURE

DATE

Figure 4. Request for Hazard Identification Form.

REQUEST FOR HAZARD IDENTIFICATION

WHC TRACKING # \_\_\_\_\_

IDW Coordinator / MSIN / Phone	Signature/Date	Generating Facility	Generator Log Number
--------------------------------	----------------	---------------------	----------------------

Item Number	Number of Containers	Container Description	Kg Waste	Waste / Process Description	Chemical Properties	Weight %

9  
2  
1  
2  
6  
4  
3  
1  
5  
3  
2

Solid Waste Engineering Analysis:

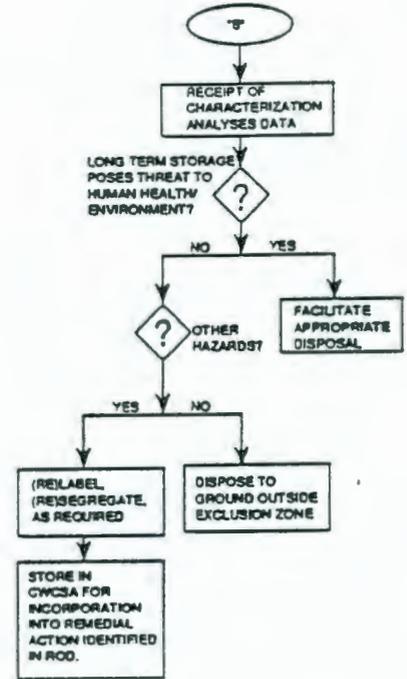
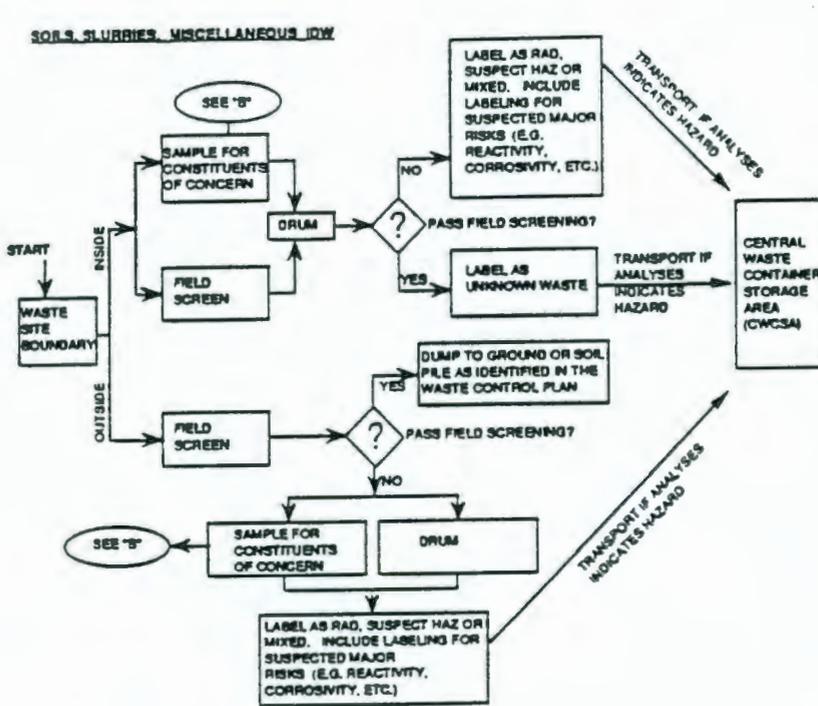
Based on the information provided, please make the following identifications:

- 1) Does the material meet or exceed Washington State Dangerous Waste limits?
- 2) If so, what are the constituents of concern?
- 3) Does it qualify as a Dangerous Waste or Extremely Dangerous Waste?
- 4) Do you have any special packaging recommendations?

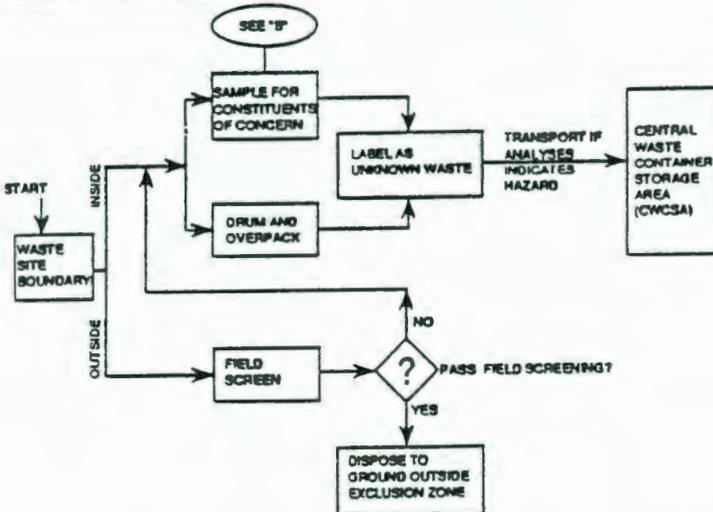
CONTROL OF CERCLA AND OTHER  
PAST-PRACTICE INVESTIGATION DERIVED WASTE

Figure 6. Waste Determination Logic Diagram.

