Hazardous Waste Determination
for
WAG 4; OU 4-13 RI/FS
Groundwater Samples
July 1999

Prepared by Steve McCormick
Environmental Restoration
July 16, 1999
Hazardous Waste Determination
for
Waste Area Group 4; Operable Unit 4-13 RI/FS
CFA-04 Pond

I. Waste Stream
The waste stream in this hazardous waste determination (HWD) is 7 unaltered water samples to be collected from groundwater monitoring wells (LF2-9, LF2-11, LF3-10, USGS-77, CFA-MON-001, CFA-MON-002, CFA-MON-003) in July 1999 for the WAG 4 Comprehensive Remedial Investigation. The field investigation is being conducted in accordance with the Federal Facilities Agreement/Consent Order under CERCLA. Attachment 1 contains a summary of analytical results from the above listed wells from 1998 and 1999.

II. Waste Description
The waste included in this HWD includes unaltered groundwater samples collected from the groundwater monitoring wells listed above. The samples are contained in 1-L containers.
A. Waste Quantity: The volume of waste is approximately 7-L (water).
B. Waste Storage Location: The unused water samples will be handled in the same manner as purge water from each well where the sample was collected.

III. Hazardous Waste Determination
1. Is the material a solid waste? This is a solid waste under the definition of 40 CFR 261.2.
2. Is the waste excluded under 40 CFR 261.4? This waste does not meet the exclusion requirements under 40 CFR 261.4.
3. Is the waste listed under 40 CFR 261 SUBPART D? No. The waste is not listed under 40 CFR 261 Subpart D.
Is the waste identified under 40 CFR 261 SUBPART C? No. Data from samples collected from the same wells indicate that all constituents are less than the Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit. Therefore, these wastes are not classified as RCRA characteristic under 40 CFR 261 Subpart C.
4. Is the waste identified under 40 CFR 761? No. There is no past or present data that would indicate any reason to believe PCB contamination would be present.

IV. Waste Treatment/Disposal Determination
This determination is the basis that these wastes generated during CERCLA sampling activities in July 1998 are not RCRA characteristic or listed under 40 CFR 261, Subpart C and D. Furthermore, these wastes are not expected to contain PCB contamination under 40 CFR 76. These wastes will be discharged to the ground in the vicinity of each well from which the sample was collected.

WASTE DETERMINATION REVIEWED BY: Steve McCormick, WAG 4 PBS Manager/Date

WASTE DETERMINATION REVIEWED BY: Walker Howell, ER Environmental Compliance/Date

WASTE DETERMINATION APPROVED BY: Roger Jones, ER Waste Characterization Team/Date

WAG/0004
Attachment 1

Data Summary
(Taken from
From the OU 4-12 Monitoring Summary Report
INEEL/EXT-99-00353)