

1158

**FEED MATERIALS PRODUCTION CENTER DRUM
MANAGEMENT PLAN**

08-01-90

**DOE-FMPC/USEPA
35
ENCLOSURE**

FEED MATERIALS PRODUCTION CENTER

DRUM MANAGEMENT PLAN

DRUM MANAGEMENT PLAN OUTLINE

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APPENDIX I DRUM TYPES

1.0 PURPOSE OF PLAN

The purpose of the Feed Materials Production Center (FMPC) Drum Management Plan is to set forth the program that is in place to minimize environmental impact of stored, drummed materials at the FMPC. The sections contained in this plan outline the aggressive operational actions and administrative controls which have been implemented to enhance FMPC drum storage.

2.0 OBJECTIVE OF PLAN

The objective of the FMPC Drum Management Plan is to document drum management activities consistent with the commitments contained in the Amended Consent Decree for Ohio Environmental Protection Agency (OEPA) concurrence. In addition, Section 5.0 of this plan is submitted to obtain Ohio Environmental Protection Agency approval.

3.0 SUMMARY OF AMENDED CONSENT DECREE COMMITMENTS FOR DRUM MANAGEMENT

Listed below are the commitments as stated in the Amended Consent Decree made by the FMPC relating to drum management during the evaluations:

Amended Consent Decree Reference	Commitment	Drum Management Plan Reference
Subsection 3.5.1 (f)	DOE shall, as soon as reasonably possible but in no event more than sixty (60) days from a determination that any drummed materials are hazardous or mixed waste, move such materials to units that are identified in the FMPC Part A Permit Application submitted September 1989, or subsequent revisions. If storage space which meets RCRA and Ohio hazardous waste storage requirements is not available, DOE shall store such wastes in a manner as protective of human health and the environment as possible, shall perform daily leakage inspections on all such containers that are not located under cover, and shall, within sixty (60) days of a determination that sufficient RCRA storage space is not available, submit a plan and	Section 7.0

Amended Consent
Decree Reference

Commitment

Drum Management
Plan ReferenceSubsection 3.5.1 (f)
(Continued)

schedule for OEPA approval for short-term storage of such wastes. DOE shall perform weekly inspection in accordance with 40 CFR 265.15 and 265.174, and OAC 3745-65-15 and 3745-66-74 on all such containers.

Section 7.0
(Continued)

Subsection 3.5.1 (f)

DOE shall store backlog material which is being evaluated for the potential to be hazardous or mixed waste, but for which such evaluations have not been completed, on the best available hard surfaced facilities at the FMPC in such a manner that any leakage can be readily detected, and no later than September 30, 1990, will maintain aisle space meeting the requirements of 40 CFR 265.35.

Section 4.1, 6.1

Section 3.8 (a)

On or before September 30, 1990, DOE shall ensure that sufficient aisle space is maintained on the Plant 1 Pad to meet the requirements of 40 CFR 265.35, except on the covered staging area.

Section 4.1

Section 3.8 (b)

Until such time as the approximate 16,000 drums identified on Attachment 1 are removed from the Plant 1 Pad, or such drums are determined not to be hazardous or mixed waste, DOE shall perform daily leakage inspections on all such drums, and shall perform weekly inspections in accordance with 40 CFR 265.15 and 265.174, and OAC 3745-65-15 and 3745-66-74.

Section 4.2

Amended Consent
Decree Reference

Commitment

Drum Management
Plan Reference

Section 3.8 (c)

Until such time as all containers evaluated under paragraph 3.5.1 above and all other containers of hazardous or mixed wastes are removed from the Plant 1 Pad, DOE shall maintain containment measures at the overpack covered staging area, such as the use of temporary dikes or liners, sufficient to ensure that any potential spillage or releases of material from drums are contained on the covered staging area of the pad and are not released into any drains, soil, storm sewers, or other areas outside of the covered staging area.

Section 5.0

Section 3.8 (c)

For any drums that are actually leaking in such a manner as to allow wastes to be released onto the pad DOE shall immediately contain the release or spill and shall manage the drum in accordance with OAC 3745-66-71 as soon as possible after detection, but in no event more than 24 hours after discovery.

Section 8.0

Section 3.8 (c)

Within thirty (30) days after entry of this Amendment, DOE shall submit to OEPA for its approval a plan describing the actions DOE will perform in order to comply with this subsection.