SOILS, SLURRIES, MISCELLANEOUS IDW



DECONTAMINATION FLUIDS



9 2 1 2 6 4 3 1 5 3 3

## ATTACHMENT # 9

## EII 4.3 INFORMATION/REQUIREMENTS SPECIFIC TO UNIT MANAGERS

2.0 Scope

Initially, Unit Managers are responsible for approving working/planning documents that govern the projects for which investigation-derived waste (IDW) management under EII 4.3 will apply.

4.1 Project/Remedial Investigation Coordinator

The Project/Remedial Investigation (Project/RI) Coordinator prepares the Waste Control Plan. The lead agency's signature is required on the form. Specific information on the form includes:

- a. identification of wells/boreholes
- b. location of waste site boundaries
- c. location of waste storage (i.e. Centralized Waste Container Storage Area(s))
- d. need for soil pile sampling, if any (see Section 6.0, Outside a Waste Site Boundary - Dry/Moist Material)
- e. location for nonregulated material disposal to ground -- soil/slurries and decontamination water (see Section 6.8, paragraph 2)

4.1 Project/Remedial Investigation Coordinator

The Project/RI Coordinator will make available to EPA and Ecology all validated lab data collected pursuant to the Tri-Party Agreement, within 15 days of receiving the data.

5.1 Containers/Liners

The EPA/Ecology shall concur with the use of alternative storage containers (other than DOT specification drums), if and when the issue arises.

6.7 Management of Waste Containers

The EPA and Ecology, with DOE and WHC, shall review/evaluate future storage considerations for any waste containers that begin to deteriorate.

Interim storage/final disposal of extremely hazardous waste will be determined at Unit Manager meetings.

6.10 Records

Copies of the inspection logs will be provided to the lead agency at Unit Manager meetings.

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Distribution  
Unit Manager's Meeting: General Topics  
April 22, 1992

DOE (and GSSC to DOE-RL)

C.E. Clark, RL	(A5-15)
D.L. Clark, RL	(A5-55)
Julie Erickson, RL	(A5-19)
R.D. Freeberg, RL	(A5-19)
R.E. Gerton, RL	(A4-02)
Jim Goodenough, RL	(A5-19)
Paul Pak, RL	(A5-19)
Bob Stewart, RL	(A5-19)
Nancy Werdel, RL	(A5-19)
Mike Thompson, RL	(A5-15)
J.M. Hennig, RL	(A5-21)
Mary Harmon, DOE-HQ	(EM-442)
S.E. Clarke, SWEC	(A4-35)

EPA (and Contractors/Agencies in Support of EPA)

Dave Einan, EPA	(B5-01)
Pam Innis, EPA	(B5-01)
Doug Sherwood, EPA	(B5-01)
Dan Duncan, EPA, Region 10, RCRA	
Donna Lacombe, PRC	
Ward Staubitz, USGS	

Ecology (WDOE)

Larry Goldstein	Lacey Office
Chuck Cline, WDOE	Kennewick Office (c/o Darci Teel)

USACE

John Stewart, USACE	(K1-49)
---------------------	---------

WHC

Melvin Adams, WHC (Please route to:)	(H4-55)
Larry Hulstrom WHC	(H4-55)
Wayne Johnson, WHC	(H4-55)
Alan Krug, WHC	(H4-55)
Merl Lauterbach, WHC	(H4-55)
Bob Henckel, WHC	(H4-55)
Rich Carlson, WHC	(H4-55)
Tom Wintczak, WHC	(L4-92)
R.D. Wojtasek, WHC	(L4-92)
L.D. Arnold, WHC	(B2-35)

Terri Stewart, PNL	(K2-12)
Don Kane, EMO	(K1-74)
Don Praast, GAO	(A1-80)
R.O. Patt, OR Water Resources Dept.	

ADMINISTRATIVE RECORDS: 1100-EM-1, 300-FF-1, 300-FF-5, 200-BP-1, 200-AAMS, 100-AAMS; Care of EDMC, WHC (H4-22). Please inform Suzanne Clarke (SWEC) of deletions or additions to the distribution list.

9 2 1 2 6 4 3 1 5 3 5