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**DOE-FMPC HAMILTON COUNTY HAZARDOUS  
WASTE**

**05/14/91**

**OEPA/DOE-FMPC**

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**LETTER**



State of Ohio Environmental Protection Agency

Original File Copy

1485

**Southwest District Office**

40 South Main Street  
Dayton, Ohio 45402-2086  
(513) 285-6357  
FAX (513) 285-6249

George V. Voinovich  
Governor

May 14, 1991

Re: DOE-FMPC  
HAMILTON COUNTY  
HAZARDOUS WASTE

Mr. Gerald W. Westerbeck  
FMPC Site Manager  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Westerbeck:

On April 26, 1991, you submitted a revised Drum Management Plan for FMPC. The revised sections of the plan pertaining to aisle spacing and indoor drum storage are hereby approved. This office also concurs with the addendum to the plan regarding "Hydrogen Generating Material".

In order to determine the adequacy of the venting procedure identified in the Drum Management Plan, this office requested and received the WMCO Operating Procedure for Venting Potentially Explosive Drums. While the procedures described for handling drums of known RCRA waste and uncharacterized waste appear to be adequate, some concern was raised by procedures described for non-RCRA material. Specifically, Sections 7.1.6.3 and 7.1.6.4 still call for vent holes to be made in the sides of the drum. It appears that these drums will be stored in this open manner after venting. These drums are not subject to the hazardous waste storage requirements, but this office can not advocate the storage of this material in the manner described.

Please revise the procedures for handling non-RCRA hydrogen generating material. The new procedures should describe how this material will be handled and stored in an environmentally sound manner. Submit the revised procedures for my review no later than June 30, 1991. Call me at (513) 285-6357 if you have any questions.

Sincerely,

Paul D. Pardi  
Hazardous Waste Group Leader

PDP/ycrc

Date Rec'd MAY 16 1991

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cc: Graham Mitchell, FMPC Site Coordinator, SWDO  
Sue Schneider, WMCO