7.0 INVESTIGATION-DERIVED WASTE

All investigation-derived waste (IDW), including auger cuttings, personal protective equipment, disposable sampling equipment, and decontamination fluids, will be properly handled, labeled, characterized, and managed in accordance with Chapter 7.0 of the facility-wide SAP. At the conclusion of field activities in the Phase I RI of the NACA Test Area, a letter report will be submitted documenting characterization and classification of the wastes, and all solid and liquid IDW will be removed from the site and disposed of by a licensed waste disposal contractor. All shipments of IDW off site will be coordinated through and manifests will be signed by the RVAAP Environmental Coordinator. The following specific protocols will be followed during the Phase I RI at the NACA Test Area:

- *General:* The types of IDW listed below are anticipated. These different types of IDW will be contained separately.
 - auger cuttings (soil): up to ten 55-gallon drums
 - expendables (personal protective equipment and disposable sampling equipment): up to two 55gallon drums
 - sediment sampling residual material: up to one 55-gallon drum
 - IDW water: up to three 55-gallon drums of liquid IDW and one 1,500-gallon polytank of decontamination liquid.
- Soils: At locations where soil sampling is performed, any holes or openings below the ground surface will be filled with bentonite granules to ground surface to prevent vertical migration of any potential contamination. Any excess soil not used for samples will be placed in 55-gallon drums. The disposition of the drummed soil will be based on analytical results of environmental samples, and up to five Toxicity Characteristic Leaching Procedure (TCLP) samples will be collected if analytical data indicate that the contents of a drum are potentially hazardous.
- Sediment: At locations where sediment sampling results in a hole that remains open, bentonite granules will be placed in the hole to ground surface. If the hole collapses or is underwater, no additional measures will be taken with the hole. Any excess sediment not used for samples will be placed in a 55-gallon drum. The disposition of the drummed sediment will be based on analytical results of environmental samples. One TCLP sample will be collected if analytical data indicate that the contents of a drum are potentially hazardous.
- *IDW water:* Excess water not used for samples will be placed in 55-gallon drums. The disposition of excess sample matrix will be based on the analytical results of the environmental samples. Decontamination liquids will be placed in drums or a polytank, as denoted above. Disposition of decontamination liquid will be based on the collection and analysis of one TCLP liquid sample.

Drummed IDW will be transported to Building 1036, where it will be staged within a secondary containment structure. To avoid potential drum rupture due to freezing, Building 1036 will be weather-proofed to the extent possible, and drums containing liquids will be filled to only 75 percent capacity.

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