Sections 4.1, 4.2,
5.0, 8.0

4.0 PHYSICAL DESCRIPTION OF PLANT 1 PAD AREA AND ACTIVITIES

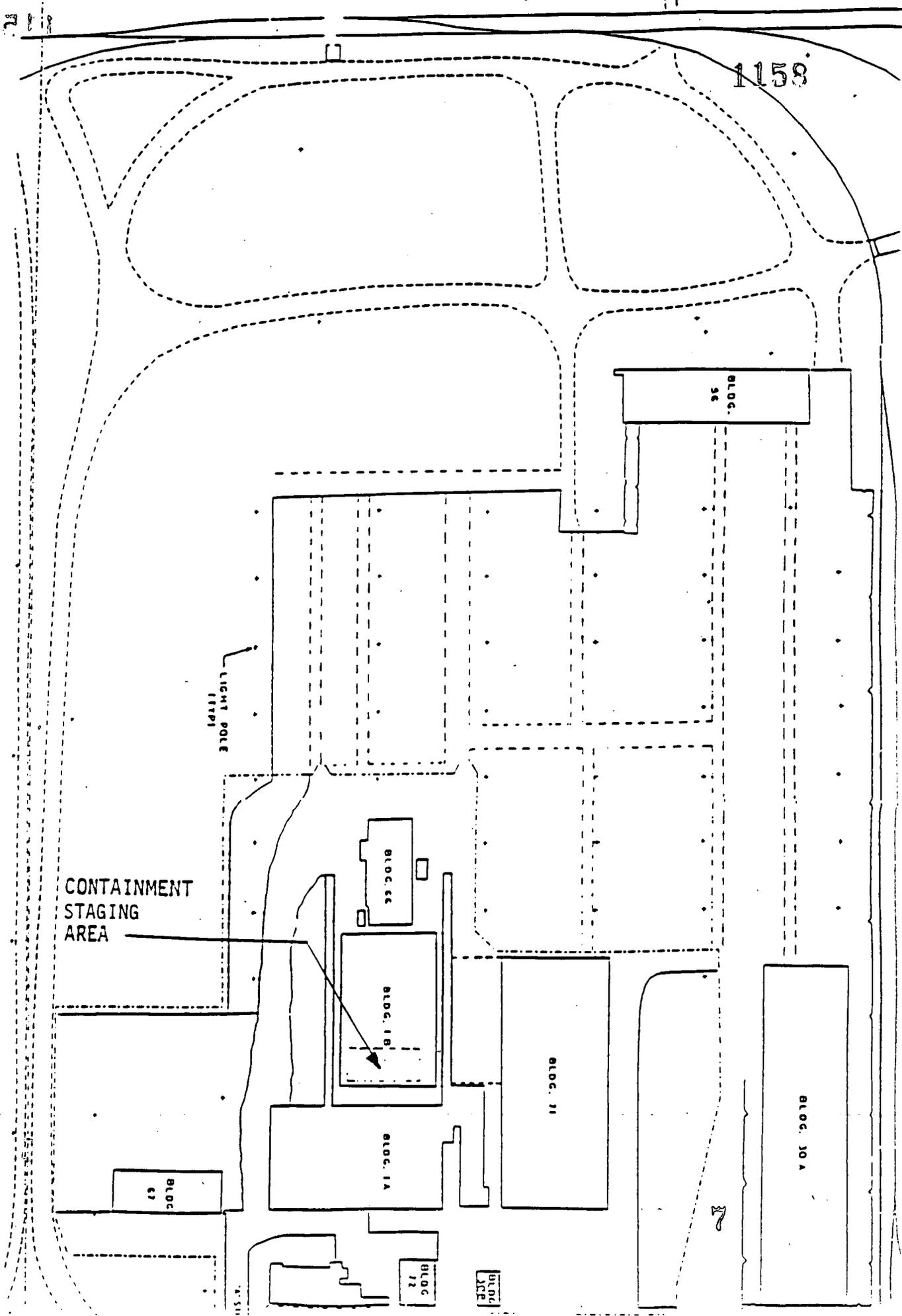
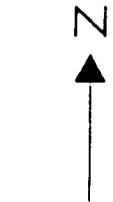
The Plant 1 Pad is a 375,000 square foot concrete storage area that is being used to store low level radioactive wastes, recoverable residues, and waste residues under Resource Conservation and Recovery Act (RCRA) evaluation. A sketch of the Plant 1 Pad, which is located in the northwest section of the FMPC production area is shown in Figure 4.0. The Containment Staging Area is located underneath the Building 1B weather shelter as noted on Figure 4.0.

Due to the deteriorated condition and environmental exposure of the approximately 45,000 drums stored on the pad, aggressive operational actions have been implemented to prevent spills/leaks from the drums. These actions include the following:

- Overpacking of deteriorated drums on the Plant 1 Pad.
- Daily drum leakage inspections.
- Weekly inspection consistent with 40 CFR 265.15 and 265.174 and OAC 3745-65-15 and 3745-66-74 by August 31, 1990.
- Operation of a lined staging area for deteriorated drums prior to overpacking.
- Relocation of 20,000 drums from the Plant 1 Pad to indoor storage within the FMPC production facilities by October 31, 1990.
- Rearrangement of remaining Plant 1 Pad drums to provide adequate aisle spacing for leakage inspections by September 30, 1990.
- Emergency repair of pad deterioration that would permit safe movement of the drums to achieve adequate aisle spacing. The repair consists of filling in deteriorated sections of the pad and cutting away severely cracked areas with subsequent replacement of the needed concrete. The emergency repair is being conducted in concert with the drum movements so that the September 30, 1990, date to achieve adequate aisle spacing is met. Controls are in place during the repair to minimize the spread of contamination and to drum the waste for subsequent evaluation.
- Special relocation of approximately 4,700 drums to the Plant 1 Pad containing uranium bearing materials that will require further action to alleviate a potential explosive hazard due to the possibility of hydrogen generation and ignition. A method for safe transport of the drums has been documented to allow development of the best method to mitigate the potential explosive hazard after the pad aisle spacing is achieved on September 30, 1990.

All of the above actions, as detailed in the remaining plan sections, are consistent with the Amended Consent Decree commitments and will result in a substantial environmental improvement at the FMPC.

FIGURE 4.0
PLANT 1 PAD AREA



SCALE

4.1 AISLE SPACING

The aisle spacing that will be implemented by September 30, 1990, for the Plant 1 Pad (not including drums in the Containment Staging Area) and other outdoor drum storage areas is shown in Figure 4.1. The inspection aisles will be maintained at a minimum of 24 inches between each row of pallets. Fifty (50) inch fork truck access is provided on at least one side of the storage locations and when possible, on two sides. The maximum number of skids in any one row is 20. The exception is for the northeast ramp area of the Plant 1 Pad which has three rows that are 41 skids long due to the dimensions of the ramp area and the intent to maximize utilization of storage space on the pad. This storage arrangement was designed to maximize utilization of the hard surfaces found on the Plant 1 Pad Area and other outdoor storage locations; provide adequate aisle space for inspections; and allow sufficient room for immediate action to contain leaks/spills and allow a drum to be mitigated within 24 hours. This storage arrangement meets the requirements of 40 CFR 265.35.

