

3631

**USDOE FMPC HAZARDOUS WASTE
MANAGEMENT OH 689 000 8976
HAMILTON COUNTY GENERATOR - TSD (S)**

07/29/92

OEPA/DOE-FN

5

LETTER



State of Ohio Environmental Protection Agency

Southwest District Office

7 East Fourth Street
Dayton, Ohio 45402-2086
(513) 449-6357

Original File Copy



3631

Richard F. Celeste
Governor

July 29, 1988

Re: USDOE FMPC
HAZARDOUS WASTE MANAGEMENT
OH 689 000 8976
HAMILTON COUNTY
GENERATOR - TSD (S)

Mr. James A. Reafsnyder
Site Manager
Department of Energy
P.O. Box 398704
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

On July 20, 1988, Scott Shane and I visited USDOE - Feed Materials Production Center (FMPC) to conduct a Generator - TSD (S) Compliance Evaluation Inspection in accordance with State and Federal Hazardous Waste Rules and Regulations. FMPC was represented by Mary Stone, Tim Poff, Bill Razor, Sam Cheng, Sue Schneider, Milt Galpu, Steve Wellington, and yourself.

During the inspection, the following violations were found (OAC - Ohio Administrative Code, CFR - Code of Federal Regulations):

1. FMPC is not maintaining records as required by CFR 265.16(d)(e) and OAC 3745-65-16(D)(E) pertaining to job descriptions. Job descriptions must be written for all employees involved in the management of hazardous waste at the site. This should be incorporated into the Personnel Training Plan. This violation was cited in a previous inspection conducted on 7/14/87. To correct this violation, FMPC must prepare the required written job descriptions. Photocopies of the documents must be submitted to this office by August 31.
2. Hazardous waste manifest number WMCO-01, 6/29/87, did not contain the date of transporter pick-up. The hazardous waste manifest must contain all of the information as required by CFR 262.21(a)(b) and OAC 3745-52-21. To correct this violation, FMPC must prepare a statement of how it intends to insure that future manifest requirements will be met and that no future violations will occur. The document must be received in this office by August 31.

1

Date Rec'd AUG 01 1988
 Log B-2022
 File _____
 Library _____

3631

3. An inspection of Bay #5 revealed that FMPC is not providing adequate aisle space to allow unobstructed movement of emergency or spill control equipment as required by CFR 265.35 and OAC 3745-65-35. On the day of the inspection, FMPC officials were asked to provide the necessary aisle space as soon as possible. They were informed that a re-inspection of the storage area will be conducted after the August 9th Technical Information Exchange meeting. To correct this violation, FMPC must prepare a statement of how it intends to insure that this violation will not occur in the future. (Personnel involved in the weekly inspection of the storage areas may need more frequent training than the regulatory required annual refresher course.) The required document must be received in this office by August 31.
4. A review of FMPC's Contingency Plan (Emergency and Spill Prevention Control and Countermeasures - SPCC) reveals that there is no one list containing the location of emergency equipments. This pertains primarily to response to hazardous waste emergency situations as required by CFR 265.51 and OAC 3745-65-52(D). Such list should include for examples spill absorbents and fire extinguishers. The locations of the equipment should be plotted on a map. To correct this violation, FMPC must prepare a list of emergency equipment necessary to respond to any hazardous waste releases. The locations should be plotted on a map in reference to the hazardous waste storage areas. The documents must be submitted to this office by August 31.
5. Due to hazards associated with the hazardous waste stored at FMPC, an evacuation plan must be incorporated into the Contingency Plan. This is a requirement of CFR 265.51(f) and OAC 3745-65-52(F). The plan must include primary and secondary routes. A review of past transmittal from FMPC shows that FMPC had intentions of submitting a detailed evacuation (primary and secondary) plan by April of '88. This office did not receive such a plan to this date. To correct this violation, FMPC must prepare an evacuation plan and submit it to this office by August 31.
6. According to the current list of Emergency Coordinators, the list does not specifically spell out who the Primary and Secondary Emergency Coordinators are. The

coordinator must be familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. This is a requirement of CFR 265.56 and 3745-65-55. To correct this violation, prepare a list of Primary and Secondary Emergency Coordinators. This list should include the following: a. the order in which they will assume responsibility; b. title/ or job description; c. phone numbers (home and business); and d. the effective dates and times of availability. (This list should be included in the front of the Contingency Plan.) The list must be submitted to this office by August 31.

