

**3746**

**DOE-FEMP HAMILTON COUNTY HAZARDOUS  
WASTE**

**09/14/92**

**OEPA/DOE-FN  
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LETTER**



State of Ohio Environmental Protection Agency

**Southwest District Office**

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George V. Voinovich  
Governor

September 14, 1992

**RE: DOE - FEMP  
HAMILTON COUNTY  
HAZARDOUS WASTE**

Mr. Wally Quaider  
DOE - FEMP  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Quaider:

This letter serves as a response to your July 31, 1992 letter regarding three regulatory issues at FEMP. Ohio EPA's response to each of the three issues follows.

1. Annual Reports: You have been instructed through a recent telephone conversation as to the proper method of amending the 1991 Annual Report.
2. Waste Characterization: DOE - FEMP has again violated Ohio Administrative Code (OAC) Rule 3745-52-11 by failing to evaluate waste generated onsite. Ohio EPA is very concerned about this ongoing violation, especially in light of all the attention this issue received in preparation of the Proposed Amended Consent Decree. The large population of waste that did not receive proper attention is all the more disturbing.

It is understood that FEMP has done much over the last two years in the area of waste characterization, and that much work is yet to be done to complete the job. However, it is of the utmost importance that DOE and its operator properly evaluate all newly-generated waste in a timely manner so as to not compound the existing problem of storing uncharacterized waste. Future violations of OAC 3745-52-11 will warrant consideration of escalated enforcement action.

In order to rectify this recent violation of OAC 3745-52-11, the identified population of waste (approximately 1,600 drums, 250 white boxes, and 120 wooden boxes), must be fully characterized no later than the dates identified in your July 31, 1992 letter (12/31/92 for the drums and 8/31/92 for the boxes). In addition, please submit to this office, procedures that will be implemented at FEMP to ensure that all wastes generated in the future will be characterized in a timely manner. Submit these procedures in writing no later than October 16, 1992.

Mr. Wally Quaider  
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3. Compliance Schedules: Submit the revised schedule to this office no later than October 16, 1992. Please highlight the 64 (or more) actions that were not completed as set forth in the original schedules.

Feel free call Phil Harris or me at 513-285-6357 if you have any questions or comments.

Sincerely,



Paul D. Pardi  
Group Leader  
Division of Hazardous Waste Management

PDP:nys

cc: Phil Harris, SWDO  
Graham Mitchell, DWQPA, SWDO  
Jack Van Kley, Ohio AGO  
Nick Kaufman, President, FERMCO