SWMU 18 - Scrap Steel and Scrap Tin Bales Areas

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5.5.18 SWMU 18 – Scrap Steel and Scrap Tin Bales Areas

The location of Solid Waste Management Unit (SWMU) 18 is shown on Figure 5.5.18-1a and SWMU 18 monitoring stations and sample locations are provided on Figure 5.5.18-1b. SWMU 18, the Scrap Steel and Scrap Tin Bales Area, is located southeast of the Crude Phosphorus Burial Area (SWMU 11), east of the New and Used Carbon Block and New Carbon Brick Area (SWMU 5), and northeast of the Used Carbon Brick and Furnace Liner Pile (SWMU 3). Scrap metal was recycled to the extent practicable during Plant demolition activities. The low quality steel and tin was baled together and stockpiled in the area designated as SWMU 18. The area is approximately 50 feet long and 50 feet wide, with approximately 400 bales of materials. Several truck loads of this material were shipped to a metal recycler, but were rejected due to low level radiation detected by their screening instruments. These rejected materials were returned to SWMU 18. The low level radiation may be due to small amounts of slag and/or phosphate dirt comingled within the bales of metal. Photographs of the scrap steel and scrap tin bales are provided as Figure 5.5.18-2.

The ground surface beneath the scrap steel and scrap tin bales is covered by slag. Therefore, corrective measures appropriate for other SWMUs that contain low level radiation would also be appropriate for this SWMU.

Rhodia will make another attempt to recycle this low quality steel. If no recycler is found, the following potential corrective measures will be evaluated:

1. Consolidating and placing this material under the cover of the Coarse Slag Pile (SWMU 12) and the Tailing Basin and Water Recirculation System (SWMU 1)
2. Sending the material to a permitted solid waste facility

Elemental phosphorus was not managed in SWMU 18, and therefore was not sampled in accordance with the RFI Work Plan (Barr 2009).

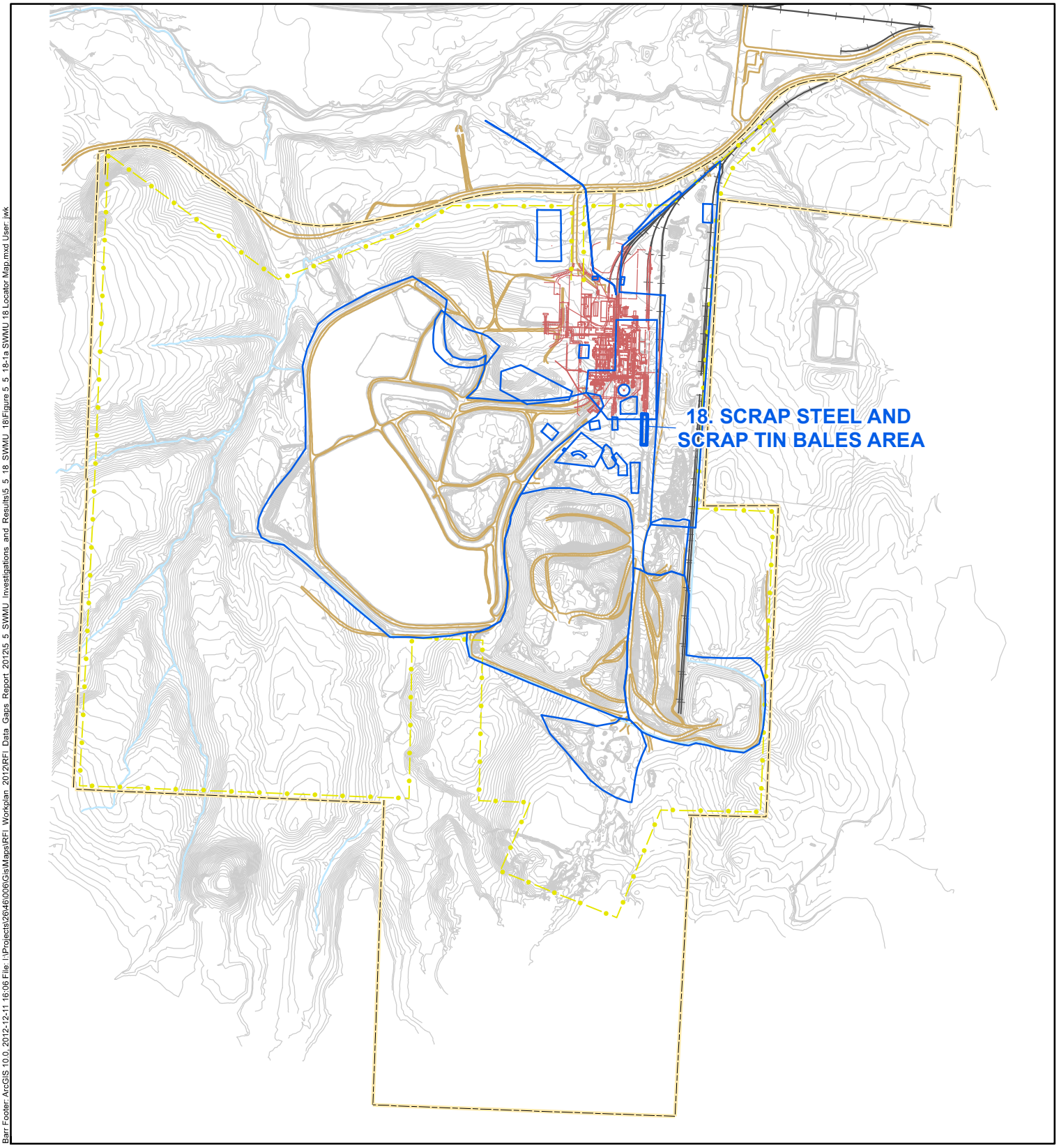
5.5.18.1 Conclusions

There is sufficient information to conduct the risk assessment for this SWMU. The risk assessment will identify which parameters, if any, are present at concentrations that warrant corrective measures. The dataset would be reviewed at that time and additional sampling may be necessary to inform the corrective measures study or later during the corrective measures design phase.

