

4368

**FERNALD ENVIRONMENTAL MANAGEMENT
PROJECT HAZARDOUS WASTE MANAGEMENT
UNIT ISSUES**

04/26/93

**DOE-FN/OEPA
DOE-1775-93
25
LETTER**



4368

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

APR 26 1993

DOE-1775-93

Mr. Paul Pardi
Hazardous Waste Group Leader
Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Pardi:

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT HAZARDOUS WASTE MANAGEMENT UNIT ISSUES

- Reference 1): WEMCO:EC&QA(OU3/RI):92-036, J. M. Sattler to P. Harris, "FEMP Hazardous Waste Management Unit Issues," dated April 1, 1992
- Reference 2): P. D. Pardi (OEPA/SWDO) to J. M. Sattler, "DOE-FEMP, Hamilton County Hazardous Waste," dated June 2, 1992

On April 1, 1992, the Fernald Environmental Management Project (FEMP) submitted a letter (Reference 1, see enclosure) to Mr. Phil Harris, Ohio Environmental Protection Agency (OEPA), which provided a synopsis of issues and information associated with the regulatory status of several of the FEMP Hazardous Waste Management Units (HWMUs). The OEPA responded to the letter by providing comments and requesting more information (Reference 2, see enclosure). The FEMP responses to the OEPA comments are enclosed along with supporting documentation.

The Department of Energy (DOE) believes that the facts and the regulatory interpretations support the conclusion that the Parts Cleaner, the Well Drilling Storage Area, the Equipment Storage Area, the Coal Pile Runoff Basin, and UST 5 are not HWMUs and should no longer be classified as such.

If you have any questions regarding this matter, please contact John Sattler at 513-648-3145.

Sincerely,



Thomas J. Rowland
Acting Manager

FN:Sattler

Enclosure: As Stated

cc w/enc:

K. A. Hayes, EM-424, TREV II
P. Harris, OEPA-Dayton
G. E. Mitchell, OEPA-Dayton

cc w/o enc:

H. O'Connell, OEPA-Dayton
R. Fisher, OEPA-Dayton
M. McDermontt, DOJ
J. Van Kley, Ohio AGO
N. C. Kaufman, FERMCO/1
K. Alkema, FERMCO/65-2
P. Clay, FERMCO/19
AR Coordinator/FERMCO



Westinghouse
Environmental Management
Company of Ohio

PO Box 398704
Cincinnati, Ohio 45239-8704
(513) 738 6200

WEMCO:EC&QA(OU3/RI):92-036
April 1, 1992

Mr. Phil Harris
Ohio EPA
40 South Main Street
Dayton, Ohio 45402

Dear Mr. Harris:

FEMP HAZARDOUS WASTE MANAGEMENT UNIT ISSUES

After the recent OEPA/DOE/WEMCO meeting in Dayton, Ellery Savage indicated to me that OEPA still had some questions regarding the HWMU issues that were presented during the meeting last September. On Monday (3/31/92), Tom Walsh and I spoke with Paul Pardi to find out what information you needed and to see if we could set up a meeting to resolve these issues. As a result of Monday's telephone call, I offered to send a brief review of the issues discussed in September (Paul recommended that I address it to you). This memo provides a brief synopsis of the HWMU issues, and where appropriate, information discovered since September that is pertinent to the regulatory status of the units is noted.

1) **Parts Cleaner in Welding Shop - Maintenance Building 12.**

The FEMP requested OEPA concurrence to change status from HWMU to non-unit. Information was found that showed the unit was emptied at the time it was removed from service. Therefore, it did not store solid or hazardous wastes and the unit is not a SWMU or a HWMU.

A letter was submitted to OEPA in February explaining that the FEMP no longer considered the unit to be a HWMU.

2) **Drum Storage Area Near Loading Dock - Laboratory Building.**

The FEMP requested relief from regulation for two reasons. First, while conversation reports indicate that hazardous wastes were stored in the area, there are no written records or other documentation that list the hazardous waste constituents or characteristics. Without this information, a closure plan cannot be prepared. Second, the wastes and the concrete, soil, and debris from the loading dock and surroundings where the hazardous waste was stored were removed during the construction/renovation of the lab building or as part of a CERCLA removal action in the area. Because the HWMU no longer exists, the FEMP requests concurrence from OEPA to close this unit during the CERCLA remedial action.

Phil Harris

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WEMCO:EC&QA(OU3/RI):92-036

OEPA requested further information on the non-contaminated general sump wastewaters in late November. The FEMP is in the process of preparing a response to the request. While re-evaluating the non-contaminated general sump wastewater system in order to respond to OEPA's questions, it was discovered that the only potential source of 1,1,1-trichloroethane (TCA) did not drain into the Coal Pile Runoff Basin. Therefore, no TCA flowed through the unit, and it is not a HWMU.

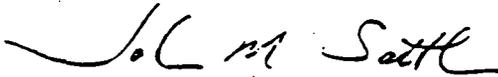
8) UST #5.

This unit was discussed briefly during the September meeting. The FEMP had previously sent a position paper to OEPA stating that the UST #5 should not be regulated as a HWMU because it meets the requirements of the wastewater treatment exclusion. In response to questions OEPA had at the meeting additional information was forwarded to the State in late September.

All of the above mentioned units were listed on the October, 1991 Part B Permit Application as HWMU's.

At the September meeting, OEPA was presented with fact sheets on each of the units/issues discussed above, except for UST #5. This memo serves only as a brief condensation of the HWMU issues, it is not intended to be an in-depth analysis of all the facts or regulatory positions. The FEMP would like to discuss these issues in more detail with OEPA in order to come to resolution. Please call Tom Walsh or me to establish a time and date when we can meet. In addition, if you need additional information on any of the units, we can forward it to you.

Very truly yours,



John M. Sattler, Manager
Regulatory Integration
OU3 Compliance

JMS:kst

c: V. A. Franklin
O. D. Laursen
W. J. Quaid, DOE
D. Rast, DOE
E. D. Savage
S. G. Schneider
T. J. Walsh

RI Files
Central Files



State of Ohio Environmental Protection Agency

4368

Southwest District Office

40 South Main Street
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George V. Voinov
Governor

June 2, 1992

Re: DOE-FEMP
HAMILTON COUNTY
HAZARDOUS WASTE

Mr. John Sattler
WEMCO
P.O. Box 398704
Cincinnati, Ohio 45239-8704

Dear Mr. Sattler:

OEPA has reviewed your April 1, 1992 letter in which you provide a brief synopsis of the status of issues involving several declared Hazardous Waste Management Units (HWMU) at the FEMP. OEPA offers the following comments regarding these units:

- 1) Parts Cleaner in Welding Slop - Maintenance Building 12
Submit the documentation discovered that has led WEMCO to change the status of this unit. Upon review of this documentation, OEPA will issue a final decision on the Parts Cleaner.
- 2) Drum Storage Area Near Loading Dock - Laboratory Building
This storage area was initially called a HWMU. WEMCO wishes to change the status of this unit based on a lack of information rather than additional information supporting a change in status. For this reason, OEPA cannot agree to change the status of this unit. This area must remain a HWMU, subject to closure. OEPA recommends WEMCO submit a closure plan which describes the activities that have already occurred effecting this unit, the nature and extent of existing contamination, and a schedule of activities to be conducted under the CERCLA remedial action.
- 3) Drummed HF Residue and Associated Storage Areas
OEPA requests further information regarding this unit. Submit any documentation available which describes the length of time waste was stored in these areas, the condition of the containers (inspection logs), a description of the base of the storage areas (soil, concrete, etc.) and the condition of these base materials. Upon review of this additional information, OEPA will decide on the status of this unit.

Enclosure 3

RESPONSE TO OEPA COMMENTS

1) Parts Cleaner in Welding Shop - Maintenance Building 12OEPA Comment

Submit the documentation discovered that has led WEMCO to change the status of this unit. Upon review of this documentation, OEPA will issue a final decision on the Parts Cleaner.

Response

The Parts Cleaner is a pan type unit with cover. The solvent in the Cleaner flowed over the parts to be cleaned and through a center hole in the bottom of the unit. The center hole drained to a bucket placed under the unit. Residual sludge settled in the pan of the unit.

