

4048

**SEMI-ANNUAL POLYCHLORINATED BIHPEHLYS
STATUS REPORT, JANUARY 1993**

01/12/93

DOE-FN/USEPA

DOE-0783-93

4

LETTER



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

4048

JAN 12 1993

DOE-0783-93

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 BIPHENYLS STATUS REPORT, JANUARY 1993

- Reference: 1. USEPA-V S-14J, P. A. Reed to R. E. Tiller, "Notice of Noncompliance for Polychlorinated Biphenyls (PCB) Storage," dated February 26, 1992
2. WEMCO:P:92-722, H. F. Daugherty to R. E. Tiller, "Semi-Annual PCB Status Report," dated July 1, 1992

The purpose of this letter is to transmit the semi-annual Polychlorinated Biphenyl (PCB) status report to the United States Environmental Protection Agency (USEPA) Region V. In Reference 1, USEPA Region V requested the Department of Energy (DOE) to provide a semi-annual status report detailing the efforts undertaken to dispose of PCB wastes at the Fernald Environmental Management Project (FEMP). This report will update the status of the PCB waste identified in the July, 1992 PCB status report (Reference 2). This report is in addition to the PCB Annual Report and Document Log required to be filed by July 1 annually.

Background

A representative of the USEPA conducted an inspection of the FEMP site on August 20, 1991, to determine compliance with the PCB regulations set forth in 40 CFR 761. On November 14, 1991, the USEPA issued 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 DOE described the limited treatment and disposal options for radioactive PCB waste. As a follow-up action, USEPA requested that the DOE submit a semi-annual PCB status report for the waste categories identified in Reference 1.

1

PCB Inventory

The FEMP currently has forty-eight drums of PCBs and PCB items in its inventory. Twenty-eight additional drums were shipped to Rollins Environmental Services in Deer Park, Texas in January, 1992 and incinerated. Table 1 (attached) lists the previous and current FEMP inventories for the categories identified in Reference 1.

Radioactive PCB Liquids

There have been changes in the status of radioactive PCB liquids since the July, 1992 PCB status report (Reference 2) was submitted. Two drums of mixed PCB liquids have been added to the thirty drums identified in Reference 2. The thirty-two drums are to be incinerated in the Toxic Substances Control Act (TSCA) incinerator at the DOE Oak Ridge Field Office facility in Oak Ridge, Tennessee. These PCB drums are stored in a FEMP warehouse (Building 81) in compliance with the regulations set forth in 40 CFR 761. Disposal of the thirty-two drums is to be pursued in conjunction with Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Removal Action No. 9. CERCLA Removal Action No. 9 involves the removal of waste inventories from the FEMP. This includes the packaging and shipment of waste materials including PCBs.

Discussions have been initiated and will continue with personnel at Oak Ridge who operate the TSCA incinerator to ascertain a shipment time. Due to the TSCA incinerator "down time" a substantial backlog of wastes exists from other DOE sites. The Oak Ridge facility has also entered into a legal agreement to dispose of wastes from other DOE sites. This puts disposal of wastes from these sites at a higher priority and makes scheduling difficult for the disposal of FEMP waste.

Radioactive PCB Solids

There have been changes in the status of radioactive PCB solid items since Reference 2 was submitted. Six additional drums of PCB solids have been generated since that time. These drums are PCB light ballasts from the laboratory renovation project. Disposal of the six drums is to be pursued in conjunction with CERCLA Removal Action No. 9.

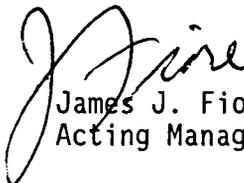
The initial ten drums of radioactive contaminated PCB solids identified in Reference 2 include trash and electrical equipment that cannot be decontaminated. All sixteen drums of radioactive PCBs and PCB items (solids) are stored in a FEMP warehouse (Building 81). These wastes have no current treatment or disposal options and will remain in storage until treatment and disposal capacity is available. Action will continue to locate capacity to properly handle this waste.

PCB Actions

As stated above, the radioactive 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 forty-eight drums of radioactively contaminated PCBs and PCB items are being stored and managed in a storage facility (Building 81) and will continue to remain in storage until a viable disposal option for radioactive PCBs has been determined.

If you have any further questions concerning this letter or the proposed actions, please contact Ed Skintik at (513) 738-6660.

Sincerely,



James J. Fiore
Acting Manager

FN: Skintik

cc w/atch:

K. A. Hayes, EM-424, TREV II
S. M. Beckman, FERMCO/65-2
J. Curtis, FERMCO/8
D. P. Dubois, FERMC/65-20
D. L. Dunaway, FERMCO/28
K. R. Kolthoff, FERMCO/76
L. B. Ko, FERMCO/16-3
J. T. Witzeman, FERMCO/75

Administrative Record, FERMCO
RCRA Operating Record, FERMCO

Table 4
 FAP PCB DRUM INVENTORY

Document/Date	Radioactive PCB Liquids for Oak Ridge Disposal	PCB Solids for commercial disposal	Radioactive PCB Solids No Disposal Options	Total Drums
12-20-91 Response to NON	30	28	10	68
7-1-92 Semi-Annual PCB Report	30	0*	10	40
1-1-93 Semi-Annual PCB Report	32	0	16	48

* The 28 drums were transported to Rollins Environmental Services in Deer Park, Texas for incineration on January 24, 1992.