Department of Energy
Oak Ridge Operations
Weldon Spring Site
Remedial Action Project Office
Route 2, Highway 94 South
St. Charles, Missouri 63303

May 7, 1990

Mr. Dan Wall
Remedial Project Manager
U. S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Wall:

RCRA COMPLIANCE FOR CONTAINERIZED CHEMICALS

In carrying out the Containerized Chemical Interim Response Action, we have found a disconnect between the requirements of RCRA (both State and EPA) and what we consider to be best conduct of operations for expediting secure storage of chemicals.

The enclosed flow chart illustrates the sequence of activities for collecting, sampling, repackaging and storing potentially hazardous chemicals at the site. Basically, the concept is to move chemicals that we find into the RCRA storage area as quickly as possible. To accomplish this we do a gross field analysis; move the material into the RCRA storage area; and then we do a detailed chemical analysis as required in order to fully meet the requirements of 40 CFR 264.13 and 10 CSR 25.5.262 (2) (c). These regulations require, however, that the detailed analysis be performed prior to placing the material in the RCRA storage area and that the containers be properly labeled during the entire storage period. Therefore, there is a period of time that we are in non-compliance. We do label all containers based on all information currently available and the containers will be relabeled as the detailed chemical analyses becomes available. For the most part, all required information for labeling is provided by the gross field analyses. In addition, all chemical waste is being packaged in DOT-approved containers regardless of its RCRA standing.

It is our belief that the approach we have adopted is preferable to leaving chemicals in an "as is" condition until detailed analysis is performed. I understand that this issue has been discussed with Dan Wall and Joe Davis and this letter is to solicit concurrence.

FILE NUMBER: _____

If you have any questions please give me or Ken Lawver a call.

Sincerely,

Stephen H. McCracken
Project Manager
Weldon Spring Site
Remedial Action Project

cc: Joe Davis, MDNR
R. E. Hlavacek, PMC
Peter Gross, SE-31