7. Upon further review of FMPC's Contingency Plan, there is no mention of the reporting requirements to the Regional Administrator within 15 days after the Contingency Plan has been implemented. This is a requirement of CFR 265.56(j) and OAC 3745-65-55. The report must include: a. Name, address, and telephone number of the owner or operator; b. Name, address, and telephone number of the facility; c. Date, time, and type of incident (e.g., fire, explosion); d. Name and quantity of material(s) involved; e. The extent of injuries, if any; f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and g. Estimated quantity and disposition of recovered material that resulted from the incident. To correct this violation, FMPC must prepare a document to include the above requirements. A photocopy must be sent to this office by August 31.
8. An inspection of Bay #5 revealed that three containers were not being stored closed as required by CFR 265.173 and OAC 3745-66-73(A). Two containers had punctures on top and one had a bung missing. On the day of the inspection, FMPC officials were asked to correct the above violation as soon as possible. They were told that a re-inspection of the storage area will be done after the (TIE) meeting on the 9th. To correct this violation, FMPC must prepare a statement indicating how it intends to keep the above violation from occurring in the future. The document for submittal must be received in this office by August 31.

9. There were three drums in Bay #7 which showed corrosion through the metals. Hazardous wastes must be stored in containers that are in good physical condition as required by CFR 265.171 and OAC 3745-66-71. Due to the corrosion, wastes were being slowly leaked through the containers. On the day of the inspection, FMPC officials were told to immediately correct this problem. They were told that a re-inspection would be followed. To correct this violation, FMPC must replace any containers that are corroded through the metals with better conditioned containers immediately. FMPC must submit a statement indicating how it intends to correct this violation from ever occurring in the future. This document must be received in this office by August 31.

10. Hazardous wastes must be stored in containers which are compatible with the wastes stored in them as required by CFR 265.172 and OAC 3745-66-72. The wastes stored in the corroded drums in Bay #7 is obviously not compatible with the design of those containers. To correct this violation, FMPC must use containers that will be compatible with the wastes stored in them. FMPC must indicate the alternate types of containers that will be used. A list of the types of wastes and the types of containers that will be used in the future to correct any incompatibilities must be submitted to this office by August 31.

11. An inspection of FMPC's Inspection Log/Record shows that weekly inspections to detail any signs of leaks or corrossions in the storage areas are not being carried forth as required by CFR 265.174 and OAC 3745-66-74. No-where in the records for current inspections does it mention the corroded and/or leaking drums. The inspection records should indicate the type of problem and the correction made to remediate the problem. To correct this violation, FMPC must thoroughly indicate how it will correct this inspection requirement. FMPC must make the submittal to this office by August 31.

The Pilot Plant Warehouse was not inspected on the day of the visit because Ohio EPA Inspectors did not have FIT Respirator Certification documents on hand. The Inspectors were told for

Mr. James A. Reafsnyder
July 29, 1988
Page 5

3631

safety and liability requirements that it was necessary. The inspectors were told that a 2 hour FMPC FIT training could be provided. However, due to time constraints it was agreed that an inspection will be done of the warehouse on August 9th.

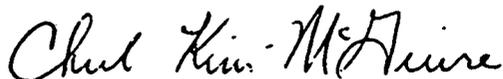
On the day of the inspection, a USEPA Land Disposal Restrictions Compliance Evaluation was done. Copies of the inspection are being forwarded to USEPA - Region V.

Any violation or deficiency not cited in this inspection letter does not relieve USDOE - FMPC from meeting the requirements of State and Federal Hazardous Waste Rules and Regulations.

Please find enclosed photocopies of the inspection forms used for FMPC.

Should you or any of your staff have any questions, I may be contacted at (513) 449-6357.

Sincerely,



Chul Kim-McGuire
Division of Solid & Hazardous Waste Management

cc: Dave Sholtis, OEPA, DSHWM
Jack Van Kley, AGO
Wayne Hibbitts, USDOE, Oak Ridge