Documentation concerning the emptying of the Parts Cleaner is provided in Attachment 1 (pages 1-5). The attached information indicates that the Parts Cleaner was taken out of service and emptied on May 4, 1989. Residuals were scraped out of the unit and the unit was wiped down. Both the bucket and the pan were also cleaned and removed from the unit.

A visual inspection of the Parts Cleaner conducted on July 18, 1991 indicated that the unit met the definition of an empty container under OAC-3745-51-07. Consequently, the Parts Cleaner never contained residual solvent and/or sludge for a period of 90 days after the unit was removed from service as was originally thought.

2) Drum Storage Area Near Loading Dock - Laboratory BuildingOEPA Comment

This storage area was initially called a HWMU. WEMCO wishes to change the status of this unit based on a lack of information rather than additional information supporting a change in status. For this reason, OEPA cannot agree to change the status of this unit. This area must remain a HWMU, subject to closure. OEPA recommends WEMCO submit a closure plan which describes the activities that have already occurred effecting this unit, the nature and extent of existing contamination, and a schedule of activities to be conducted under the CERCLA remedial action.

Response

The FEMP recently submitted Closure Plan Information Data (CPID) for the Drum Storage Area Near the Loading Dock to OEPA.

3) Drummed HF Residue and Associated Storage Areas

OEPA Comment

OEPA requests further information regarding this unit. Submit any documentation available which describes the length of time waste was stored in these areas, the condition of the containers (inspection logs), a description of the base of the storage areas (soil, concrete, etc.) and the condition of these base materials. Upon review of this additional information, OEPA will decide on the status of this unit.

Response

Three areas involving HF residue storage were declared HWMUs by the FEMP. These three areas included inside Plant 4, the gravel area northwest of Plant 4, and the area south of the FEMP Cooling towers.

The areas involving the HF residue storage are being addressed in the CPID submittals to OEPA. At the present time, the FEMP will continue to address the three HF storage areas as HWMUs. The status of the CPID submittals for the units is discussed in the following paragraph.

The CPID for the Drummed HF Residue Storage Area Inside Plant 4 was submitted to OEPA in October 1992. A Notice of Deficiency (NOD) was received from OEPA on January 11, 1993. A revised CPID was returned to OEPA on February 11, 1993. A CPID for the second area (Drummed HF Residue Storage Area Northwest of Plant 4) was submitted to OEPA in November 1992. The third area called "Drummed HF Residue Storage Area South of the Cooling Towers" will be addressed and combined with a CPID for the "Tank Farm Sump" (HWMU #11). This information on the CPID for HWMU #11 was conveyed to the OEPA on November 2, 1992 with the resubmittal of the revised Compliance Schedules for the HWMUs. A letter specifying the details of the combining of the closure plans for the area South of the Cooling Towers with the Tank Farm Sump transmitted to OEPA on December 11, 1992. (Attachment 2)

4) Primary Calciner

OEPA Comment

OEPA does not recall reviewing information related to the waste burned at the calciner. Please submit any information available regarding this waste so that final determination of the status of this unit can be made.

Response

The HWMU status of this unit is impacted by Wastewater Treatment Unit issues at the FEMP. Information related to this unit will be addressed in a later submittal to the OEPA pertaining to the final Wastewater Treatment Unit analysis report.

5) Well Drilling Storage AreaOEPA Comment

The decision is on hold pending receipt of additional information. See #3 above for the type of documentation OEPA would like to see.

Response

Information pertaining to this unit was submitted to OEPA by DOE in June 1992. Attachment 3 provides the information surrounding the decision to change the classification of this unit from a HWMU to a Solid Waste Management Unit (SWMU).

According to site personnel associated with the collection of soil boring cuttings and responsible for the Well Drilling Storage Area, only environmental media taken from the CERCLA soil boring program or wells drilled outside the former production and waste unit areas were stored at the unit.

With the exception of wells drilled in the Fire Training Facility, all cuttings declared to be hazardous were generated inside the production/waste areas. These cuttings were never stored in the Well Drilling Storage Area. Cuttings from the Fire Training Facility were stored in the former production area, and not in the Well Drilling Storage Area (see Attachment 4).

Standard practices dictated that cuttings generated from inside the plant controlled areas were kept in the former process area. Those generated from outside the controlled areas, and outside the boundary of "suspect" areas, were held at the Well Drilling Storage Area pending receipt of analytical data on the cuttings. Suspect areas were defined as those areas where process knowledge or existing data indicated a significant potential to encounter hazardous waste or hazardous waste constituents.

Information about the cuttings was examined in a file study of the soil cuttings that have been declared hazardous, or are designated "NFA" (i.e., Needs Further Action, and might yet be found to be hazardous). From the study of these files, it was determined that all drums of waste that have been declared to be hazardous were generated in areas that would have precluded them from being stored at the Well Drilling Storage Area. In addition, it was discovered that a drum photographed in this area and originally thought to contain hazardous waste, did not. The lot marking on the drum had the same general material and source codes as previously generated RCRA hazardous cuttings, but these particular cuttings in the Storage Area came from the installation of a monitoring well outside the controlled area and not within a "suspect" area. Further, this well is not located in a HWMU or in a known plume of contamination emanating from a HWMU or a SWMU (see Attachment 5).

A review of the site's spill records, revealed that there have been no releases to the environment reported from this location, nor is there any obvious physical evidence of past releases from any of the containers at the cited location.

6) Equipment Storage Area

OEPA comment

OEPA concurs that if spent lead-acid batteries were the only hazardous wastes stored in this area, this area is not a HWMU.

Response

A review of information on why this area was designated a HWMU shows that spent lead-acid batteries were stored on a wooden pallet in this area for greater than 90 days. Attachment 6 provides information on the batteries which were stored in the area and indicates that the batteries were either reused or reclaimed. Information provided in Attachment 6 is based on a conversation with the Supervisor of the contracting firm which used the lead-acid batteries at the FEMP. Based on this information, this area will no longer be classified as a HWMU.

7) Coal Pile Runoff Basin

OEPA Comment

Provide the newly discovered documentation proving that the only potential source of 1,1,1-trichloroethane did not drain into the Coal Pile Runoff Drain.

Response

The Coal Pile Runoff Basin (CPRB) was originally declared a HWMU since the draft wastewater treatment unit analysis indicated that all wastewater from the Boiler Plant flowed to the CPRB. Recent information has revealed that wastewaters from the Boiler Plant area were segregated and directed from two separate locations. The locations were (1) Ash Wash Sump and Continuous Blowdown wastewater, and (2) Boiler Plant basement floor sumps and drains. See Attachment 7 for a flow diagram of the two wastestreams.

The flow patterns for the Boiler Plant's wastewaters are as follows:

a) Ash Wash Sump & Continuous Blowdown

Between 1980 and October 1985, the wastewater went to the Chemical Feed Sump and onto the General Sump. In October 1985, the CPRB came into service and received wastewaters from the Ash Wash Sump and Continuous Blowdown. Waters from the CPRB then flowed into the General Sump for treatment (see Attachments 8 and 9 for information provided by the Manager of Utility Services at the FEMP).

b) Boiler Plant Basement Floor Sumps & Drains

The Boiler Plant's basement floor sumps and drains flowed under the Water Treatment Plant to the Chemical Feed Sump and onto the General Sump. The Boiler Plant floor sumps and drains never flowed to the CPRB (see Attachment 8 & 9).

As part of the FEMP Wastewater Treatment Unit investigation to determine the applicability of the wastewater mixture rule exclusion (OAC 3745-51-03 (A)(2)(f)), an examination of the flow into the CPRB was conducted. This information confirms that 1, 1, 1 - trichloroethane (TCA) did not enter the CPRB from the Boiler Plant.

Wastewater treatment analysis shows that TCA was used in the Boiler Plant from 1980 to June 1988. Flows from the Boiler Plant sumps and drains enter the chemical feed sump and then on to the general sump. TCA was maintained and used on the first floor and basement levels on the west side of the Plant. After June 1988, maintenance functions were centralized in a new structure (Building 10B) located west of the Boiler Plant. There are no floor drains located in this Building. The source of the TCA in the CPRB is being investigated. OEPA will be advised of the results once this investigation is completed.