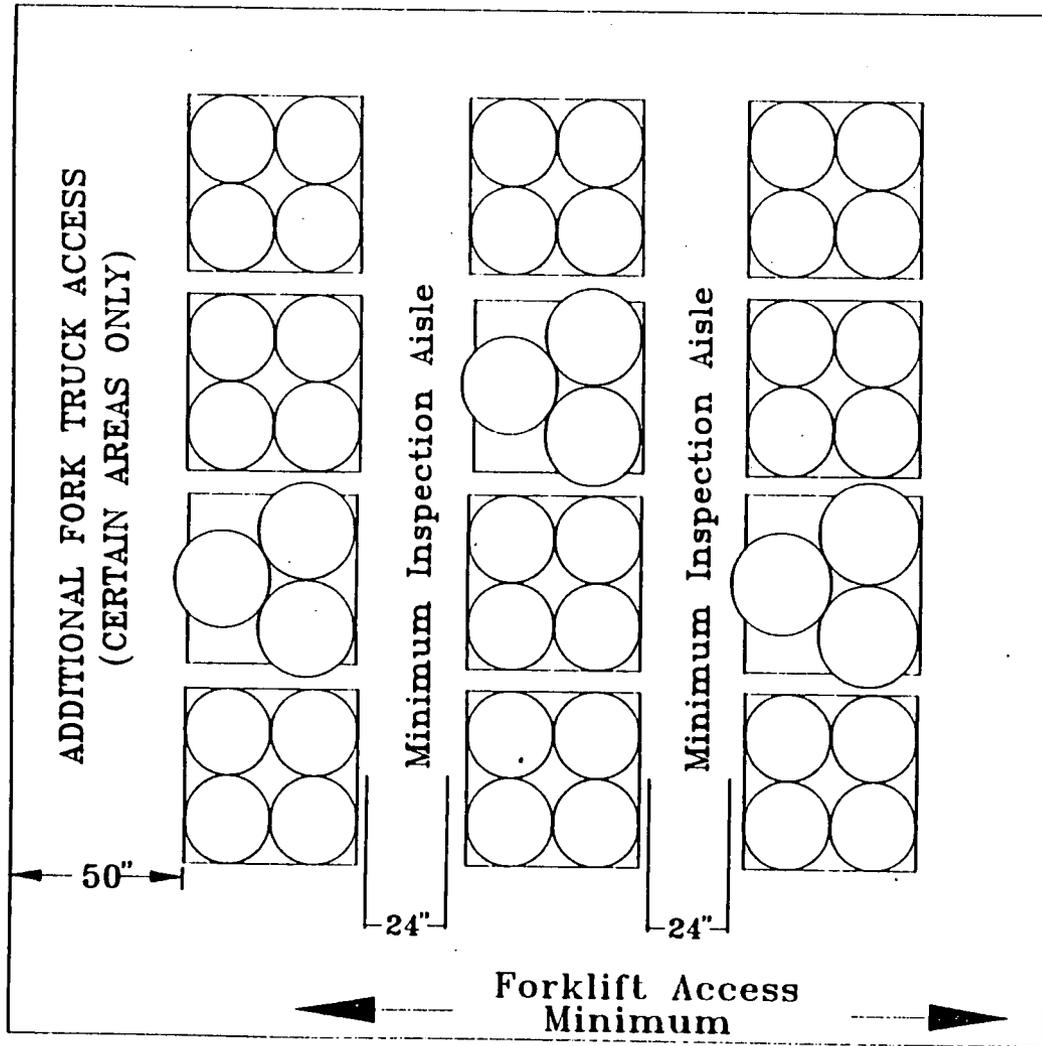
4.2 . INSPECTIONS

Figure 4.2.0 is an example of a Plant 1 Pad daily leakage inspection sheet. The "RI" and "R" Areas marked at the top of the row columns in Figure 4.2.0 are examples of designated areas on the Plant 1 Pad for drum storage. Until September 30, 1990, the outdoor daily leakage inspections are performed to the extent that current aisle space allows due to the fact that not all of the drums stored outdoors have adequate aisle space. After September 30, 1990, the FMPC has committed to provide adequate aisles for all drums under evaluation. Ladders will be utilized during the daily leakage inspections to enhance observation of third tier drums. On this particular day, July 19, 1990, one drum was identified as leaking during the inspection contained in "R" Area, row number 4. Figure 4.2.1 is a comment page that is attached to an inspection sheet when a leaking drum is found and provides additional information on the drum, the corrective action, and the minor event report (MER) log number that the incident is recorded under.

Figures 4.2.2 and 4.2.3 illustrate the MER in which the documented corrective action states that the FMPC utility engineer, who is the on-shift assistant emergency duty officer (AEDO), was notified and the drum overpacked. The AEDO contacts the FMPC spill coordinator (as shown in Figure 4.2.4 under event number 90-07-261) to determine if a reportable quantity (RQ) was involved. In this case, an RQ was not spilled.

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Plant 1 Pad/Outdoor Drum Storage



NOTE: MAXIMUM ROW LENGTH IS 20 PALLETS

"RI" AREA		"R" AREA
ROW 1 OK	ROW 26 Non ReRA STORAGE	ROW 1 OK 1158
ROW 2 OK	ROW 27 MT	ROW 2 OK
ROW 3 OK	ROW 28 MT	ROW 3 OK
ROW 4 OK	ROW 29 MT	ROW 4 Jerker ST/O SK
ROW 5 OK	ROW 30 Non ReRA STORAGE	ROW 5 OK
ROW 6 OK	ROW 31 " " "	ROW 6 OK
ROW 7 OK	ROW 32 " " "	ROW 7 OK
ROW 8 OK	ROW 33 " " "	ROW 8 OK
ROW 9 OK		ROW 9 OK
ROW 10 OK		ROW 10 OK
ROW 11 OK		ROW 11 OK
ROW 12 OK		ROW 12 OK
ROW 13 OK		ROW 13 OK
ROW 14 OK		ROW 14 OK
ROW 15 OK		ROW 15 OK
ROW 16 OK		ROW 16 OK
ROW 17 OK		ROW 17 OK
ROW 18 OK		ROW 18 OK
ROW 19 OK		ROW 19 OK
ROW 20 OK		ROW 20 Non ReRA Stor.
ROW 21 MT		ROW 21 " " "
ROW 22 MT		ROW 22 " " "
ROW 23 MT		ROW 23 " " "
ROW 24 MT		ROW 24 " " "
ROW 25 MT		ROW 25 " " "
		ROW 26 " 10 " "

INSPECTOR NAME: *Richard S. Keever*

DATE: *7-19-07*

LIST LOT AND DRUM NUMBER: H093-658-D069-0300 DR. 38

LIST DRUM WEIGHTS: 471-48-423 1158

LIST TIME SUPERVISOR OR U.E. NOTIFIED: A. ELAM 0900AM

ACTIONS TAKEN AND TIMES: Drum plugged + overpacked 0945

MER REPORT NUMBER: 90-07-261

LIST LOT AND DRUM NUMBER:

LIST DRUM WEIGHTS:

LIST TIME SUPERVISOR OR U.E. NOTIFIED:

ACTIONS TAKEN AND TIMES:

MER REPORT NUMBER

LIST LOT AND DRUM NUMBER:

LIST DRUM WEIGHTS:

LIST TIME SUPERVISOR OR U.E. NOTIFIED:

ACTIONS TAKEN AND TIMES:

MER REPORT NUMBER:

LIST LOT AND DRUM NUMBER:

LIST DRUM WEIGHTS:

LIST TIME SUPERVISOR OR U.E. NOTIFIED:

ACTIONS TAKEN AND TIMES:

MER REPORT NUMBER:

LIST LOT AND DRUM NUMBER:

LIST DRUM WEIGHTS:

LIST TIME SUPERVISOR OR U.E. NOTIFIED:

ACTIONS TAKEN AND TIMES:

Westinghouse Materials Company of Ohio
MINOR EVENT REPORT

FIGURE 4

EVENT LOG NO: 90-07-261
DEPARTMENT REPORT NO: MER:R:(WM):90-0
PAGE: 1 of 2

2211

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UOR EVALUATION: This MER was reviewed for UOR criteria in accordance with Site Procedure FMPC-703.

