

7/9/98

DOD - FWDA
FW Blue Files

**POLICY STATEMENT
WASTE ANALYSIS AND DISPOSAL PLAN
FOR INVESTIGATION DERIVED WASTES
MANAGED AT FWDA**

1. Scope

Wastes covered by this policy statement include wastes generated from the investigation and remediation of sites contaminated by past operations at Fort Wingate Depot Activity (FWDA). Analysis of waste performed using this policy are to determine the proper hazardous waste characterization and insure the waste is disposed of consistent with Solid and Hazardous Waste Regulations. Prior to disposal, the wastes will be collected, transferred and stored in accordance with all applicable regulations.

2. Responsibilities

As the contracting agency, the CORPS of Engineers will insure that the procedures and actions identified in this policy statement are incorporated into the applicable work plan. The contractor(s) are tasked with the collection, storage, transportation and disposal of solid and hazardous waste generated from the site investigation and remediation work in accordance with all applicable regulations. This includes the proper containerization and labeling of wastes; safe movement of waste containers; characterization of the waste; temporary storage of the waste; and the preparation of the hazardous waste manifests and the notifications required under the Land Disposal Restrictions (LDR). While the CORPS holds and administers the contract for the collection and disposal of hazardous waste generated by the site investigation and remediation work, Tooele Army Depot (TEAD) has the ultimate responsibility as the property owner.

2. Collection and Temporary Storage of Investigation Derived Wastes

Investigation or remediation derived waste, that are known or suspected to be hazardous waste, will be placed in containers labeled with the words "Hazardous Waste". Additional information will be annotated on the label to indicate the source of the waste placed in the drum. Upon filling of the drum, the start accumulation date will be annotated on the label and the container will be transferred to a 90 day holding area within 3 days. The contractor will establish and operate the 90 day holding area in accordance with 40 CFR 262.34(a); Subpart I of 40 CFR 265; and 40 CFR 265.16, 265.111 and 265.114. All plans (Training, Inspection and Contingency) and procedures required to operate the 90 day holding area in accordance with the regulations will be incorporated into the applicable work plan. Unless the waste has been previously characterized, all containers placed in the 90 day holding area

will be sampled within 10 days of arrival. The sample will be analyzed, as discussed in the paragraphs below, and characterized for proper disposal within 30 days of being sampled. The waste will then be disposed of accordingly within 30 days of completing the characterization. In no case should a drum of waste remain in the holding area in excess of 90 days, unless an extension has been granted by the State of New Mexico.

3. Sampling Method

Wastes are either managed in open top, or closed top drums, gondolas, or bulk tanker for transport to a Treatment Storage and Disposal Facility.

The sampling method selected for a given waste stream is based on the physical properties the waste exhibits. Liquids will be sampled with a coliwasa or glass tube; dry powder, sludges, and moist granules will be sampled with a trier; and packed powder will be sampled with an auger.

Each sample will be taken using a sampling tool that will insure the most representative sample. When more than one container is generated per waste stream, the sample to be analyzed will be a composite sample comprised of equal amounts taken from all the containers filled with that waste stream. For example, the drill cuttings from a single well would be composited into one sample. However, if information pertaining to the waste stream indicates the contamination may vary significantly, then composites would only be utilized for those portions of the waste stream with similar characteristics or each container would be sampled.

4. Selection of Test Parameters

The type of analysis of each waste will depend upon the operations previously conducted at the site and information gained from previous investigative or remedial work performed. The parameters of analysis that normally will be considered include the characteristics of Ignitability, Corrosivity, Reactivity, Toxicity Characteristic Leaching Procedure (TCLP) Metals, TCLP Pesticides/Herbicides and TCLP Organics. Parameters for F and K listed hazardous wastes will only be analyzed for if information specific to the site indicates their possible presence.

Parameters will be eliminated when previously gathered information for a site or the physical state of the waste generated would so justify. For example, if the waste is a solid, then the parameters of ignitability and corrosivity would be eliminated.

5. Parameter Test Methods

Table 1 contains the EPA waste codes and the applicable SW-846 analytical method(s). In addition, the EPA waste numbers have been grouped into analyte groups.

6. Transportation and Disposal of Hazardous Waste Off-site

Prior to transporting or offering a container of hazardous waste for transport off site, the contractor must label each container in accordance with Department of Transportation regulations on hazardous materials under 49 CFR Part 172. In addition, each container of 110 gallons or less must be labeled with the following words and displayed in accordance with 49 CFR 172.304:

HAZARDOUS WASTE – Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____.

Manifest Document Number _____.

Any hazardous wastes shipped off-site will include a manifest prepared by the contractor in accordance with 40 CFR 262.20. Acquisition, copies and use of the manifest will be in accordance with 40 CFR 262.21 thru 23. A representative from TEAD will sign the manifest as the generator.

An LDR will be completed by the contractor in accordance with 40 CFR 268.7 and provided with each shipment of hazardous waste that is being sent off-site for storage, treatment, and/or disposal. This notification is to make the receiving facility aware of any land disposal restrictions, and/or treatment methods that may be required before the hazardous waste can be placed into the ground. This notification must be included with each shipment of hazardous waste transported off-site and is in addition to, and in association with, the hazardous waste manifest. As with the manifest, a TEAD representative will sign as the generator on the LDR.