Sludge and water samples from the CPRB were taken in November 1991 in response to a sludge dredging operation at the CPRB. Results of the sample analysis received in May 1992 show no TCA present in the water samples. However, TCA was detected in the sludge. Due to the presence of coal particles in the sludge, an accurate concentration of TCA could not be determined. In August 1992, additional samples from the CPRB were requested. The FEMP analytical laboratory is examining alternative methods of analysis to quantify the TCA concentrations in the samples. The FEMP will advise the OEPA of any alternative analysis methods once they are finalized. In the interim, the FEMP will continue to investigate the source of the TCA present in the CPRB.

8) UST#5**OEPA Comment**

OEPA concurs that this tank was part of a wastewater treatment unit as defined in 3745-50. However, prior to releasing this unit as a HWMU, OEPA would like to see documentation that shows that spent 1,1,1-trichloroethane generated in Building 31 was collected and stored on-site.

Response

TCA was used in Building 31 as a degreaser/cleaner. Prior to the designation of a Satellite Accumulation Area (SAA), the standard practice was to place the TCA in pails at a work station Bldg 31. TCA from the pails would be discarded into drums of used oil also generated in Building 31 (see Attachment 10). Therefore a wastestream which contained TCA and used oil was generated in Building 31 (Garage).

Interviews with Bldg 31 personnel indicate that TCA generated in the building was collected and stored on-site. The general practice involving the used oil generated in the Garage was to send the drums to the Plant 8 Pad. The drums would then be sent to either the Trane Incinerator (on-site); the TSCA incinerator at Oak Ridge after 1987 or stored on-site. Table 1 of Attachment 11 provides information on the disposition of used oil waste and the concentration of TCA present in the waste oil. The concentration of the TCA reported is an average of the available analytical data (see Attachment 11, table 2).

Not all of the waste oil or TCA included in this table was generated by garage operations. It is not possible to determine exactly which drums of waste oil originated at the garage because this information was recorded prior to establishment of SAA's and detailed record-keeping of the disposition of wastes. However, of the 1,258 drums of waste oil reported in the data table, it is highly probable that many of them were generated from activities in Bldg 31. This data supports the statements above that waste TCA was routinely discarded into the drums of used oil.



4368

From: J. M. Sattler

WEMCO:EC(HSWC/RCI):92-089

Date: September 23, 1992

Subject: DISPOSITION OF SOLVENT WASTE FROM THE PARTS CLEANER IN THE WELDING SHOP,
BUILDING 12

To : C. G. Rieman

- Reference: 1) OEPA, P. D. Pardi to J. M. Sattler, "Hazardous Waste Management Units," dated June 2, 1992.
- 2) WEMCO:SS(MA):91-460, C. D. Batchelor to O. Laursen, "Parts Cleaner in Welding Shop (Building 12)," dated June 6, 1992.

Please add this memo to the HWMUR (Task 3) file for the Parts Cleaner.

In response to a request from OEPA (reference 1) for documentation on the disposition of the contents of the Parts Cleaner, I contacted Charlie Batchelor, Maintenance Compliance Supervisor, to see if he could track down this information. Mr. Batchelor investigated this matter, and the results of his research are as follows:

On 8/21/92, Mr. Batchelor spoke with Paul Raab and Ron Young. Both remember assisting a worker in emptying the remaining contents of the Parts Cleaner into the Paint Shop Satellite Accumulation Area (SAA R050-748-P013). Mr. Raab was in charge of the Paint Shop SAA at that time.

Reference 2 states that the unit was cleaned out 5/4/89. Records indicate that the next date that a drum of waste was transferred from SAA R050-748-P013 to RCRA storage on 7/21/89. This container is currently in the KC-2 warehouse (there is no form attached to it that lists the dates when waste was added to the drum because the procedure for recording waste entries was not begun until 10/89). Note that reference 2 said that the waste was placed into the SAA drum R050-746-P013-0. Mr. Batchelor learned during his research that this was an incorrect assumption on his part. His interviews with Mr. Raab and Mr. Young clearly indicated that the waste was placed into the Paint Shop SAA (R050-748-P013). In fact, it would be very unlikely that the waste solvent would have been put into the R050-746-P013 SAA because that area was established specifically to collect waste from the clean out of one particular piece of machinery.

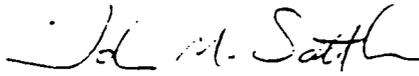
From the information that Mr. Batchelor collected, it can be concluded that the solvent wastes from the Parts Cleaner were placed into the Paint Shop SAA, and that waste was subsequently moved to one of the FEMP hazardous waste storage facilities.

C. G. Rieman

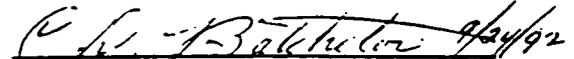
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4368
WEMCO:EC(HSWC/RCI):92-089

If you have any comments or questions, please call me at extension 8672.



John M. Sattler, Manager
RCRA/CERCLA Integration
Hazardous & Solid Waste Compliance


C. D. Batchelor (Date)

JMS:jrr

- c. C. D. Batchelor
- S. R. Eleton
- V. A. Franklin
- O. D. Laursen
- P. H. Raab
- M. W. Salisbury
- T. J. Stone
- T. J. Walsh
- C. S. Waugh
- R. E. Young

Central Files
RCI Files



4368

WMCO:SS(MA):91-460

From: Charles D. Batchelor - 6407

Date: June 28, 1991

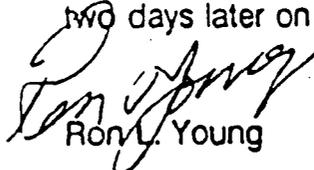
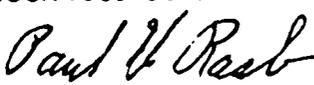
Subject: PARTS CLEANER IN WELDING SHOP (BLDG. 12)

To: Otto Laursen

On 5/31/91 you called and asked me if I could give you a date that the parts cleaner located in the welding shop in building 12 was removed from service. The following is the information I found on the date of shutdown of this unit.

The present supervisor of the welding shop at present and at time of the shutdown of this unit gave me the date this unit was removed from service. Mr. Young said, "The parts cleaner had been in service until 5/4/89 at which time it was removed from service and there was a small bucket of 111 Trichloroethane in the unit being used for cleaning parts". There was also a drum containing a small amount of 111 Trichloroethane under the drain on the unit. Mr. Young had Mr. Paul Raab, the paint supervisor, assist him on disposing of both of these containers of 111 Trichloroethane. The containers were emptied into the Satellite Accumulation Area in building 12 in the SOLVENT/OIL drum R050-746-P013-0.

Mr. Young then had a cover placed over the access area of this unit which was and still is permanently held in place with sheet metal screws. Mr. Steve Harvey, Badge #2623 was the millwright who installed the cover. Mr. Harvey was laid off two days later on 5/6/89 and has not been recalled as to date.

	7-1-91		7/1/91
Ron L. Young	Date	Paul H. Raab	Date

If you have any question or need help in identifying of waste call me on ext. 6407.


Charles D. Batchelor
Sr. Maintenance
Compliance Supervisor

CDB:gj

c:	S. W. Heisler	J. M. Sattler	T. J. Walsh	File
	P. H. Raab	M. L. Townsend	G. Walters	R. L. Young



4368

From: Charles D. Batchelor - 6407
 Date: July 23, 1991
 Subject: PARTS CLEANER IN WELDING SHOP (BLDG. 12)

WMCO:SS(MA):91-504

To : Otto Laursen

On 7/18/91 Mr. Tim Venneman from SWC called and requested to inspect the inside area of the parts cleaner in building 12. I invited Mr. Venneman to come to building 12 and said we would remove the cover off the parts cleaner and open and check the inside area of the cleaner together. A few minutes later Mr. Venneman arrived and we removed the cover and inspected the cleaner. This parts cleaner unit meets the definition of a container. This container (parts cleaner) had been drained and all waste removed by using the practice most commonly employed and meets the definition of an empty container under 40 CFR-261.7.

C D Batchelor
 C. D. Batchelor

7/24/91
 Date

T Venneman
 T. Venneman

7/21/91
 Date

If you have any questions or need help in the identifying of waste call me on ext. 6407.

