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**PROPOSED AMENDED CONSENT DECREE
REQUIREMENTS FOR NEWLY IDENTIFIED
HAZARDOUS WASTE MANAGEMENT UNITES
(HWMUS)**

11/18/91

**DOE-351-92
DOE-FN/OEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
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DOE-351-92

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

Dear Mr. Pardi:

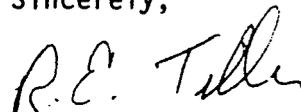
PROPOSED AMENDED CONSENT DECREE REQUIREMENTS FOR NEWLY IDENTIFIED HAZARDOUS WASTE MANAGEMENT UNITS (HWMUs)

In accordance with Section 3.12 of the proposed Amended Consent Decree (PACD), the Fernald Environmental Management Project (FEMP) is required to submit, to the Ohio EPA, a compliance schedule which addresses the proper management of newly identified HWMUs. The compliance schedule must be submitted to the Ohio EPA within sixty days from the date a report identifying additional hazardous wastes is submitted.

On September 18, 1991, as a result of continuing site investigations, the FEMP identified five HWMUs. On October 31, 1991, the FEMP submitted a revised Part A Permit Application to the Ohio EPA which identified these HWMUs. Enclosed is a Compliance Schedule establishing a timetable for implementation of the hazardous waste requirements for these HWMUs.

If you or your staff have any questions, please contact David Rast at (513) 738-6322.

Sincerely,


R. E. Tiller
Manager

FO:Rast

Enclosure: As Stated

cc w/encl.:

R. P. Whitfield, EM-40, FORS
K. A. Hayes, EM-424, TREV
J. A. Saric, USEPA-V, 5HR-12
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**REQUIREMENTS SCHEDULE FOR
NEWLY DETERMINED URANYL NITRATE SOLUTION
HAZARDOUS WASTE MANAGEMENT UNITS
AT THE FEMP**

I. INTRODUCTION

Section 3.12 of the proposed Amended Consent Decree for Civil Action No. C-1-86-0127 requires that within sixty days of the date of any report or revision to a permit application which identifies additional hazardous waste management units (HWMUs), the DOE shall submit a schedule to OEPA for approval setting forth a timetable within which hazardous waste requirements shall be implemented with regard to the new HWMU.

On September 18, 1991, the Fernald Environmental Management Project (FEMP) identified five (5) hazardous waste management units (HWMUs) associated with the uranyl nitrate tanks. On October 31, 1991, the FEMP submitted a RCRA Part B Permit Application to the OEPA. The Part A Permit Revision 12 submitted with the Part B identified these additional HWMUs. They are listed as follows:

Uranyl Nitrate Tanks (NFS Storage Area) (Tank Nos. F2-605, F2-606, F2-607, F2-608, 02-E004A-TNK)
Uranyl Nitrate Tanks (North of Plant 2) (Tank Nos. F2E-5(SE), F2E-6(NE), F2E-8(SW))
Uranyl Nitrate Tanks (Southeast of Plant 2) (Tanks Nos. F3E-223)
Uranyl Nitrate Tanks (Digestion Area) (Tank Nos. D1-1, D1-2, D1-4, D1-7, D1-10, F1-1, F1-25, F1-26)
Uranyl Nitrate Tanks (Raffinate Building) (Tank Nos. F1-301, F1-302, F1-303, F1-308)

II. SCHEDULE

In accordance with Section 3.12 of the proposed Amended Consent Decree, the following Compliance Schedule for the newly identified HWMUs is being submitted.

1. Complete the posting of the required signs "Danger - Unauthorized Personnel Keep Out" or its equivalent at the entrance to each hazardous waste management unit (HWMU) or at other locations in sufficient quantities to be visible from any approach. The signs will be visible from a distance of at least 25 feet. (OAC 3745-65-14(C))

COMPLETION DATE: December 31, 1991



2. Institute measures to control access to each unit, including but not limited to:

- Provide boundary markers such as signs, ropes, barriers, diking, etc. until appropriate danger signs, warning, etc. are posted as indicated in Item #1

COMPLETION DATE: November 30, 1991

3. Initiate HWMU inspections and maintain records in accordance with OAC 3745-65-15 and OAC 3745-66-74.

COMPLETION DATE: Completed

4. Verify the amount, if any, hazardous waste that is stored in each unit and document in the inspection record the amount of waste that is present.

COMPLETION DATE: Completed

5. Submit Closure Plan Information for each HWMU to the OEPA. The Closure Plan Information will integrate the long-term cleanup requirements of CERCLA and will contain a schedule for completing closure activities.

SUBMITTAL DATE:	UNH NFS Storage Area	May 31, 1997
	UNH North of Plant 2	May 31, 1997
	UNH Southeast of Plant 2	May 31, 1997
	UNH Digestion Area	May 31, 1997
	UNH Raffinate Building	May 31, 1997

6. Initiate transfer of any remaining wastes from each unit and manage the waste in accordance with proposed Amended Consent Decree and appropriate regulatory requirements. (OAC 3745-66-(70-74) and OAC 3745-65-35)

COMPLETION DATE: The characteristic wastes in the UNH Tanks will be treated and transferred by emergency removal action under CERCLA. The dates for waste processing have not yet been established. The waste and removal action will be managed in accordance with the proposed Amended Consent Decree and the CERCLA Consent Agreement as well as applicable and relevant portions of OAC 3745 and 40 CFR. A Permit Information Summary will be submitted to OEPA as necessary.



7. Update the facility operating record to include the description, quantity (if known), the location of wastes stored or in each unit, and the results of any waste analysis. (OAC 3745-65-73(B))

COMPLETION DATE: Completed

8. Update the facility operating record, as needed, if amount of waste stored in each unit is found, through remediation/closure activities to be different than the amount identified in Item 7.

COMPLETION DATE: As required

9. Submit a RCRA Annual Report to OEPA which includes operating information on each unit or any waste management activity that occurred after June 30, 1991. (OAC 3745-65-75)

COMPLETION DATE: March 1, Annually

10. Update the Waste Analysis Plan (WAP) to include the hazardous waste stream stored in each HWMU. (OAC 3745-65-13)

COMPLETION DATE: Completed

11. Incorporate into the written Contingency Plan the requirements to minimize hazards from fire, explosions, or unplanned releases of hazardous wastes from each unit. (OAC 3745-65-52 and OAC 3745-65-54)

COMPLETION DATE: Completed

12. Update training to instruct personnel involved in work at or near the vicinity of each HWMU to perform their duties in a way that ensures compliance with regulations. (OAC 3745-65-16)

COMPLETION DATE: March 1, 1992

13. Update training records to show that personnel who work at or near the vicinity of each HWMU have been trained. (OAC 3745-65-16(D)(4))

COMPLETION DATE: March 31, 1992

14. Update general site worker initial and annual training to address each unit and its hazards. (OAC 3745-65-16)

COMPLETION DATE: March 1, 1992

15. Update training records to show that site personnel have been trained on the location and hazards of each HWMU. (OAC 3745-65-16(D)(4))

COMPLETION DATE: March 31, 1993