UOR is required: NO YES UOR NUMBER: _____

18. STAFF MANAGER: J. P. Hopper DATE: 7/20/90

NO.	DISTRIBUTION OF COPIES
1	Staff Manager (ORIGINAL)
2	Vice President, Quality & Safety
3	Performance Assessment Department Manager
4	Section Manager
5	Area Supervisor/Group Manager
6	Central Files
7	Assistant Emergency Duty Officer/Utility En.

This report is to be completed in accordance with Site Procedure FMPC-704 during the shift which the event took place. Notify the Manager. Environmental Compliance immediately if the event represents a threat to the environment, on or off site.

ACTUAL EVENT

1. EVENT SUBJECT:

LEAKING DRUM

2. DATE OF EVENT:

7-19-90

3. TIME:

0930

4. SHIFT:

1

5. LOCATION:

PLANT 1 EAST PAD

6. RESPONSIBLE DEPARTMENT:

WASTE OPERATIONS

7. SECTION:

W/O

8. EQUIPMENT/PROCESS/AREA:

PLANT 1 EAST PAD

9. DESCRIBE THE EVENT IN DETAIL:

See attached sheets (if required).

DURING ROUTINE EAST PAD INSPECTION A DRUM OF
H093-658-D-69-0300 DRUM 38 UNITS FOUND
LEAKING. APPROX. 202 LEAKED OUT.

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10. CORRECTIVE ACTION TAKEN:

See attached sheets (if required).

THE LEAK WAS CONTAINED WITH ASSURIBUNT PDS
U.E WAS NOTIFIED.

THE DRUM WAS TAKEN TO A OVERPACK STATION
& OVERPACKED. NO LIQUIDS LEAKED ONTO THE PA

11. HAS THIS EVENT OCCURED PREVIOUSLY?

NO
 YES

WHEN? 7/15/90

WHERE? PLANT 1 PAD

12. WAS EVACUATION ALARM SOUNDED?

NO
 YES

WHEN? _____

13. WAS BUILDING/AREA EVACUATED?

NO
 YES

WHEN? _____

14. WHEN WAS THE BUILDING/AREA REENTERED?

AUTHORIZED BY: _____

PERSONNEL INVOLVED/
WITNESSES:

See
attached
sheets for
additional
information.

NAME	BADGE	TITLE	DEPARTMENT	SENT TO MED: YES OR NO
R KEJNER	2571	CHEM OPR.	W/O	NO

ADDITIONAL INFORMATION:

See attached sheets (if required).

AEDO'S DAILY EVENT LOG

EVENT LOG NUMBER (YR - MO - NO)	TIME AND DATE	DESCRIPTION	AEDO'S BADGE NUMBER	RE	LE	NOTIFIED SPILL ADVISOR	DII MOI
90-07-261	0930 7-19-90	PLT. 1 PERSONNEL FOUND LEAKING DRUM ON PLT 1 PRD DURING ROUTINE INSPECTION - APPROX 202 DRUM WAS OVERPRESSED - LOT #	DU 116		✓	✓	
90-07-258	7-19-90	H 093-658-0069-0308 DR # 38					
90-07-258	1100 7-19-90	THE PROBLEMS WITH THE OFFSITE EMERG. WARNING SYSTEM AT BOSS FIRE HOUSE AND NEW BALTIMORE HAS BEEN CORRECTED - CONFIRMED AT 1100 HRS ON 7-19-90	DU 116			NA	
90-07-262	1230 7-19-90	EMPLOYEE FOR CLEVELAND WRECKING CO. (BOB VALINES # 50-1887) RECEIVED LACERATIONS ON RIGHT THUMB WHILE WORKING AT LAB. WAS TRANSPORTED TO FRANCISCAN MEDICAL CENTER, AT HARRISON, IN PRIVATE VEHICLE - NOT REPORTABLE TO OROC - PER HRASENT	DU 116		✓	NA	

CLOSE OUT OF EVENT

1100

COPIES OF THIS LOG MUST BE DELIVERED TO THE EOC DAILY.

NO.	DISTRIBUTION
1	EOC
2	Originator

- * EOC TO MAKE DISTRIBUTION:
- 1. EDOs. (9)
 - 2. DOE Site Office
 - 3. Manager Public Affairs and Communications
 - 4. Manager Environmental Compliance
 - 5. Manager Industrial Hygiene & Safety

8. Facility Owner: GRUBBS

The following criteria was developed to prioritize mitigation activities such that the most deteriorated drums are addressed first. This criteria will be implemented during the daily leakage inspections by August 31, 1990:

- TYPE I - Obvious observation of material flowing or having accumulated on pallet or pad.
- Notify supervisor.
 - Immediately stop or contain the leak.
 - Supervisor notifies AEDO.
 - Note drum on inspection form as requiring mitigation within 24 hours.
 - Complete additional cleanup as necessary.
 - Supervisor generates a MER.
 - AEDO notifies FMPC spill coordinator.
- TYPE II - Localized evidence of material on exterior of drum but no material contact with pallet or pad.
- Note on inspection form.
 - Supervisor generates a MER.
 - Supervisor reviews completed inspection sheets to prioritize drum for movement to Overpack Staging Area and subsequent mitigation.
- TYPE III - Evidence of exterior contamination/discoloration without evidence of active release.
- Note on inspection form.
 - Supervisor to schedule for overpacking when Type I and II drums are all overpacked.
 - Supervisor generates a MER.

Appendix I contains example photographs of Type I, II, and III drums.

Table 4.2.1 illustrates the frequency of inspections for drums that are under evaluation with respect to the FMPC storage location.

TABLE 4.2.1
FMPC DRUM INSPECTION FREQUENCY*

TYPE OF INSPECTION	PLANT 1 PAD	ALL OTHER OUT-DOOR DRUM STORAGE AREAS	INDOOR PLANT	RCRA WAREHOUSES
Daily Leakage	X	X		
Weekly Leakage			X	
Weekly RCRA	X			X

*DOES NOT INCLUDE INTERMEDIATE PRODUCTS/PRODUCTS OR THORIUM

In addition to the daily leakage inspections performed on the Plant 1 Pad, weekly RCRA inspections will be performed as of August 30, 1990, to meet the requirements of 40 CFR 265.15 and 265.174 and OAC 3745-65-15 and 3745-66-74. The criteria used for the weekly Plant 1 Pad inspections is shown in Table 4.2.2.