Charles D. Batchelor
 Charles D. Batchelor
 Sr. Maintenance
 Compliance Supervisor

CDB:gj

- c: S. W. Heisler
- M. J. Krauss
- J. W. Ogg
- P. H. Raab
- J. M. Sattler
- M. L. Townsend
- T. J. Walsh
- G. Walters
- R. E. Young
- File



Department of Energy

Fernald Environmental Management Project

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REGISTRATION 4368
 COMMISSION
 DEC 15 12 08 PM '92

DEC 15 1992
 DOE-0523-93

Mr. Paul D. Pardi
 Hazardous Waste Group Leader
 Ohio Environmental Protection Agency
 Southwest District Office
 40 South Main Street
 Dayton, OH 45402-2086

Dear Mr. Pardi:

CONSOLIDATION OF CLOSURE PLAN INFORMATION AND DATA FOR TWO HAZARDOUS WASTE MANAGEMENT UNITS

Reference: DOE:0259-93, W. D. Adams to Mr. Paul D. Pardi, "Fernald Environmental Management Project (FEMP) Proposed Amended Consent Decree (PACD) Compliance Schedules," dated November 2, 1992

The purpose of this letter is to inform the Ohio Environmental Protection Agency (OEPA) of the closure schedule consolidation of two geographically contiguous Hazardous Waste Management Units (HWMUs). The two units involved are the "Drummed HF Residue/Associated Storage Areas South of the Cooling Towers" (HWMU 8) and the "Tank Farm Sump" (HWMU 11). This action will facilitate the preparation and submittal of one joint Closure Plan Informatic and Data (CPID) package to the OEPA for review and approval. Subsequent time savings will be realized through the preparation and review of only one CPID package, reduced sampling and analytical costs, and the consolidation of physical closure activities in the field. In order to avoid any confusion, the original identities of both HWMUs will be retained.

The HWMU known as the "Drummed HF Residue/Associated Storage Areas South of the Cooling Towers" was classified as a HWMU in accordance with OAC 3745-51-3 and OAC 3745-52-34, because of the placement of containerized hazardous waste (U134) in the storage area in excess of 90 days. There has been no release to the environment reported from this location, nor is there any obvious physical evidence of past releases from any of the containers at the cited location.

The Tank Farm Sump was classified as a HWMU based upon the neutralization of 15,500 gallons of 20 - 35 percent aqueous (dilute) hydrofluoric acid (DHF), transferred to the sump because of a gross leak in tank farm Tank 21 on August 22, 1985. Under these circumstances, the DHF was determined to be a solid waste because it was discarded by abandonment for disposal in the Tank Farm Sump. Because the Tank Farm Sump does not meet the definition of a tank or



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Attachment 3, pag

Department of Energy

ENV. ENG. SDS DEPT

Fernald Environmental Management Project

P.O. Box 336705

Cincinnati, Ohio 45239-6705

513/703-8357

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DOE-1965-92

Mr. Paul Pardi
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
40 South Main Street
Dayton, Ohio 45402

CONTROL NO.:	<u>C10002</u>
SD NO.:	<u>SD-EES-C23-4211-1</u>
REVISION:	<u>-</u>
SUPERSEDES:	<u>-</u>
ISSUE DATE:	<u>6-26-92</u>
REVISION DATE:	<u>-</u>

Dear Mr. Pardi:

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP) WELL DRILLING STORAGE AREA

On Thursday, April 16, 1992, Phil Harris of your staff, spoke with Tom Walsh and John Sattler of the Westinghouse Environmental Management Company of Ohio (WEMCO) staff about the possibility of extending the submittal date for the Well Drilling Storage Area Closure Plan. The primary reason for the request for extra time was to resolve some ambiguity about what hazardous wastes were actually stored in the unit. The following Monday, Mr. Harris called Mr. Walsh and indicated that a time extension was acceptable, and requested a letter from the FEMP explaining the situation.

During the process of gathering more information to prepare a complete closure plan, it was determined that the Well Drilling Storage Area is not a Hazardous Waste Management Unit (HWMU). WEMCO staff representatives contacted you on Tuesday, April 21, 1992, about the possibility of removing the area from regulation as a HWMU. During the conversation, you indicated that if the facts reveal that the unit did not store hazardous wastes, then the unit would not be a HWMU and would not be regulated as such. You requested the FEMP provide a formal transmittal letter to the Ohio Environmental Protection Agency (Ohio EPA) discussing the change in the HWMU determination.

The purpose of this letter is to respond to your request and serve as notification that the submittal of the closure plan for the Well Drilling Storage Area will not be necessary.

BACKGROUND INFORMATION

The Well Drilling Storage Area is located to the northwest of the FEMP waste pit area (Operable Unit 1). Drums of soil boring cuttings generated under the Comprehensive Environmental Response Compensation & Liability Act (CERCLA) investigations were temporarily stored there prior to placement in an established storage area. Several surveillance inspections found that these wastes were stored at this location for time periods exceeding ninety days. Investigation also found that some drums had lot marking codes that



From: R. H. Frost (738-4327) WEMCO:E(EE):92-108

Date: April 1, 1992

Subject: WELL DRILLING STORAGE AREA HAZARDOUS WASTE MANAGEMENT UNIT DETERMINATION

To: T. J. Walsh

The Environmental Engineering (EE) section is currently in the process of preparing a RCRA closure plan information and data (CPI&D) for the Well Drilling Storage Area hazardous waste management unit (HWMU) that was identified in the latest revised Part A Permit Application. The unit is located in the ASI camp north of OUI, and outside of the fenced production area. The unit stored drums of soil borings from approximately March 1990 to January 1991.

A file review of background information on the unit calls into question the validity of the determination that the unit is a HWMU. There appears to be no information to support the belief that the unit stored drums of soil boring material at any time was characterized as RCRA hazardous waste. According to site personnel associated with waste characterization and personnel from ASI who were in charge of the Well Drilling Storage Area, only environmental media taken from RI/FS soil borings or wells, drilled outside the fenced areas, were placed in temporary storage at the unit. According to ASI, none of the parent borings associated with the material stored in the unit were drilled in either RCRA HWMUs or known plumes of contamination. No records have been found which document that RCRA hazardous wastes have been stored in the unit at any time.

A fact sheet documenting the file review and communication with associated personnel is attached for your information and records. Environmental Engineering requests that you review the attached fact sheet and respond with your concurrence as soon as possible. Until the unit is determined to be a non-HWMU, EE will proceed with the preparation of the CPI&D for the unit in order to meet the schedule submitted to the OEPA.

The unit is approximately 29 feet by 59 feet in size, and is located at the base of the west berm of Waste Pit 5. The CPI&D, as currently written, would require a minimum of 140 samples to characterize the three sub-layers of construction media, and the first 6 inches of sub-soil beneath the unit for VOAs, AE/BN, and RCRA metals to show that the unit is "clean." This is considered a conservative estimate and is included for your information only.

T. J. Walsh

-2-

WEMCO:E(EE):92-108

If you have questions regarding the memo or attached fact sheet, please contact me at 738-4327.



Robert H. Frost, Sr. Engineer
Environmental Engineering

RHF:slk

Attachment

c: D. A. Bastin
G. R. Blank
S. R. Eleton
V. A. Franklin
D. Harmel, ASI
F. R. Hertweck
L. L. Honigford
O. D. Laursen
J. M. Lippitt
T. M. Patterson
M. W. Salisbury
J. M. Sattler
L. Singleton
S. J. Skalka
K. A. Solomon
T. J. Stone
C. S. Waugh

Central Files
EE RCRA Files (SD-EES-C23-CPI-10005)

CONCLUSION AND SUMMARY:

No documentation has been found which confirms that the unit stored soil boring material that was characterized as RCRA hazardous waste. According to personnel associated with waste characterization, and personnel from ASI who were in charge of the Well Drilling Storage Area, only non-RCRA environmental media taken from RI/FS soil borings drilled outside the fenced areas were placed in temporary storage at the unit. No records have been found which document that RCRA hazardous wastes have been stored in the unit at any time. Until such records are produced, the unit should be deleted from consideration as a HWMU.

