

PROJECT NOTE NO.		PROJECT NO.	
PN-0122-21/CLE-C01-01F122-I3-0030		01-F122-YS	
PN-0123-21/CLE-C01-01F123-I3-0030		01-F123-YT	
CONFIRMATION OF:	CONFERENCE TELECOM OTHER X	DATE HELD DATE ISSUED RECORDED BY PLACE	10 December 1991 11 December 1991 R. Robertson/P. Torrey N/A
SUBJECT	Storage and Disposal of Investigation Generated Waste Naval Station and Naval Shipyard Long Beach Site Inspection		
PARTICIPANTS: (* DENOTES PART-TIME ATTENDANCE)			
ACTION REQ'D. BY	ITEM		
	<p>This project note addresses the storage of the Personal Protective Equipment drums and soil/sediment wastes generated during the Site Inspection (SI) field work at the Naval Station and Naval Shipyard Long Beach. Because of the detailed process necessary to profile the waste, CH2M HILL became concerned that storage of the waste might exceed what was thought to be a 90-day storage period.</p> <p>On December 10, 1991, CH2M HILL contacted Suwan Sonkprasha of the California Department of Toxic Substance Control concerning this matter. After he was briefed on the origin of the SI waste and the potentially hazardous constituents, Mr. Sonkprasha made two points. First, he stated that the RCRA 90-day storage period for hazardous waste begins at the point the particular waste is known to be hazardous. Theoretically, for the SI generated waste, the 90-day period would begin on 02 November, 1991, the date CH2M HILL received the results of the generated waste analyses. Secondly, Mr. Sonkprasha stated that wastes generated during a corrective action or site cleanup, as in this case, are not limited to a 90-day storage period. The 90-day limit generally applies to routine generators.</p> <p>Based on this conversation, there is no specific regulatory deadline for removing the generated wastes. However, plans for the removal of the generated wastes are proceeding as quickly as possible. CH2M HILL anticipates the disposal will be completed the first week of January as indicated by the drilling subcontractor.</p>		