TABLE 4.2.2
WEEKLY INSPECTION CRITERIA FOR PLANT 1 PAD*

1. Communications Device
(Supervisors Office)
2. Spill Response Equipment (on Pad)
 - 2.A. Recovery drums (10)
 - 2.B. Absorbent Pad (6)
 - 2.C. Hazardous Material Pig (6)
 - 2.D. Leather Palm Gloves (3)
 - 2.E. Rubber Boots (3)
 - 2.F. Disposable Coveralls (3)
 - 2.G. Shovels (2)
 - 2.H. Brooms (1)
 - 2.I. Granular Absorbent (3 bags)
3. Respirators and Cartridges (3)
(Building 66 and Plant 1)
4. Emergency Eyewash
(outside Plant 1/Building 66)
5. Green Light for Eyewash Stations
6. Signs (pad perimeter)
 - 6.A. Authorized Personnel Signs
 - 6.B. No Smoking Signs
 - 6.C. Emergency Call
7. Fire Extinguisher
(Outside Plant 1/Building 66/Building 71)
8. Containment Area
 - 8.A. Curb Condition
 - 8.B. Liner Condition
 - 8.C. Free Liquids
9. Security Maintained by FMPC Security System
10. Container Inspections-Reference Daily Leakage Inspection Forms.
11. Pad Inspection-Not applicable, Pad Integrity to be Addressed During Operational Improvement Project.

*This is the minimum inspection criteria and subject to revision.

The approximately "16,000" suspect drums as referenced in the Amended Consent Decree are located on the Plant 1 Pad, except for one material type representing approximately 5,539 drums located in Plant 6. The specific material stream, which is a sump cake that had previously been processed through the FMPC rotary kiln, was moved to Plant 6 because in February 1990, WMC0 had concluded sampling/analysis of the material and evaluated it to be nonRCRA. Since the criteria for moving drums into the Plant 6 "dense pack" storage array (as outlined in Section 6.0) is that the material be dry as determined by process knowledge and unlikely to be evaluated RCRA, the dried sump cake stream was one of the materials selected for Plant 6 storage. The movement of the dried sump cake stream was initiated the week of June 18, 1990, and completed the week of July 16, 1990. The drum material contained in Plant 6, including the dried sump cake, has a weekly leakage inspection performed as shown in Table 4.2.1 which is sufficient based on the material type, drum conditions, and enhanced storage area location.

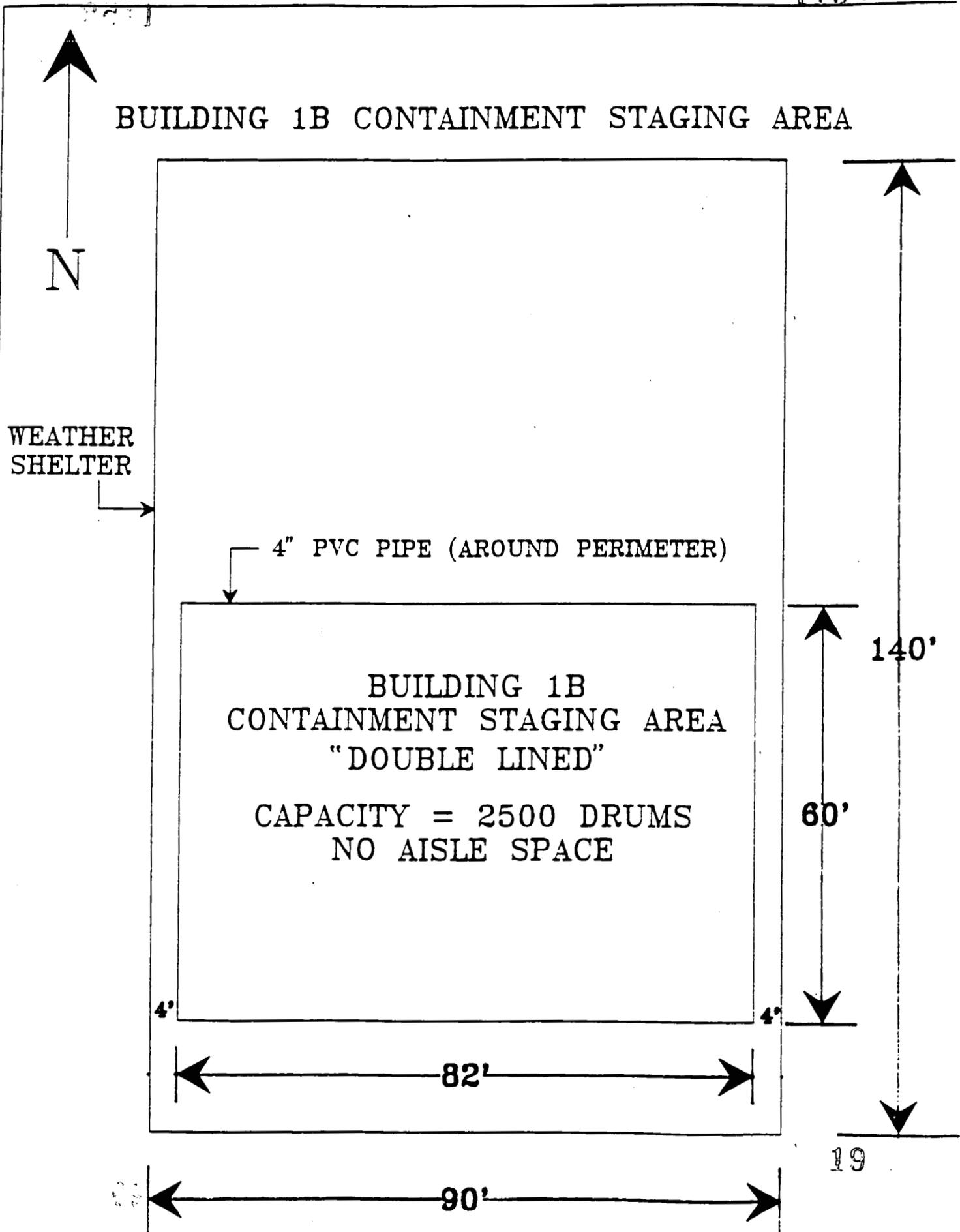
5.0 PLANT 1 PAD CONTAINMENT STAGING AREA OPERATION

The Plant 1 Pad Containment Staging Area is approximately 4,920 square foot area constructed of a layer of impermeable, vinyl-nylon plastic surrounded by 4 inch plastic pipe. The area is covered by a metal roof structure which is open on the sides. The capacity of the Containment Staging Area is approximately 2,000 drums without aisle spacing. Figure 5.0 contains a sketch of the Containment Staging Area.