5.5.18.2 References

Barr 2009. Final Phase 1 RCRA Facility Investigation Work Plan, Corrective Action Order on Consent, Docket No. RCRA-08-2004-0001 Rhodia Silver Bow Plant Butte, Montana March 25, 2009.

Figures



Barr Footer: ArcGIS 10.0, 2012-12-11 16:06 File: I:\Projects\26946\006\Gis\Maps\RFI Workplan 2012\RFI Data Gaps Report 2012\5.5 SWMU Investigations and Results\5.5.18 SWMU 18\Figure 5.5.18-1a SWMU 18 Locator Map.mxd User: jwk

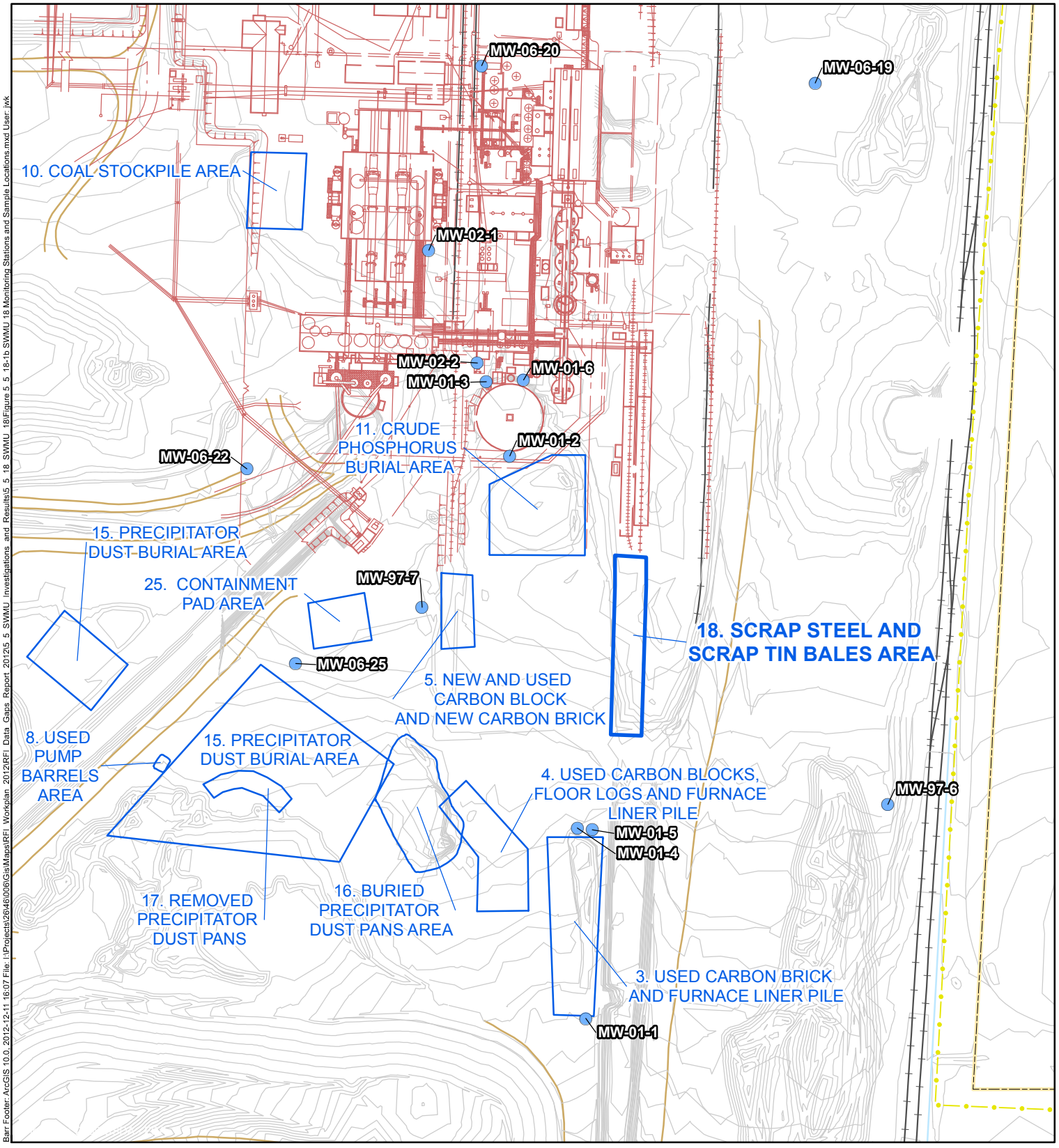
SWMU 18
Other SWMUs
Elevation Contour
Drainage
Railroad
Road
Former Plant Structures
Property Boundary
Fence Line

N

Feet
1,000 0 1,000

Figure 5.5.18-1a

SWMU 18 LOCATION
Rhodia Silver Bow Plant
Montana



Monitoring Well
SWMU 18
Other SWMUs
Fence Line
Property Boundary
Elevation Contour
Drainage
Railroad
Road
Former Plant Structures

N

Feet
200 0 200

Figure 5.5.18-1b

SWMU 18
MONITORING STATIONS
AND SAMPLE LOCATIONS
Rhodia Silver Bow Plant
Montana

Figure 5.5.18-2
Photographs of Scrap Steel and Scrap Tin Bales
Rhodia Silver Bow Plant