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**SEMI-ANNUAL POLYCHLORINATED BIPHENYL  
(PCB) STATUS REPORT**

**06/02/92**

**DOE-2050-92  
DOE-FN/USEPA  
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LETTER**



**Department of Energy**  
Fernald Environmental Management Project  
P.O. Box 398705  
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(513) 738-6357

**APR 2 1992**

DOE-2050-92

Mr. Tony Silvasi  
PCB Control Section (SP-14J)  
U. S. Environmental Protection Agency  
230 South Dearborn  
Chicago, IL 60604

Dear Mr. Silvasi:

**SEMI-ANNUAL POLYCHLORINATED BIPHENYL (PCB) STATUS REPORT**

- Reference:
1. U.S. EPA letter, Region V, S-14J, P. A. Reed to R. E. Tiller, "Notice of Noncompliance for Polychlorinated Biphenyls (PCB) Storage," dated February 26, 1992
  2. DOE letter, DOE-531-92, R. E. Tiller to T. Silvasi, "Notice of Noncompliance," dated December 20, 1991
  3. U.S. EPA letter, SP-14J, A. L. Restaino to G. W. Westerbeck, "Notice of Noncompliance, Westinghouse Materials Company of Ohio," dated November 14, 1991

The purpose of this letter is to transmit the first semi-annual PCB status report in response to a letter (Reference 1) from the United States Environmental Protection Agency (U.S. EPA) dated February 26, 1992. This response will address the status of the sixty-eight drums of PCB waste identified in Reference 2 as well as address actions currently being taken to address PCBs and PCB items in storage for disposal in excess of one year:

In summary, a representative of the U.S. EPA conducted an inspection of the Fernald Environmental Management Project (FEMP) site on August 20, 1991, to determine compliance with the PCB regulations set forth in 40 CFR 761. On November 14, 1991, the U.S. EPA issued to the FEMP a Notice of Noncompliance (NON) for storing PCB wastes for more than twelve months after removal from service. In response to the NON, the Department of Energy, Fernald Field Office (DOE-FN) described the limited treatment/disposal options for radioactively mixed PCB waste (Reference 2). As a follow-up action, U.S. EPA requested that the DOE-FN submit a semi-annual PCB status report for the three waste categories identified in Reference 1.

## PCB Inventory

The FEMP currently has forty of the sixty-eight drums of PCBs and PCB items identified in Reference 2 in its inventory. For your information, an additional four drums of radioactively mixed PCB solids have been generated since Reference 2 was submitted. A complete breakdown of the inventory of drums held for more than one year including the disposal status is provided below:

Radioactively Mixed PCB Liquids for Incineration	30 Drums
PCB Solids/Commercial Disposal Facility	0 Drums
Radioactively Mixed PCB Solids - No Disposal Option	<u>10 Drums</u>
TOTAL	40 Drums

### Radioactively Mixed PCB Liquids

There have been no changes in the status of radioactively mixed PCB liquids since Reference 2 was submitted. Thirty drums of liquid radiologically-mixed PCBs are to be incinerated in the Toxic Substances Control Act (TSCA) Incinerator at the Oak Ridge Facility in Oak Ridge, Tennessee. The PCB drums are stored in a FEMP warehouse (Building 81) in compliance with the regulations set forth in 40 CFR 761. The particular waste stream proposed for incineration in the TSCA Incineration was determined by the review of sampling results in July 1991.

Discussions have been initiated and will continue with personnel from Oak Ridge who operate the TSCA Incinerator to ascertain a shipment time. Because of the TSCA Incinerator "down time" as well as a substantial backlog of wastes received from other DOE sites ahead of the FEMP on the burn schedule, a schedule for the shipment and subsequent disposal has not been determined. The FEMP conducted a surveillance on May 19 and 20, 1992, in conjunction with a physical inventory of FEMP and Reactive Metals, Inc. (RMI) material at the Oak Ridge Facility. As of that date, all drums were accounted for and found to be in good condition.

### PCB Solids/Commercial Disposal Facility

There have been changes in the status of non-radioactive PCB solid items since Reference 2 was submitted. Twenty-eight drums of non-radioactive PCBs and PCB items have been incinerated. The twenty-eight drums were shipped on January 24, 1992, and incinerated on February 11, 1992, at the Rollins Facility in Deer Park, Texas.

### Radioactively Mixed PCB Solids

There have been changes in the status of radioactively mixed PCB solid items since Reference 2 was submitted. The ten drums of radioactively contaminated PCB solids identified in that letter include trash and electrical equipment that cannot be decontaminated. An additional four drums of radioactively contaminated PCB solids that include discarded rags have been generated that cannot be decontaminated.

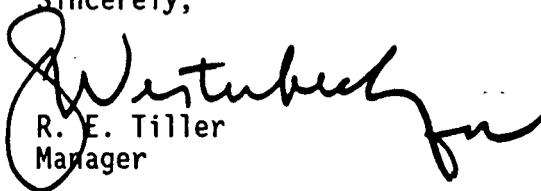
All radioactively mixed PCBs and PCB items (solids) are stored in a FEMP warehouse (Building 81). These wastes have no current treatment and/or disposal options and will remain in storage until treatment/disposal capacity is available.

#### PCB Actions

As stated above, the radioactively mixed PCB liquids are to be incinerated in the TSCA incinerator at the Oak Ridge facility. The schedule of incineration has yet to be determined. Meanwhile, all radioactively contaminated PCBs and PCB items are being stored and managed in a storage facility (Building 81) and will continue to remain in such storage until viable disposal options of radioactively mixed PCBs have been determined.

If you or your staff have any questions, please contact Ed Skintik at FTS/Commercial (513) 738-6660.

Sincerely,



R. E. Tiller  
Manager

FN:Skintik

cc:

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