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**FERNALD ENVIRONMENTAL  
MANAGEMENT PROJECT (FEMP)  
WELL DRILLING STORAGE AREA**

**06/26/92**

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DOE-FN/OEPA  
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LETTER**



## Department of Energy

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JUN 26 1992  
DOE-1965-92

Mr. Paul Pardi  
Ohio Environmental Protection Agency  
Division of Hazardous Waste Management  
40 South Main Street  
Dayton, Ohio 45402

Dear Mr. Pardi:

### FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP) WELL DRILLING STORAGE AREA

On Thursday, April 16, 1992, Phil Harris of your staff, spoke with Tom Walsh and John Sattler of the Westinghouse Environmental Management Company of Ohio (WEMCO) staff about the possibility of extending the submittal date for the Well Drilling Storage Area Closure Plan. The primary reason for the request for extra time was to resolve some ambiguity about what hazardous wastes were actually stored in the unit. The following Monday, Mr. Harris called Mr. Walsh and indicated that a time extension was acceptable, and requested a letter from the FEMP explaining the situation.

During the process of gathering more information to prepare a complete closure plan, it was determined that the Well Drilling Storage Area is not a Hazardous Waste Management Unit (HWMU). WEMCO staff representatives contacted you on Tuesday, April 21, 1992, about the possibility of removing the area from regulation as a HWMU. During the conversation, you indicated that if the facts reveal that the unit did not store hazardous wastes, then the unit would not be a HWMU and would not be regulated as such. You requested the FEMP provide a formal transmittal letter to the Ohio Environmental Protection Agency (Ohio EPA) discussing the change in the HWMU determination.

The purpose of this letter is to respond to your request and serve as notification that the submittal of the closure plan for the Well Drilling Storage Area will not be necessary.

### BACKGROUND INFORMATION

The Well Drilling Storage Area is located to the northwest of the FEMP waste pit area (Operable Unit 1). Drums of soil boring cuttings generated under the Comprehensive Environmental Response Compensation & Liability Act (CERCLA) investigations were temporarily stored there prior to placement in an established storage area. Several surveillance inspections found that these wastes were stored at this location for time periods exceeding ninety days. Investigation also found that some drums had lot marking codes that

corresponded with boring wastes that were designated as Resource Conservation and Recovery Act (RCRA) hazardous.

According to OAC 3745-52-34, a facility can accumulate containers of hazardous waste for a period of time up to ninety days and not be required to meet interim status standards or permitted facility standards, provided the wastes are in containers and the generator complies with the provisions of OAC 3745-66-70 through 3745-66-77. If a facility exceeds the ninety day period, that facility becomes a hazardous waste storage facility and is subject to regulatory operating standards. Based on the available information at the time of the initial HWMU determination, it was believed that hazardous wastes were stored at the Well Drilling Storage Area in excess of ninety days and, as a result, the area was declared a HWMU.

In June of 1991, the FEMP submitted a RCRA Part A permit application that listed the Well Drilling Storage Area as a HWMU. This unit was determined to be a HWMU during the HWMU review performed at the FEMP, as required by the Proposed Amendment to Consent Decree (PACD). In accordance with the PACD, a compliance schedule was submitted to Ohio EPA in August 1991 that put forth a time-table for addressing the regulatory requirements for this unit, including the submittal of a closure plan.

During a meeting with Ohio EPA in September 1991, the Department of Energy (DOE) and WEMCO provided a fact sheet on the Well Drilling Storage Area. At that time, the FEMP representatives requested Ohio EPA concurrence that this area not be regulated as a HWMU. Also, in a recent letter to you, the FEMP said that further investigation into the waste management practices at this unit indicates that it did not store hazardous wastes for an extended period of time.

#### NEW INFORMATION

When the FEMP began to prepare closure plan information and data for the Well Drilling Storage Area, it was necessary to do a follow-up investigation of the hazardous wastes stored in the area in order to specify the hazardous waste constituents that would be addressed in the plan. During this research, information came to light that shows that no hazardous wastes were known to be stored in the area.

According to site personnel associated with the collection of soil boring cuttings and those in charge of the Well Drilling Storage Area, only environmental media taken from CERCLA soil borings or wells drilled outside of the production and waste unit areas were stored at the unit. These individuals stated that all cuttings declared to be hazardous were generated inside the waste unit/production area, and that these wastes were never stored in the Well Drilling Storage Area. Standard practices dictated that cuttings generated from inside the plant controlled areas were kept in the process area, and those generated from outside the controlled areas, and outside "suspect" areas, were held at the Well Drilling Storage Area pending receipt of analytical data on the cuttings. Suspect areas were defined as those areas where process knowledge or existing data indicated a significant potential to encounter hazardous waste or hazardous waste constituents.

These statements were confirmed through a file study of the soil cuttings that have been declared hazardous, or are designated "NFA" (i.e., Needs Further Action, and might yet be found to be hazardous). From the study of these files, it was determined that all drums of waste that had been determined to be hazardous were generated in areas that would have precluded them from being stored at the Well Drilling Storage Area. In addition, it was discovered that a drum photographed in this area and originally thought to contain hazardous waste, did not. The lot marking on the drum had the same general material and source codes as the RCRA hazardous cuttings, but these particular cuttings came from the installation of a monitoring well outside the controlled area and not within a "suspect" area. Further, this well is not located in a HWMU or in a known plume of contamination emanating from a HWMU or Solid Waste Management Unit (SWMU).

### CONCLUSIONS

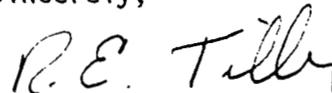
Information reviewed above shows that the Well Drilling Storage Area is not a HWMU. Consistent with this finding, a closure plan will not be submitted, associated hazardous waste management unit activities (e.g. inspections) will be discontinued, and the FEMP will be removing this unit from future revisions of the RCRA Part A and B permit applications.

Please note that this unit will remain classified as a SWMU and it will be remediated, as necessary, as part of the CERCLA actions at the FEMP.

After your review of the above reported facts, I am requesting that Ohio EPA provide the FEMP with a letter stating their concurrence with the conclusions of this submittal.

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

Sincerely,



R. E. Tiller  
Manager

FN:Rast

cc:

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