

## Waste Site Reclassification Form

<b>Date Submitted:</b> 4/17/2000	<b>Operable Unit(s):</b> 1100-EM-1	<b>Control Number:</b> 2000-039
<b>Originator:</b> J. W. Golden	<b>Waste Site ID:</b> 1100-9	
<b>Phone:</b> 376-6961	<b>Type of Reclassification Action:</b>	
	Rejected <input checked="" type="radio"/> Closed-Out <input type="radio"/> No Action <input type="radio"/>	

This form documents agreement among the parties listed below authorizing classification of the subject unit as rejected, closed-out, or no action and authorizing backfill of the site, if appropriate. Final removal from the NPL of no action or closed-out sites will occur at a future date.

**Description of current waste site condition:**

The 90 Day Storage Area was inside the 1164 Building, a small steel building next to the Excess Storage Yard. The 1164 Building is northeast of the 1167A Excess Salvage Office Building. The 1164 Building is also marked as the 2453 Building. The specific location within the building is not known.

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**Basis for reclassification:**

WAC 173-303-630(10) requires that at closure, all dangerous waste and dangerous waste residues be removed from the containment system. However, there are no documentation requirements for this closure, and thus no referenceable records for older pads. For many of these older pads, the exact locations were not recorded and cannot be reliably re-examined at this time. By analysis of the spill response standard operating procedure and interviews with the spill response coordinator, documentation of closure of these 90 Day Storage Areas can be recreated.

According to J. Culmer (July 31, 2000), spill response and reporting coordinator, there have been no releases to the environment from 90-Day pads. The HNF-PRO-453 Spill and Release Reporting procedure covers cleaning up releases and entering release sites, where releases cannot be immediately cleaned up due to the location of the release or the decision made to clean up the site at a later date, as part of the Operable Unit. If the release is to be cleaned up as part of the Operable Unit, then it is required that the release site and material released be added to an existing Operable Unit WIDS site or a new WIDS site created and entered into the data base. Mr. Culmer is not aware of any spills or releases onto 90 Day Storage Pads, that have not been cleaned up immediately, waste managed properly and then disposed of per state and federal requirements. All releases have been handled per the HNF-PRO-453 Spill and Release Reporting procedure. The releases onto 90 Day Storage Pads that had been reported internally to the spill response office were small leaks from containers that had been cleaned up; none of these releases migrated off the pads and into the soil column or environment. Thus, all evidence indicates this 90 Day

<u>Steven Burkum</u>	<u>Steven Burkum</u>	<u>8/23/2000</u>
DOE Project Manager	Signature	Date
<u>Wayne Soper</u>	<u>Wayne Soper</u>	<u>9-6-00</u>
Ecology Project Manager	Signature	Date
<u>Doug Sherwood</u>	<u>Doug Sherwood</u>	<u>9/14/00</u>
EPA Project Manager	Signature	Date