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**NOTIFICATION TO OHIO ENVIRONMENTAL
PROTECTION AGENCY OF AMENDMENT TO
SHORT-TERM RESOURCE CONSERVATION AND
RECOVERY ACT STORAGE PLAN**

12/01/92

**DOE-0339-93
DOE-FN/OEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

G-000-102.93

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DEC 1 1992
DOE-0339-93

Donald R. Schregardus, Director
Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Dear Mr. Schregardus:

**NOTIFICATION TO OHIO ENVIRONMENTAL PROTECTION AGENCY OF AMENDMENT TO THE
SHORT-TERM RESOURCE CONSERVATION AND RECOVERY ACT STORAGE PLAN**

Reference: DOE-1798-92, R. E. Tiller to P. Pardi, "Proposed Amended
Consent Decree (PACD) Requirements for Newly Determined Wastes,"
dated May 29, 1992

As a result of lack of proper Resource Conservation and Recovery Act (RCRA) storage space for newly determined waste streams (approximately 4,000 containers), the Department of Energy (DOE-FN) provided the Ohio Environmental Protection Agency (OEPA) a short-term storage plan and schedule for their approval on May 29, 1992 (Reference). The intent of the short-term storage plan is to provide temporary storage for the approximate 4,000 containers in a manner as protective of the human health and the environment as possible until proper RCRA storage space is available.

The first step of the short-term storage plan was to move the approximately 4,000 container population to the Plant 1 Pad. This was accomplished June 15, 1992 by placing the approximately 4,000 containers in a tension support structure.

The second step of the short-term storage plan stated that drums of ignitable (D001) wastes would be moved to Bay 8 of the KC-2 Warehouse by November 2, 1992, and that the other bays of the KC-2 Warehouse and Building 56 would accommodate a portion of the remaining 4,000 container population by November 9, 1992. This movement of hazardous waste containers was contingent upon completion of a renovation project to upgrade Building 56 and the KC-2 Warehouse to meet proper RCRA storage requirements. Containers not fitting into the storage space made available by the renovation project would remain on the Plant 1 Pad until additional space becomes available.

The scope of upgrading these facilities includes the addition of concrete diking and floor coating. These activities are contingent on proper curing temperatures. Due to forthcoming colder temperatures, completion of these projects will be postponed until a later date. Also, due to problems with building design and project authorization approvals for the RCRA warehouse conversions, the originally submitted short-term storage plan dates of November 2 and 9, 1992 will not be met.

As the last part of the short-term storage plan, the Finished Product Warehouse, Building 77, was to be cleared of its uranium metal creating additional storage space. Building 77 has yet to be released to the DOE from the Department of Defense. No construction can occur until this change of ownership. Once Building 77 is released to DOE, preliminary and detailed engineering may begin within 6 months.

However, in the near future, additional RCRA storage space is expected to be available from one of two permanent 40,000 square foot tension structures which are part of the Plant 1 Pad Upgrade project. Once completed, some RCRA wastes can be moved into the tension support structure if they are not moved into the KC-2 Warehouse or Building 56.

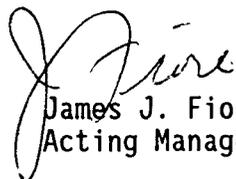
The Fernald Environmental Management Project (FEMP) is purchasing up to sixteen (16) portable lockers for storage of the 600 containers of ignitable (D001) wastes. Since additional fire protection standards must be met for storage of the ignitable (D001) wastes, storage of the D001 materials in these portable storage lockers will be safer and meet the RCRA requirements simultaneously. As stated in Attachment II of the letter sent to OEPA on May 29, 1992 (Reference), the FEMP will place the ignitable (D001) waste in proper RCRA storage as space becomes available. Specific information regarding the procurement and availability of the portable storage lockers will be provided to you shortly.

The following is the proposed short-term storage plan:

- o Move RCRA hazardous containers to interim storage on Plant 1 Pad
COMPLETED: June 15, 1992
- o Move RCRA hazardous containers to Building 56 and the KC-2 Warehouse
COMPLETION DATE: March 15, 1993
- o Move RCRA hazardous containers to Plant 1 Pad Tension Support Structure
COMPLETION DATE: June 1, 1993

If you have any questions regarding the amendment to the originally submitted storage plan, please contact Ed Skintik at (513) 738-6660.

Sincerely,


James J. Fiore
Acting Manager

FN: Skintik

cc:

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