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**RETURN OF SAMPLE WASTES TO THE
FERNALD ENVIRONMENTAL MANAGEMENT
PROJECT (FEMP)**

09/10/91

**DOE-2207-91
DOE-FSO/OEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

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DOE-2207-91

Mr. Paul Pardi, Group Leader
Solid and Hazardous Waste
Management Unit
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402

Dear Mr. Pardi:

RETURN OF SAMPLE WASTES TO THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)

This letter summarizes the approach for the return of contact wastes and bulk (aggregated) wastes from off-site labs to the Fernald Environmental Management Project (FEMP). These wastes are generated as a result of laboratory waste analysis to support RCRA characterization activities at the FEMP. These wastes are returned to the FEMP for management because the off-site labs generally do not have alternative disposal options for these mixed wastes. The following specific actions have been identified to ensure compliant management of these materials.

Contact Wastes: Contact wastes (e.g., latex gloves, kim wipes, paper towels, etc.) will be sampled and analyzed as a bulk waste stream to determine if it exhibits the Toxicity Characteristic (TC). If the waste does not exhibit the TC, then the waste will be shipped to the FEMP on a bill of lading and dispositioned as low level waste. If it exhibits the TC, then it will be returned to the FEMP on a hazardous waste manifest and managed as a mixed waste (i.e., RCRA hazardous and low level waste).

Bulk Wastes: Each container of bulk waste will be sampled and analyzed to determine if it exhibits any hazardous waste characteristics (i.e., TC, ignitability, or corrosivity). In addition, the waste will be identified by any applicable hazardous waste listings. When properly characterized, the waste will be returned to the FEMP on a hazardous waste manifest and managed accordingly.

As you discussed with Ellery Savage (Manager, Environmental Compliance and Quality Assurance, WEMCO) on August 28, 1991, this notification is sufficient to initiate return of these wastes and formal approval from OEPA is not required.

If you have any questions regarding this issue, please contact David Rast of my staff at (513) 738-6322.

Sincerely,

Wally Davidson
Gerald W. Westerbeck *for*

cc:

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