

DOCUMENT CONTROL SYSTEM - CORRESPONDENCE FILE

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

Document Number: 16318  
 Document Type: LR-DOEW-MORR  
 Originators DCN: 002758

SUBJECT REQUEST FOR EXCEPTION FROM THE DEPARTMENT OF TRANSPORTATION

REGULATIONS FOR PACKAGING & STORAGE OF HAZARDOUS MATERIAL

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

SUBJECT CODE/WORK PACKAGE NUMBER 515130

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 1/1 ACTION ITEM LOG NUMBER

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY?

CLOSE ACTION ITEM

IS THIS A RESPONSE TO AN ACTION ITEM? NO 1 YES

ACTION ITEM LOG NUMBER CLOSING DOCUMENT DIN

COMPLETION DATE APPROVAL

COMMENTS

DISTRIBUTION	ATTACH M W/O	APPRVL.ROUTE ORDER INITIAL	DISTRIBUTION	ATTACH M W/O	APPRVL.ROUTE ORDER INITIAL	DISTRIBUTION	M W/O
J.R. Powers	✓		M.R. Lewis			DOE	
R.R. Tucker	✓		C.C. Reith			G.N. McCracken	
D.B. Steffen	✓		J.E. Williams			J.B. VanFossen	
M.R. Antram			<i>J. Cooney</i>	✓		G.A. Newton	
C.B. Bowers			<i>S. Phillips</i>	✓		M.K. Love	
J.A. Cooney			<i>D. Hipsley</i>	✓		J.E. Enright	
R.D. Ferguson			<i>M. Gilbert</i>	✓		K.D. Lower	
B.V. Green			<i>A. Lewis</i>	✓		A. Gibson	
K.M. Greenwell			<i>R. Smith</i>	✓		J.N. Richmond	
P.D. Cote			Reading File			M.D. Ballow	
K.D. Jenkins			Admin. Record			B. Richardson	
J.B. McKee			Tech Editor				
M.S. Nelson	✓						
P.D. Barton	✓		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.

008758

Dave Bedan

-2-

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 S. Van Follen*  
for Stephen H. McCracken  
Project Manager  
Weldon Spring Site  
Remedial Action Project

cc: Dan Wall, EPA  
Jim Powers, FMC

008759

APR 02 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.

CONCURRENCES

RTG SYMBOL

INITIALS/NO.

DATE

Dave Bedan

-2-

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,

"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:x830:emh:3/31/92 (m:DOTReg.let)

CONCURRENCES

RTG SYMBOL

EW-94

INITIALS/SG

AGibson

DATE

3/31/92

RTG SYMBOL

EW-94

INITIALS/SG

J McCracken

DATE

4/1/92

RTG SYMBOL

EW-94

INITIALS/SG

SMcCracken

DATE

3/ /92

RTG SYMBOL

INITIALS/SG

DATE

RTG SYMBOL

INITIALS/SG

DATE

RTG SYMBOL

INITIALS/SG

DATE

RTG SYMBOL

INITIALS/SG

DATE

RTG SYMBOL

INITIALS/SG

DATE