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**REVISION TO THE RESOURCE CONSERVATION
AND RECOVERY ACT PART A AND PART B
PERMIT APPLICATION**

XX/XX/XX

**DOE-FN/EPA
DOE-1206-93
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LETTER**



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

DOE-1206-93

Mr. Donald R. Schregardus
 Director of the Ohio Environmental
 Protection Agency
 1800 WaterMark Drive
 Columbus, Ohio 43266-1049

Dear Mr. Schregardus:

**REVISION TO THE RESOURCE CONSERVATION AND RECOVERY ACT PART A AND PART B
 PERMIT APPLICATION**

Enclosed is a revised copy of the entire Resource Conservation and Recovery Act (RCRA) Part A Permit Application and revised Certification pages for the RCRA Part B Permit Application. This revision to the Part A and Part B Permit Application reflects the change in co-operator for the Fernald Environmental Management Project (FEMP). The revisions are being submitted in accordance with the Ohio Administrative Code (OAC) 3745-50-51(B)(1) which governs administrative changes to permits and allows change of operator information to be made.

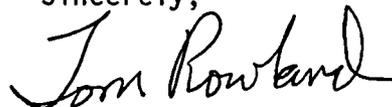
In addition to the change of co-operator information, the Part A Permit Application is being revised to include information on the waste streams (Item XIV: Description of Hazardous Wastes) from the characterization of the remaining twenty percent of the 26,000 drums and other materials not affected by the Hazardous Waste Management Unit Review (HWMUR) and waste streams from the 10,000 drums and other materials affected by the HWMUR as scheduled in the Amended Consent Decree dated January 22, 1993. Also, certain waste streams were removed from the list of wastes in Item XIV after a comparison of databases was conducted. These waste streams are being removed because they have not been generated in the past and are not expected to be generated in the future. Item X, Other Environmental Permits, reflects the latest information for other environmental permits at the FEMP.

No Hazardous Waste Management Units (HWMUs) have been added or removed since the last Part A Permit Application submittal. The FEMP is in the process of re-evaluating some of the previous HWMU determinations. Also, efforts are underway to provide sufficient information to support the change in status of some of the HWMUs and remove them from the FEMP Part A and Part B Permit Application at a future date.

To expedite the review of this document, enclosed is a summary of the changes made in this revision.

If you or your staff have any questions concerning the revisions to the Part A and Part B Permit Application, please contact Ed Skintik at (513) 738-6660.

Sincerely,



Thomas J. Rowland
Acting Manager

FN: Skintik

Enclosure: As Stated

cc w/ enc.:

J. A. Saric, USEPA-V
P. Pardi, OEPA-SWDO
AR Coordinator, FERMCO

cc w/o enc.:

K. A. Hayes, EM-424, TREV II
G. E. Mitchell, OEPA-SWDO, Dayton
J. T. Curtis, FERMCO/8
D. P. Dubois, FERMCO/65-2
N. C. Kaufman, FERMCO
L. B. Ko, FERMCO/16-3
J. Long, FERMCO/35-1
D. Paine, FERMCO/31
J. A. Rasile, FERMCO
M. J. Strimbu, FERMCO/65-2
J. W. Thiesing, FERMCO

PART B CERTIFICATIONS

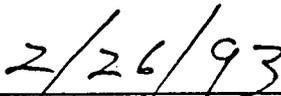
CERTIFICATION(S) (Page 1)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U. S. Department of Energy
Owner and Operator



Thomas J. Rowland, Acting Manager
Fernald Site Office



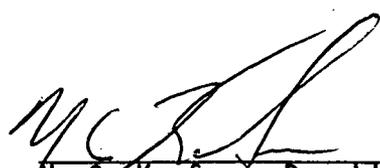
Date signed

CERTIFICATION(S) (Page 2)

The Department of Energy (DOE-FN) and its contractor, Fernald Environmental Restoration Management Corporation (FERMCO), have jointly signed this application as co-operators of the permitted facility. The Department has determined that dual signatures best reflect the actual appointment of responsibility under which the Department's Resource Conservation and Recovery Act (RCRA) responsibilities are for policy, programmatic, funding, and scheduling decisions, as well as, general oversight, and the contractor's RCRA responsibilities are for day-to-day operations, including but not limited to, the following responsibilities: waste analyses and handling, monitoring, record keeping, reporting, and contingency planning. Execution of this certification is not intended to nor does it waive or limit application of 42 U.S.C. §§9621(e)(1), 9621(f)(3), 9613(h), and 9622(e)(6).

For purposes of the certification required by 40 CFR 270.11(d), I certify to the best of my knowledge and belief, the truth, accuracy and completeness of the application. This certification, based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Fernald Environmental Restoration
Management Corporation, Co-Operator



N. C. Kaufman, President
Fernald Environmental Restoration
Management Corporation

2/15/93

Date signed