7. Disposal of Non-hazardous Waste

Wastes that are not hazardous and are below background plus two standard deviations will be returned to the location where they were generated and spread out evenly across the ground. If the waste is greater than background plus two standard deviations, then the waste will be transported off-site to an approved landfill.

SW-846 Approved Analytical Methodologies (Table 1)

CHARACTERISTIC	WASTE CODE	DEFINITION CONSTITUENT OF CONCERN	SW-846 ANALYTICAL METHOD(S)*
Ignitability	D001	Flash Point less than 140 °F	1010 or 1020
Corrosivity	D002	pH less than or equal to 2 or greater or equal to 12.5	9040 or 9045
Reactivity	D003	Total Cyanide greater than 590 mg/kg Total Sulfide greater than 500 mg/kg	9010 or 9012 9030
Toxicity (Metals)	D004	Arsenic	6010, 7060, or 7061
	D005	Barium	6010, 7080, or 7081
	D006	Cadmium	6010, 7130, or 7131
	D007	Chromium	6010, 7190, or 7191
	D008	Lead	6010, 7420, or 7421
	D009	Mercury	7470, or 7471
	D010	Selenium	6010, 7740, or 7741
	D011	Sliver	6010, 7760, or 7761
Toxicity (Pesticides/Herbicides)	D012	Endrin	8080, or 8250
	D013	Lindane	8080, or 8250
	D014	Methoxychlor	8080, or 8250
	D015	Toxaphene	8080, or 8250
	D016	2,4 D	8150, or 8250
	D017	2,4,5- TP (Silvex)	8150, or 8250
	D020	Chlordane	8080, or 8250
	D031	Heptachlor & (hydroxide)	8080, or 8250
Toxicity (Organics)	D018	Benzene	8020, or 8240
	D019	Carbon Tetrachloride	8010, or 8240
	D020	Chlorodane	8020, or 8240
	D021	Chlorobenzene	8020, or 8240
	D022	Chloroform	8020, or 8240
	D023	o-Cresols	8040, or 8250
	D024	m-Cresol	8040, or 8250
	D025	p-Cresol	8040, or 8250
	D026	Cresol (Total)	8040, or 8250
	D027	1,4 Dichlorobenzene	8010, 8120, or 8250
	D028	1,2 Dichloroethane	8010, or 8240
	D029	1,1 Dichloroethylene	8010, or 8240
	D030	2,4 Dinitrotoluene	8090, or 8250
	D032	Hexachlorobenzene	8120, or 8250
	D033	Hexachloro 1,3 butadiene	8120, or 8250
	D034	Hexachloroethane	8010, or 8240
	D035	Methyl Ethyl Ketone	8015, or 8240
	D036	Nitrobenzene	8090, or 8250
	D037	Pentachlorophenol	8040, or 8250
	D038	Pyridine	8090, or 8250
D039	Tetrachloroethylene	8010, or 8240	
D040	Trichloroethylene	8010, or 8240	
D041	2,4,5 Trichlorophenol	8040, or 8250	
D042	2,4,6 Thichlorophenol	8040, or 8250	
D043	Vinyl Chloride	8010, or 8240	

* Most current version

SW-846 Approved Analytical Methodologies (Table 1)

CHARACTERISTIC	WASTE CODE	DEFINITION CONSTITUENT OF CONCERN	SW-846 ANALYTICAL METHOD(S)
Spent Halogenated Solvents used in Degreasing	F001	Carbon Tetrachloride	8010, or 8240
		Methylene Chloride	8010, or 8240
		1,1,1 Trichloroethane	8010, or 8240
		Tetrachloroethylene	8010, or 8240
		Trichloroethylene	8010, or 8240
		Chlorinated Fluorocarbons	8010, or 8240
Spent Halogenated Solvents	F002	Chlorobenzene	8020, or 8240
		Methylene Chloride	8010, or 8240
		Ortho-Dichlorobenzene	8010, 8120, or 8250
		Tetrachloroethylene	8010, or 8240
		1,1,1 Trichloroethane	8010, or 8240
		Trichloroethylene	8010, or 8240
		Trichlorofluoromethane	8010, or 8240
		1,1,2 Trichloroethane	8010, or 8240
		1,1,2 Trichloro- 1,2,2 trifluoroethane	8010, or 8240
Spent nonhalogenated Solvents	F003	Acetone	8015, or 8240
		n-Butyl Alcohol	8015, or 8240
		Cyclohexanone	8090, or 8250
		Ethyl acetate	8015, or 8240
		Ethyl Benzene	8020, or 8240
		Ethyl Ether	8015, or 8240
		Methanol	8015, or 8240
		Methyl Isobutyl Ketone	8015, or 8240
		Xylene	8020, or 8240
Spent nonhalogenated Solven	F004	Cresols	8040, or 8240
		Cresylic Acid	8040, or 8250
		Nitrobenzene	8090, or 8250
Spent nonhalogenated Solven	F005	Carbon Disulfide	8015, or 8240
		Isobutanol	8015, or 8240
		Methyl Ethyl Ketone	8015, or 8240
		Pyridine	8090, or 8250
		Toluene	8020, or 8240
		Benzene	8020, or 8240
		2 Ethoxy ethanol	8030, or 8240
		2 Nitropropane	8015, or 8240

* Most current version