4368

Knue - Harold

McDA

DETERMINATION LOG
PRE WASTE STREAM
ASI WASTE STREAMS

Inventory of Drums

FILE NO. 1
21/91

FILE NO.	DATE	RECEIVED REQUESTOR	MATERIAL DESCRIPTION	MATERIAL SOURCE CODE	CODE	DETERMINATION CODE	HAZAR	ANALYSIS AVAILABLE	RESTRICTED NUMBER	DATE	COMMENTS
326	03/27/91	BENJAMIN, K.	BORING #1011, LOCATED EAST SIDE OF PLT. 6	ASI	NON-RCRA	011		1.2.7.10° RESTRICTED	774	04/04/91	
327	03/27/91	BENJAMIN, K.	BORING #1612, LOCATED EAST SIDE (CANOPY) OF PLT 6	ASI	NON-RCRA	011		1.2.7.10° RESTRICTED	775	04/04/91	
328	03/27/91	BENJAMIN, K.	BORING #1674, LOCATED INSIDE PILOT PLT ON NORTHWEST SIDE OF	ASI	RCRA	011		1.2.7.10° SOLVENT 11/8/86	776	05/09/91	BORING FROM N-WEST SIDE AREA IN PILOT PLANT
626	03/27/90	SINGLETON, L.	BORING #1317 N.E. BLDG. 12	ASI	RCRA	011		2.7.8 THIRD-THIR D 5/8/92	451	08/10/90	Needs follow for borin investigation
627	03/27/90	SINGLETON, L.	BORING # 1307 N.W. BLDG. 12	ASI	RCRA	011		SOLVENT 11/8/86	453	04/30/90	
628	03/27/90	SINGLETON, L.	BORING #1411 S.W. PILOT PLT	ASI	RCRA	011		THIRD-THIR D 5/8/92		04/30/90	
629	03/27/90	SINGLETON, L.	BORING #1287 N. Bldg. PLT. 011	ASI	RCRA	011		SOLVENT 11/8/86		04/30/90	
630	04/30/90	SINGLETON, L.	BORING #1149 PLANT. C	ASI	RCRA	011		SOLVENT 11/8/86	134	04/30/90	
631	03/27/90	SINGLETON, L.	BORING #1346 N. DRUM ACCORD. 011	ASI	RCRA	011		THIRD-THIR D 5/8/92		04/27/90	
632	03/27/90	SINGLETON, L.	BORING #1140 PLANT C	ASI	RCRA	011		THIRD-THIR D 5/8/92		04/26/90	
633	03/27/90	SINGLETON, L.	BORING #1193 IN PLT. 2/3	ASI	RCRA	011		THIRD-THIR D 5/8/92		04/27/90	
634	03/27/90	SINGLETON, L.	BORING #1308 N. BLDG. 12	ASI	RCRA	011		THIRD-THIR		04/27/90	

*THIRD-THIR
To be
Reevaluated*

THIRD-THIR

4368

No. 2

1/91

FINE WASTE STREAM
DETERMINATION LOG
ASI WASTE STREAMS

DATE RECEIVED	REQUESTOR	MATERIAL DESCRIPTION	MATERIAL SOURCE CODE	HAZARD DETERMINATION CODES	HAZARD CODES	ANALYSIS AVAILABLE	RESTRICTED NUMBER	MEF NUMBER	DETERMIN DATE	COMMENTS
03/27/90	SINGLETON, L.	BORING 01363 P.T. 1 PAD	ASI	RCRA	F002		SOLVENT 11/8/86		04/30/90	
03/27/90	SINGLETON, L.	BORING 01103 N. P.L.T. 2/3	ASI	SUSPECT	D006,000		THIRD-THIR D 5/8/92		04/27/90	
03/27/90	SINGLETON, L.	BORING 01203 N. GRAPHITE FURNACE	ASI	RCRA	F002		SOLVENT 11/8/86		04/30/90	
03/27/90	SINGLETON, L.	BORING 01365 N. DRUM RECORDING	ASI	RCRA	U044		THIRD-THIR D 5/8/92		04/27/90	
03/27/90	SINGLETON, L.	BORING 01324 S. E. P.T. 9	ASI	RCRA	F002		SOLVENT 11/8/86		04/30/90	
03/27/90	SINGLETON, L.	BORING 01327 S. E. BLDG. 12	ASI	RCRA	U044		THIRD-THIR D 5/8/92		04/27/90	
03/27/90	SINGLETON, L.	BORING 01282 S. W. PILOT P.T. 011	ASI	RCRA	U210		THIRD-THIR D 5/8/92		04/30/90	
03/27/90	SINGLETON, L.	BORING 01294 N. W. MAG. W/H 011	ASI	RCRA	F002		SOLVENT 11/8/86		04/30/90	
03/27/90	SINGLETON, L.	BORING 01260 S. W. PILOT P.T. 011	ASI	RCRA	F002		SOLVENT 11/8/86		04/30/90	
03/27/90	SINGLETON, L.	BORING 01213 PIPE ALLEY	ASI	SUSPECT			NOT RESTRICTED		04/30/90	
03/27/90	SINGLETON, L.	BORING 01412 P.L.T. 1 PAD	ASI	RCRA	F002		SOLVENT 11/8/86		04/30/90	
08/09/90	SI	TON. LEO BORING 01510	ASI	NON-RCRA			NOT RESTRICTED		08/10/90	

11/11/86

Table

Reevaluated

THIRD-THIR D 5/8/92

23

1/21/91

FINE WASTE STREAM
DETERMINATION LOG
ASI WASTE STREAMS

FILE DATE	MATERIAL DESCRIPTION	MATERIAL SOURCE CODE	HAZARD DETERMINATION CODES	ANALYSIS AVAILABLE	REF RESTRICTED NUMBER	DETERM DATE	COMMENTS
810 08/08/90	SINGLETON, LEO BORING #1522	ASI	NON-RCRA	1.2.7	452 RESTRICTED	08/10/90	
811 08/08/90	SINGLETON, L. BORING #1523	ASI	NON-RCRA	1.2.7	451 RESTRICTED	08/10/90	
961 08/16/90	SINGLETON, LEO BORING #1516	ASI	NON-RCRA		467 RESTRICTED	08/17/90	
962 08/16/90	SINGLETON, LEO BORING #1517	ASI	NON-RCRA		466 RESTRICTED	08/17/90	
982 09/26/90	SINGLETON, L. BORING #1519	ASI	NON-RCRA	1.2.7	490 RESTRICTED	09/27/90	Need ICLP for semi-
983 09/27/90	SINGLETON, L. BORING #1520	ASI	NON-RCRA	1.2.7	488 RESTRICTED	09/27/90	
984 09/27/90	SINGLETON, L. BORING #1521	ASI	NON-RCRA	1.2.7	489 RESTRICTED	09/27/90	
1004 10/11/90	SINGLETON, L. BORING #1503	ASI	NON-RCRA		529 RESTRICTED	10/11/90	Needs semi-vol 1'
1010 10/15/90	SINGLETON, L. BORING # 1502 - RAFFINATE AREA	ASI	NON-RCRA		531 RESTRICTED	12/06/90	
1017 10/24/90	SINGLETON, L. BORING # 1565	ASI	NON-RCRA		536 RESTRICTED	10/24/90	
1018 10/24/90	SINGLETON, L. BORING # 1568	ASI	NON-RCRA		537 RESTRICTED	10/24/90	
1019 10/24/90	SINGLETON, L. BORING # 1508 FIRE TRAINING	ASI	RCRA		THIRD-THIR 538	10/24/90	

4368

4368

No. 4
791

to 10/24/90
to 11/16/90

FINE WASTE STREAM
DETERMINATION LOG
ASI WASTE STREAMS

DATE RECEIVED REQUEST	MATERIAL DESCRIPTION	BORING #	MATERIAL SOURCE CODE	HAZARD DETERMINATION CODES	ANALYSIS AVAILABLE	RESTRICTED NUMBER	MEF DETERMIN DATE	COMMENTS
20 10/24/90 SINGLETON, L.	BORING # 1509	FIRE 7	ASI	RCRA	0004, 0006, 0007, 0008	THIRD-THIR 539	10/24/90	
21 10/24/90 SINGLETON, L.	BORING # 1512	SAME	ASI	RCRA	0004, 0005, 0006, 0007, 0008, 0011	THIRD-THIR 540	10/24/90	
22 10/24/90 SINGLETON, L.	BORING # 1513	SAME	ASI	RCRA	0005, 0006, 0007, 0008	THIRD-THIR 541	10/24/90	
23 10/24/90 SINGLETON, L.	BORING # 1514	SAME	ASI	RCRA	0004, 0005, 0006, 0007, 0008	THIRD-THIR 542	10/24/90	
24 10/29/90 SINGLETON, L.	BORING # 1511	SAME	ASI	RCRA	0004, 0005, 0006, 0007, 0008	THIRD-THIR 545	10/29/90	
035 11/05/90 SINGLETON, L.	BORING #1562		ASI	NON-RCRA		NOT RESTRICTED	11/05/90	
060 11/16/90 SINGLETON, L.	BORING #1569		ASI	NON-RCRA		NOT RESTRICTED	11/16/90	
1069 11/16/90 SINGLETON, L.	BORING #1570		ASI	NON-RCRA		NOT RESTRICTED	11/16/90	
1070 11/16/90 SINGLETON, L.	BORING #1643 (1943)		ASI	NON-RCRA		NOT RESTRICTED	11/16/90	
1075 11/21/90 SINGLETON, L.	BORING #1566		ASI	NON-RCRA		NOT RESTRICTED	11/21/90	
1075 11/21/90 SINGLETON, L.	BORING # 1944		ASI	NON-RCRA		NOT RESTRICTED	11/21/90	