The Plant 1 Pad Containment Staging Area is used to store deteriorated drums that require overpacking. Drums are overpacked for one of two reasons: (1) to correct a leak (Type I drums) or (2) to improve the integrity of the container due to a general or local deterioration so as to preclude future leaks (Type II/III drums).

As space permits, Type II/III drums are transported by fork truck from the Plant 1 Pad Area to the Containment Staging Area. From the Containment Staging Area, the drums are scheduled for overpacking at one of three locations (two inside Plant 1 and one inside Building 71 located on the pad). Additional overpacking areas may be set up on the Plant 1 Pad or alternate locations depending on the overpacking requirements. Figure 5.1 shows the number of drums overpacked to date during FY-1990.

When a Type I drum is identified, immediate action is taken to contain the drum/material using a patch, absorbent materials, or other appropriate methods. Once contained and direction has been given by the AEDO, as detailed in Section 8.0, the drum is transported to an overpacking area and mitigated within 24 hours after the drum was identified.



WASTE MANAGEMENT PERFORMANCE MEASURE

FMPC

OVERPACK 10,000 DRUMS ON THE PLANT 1 PAD

20

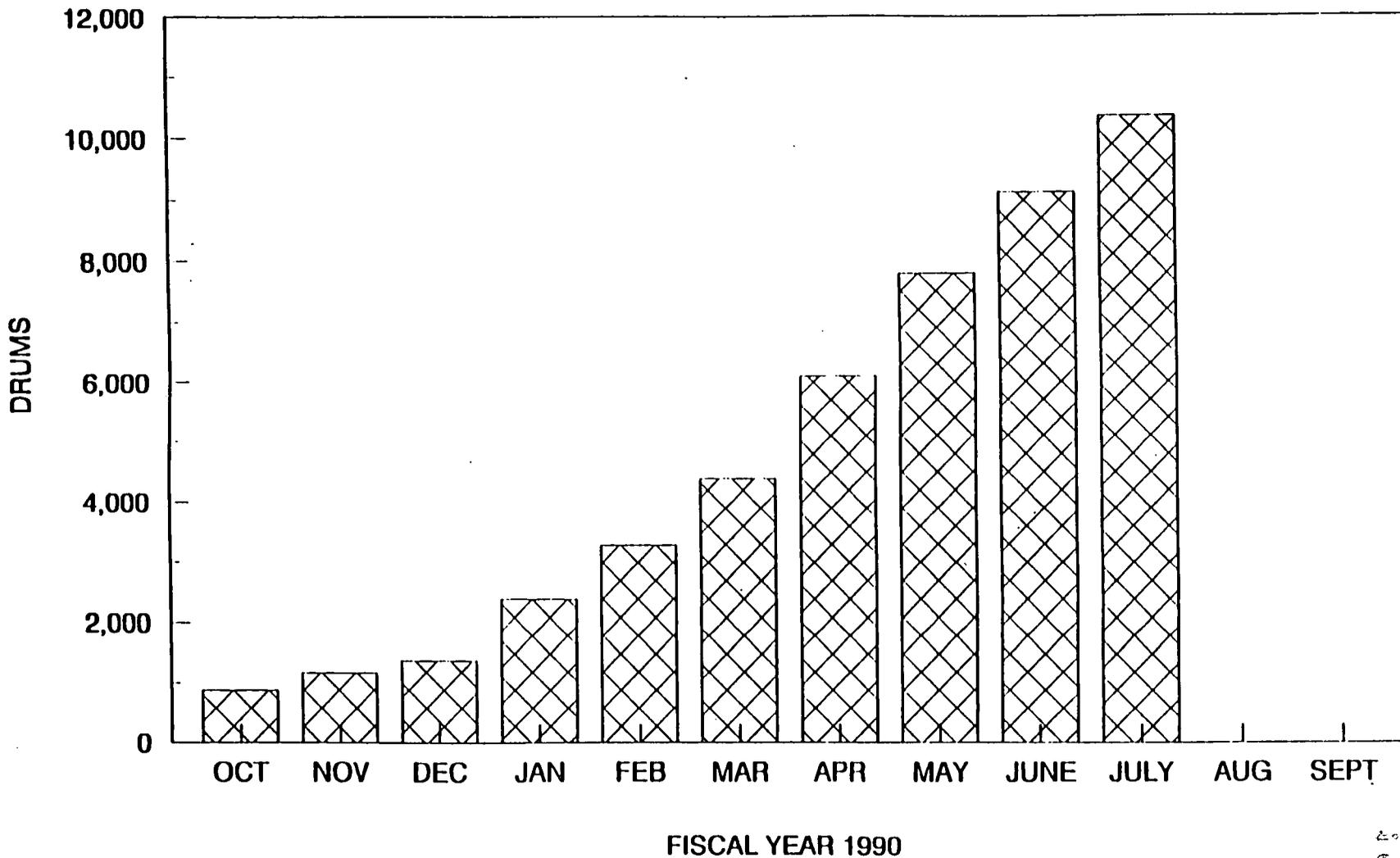


FIGURE 5.1

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20

6.1 Scope

The scope of the indoor drum storage activity involves relocating drums from outdoor storage locations to the inside areas of idle production plants. In some plants, machinery/equipment is being moved to make available the maximum amount of floor space to accommodate drums. The goal is to relocate 20,000 drums of residues into indoor storage by October 31, 1990. The movement and storage of drum residues inside FMPC facilities on lined and contained surfaces represents a significant environmental enhancement until evaluation, treatment/disposal of the residues is completed.

