

Hazardous and Radioactive Materials Bureau
July 21, 1997

MEMORANDUM:

To: Teri Davis

From: Dianne Williams Wilburn

RE: IDW

I have reviewed the LANL Policy on Management of Investigation Derived Waste. For review, I have compared the document to an EPA publication, Management of Investigation-Derived Wastes During Site Inspections. I am giving my copy of this guidance to you for reference.

Section 2.4.2 of the EPA document explains handling IDW. The basic policy on IDW can be found in this Section on pages 6 through 8. I have highlighted the major points of the Section.

Reading the EPA policy and then reviewing LANL's policy led to only one problem. LANL's policy states that if the waste is moved outside a SWMU boundary, it will be handled as a generated hazardous waste. There is a problem with the LANL document with the section entitled Types of Environmental Media (Indigenous). My concern is that I am not sure what happens with ground water from a SWMU during a site investigation. LANL's document states all indigenous media, including groundwater, will environmental media even if they contain hazardous waste and are contained within the SWMU boundary. On pg. 7 of the EPA guidance, second paragraph, it states: The AOC concept applies only to contaminated soil and sediments from the inspected site. The AOC concept does not affect the approach for managing IDW that did not come from the AOC, such as PPE, DE, decontamination fluids and ground water.

cc: John Kieling



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