0004, 0005, 0006, 0007, 0008

0004, 0005, 0006, 0007, 0008

0005, 0006, 0007, 0008

0004, 0005, 0006, 0007, 0008

0004, 0005, 0006, 0007, 0008

11/21/90 ORGANICS RECEIVED AND REVIEWED. NO CHANGES RI.

1.2.7.10

025

Page No. 5
1/21/91

FME WASTE STREAM
DETERMINATION LOG
ASI WASTE STREAMS

FILE NUMBER	DATE RECEIVED	REQUESTOR	MATERIAL DESCRIPTION	MATERIAL SOURCE CODE	HAZARD DETERMINATION CODES	ANALYSIS AVAILABLE	RESTRICTED NUMBER	DETERMIN DATE	COMMENTS
1000	10/24/90	SINGLETON, L.	BORING #1515, FROM THE FIRE TRAINING GROUNDS	ASI 011	RCRA	0004, 0005, 0006, 0007, 1, 2, 3.	CALIFORNIA 503 7/8/87	10/24/90	Fire training ground to be a MAMU
1286	12/03/90	SINGLETON, L.	BORING # 1288 - SOUTH SIDE OF PILOT PLANT	ASI 011	NON-RCRA	0900 <i>See P. 100</i>	NOT RESTRICTED	12/04/90	
1287	12/03/90	SINGLETON, L.	BORING # 1646 - K-65 ADJACENT TO PIT 4	ASI 011	NON-RCRA		NOT RESTRICTED	12/04/90	
1288	12/03/90	SINGLETON, L.	BORING # 1504	ASI 011	NON-RCRA		NOT RESTRICTED	12/04/90	
1289	12/03/90	SINGLETON, L.	BORING # 1645 - K-65 ADJACENT TO PIT 4	ASI 011	NON-RCRA		NOT RESTRICTED	12/05/90	
1290	12/10/90	SINGLETON, L.	BORING # 1256 - SOUTHWEST SIDE OF PILOT PLANT	ASI 011	NON-RCRA		NOT RESTRICTED	12/10/90	
1298	12/18/90	HALL, J.	BORING # 1590 - NORTH OF BUILDING 12	ASI 011	NON-RCRA		NOT RESTRICTED	12/18/90	
1299	12/18/90	HALL, J.	BORING # 1508 - NORTH OF BUILDING 12	ASI 011	NON-RCRA		NOT RESTRICTED	12/18/90	
1300	12/18/90	HALL, J.	BORING # 2648 - K-65 AREA	ASI 011	NON-RCRA		NOT RESTRICTED	12/18/90	
1301	12/19/90	HALL, J.	BORING # 1591 - NORTH OF BUILDING 12	ASI 011	NON-RCRA		NOT RESTRICTED	12/19/90	
1302	12/19/90	HALL, J.	BORING # 1509 - NORTH OF BUILDING 12	ASI 011	NON-RCRA		NOT RESTRICTED	12/19/90	
1303	12/19/90	HALL, J.	BORING # 1592 - NORTH OF	ASI 011	NON-RCRA		NOT RESTRICTED	12/19/90	

No. 6
1/91

FINE WASTE STREAM
DETERMINATION LOG
ASI WASTE STREAMS

DATE RECEIVED REQUEST	MATERIAL DESCRIPTION	MATERIAL SOURCE CODE	HAZARD DETERMINATION CODES	ANALYSIS AVAILABLE	RESTRICTED NUMBER	MEF DETERMIN DATE	COMMENTS
04 12/19/90 HALL, J.	BORING # 1504 - NORTH OF BUILDING 12	011 ASI	NON-RCRA		NOT RESTRICTED 640	12/19/90	
05 12/19/90 HALL, J.	BORING # 1505 - NORTH OF BUILDING 12	011 ASI	NON-RCRA		NOT RESTRICTED 649	12/19/90	
06 12/19/90 HALL, J.	BORING # 1506 - NORTH OF BUILDING 12	011 ASI	NON-RCRA		NOT RESTRICTED 650	12/19/90	
07 12/19/90 HALL, J.	BORING # 2603 - NORTHWEST OF PIT 4	011 ASI	NON-RCRA		NOT RESTRICTED 651	12/19/90	
08 12/19/90 HALL, J.	BORING # 1503 - NORTH OF BUILDING 12	011 ASI	NON-RCRA		NOT RESTRICTED 652	12/19/90	
09 12/19/90 HALL, J.	BORING # 1502 - NORTH OF BUILDING 12	011 ASI	NON-RCRA	1.2.7.10	NOT RESTRICTED 653	12/20/90	ORGANICS RECEIVED AND REVIEWED, NO CHANGES
10 12/19/90 HALL, J.	BORING # 1501 - NORTH OF BUILDING 12	011 ASI	NON-RCRA		NOT RESTRICTED 654	12/19/90	
11 12/19/90 HALL, J.	BORING # 1506 - NORTH OF BUILDING 12	011 ASI	NON-RCRA	1.2.7.10	NOT RESTRICTED 655	12/20/90	ORGANICS RECEIVED AND REVIEWED, NO CHANGES
112 12/19/90 HALL, J.	BORING # 1597 - NORTH OF BUILDING 12	011 ASI	NON-RCRA	1.2.7.10	NOT RESTRICTED 656	12/20/90	ORGANICS RECEIVED AND REVIEWED, NO CHANGES
120 01/03/91 SINGLETON, L.	BORING # 1594 - FROM NORTHWEST CORNER BLDG. 12	011 ASI	RCRA	1. 2. 3.	SOLVENT 661	01/17/91	Further investigation be performed to clear
121 01/03/91 SINGLETON, L.	BORING # 1595 - FROM NORTHWEST CORNER OF BLDG. 12	011 ASI	NON-RCRA	1. 2. 3.	NOT RESTRICTED 660	01/07/91	All analyses results below detection limit

4368

6 No. 7
21/91

FME WASTE STREAM
DETERMINATION LOG
ASI WASTE STREAMS

FILE NO.	DATE	RECEIVED REQUESTOR	MATERIAL DESCRIPTION	MATERIAL SOURCE CODE	HAZARD DETERMINATION CODES	ANALYSIS AVAILABLE	RESTRICTED NUMBER	MEF DETERMIN DATE	COMMENTS
324	01/11/91	SINGLETON, L.	SOIL BORING #1643 (K-65 AREA, N.W. CORNER OF PIT #4)	ASI	NON-RCRA	1, 2, 3	602	01/14/91	All analyses results were below detection limits
325	01/11/91	SINGLETON, L.	SOIL BORING #1507 (BUILDING #12)	ASI	NON-RCRA	1, 2, 3	601	01/14/91	All analyses results were below detection limits
327	01/11/91	SINGLETON, L.	SOIL BORING #1593 (BUILDING #12)	ASI	NON-RCRA	1, 2, 3	600	01/14/91	All analyses were below detection limits.
361	02/04/91	L. SINGLETON	BORING #1600 FROM GRAPHITE FURNACE PAD	ASI	NON-RCRA	1, 2, 7, 10	701	02/04/91	
364	02/15/91	L. SINGLETON	BORING CUTTINGS #1600	ASI	NON-RCRA	1, 2, 7, 10	698	02/19/91	located by storage pad
1365	02/14/91	L. SINGLETON	BORING CUTTINGS #1600	ASI	NON-RCRA	1, 2, 7, 10	699	02/26/91	
1366	02/14/91	L. SINGLETON	BORING CUTTINGS #1261 EAST SIDE OF PILOT PLY.	ASI	RCRA	1, 5, 10, 7	720	02/21/91	
1368	03/04/91	L. SINGLETON	SOIL BORING #1603	ASI	NON-RCRA	1, 2, 7, 10	759	03/04/91	
1464	04/24/91	BENJAMIN, K.	SOIL BORING #1261 EAST SIDE OF PILOT PLY.	ASI	RCRA	1, 2, 7, 10	819	05/09/91	BORING FROM N-WEST SIDE AREA IN PILOT PLANT
1567	10/29/91	LEAR, J.	VERSALINE	ASI	PENDING	NONE	1219	/ /	to be evaluated
1749	10/01/91	23000	GROUNDWATER FROM WELL # 1149	ASI	CO		60037	/ /	