6.2 Criteria for Drum Movement

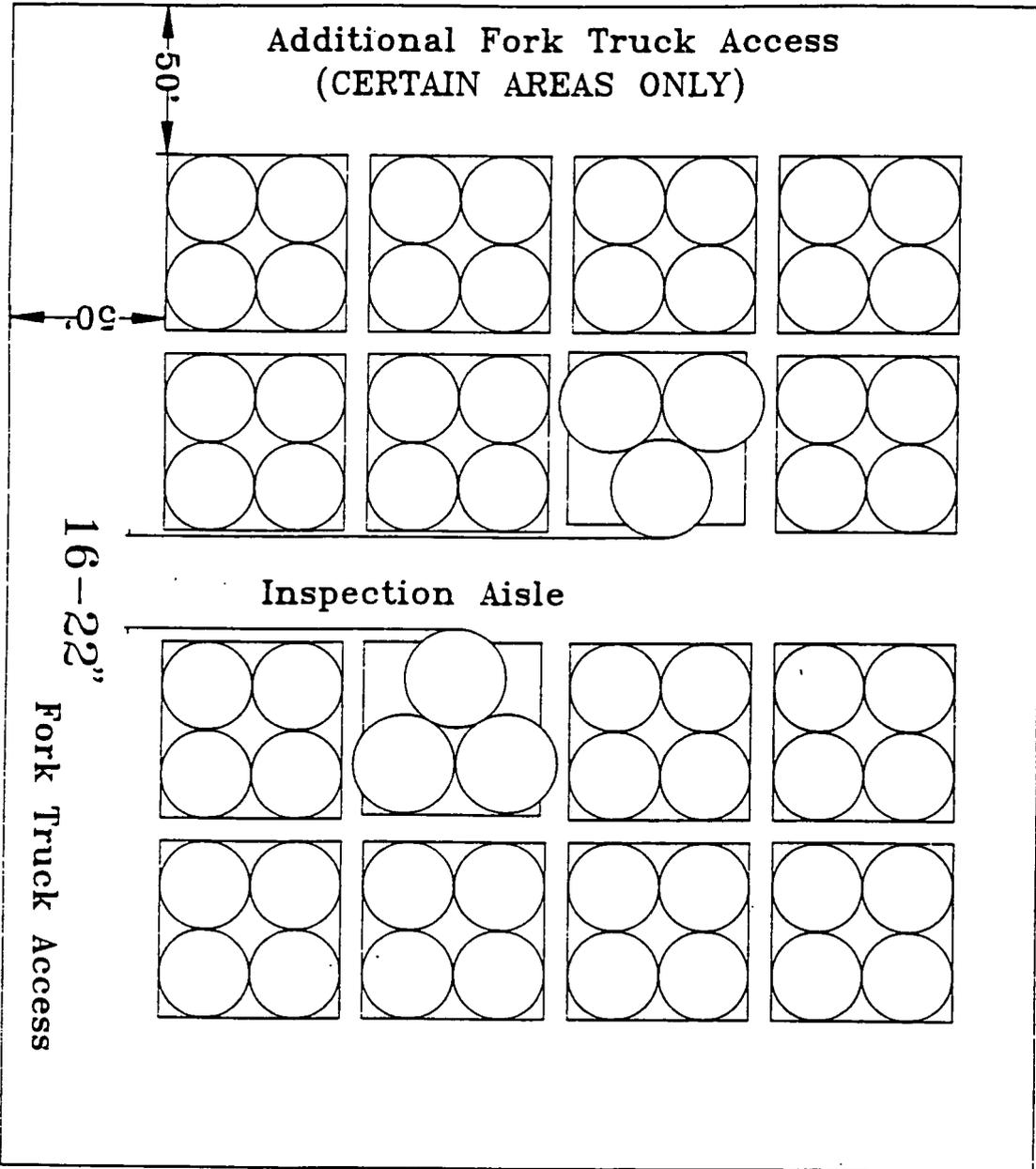
The criteria for selecting which materials are moved into indoor storage primarily depends on two factors. The first factor concerns the relative certainty that the material will be evaluated to be nonRCRA. Process knowledge combined with past analytical data indicates that certain process residues, such as the dried sump cake discussed in Section 4.2 or magnesium fluoride have a very unlikely probability of being evaluated hazardous. The final determination of many of the residues, however, cannot be finalized until the identification of all FMPC hazardous waste management units is complete in June 1991. Therefore, the FMPC will not knowingly create new hazardous waste storage units by relocating residues under evaluation that have a potential to be later determined hazardous. The second criteria is the use of process knowledge to verify the material contains no free liquids. The reason for this criteria is that in order to relocate as many drums indoors to reduce environmental deterioration of the drums, the FMPC is utilizing a "dense pack" arrangement as described in Section 6.3. The determination by process knowledge of a dry material allows the "dense pack" of the drums, yet still provides adequate room for inspection and spill response activities based on the relative immobility of the stored material.

6.3 Aisle Spacing

Figure 6.3 illustrates the "dense pack" arrangement for storage of dry materials (as determined by process knowledge) in FMPC plant facilities. All of the drums stored indoors are placed on an impermeable laminated vinyl/nylon and surrounded completely by 4 inch curbing to form a containment in the storage areas. This storage arrangement meets the requirements of 40 CFR 265.35.

The inspection aisles are currently 16 to 24 inches between each two rows of pallets with a 50 inch fork truck access provided on at least one side of the storage locations and when possible on two sides. Although the 16 to 24 inch inspection aisle is adequate for leakage inspections and initial spill response, the FMPC is in the process of upgrading the aisles for indoor storage to be a minimum

Indoor Drum Storage



- NOTES:
1. MAXIMUM ROW LENGTH IS 20 PALLETTS.
 2. MINIMUM 22 INCH AISLE SPACING ONLY TO BE ACHIEVED BY SEPTEMBER 30, 1990.

6.3 Aisle Spacing (Continued)

of 22 inches. The 22 inch aisle spacing was based upon leakage inspection capability, spill response actions, and maximizing the number of drums stored indoors. This upgrade will be completed September 30, 1990. This storage arrangement meets the requirements of 40 CFR 265.35.

6.4 Drum Inspections

The inspection criteria for indoor drum storage is the same as described for outdoor drum storage in Section 4.2. The three levels of drum deterioration are applicable with the requirement of immediate spill response actions for Type I drums. The leakage inspections for indoor drum storage are conducted on a weekly basis as indicated in Table 4.2.1.

To enhance the inspection process inside plants where the lighting is not as bright during the daytime hours as in outdoor storage areas and the dense pack array requires more extensive examination, high intensity flashlights and rolling ladders are utilized. Each operator inspecting drums indoors is required to use a high intensity flashlight to shine between the double stack of pallets to perform the inspection. In addition, a rolling ladder is used to gain greater visibility to drums located within the interior of the third stack.

