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IC-36

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PLEASE ADDRESS REPLY TO THE  
 COMMANDING OFFICER, NOT TO  
 THE SIGNER OF THIS LETTER.  
 REFER TO:

5090  
 Code 18211  
 09 SEP 1993

3131194

From: Commanding Officer, Southern Division, Naval Facilities  
 Engineering Command  
 To: Commanding Officer, Coastal Systems Station, Panama City  
 Subj: RESPONSE TO ENGINEERING SERVICE REQUEST (ESR) # 3020-017,  
 DISPOSAL OF IDW DRUMS  
 Encl: (1) Disposal Method for IDW drums

1. As requested by the subject ESR, we have investigated several disposal methods for the IDW drums. After careful review of all analytical data and conversing with several laboratories, we recommend the disposal method outlined in enclosure (1). We believe a conservative approach in disposal of the drums is best.
2. If you have any questions or comments please contact either James Worthy at DSN 563-0391 or (803) 743-0391, or Ervin Smalls at DSN 563-0337 or (803) 743-0337.

*E. M. MORRISON*

E. M. MORRISON  
 By Direction



## DISPOSAL OF IDW DRUMS

1. We have reviewed all analytical data (soil and groundwater) regarding the subject drums. The soil analyses (Total) contain hazardous constituents identified in 40 CFR 261.24 Subpart C and 40 CFR 261.30 Subpart D. The groundwater analyses (Total) contain hazardous constituents identified in 40 CFR 261.30 Subpart D. As a result of this review, the subject drums should be disposed of using the following EPA Hazardous Waste Codes: F001-F005, F039, D006, D007, D008, D009, and D011. This determination was made after a review of all analytical data and Title 40 CFR 268.9, which requires the initial generator of a solid waste to determine all EPA Hazardous Waste Codes applicable to the waste in order to determine the applicable treatment standards under Subpart D of 40 CFR 268. The rationale for our determination is described in the following paragraphs.

2. Descriptions of the sites under investigation were first evaluated for the likelihood of the presence of listed hazardous wastes which may impact the waste stream determination of the investigation derived wastes (groundwater and soil). A list of sites where listed wastes were potentially disposed is attached.

3. Analytical data from groundwater samples at the investigation sites was then evaluated for the presence of listed and characteristic waste properties. Groundwater samples indicated the presence of one or more of the following listed waste properties:

F001-F005 (solvent wastes); F039 (multi-source leachate waste from the disposal of more than one listed waste). All of the land disposal restriction (LDR) treatment standards were met for these waste properties. No characteristic waste properties were identified for the groundwater samples.

4. Analytical data from the soil samples at the investigation sites was then evaluated for the presence of characteristic waste properties. Only total metal analysis was performed (in lieu of TCLP analysis used to determine if a waste is hazardous). We contacted several laboratories in an effort to find an industry standard for the correlation between total analysis and TCLP analysis, but were unsuccessful. We believe, short of performing

ENCLOSURE (1)

additional analysis using the TCLP test method, the total results should be assumed to be the TCLP results. In that total concentrations are, if anything, greater than TCLP concentrations, this assumption is conservative. The following is a summary of the sites for which total analyses exceeded TCLP hazardous waste thresholds:

- Area of Contamination (AOC) 2 for lead, mercury, and silver
- Solid Waste Management Unit 1 for lead, mercury, and silver
- Solid Waste Management Unit 2 for chromium, Cadmium and lead
- Solid Waste Management Unit 5 for chromium
- Solid Waste Management Unit 9 for chromium and lead

The EPA hazardous waste codes assigned to these characteristic wastes are D006 for cadmium, D007 for chromium, D008 for lead, D009 for mercury, and D011 for silver. LDR treatment standards for all of these waste codes were exceeded. No listed waste properties were identified in the soil samples.

5. We were informed by your staff that the identity of each drums cannot be correlated with a specific SWMU/AOC, and that it is impossible to define which drums contains solely groundwater or soil. It is understood that as a result, all of the IDW drums will be disposed of as one shipment with one waste profile. The appropriate waste profile, therefore, is F001-F005, F039, D006, D007, D008, D009 and D011. LDR certifications should indicate that the waste exceeds the treatment standards for D006, D007, D008, D009 and D011 waste codes, and that the waste meets the treatment standards for F001-F005, and F039 waste codes.

6. You should complete another DD Form 1348-1 and forward it to the Defense Reutilization and Marketing Organization (DRMO). DRMO will invoice you for the total disposal cost. Funds will be forwarded to your Accounting Office via 2275 and must be accepted/obligated within 24 hours of receipt. Also, these are expiring funds, therefore, invoice should be processed prior to the end of the fiscal year. If assurance is not forthcoming that the funds will be accepted/obligated and invoiced, as stated above, then DERA funds will not be available for your use this year. In addition, funding was not programmed in FY94 for this effort, and may not be available.

The following list identifies F listed hazardous waste detected in the groundwater analysis.

T 1012

1-1S-----F001-F005, F039  
 1-1-----F001-F005, F039  
 1-1D-----F001-F005, F039  
 1-2-----F001-F005, F039  
 1-2S-----F001-F005, F039  
 1-3-----F001-F005, F039  
 14-2D-----F001-F005, F039  
 14-2S-----F001-F005, F039  
 15-1-----F039

T 1004

1-1D-----F001-F005, F039  
 1-2S-----F001-F005, F039  
 14-1S-----F001-F005, F039  
 14-2D-----F001-F005, F039  
 14-3S-----F001-F005, F039

T 1008

13-1S-----F001-F005, F039  
 13-3S-----F001-F005, F039  
 13-1-----F001-F005, F039  
 13-4S-----F001-F005, F039  
  
 13-4I-----F001-F005, F039  
 13-2S-----F001-F005, F039  
 13-2-----F001-F005, F039  
 13-2D-----F039  
 13-2D-----F001-F005  
 13-5I-----F001-F005, F039  
 13-3-----F001-F005, F039  
 13-3D-----F001-F005, F039  
 9-1S-----F001-F005, F039  
 9-2S-----F001-F005, F039  
 9-3S-----F001-F005, F039

T 1017

13-6S-----F001-F005, F039  
 13-6I-----F001-F005, F039  
 13-7S-----F001-F005, F039  
 13-7I-----F001-F005, F039

T 1009

14-1D-----F039  
 14-1-----F039  
 14-3S-----F039  
 14-S-----F039  
 14-1S-----F039  
 2-1-----F039  
 2-1S-----F039

T 1011

2-2-----F001-F005, F039  
 2-2S-----F001-F005, F039  
 2-6S-----F001-F005, F039  
 2-7S-----F001-F005, F039  
 2-7I-----F001-F005, F039  
 2-3-----F001-F005, F039  
 2-5S-----F001-F005, F039