ENV. ENG. SDS DEPT

From: R. H. Frost (738-4327)

WEMCO:E(EE):92-125

Apr 14 7 13 AM '92

Date: April 13, 1992

Subject: WELL DRILLING STORAGE AREA HAZARDOUS WASTE MANAGEMENT UNIT DETERMINATION

To T. J. Walsh:

COI
OCT

This memo is a followup to my memo dated March 30, 1992 (attached), and a subsequent meeting with you, O. D. Laurson, M. W. Salisbury, and myself on April 6, 1992, regarding the ASI Well Drilling Storage Area HWMU determination. At the meeting, it was decided that the unit would continue to be considered a HWMU because inspection photographs showed a lot code marking on one of the drums stored in the unit. This lot code (?SO-700-D011-0331) is a code generically associated with soil borings taken under the RI/FS. Since some RI/FS soil borings under this "generic" code have in the past been determined to contain RCRA constituents, and since it could not be conclusively determined which drums were actually stored in the unit, or whether any drums bearing this code and stored in the unit actually were found to contain RCRA constituents, it was decided that the unit should remain a HWMU.

Since the meeting I have received some additional information that pertains to the determination. I have been able to trace the lot of drummed boring material bearing the lot code shown in the photograph. That particular lot code is associated with monitor well number 3387, which is located outside the fenced area, in the leased pasture north of Willey Road and west of the main entrance road. According to K. Nickel, the well is not located in a HWMU or in a known plume of contamination emanating from a HWMU or SWMU. Moreover, groundwater in that location is not suspected or known to contain any RCRA waste constituents, nor is the site close to any wells that have been determined to contain hazardous substances or constituents.

Data for inorganics and metals from analyses of groundwater samples from the MW 3387/2387 cluster do not show exceedances of the Interim Primary Drinking Water Standard for the RCRA metals in either well. The data appear to be representative of normal background levels for the analyzed parameters. A copy of the data is attached.

According to personnel in the Waste Characterization group, the lot currently consists of eight drums of borings stored on the Plant 1 Pad. The lot is not in the RCRA inventory, and is

ROL NO. 210004
 U. : SD = ES - C33 = 4327 - 10/09
 SIGN: _____
 REVISION: _____
 DATE: 4-13-92
 SIGN DATE: _____

T. W. Walsh

-2-

WEMCO:E(EE):92-125

c: w/att.
D. A. Bastin
G. R. Blank
V. A. Franklin
J. E. Harmon
F. R. Hertweck
L. L. Honigford
O. D. Laursen
J. M. Lippitt
K. Nickel
M. W. Salisbury
J. M. Sattler
L. Singleton
K. A. Solomon
C. S. Waugn

Central Files

EE RCRA Files (SD-EES-C23-CPI-10009)

Chemical data for Springs 2387 and 3387

Page

Well ID	Sample	Compound	MG Value	MG Unit	Lab Quali
		Aluminum	.075000000	MG/L	
3387	WB 004301	Ammonia	.100000000	MG/L	U
3387	WB 004301	Arsenic	.002000000	MG/L	U
3387	WB 004301	Barium	.025000000	MG/L	
3387	WB 004301	Cadmium	.003000000	MG/L	
3387	WB 004301	Calcium	88.600000000	MG/L	
3387	WB 004301	Chloride	11.000000000	MG/L	
3387	WB 004301	Chromium	.019000000	MG/L	
3387	WB 004301	Copper	.010000000	MG/L	U
3387	WB 004301	Fluoride	.060000000	MG/L	
3387	WB 004301	Iron	.188000000	MG/L	
3387	WB 004301	Lead	.002000000	MG/L	U
3387	WB 004301	Magnesium	25.200000000	MG/L	
3387	WB 004301	Manganese	.285000000	MG/L	
3387	WB 004301	Mercury	.000200000	MG/L	U
3387	WB 004301	Molybdenum	.011000000	MG/L	
3387	WB 004301	Nickel	.020000000	MG/L	U
3387	WB 004301	Nitrate	.100000000	MG/L	U
3387	WB 004301	Phenols	.010000000	MG/L	U
3387	WB 004301	Phosphorus	.300000000	MG/L	
3387	WB 004301	Potassium	3.330000000	MG/L	
3387	WB 004301	Selenium	.002000000	MG/L	U
3387	WB 004301	Silicon	3.810000000	MG/L	
3387	WB 004301	Silver	.012000000	MG/L	
3387	WB 004301	Sodium	11.500000000	MG/L	
3387	WB 004301	Sulfate	47.700000000	MG/L	
3387	WB 004301	Sulfide	.500000000	MG/L	U
3387	WB 004301	Total Organic Carbon	2.400000000	MG/L	
3387	WB 004301	Total Organic Halide	.162000000	MG/L	
3387	WB 004301	Total Organic Nitrog	.280000000	MG/L	
3387	WB 004301	Vanadium	.010000000	MG/L	U
3387		Aluminum	.060000000	MG/L	U
3387	WB 004336	Ammonia	.100000000	MG/L	U
3387	WB 004336	Arsenic	.002000000	MG/L	U
3387	WB 004336	Barium	.055000000	MG/L	
3387	WB 004336	Cadmium	.003000000	MG/L	
3387	WB 004336	Calcium	89.300000000	MG/L	
3387	WB 004336	Chloride	19.800000000	MG/L	
3387	WB 004336	Chromium	.020000000	MG/L	
3387	WB 004336	Copper	.010000000	MG/L	U
3387	WB 004336	Fluoride	.110000000	MG/L	
3387	WB 004336	Iron	.930000000	MG/L	
3387	WB 004336	Lead	.003000000	MG/L	
3387	WB 004336	Magnesium	23.200000000	MG/L	
3387	WB 004336	Manganese	.338000000	MG/L	
3387	WB 004336	Mercury	.000200000	MG/L	U
3387	WB 004336	Molybdenum	.010000000	MG/L	U
3387	WB 004336	Nickel	.020000000	MG/L	U
3387	WB 004336	Nitrate	.100000000	MG/L	U
3387	WB 004336	Phenols	.010000000	MG/L	U
3387	WB 004336	Phosphorus	.090000000	MG/L	
3387	WB 004336	Potassium	2.680000000	MG/L	
3387	WB 004336	Selenium	.002000000	MG/L	U
3387	WB 004336	Silicon	.402000000	MG/L	
3387	WB 004336	Silver	.012000000	MG/L	
3387	WB 004336	Sodium	9.510000000	MG/L	
3387	WB 004336	Sulfate	79.300000000	MG/L	