7.0 MATERIAL STORAGE EVALUATION

Determination of hazardous waste is defined by the FMPC when notification is made to OEPA in the form of the quarterly technical progress reports. Sixty days (60) from a determination that any drummed materials are hazardous or mixed waste, DOE will move such materials to units that are identified in the FMPC Part A permit Application submitted September 1989, or subsequent revisions. If storage space is not available, DOE will perform daily leakage inspections on all such containers as outlined in Section 4.2 of this plan, and shall, within 60 days of a determination that sufficient RCRA storage space is not available, submit a plan and schedule for OEPA approval for short-term storage of such wastes. DOE will perform weekly inspections in accordance with 40 CFR 265.15 and 265.174 and OAC 3745-65-15 and 3745-66-74 on all such containers.

8.0 SPILL RESPONSE ACTIONS

Based upon the inspection criteria listed in Section 4.2.0, the FMPC spill response actions for Type I identified drums are as follows:

1. Operator inspects drum and makes an obvious observation of material flowing from the drum or an accumulation of material on pallet or pad.
2. Operator notifies supervisor.

8.0 SPILL RESPONSE ACTIONS (Continued)

3. Immediate actions are taken utilizing the spill response equipment as identified in Table 4.2.2. Typically absorbents are used on wet spills and dry spills are covered and vacuumed or scooped up. The immediate actions are taken to contain the spill without normally moving the drums. The aisle spacing as outlined for the various FMPC storage area is adequate to perform these actions based on past operating experience.
4. Supervisor notifies the AEDO.
5. Notation is made on inspection form so that drum will be mitigated within 24 hours (for Type I drum only).
6. Supervisor generates a MER and AEDO notifies spill coordinator to determine if a RQ was spilled.
7. After the initial leak is contained or stopped, a fork truck is used to stage the pallets into the 50 inch fork truck aisle to retrieve the drum for overpacking and additional cleanup of the spill area if necessary.

APPENDIX I

DRUM TYPES

**Best
Available
Copy**

W. Samp
CAKE

S0915-88/7

0069-0309

DR. 7

PHOTO BY J.A. DENNEY

W.M.C.O. Negative No. 4487-2 111523

U.S. Department Of Energy
UNCLASSIFIED

PHO



DIR. 7

0069

87-5095

PHOTO BY J.A. DENNEY
W.M.C.O. Negative No. 4487-3 111523
U.S. Department Of Energy
UNCLASSIFIED

PHO

1158



7191

303

28

PHOTO BY J.A. DENNEY

W.M.C.O. Negative No. 44874 111523
U.S. Department Of Energy
UNCLASSIFIED

PHO

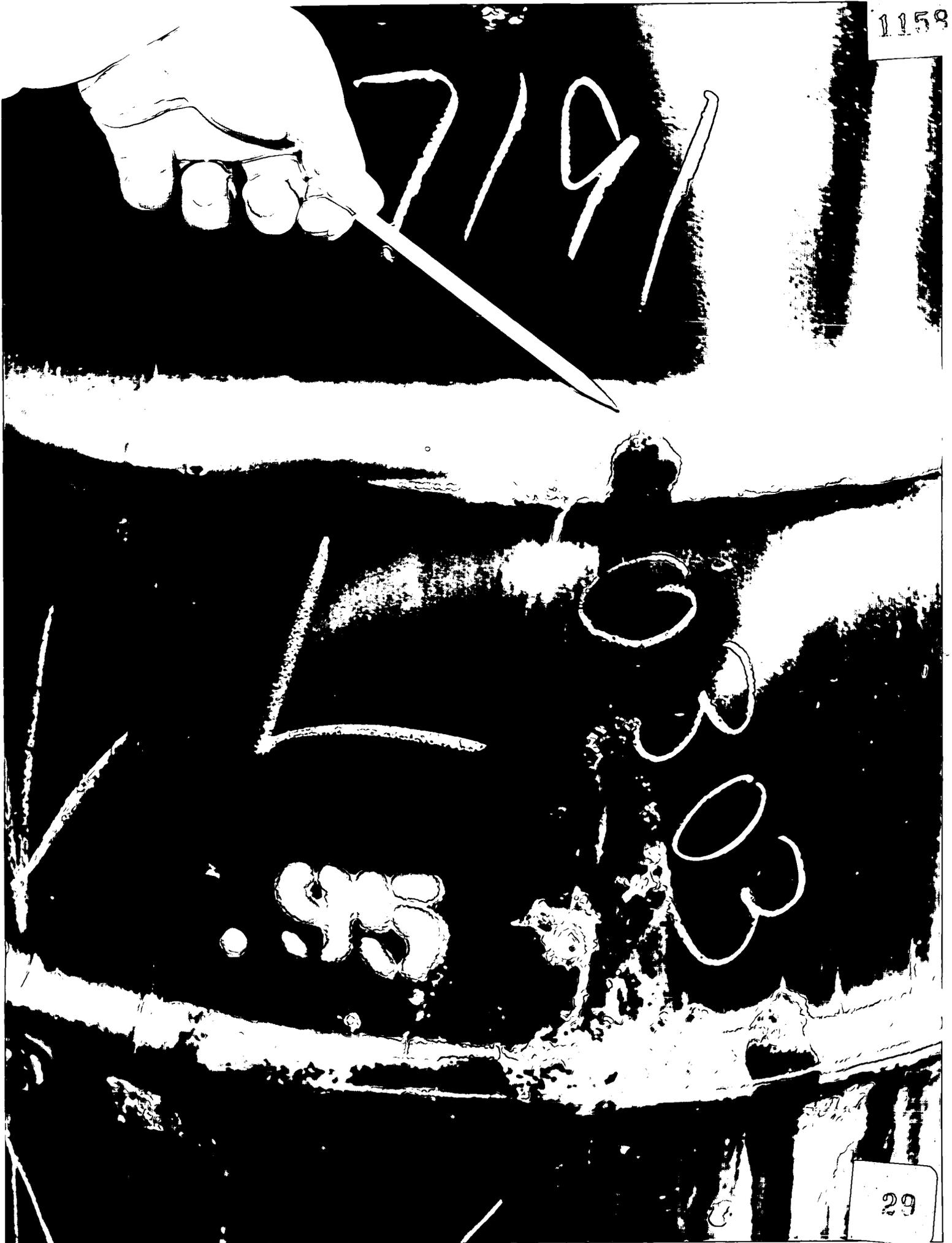


PHOTO BY J.A. DENNEY

W.M.C.O. Negative No. 4487-5 111523
U.S. Department Of Energy
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PHO

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