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WELDON SPRING SITE REMEDIAL ACTION PROJECT
MK-FERGUSON CO., INC. WO 3589 (314) 441-8086
7295 Highway 94 South
St. Charles, MO 63303

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SUBJECT REQUEST FOR EXCEPTION FROM THE DEPARTMENT OF TRANSPORTATION REGULATIONS FOR PACKAGING & STORAGE OF HAZARDOUS MATERIAL

AUTHOR MCCRACKEN SH TO BEDAN D DATE 04/02/92

SUBJECT CODE/WORK PACKAGE NUMBER 5,5130

REFERENCED DOCUMENT(S) _____

THIS IS A RESPONSE TO COMMUNICATION: NUMBER _____ DATED _____

ACTION ITEM TRACKING

INITIATE ACTION ITEM

INDIVIDUAL ASSIGNED TO ACTION _____ DEPARTMENT _____

ACTION REQUIRED _____

DUE DATE / / ACTION ITEM LOG NUMBER _____

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY? _____

CLOSE ACTION ITEM

IS THIS A RESPONSE TO AN ACTION ITEM? NO ✓ YES ___

ACTION ITEM LOG NUMBER _____ CLOSING DOCUMENT DIN _____

COMPLETION DATE _____ APPROVAL _____

COMMENTS _____

DISTRIBUTION	ATTACH W	ATTACH W/O	APPRVL. ROUTE ORDER	APPRVL. ROUTE INITIAL	DISTRIBUTION	ATTACH W	ATTACH W/O	APPRVL. ROUTE ORDER	APPRVL. ROUTE INITIAL	DISTRIBUTION	W	W/O
J.R. Powers		✓			M.R. Lewis					DOE		
R.R. Tucker		✓			C.C. Reith					S.H. McCracken		
D.E. Steffen	✓				J.E. Williams					J.S. VanFossen		
M.R. Ankrom					A. Cooney	✓				G.A. Newtown		
C.R. Bowers					L. Phillips	✓				W.K. Love		
J.A. Cooney					D. Hixson	✓				J.E. Enright		
R.D. Ferguson					M. Gilbert	✓				K.D. Lawver		
S.W. Green					A. Sisson	✓				A. Gibson		
K.M. Greenwell					R. Smith	✓				J.M. Richmond		
P.D. Cate					Reading File					M.B. Ballow		
K.D. Jenkins					Admin. Record					S. Richardson		
J.E. McKee					Tech Editor							
M.E. Nelson	✓											
F.B. Newton	✓				ORIGINATOR:					DOCUMENT CONTROL		

Department of Energy
Oak Ridge Operations
Weldon Spring Site
Remedial Action Project Office
7295 Highway 94 South
St. Charles, Missouri 63304

April 2, 1992

Dr. David E. Bedan
Missouri Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, Missouri 65102

Dear Dr. Bedan:

REQUEST FOR EXCEPTION FROM THE DEPARTMENT OF TRANSPORTATION (DOT) REGULATIONS FOR PACKAGING AND STORAGE OF HAZARDOUS MATERIAL

New Department of Transportation (DOT) regulations promulgated under HM 181 have significantly changed packaging, classification, marking, and labeling requirements for the transportation of hazardous materials. Hazardous materials presently stored in Building 434 of the WSSRAP are required by the State of Missouri to be classified, packaged, marked, and labeled in accordance with DOT (49 CFR) criteria per 10 CSR 25.5.262 (2)(C)(1) during the entire storage period. Because the hazardous material stored in Building 434 most likely will not be transported off site in the near term, it is requested that an exception to the HM 181 packaging requirements be granted. The package exception would apply to hazardous materials presently stored in Building 434 and future packaged materials.

Classification, marking, and labeling will immediately begin incorporating the new HM 181 criteria for new packages of hazardous materials being placed in Building 434 for storage. Reclassification, remarking, and labeling of approximately 700 drums of hazardous material already in storage in Building 434 will be accomplished as time permits. It should be noted that these 700 drums will remain in full compliance with DOT requirements until October 1, 1993.

The intent of the new 49 CFR requirements is to align U.S. shipments of dangerous goods with international regulations already in effect. Since January 1, 1991, all international shipments of hazardous materials were required to comply with HM 181; all hazardous classes for interstate shipments must be in full compliance within the next five years. The hazard classes are being implemented in segments which began October 1, 1991, and subsequent changes will be added annually.

A substantial cost savings would be realized by granting this exception including the labor costs for repackaging and the purchase price of the new containers. Additionally, savings would also be realized for the disposal of old containers or the extra volume generated by the use of overpacks. It should be noted that the new package requirements for transportation will have little effect on the safe storage of hazardous materials.

Full compliance with the DOT requirements will be provided in the event the waste is shipped off site.

We request a response to this for an exception by May 5, 1992. If you have any questions regarding this task, please contact Alan Gibson of my staff at (314)441-8978.

Sincerely,

Jerry L. Van Fossan

for Stephen H. McCracken
Project Manager
Weldon Spring Site
Remedial Action Project

cc: Dan Wall, EPA
Jim Powers, PMC

APR 0 2 1992

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CONCURRENCES
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"ORIGINAL SIGNED BY JERRY VAN FOSSEN" for

Stephen H. McCracken
Project Manager
Weldon Spring Site
Remedial Action Project

cc: Dan Wall, EPA
Jim Powers, PMC

EW-94:AGibson:x850:emh:3/31/92 (m:DOTReg.let)

CONCURRENCES

RTG SYMBOL	INITIALS/SIG.	DATE
EW-94	AGibson	3/31/92
EW-94	JVanFossen	4/1/92
EW-94	SMcCracken	3/ /92