



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 30, 2001

ENTERED

Mr. Steve Zappe
Hazardous Waste Permit Program
Hazardous Waste Bureau
New Mexico Environment Department
2044-A Galisteo
Santa Fe, New Mexico 87502-6110



Dear Mr. Zappe:

On February 14, 2001, you requested information relative to the characterization of waste container RFD72774 from the Rocky Flats Environmental Technology Site (RFETS). One of the items you requested was information that will help NMED understand the differences between RFETS light metal waste stream RF002.01 and Idaho National Engineering and Environmental Laboratory (INEEL) light metal waste stream INW296.001. In our response of February 23, 2001, we committed to provide this information by March 30, 2001. The requested information is attached.

In addition, we agreed to provide a status of Corrective Action Request (CAR)-01-019. The corrective actions for CAR-01-019 are nearly complete at RFETS. CBFO expects to receive the final closure documentation from RFETS early next week. After review and acceptance of the objective evidence of corrective action completion by CBFO, this documentation will be forwarded to NMED as part of the request for supplemental information. Please note that your contract staff reviewed the RFETS proposed corrective actions and completion documentation this week at RFETS.

CBFO is currently gathering information to address the NMED comments attached to the request for supplemental information. The information addressing NMED's comments will be forwarded to you as soon as it is available.

The corrective action completion documentation for CAR-01-019 and the information addressing NMED's comments contained in the request for supplemental information should constitute all the relevant information related to this matter.

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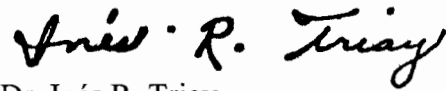


Steve Zappe

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Should you need additional information, please contact Mr. Kerry Watson at 234-7357.

Sincerely,

A handwritten signature in black ink that reads "Inés R. Triay". The signature is written in a cursive style with a large initial "I" and a prominent "R".

Dr. Inés R. Triay
Manager

Enclosure

cc:

C Walker, Techlaw

J. Bearzi, NMED

J. Kieling, NMED

Comparison of the Rocky Flats Environmental Technology Site Light Metal Waste Stream RF002.01 and the Idaho National Engineering and Environmental Laboratory Site Light Metal Waste Stream INW296.001

Narrative: Based on the information collected regarding these waste streams, they are both uncategorized metal waste streams originating from mostly the same buildings¹ and processes at the RFETS over overlapping time periods. The INEEL waste stream contains older waste than the RFETS waste stream. Waste in storage at RFETS was segregated into mixed and non-mixed waste streams with similar Item Descriptor Codes (IDCs). RF002.01 is a non-mixed stream. Segregation did not occur prior to shipment of the waste to the INEEL where the waste was sent for storage during the 1970's and 1980's. Consequently, the INEEL manages the waste as an unsegregated mixed waste stream.

INEEL routinely removes lamp ballasts when they are discovered during testing, regardless of the date of manufacture. This is appropriate for INEEL because the waste stream they manage was generated during a period of time when PCB containing ballasts were in use. RFETS lists electrical parts as one type of metal waste in IDC 480. RFETS notes that this may include ballasts.

Similarities:

Generator of the Waste

Both of the waste streams originated at the RFETS. (See footnote 1.)

Waste Stream Contents

Both are light metal waste streams.

Differences:

Item Descriptor Codes

RF002.01 contains Item Descriptor Codes 197 (Tantalum target and subtarget, to be leached), 320 (Heavy non-SS Metal w/out Cadmium or Lead), 479 (Empty Cans), 480 (Light Metal), 481 (Light Non-SS Metal, unclassified), and 824 (Light Metal)

INW296.001 contains Item Descriptor Codes 480 (Unleached Light Non-SS Metal) and 481 (Leached Light Non-SS Metal).

¹ INEEL lists Buildings 371, 374, 559, 707, 771, 774, 776, 777, and 779 as the origin of the waste. RFETS does not include building 774 and also lists Buildings 881, 886, and 991.

Mixed vs. Non-mixed

RF002.01 is a non-mixed waste stream consisting of RFETS Waste Streams RF-W109 and RF-W111.

INW296.001 is a mixed waste stream consisting of INEEL waste streams IN-W296 and IN-W294.

Waste Matrix Code

RF002.01 consists of Waste Matrix Code S5111².

INW296.001 consists of Waste Matrix Code S5110³ and S5112⁴.

Management of drums with ballasts

INEEL segregates all drums with ballasts.

RFETS does not address ballasts specifically on their Waste Stream Profile Form, however in AK documentation referenced by the Waste Stream Profile Form, ballasts are identified as occurring with IDC 480.

Date of Generation

RF002.01 was generated between 1980 and 1999.

INW296.001 was generated between 1972 and 1989.

Size

RF002.01 consists of 922 drums and 194 Standard Waste Boxes (Current and projected).

INW296.001 consists of 893 drums (current).

²The final waste form for S5111 is defined in DOE Waste Treatability Group Guidance, DOE/LLW-217 as “Uncategorized Metal (Metal Waste Other Than Lead and/or Cadmium)”. This includes RFETS IDC 197, 320, 479, 480, 481, and 824.

³ The final waste form for S5110 is defined in DOE Waste Treatability Group Guidance, DOE/LLW-217 as both “Uncategorized Metal (Metal Waste Other Than Lead and/or Cadmium)” and “Lead/Cadmium Metal”. This includes INEEL IDC 481.

⁴ The final waste form for S5112 is defined in DOE Waste Treatability Group Guidance, DOE/LLW-217 as “Lead/Cadmium Metal”. This includes INEEL IDC 480.