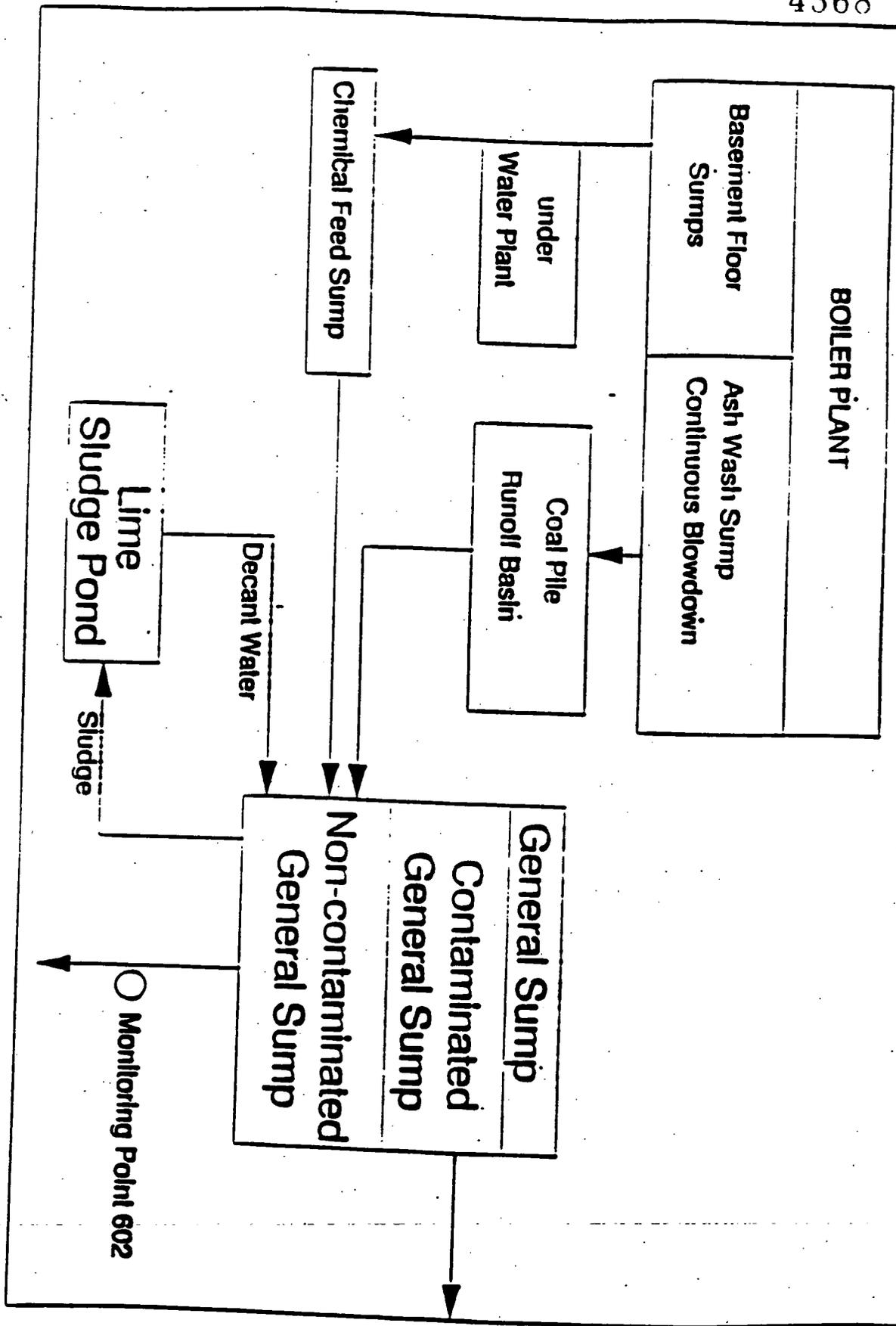
Chemical data for Borings 2387 and 3387

Page

Well	TY	Sample	Compound	MG Value	MG Unit	Lab Quali
2387	WB	004298	Fluoride	.190000000	MG/L	
2387	WB	004298	Iron	.061000000	MG/L	
2387	WB	004298	Lead	.002000000	MG/L	U
2387	WB	004298	Magnesium	29.500000000	MG/L	
2387	WB	004298	Manganese	.029000000	MG/L	
2387	WB	004298	Mercury	.000200000	MG/L	U
2387	WB	004298	Molybdenum	.010000000	MG/L	U
2387	WB	004298	Nickel	.020000000	MG/L	U
2387	WB	004298	Nitrate	1.300000000	MG/L	
2387	WB	004298	Phenols	.012000000	MG/L	
2387	WB	004298	Phosphorus	.130000000	MG/L	
2387	WB	004298	Potassium	2.190000000	MG/L	
2387	WB	004298	Selenium	.002000000	MG/L	U
2387	WB	004298	Silicon	4.390000000	MG/L	
2387	WB	004298	Silver	.019000000	MG/L	
2387	WB	004298	Sodium	13.300000000	MG/L	
2387	WB	004298	Sulfate	59.300000000	MG/L	
2387	WB	004298	Sulfide	.500000000	MG/L	U
2387	WB	004298	Total Organic Carbon	1.950000000	MG/L	
2387	WB	004298	Total Organic Halide	.010000000	MG/L	U
2387	WB	004298	Total Organic Nitrog	.200000000	MG/L	
2387	WB	004298	Vanadium	.017000000	MG/L	
2387	SB	032549				
2387	SB	032550				
2387	SB	032551				
2387	SB	032552				
2387	SB	032553				
2387	SB	032554				
2387	SB	032555				
2387	SB	032556				
2387	SB	032557				
2387	SB	032558				
2387	SB	032559				
2387	SB	032560				
2387	SB	032561				
2387	SB	032562				
2387	SB	032563				
2387	SB	032564				
2387	SB	032565				
2387	SB	032566				
2387	SB	032567				
2387	SB	032568				
2387	SB	032569				
2387	SB	032570				
2387	SB	032571				

4368

Boiler Plant Wastewater Flows



EMPC
CONVERSATION REPORT

4368

NAME: J. OGG	AGENCY: WEMCO	DATE: 9/18/91
SUBJECT: DISPOSITION OF TCA IN THE GARAGE		TIME: 11:30 A
TYPE OF CONTACT: <input type="checkbox"/> Telephone <input checked="" type="checkbox"/> Personal	DISCUSSION: I ASKED JERRY HOW WASTE 1,1,1-TRICHLOROETHENE WAS DISPOSED IN THE GARAGE PRIOR TO ESTABLISHMENT OF SAA's. HE SAID THAT THE WASTE TCA WAS TYPICALLY PUT INTO THE DRUMS FOR USED OIL. HA ALSO STATED THAT TO THE BEST OF HIS KNOWLEDGE, AND BY THE INFORMATION HE GLEANED DURING HIS STUDY ON TCA DISTRIBUTION AND DISPOSAL, THAT THIS WAS THE NORMAL PRACTICE FORM AT LEAST 1980.	
PARTICIPANTS: J. OGG J. SATTLER		
CONCLUSION/AGREEMENTS: WASTE TCA WAS NORMALLY DISPOSED OF IN THE GARAGE BY POURING INTO WASTE OIL DRUMS		
DISTRIBUTION: O. LAURSEN J. OGG S. SCHNEIDER J. SATTLER		

Signed:

J. C. Sattler

Date:

9/18/91

Table 1

Concentration of TCA in used Oil

Waste Disposition	Number of Drums	Percent Concentration of TCA
Used Oil Transferred to Oak Ridge for Incineration	377	1.8% ⁽¹⁾
Used Oil Incinerated On-site in Trane Incinerator	418	5.5% ⁽²⁾
Used Oil Stored On-site	463	5.5% ⁽²⁾

- (1) % TCA is the mean of data results for drums shipped to Oak Ridge (see table 2).
- (2) % TCA was calculated by averaging the mean concentration of data from sampling plan 052, 265, 267 (see table 2). Duplicate samples were averaged, and that value was used in the calculation of the mean for each sample plan.

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Table 2

Sample Analyses of Waste Oil	
Waste Oil sent to Oak Ridge	ppm
17061110 (7/28/87)	21000
1706358 (7/10/87)	7900
17071226(8/07/87)	22000
07/30/87	4100
17071227 (08/07/87)	26000
17051146 (06/25/87)	28000
Average	18,166.67
Sampling plan 052 (4/18/91)	
R052-1	890
R052-2	140000
R052-3(2D)	300000
R052-4	45000
Mean	88600
Sampling Plan 265 (12/11/90)	
265-1	740
265-1(D)	71
265-2	1.6
265-2(D)	1.3
265-3	38000
265-4	4100
Mean - 1&2 from same drum; duplicates not included in statistical analyses	14150
Sampling Plan 267 (10/29/90)	
R267-1	170000
R267-1(D)	420000
R267-2	123
R277-2(D)	93
R267-3	19000
R267-4	120
Mean (3 & 4 were from same drum)	101556

039