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**SUBMITTAL OF REVISION 1 OF FERNALD
ENVIRONMENTAL MANAGEMENT PROJECT'S
RESOURCE AND CONSERVATION AND
RECOVER ACT PART B PERMIT APPLICATION**

03/26/93

DOE-FN/USEPA

DOE-1471-93

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LETTER



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
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(513) 738-6357

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MAR 26 1993
DOE-1471-93

Mr. Valdus V. Adamkus
Regional Administrator
United States Environmental
Protection Agency, 5HRE-8J, Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Adamkus:

SUBMITTAL OF REVISION 1 OF FERNALD ENVIRONMENTAL MANAGEMENT PROJECT'S RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT APPLICATION

- References:
- 1) Letter, Harold O'Connell (OEPA) to W. D. Adams, dated October 23, 1992.
 - 2) Letter, Harold O'Connell (OEPA) to R. E. Tiller, "Notice of Deficiency - Part B Review Comments," dated July 29, 1992
 - 3) Letter, DOE-1537-92, R. E. Tiller to D. R. Schregardus, "Storage of Thorium Residues Characterized as RCRA Hazardous Waste," dated May 8, 1992

Please find enclosed Revision 18 to the Fernald Environmental Management Project's (FEMP) Resource Conservation and Recovery Act (RCRA) Part A Permit Application and Revision 1 to the RCRA Part B Permit Application. The revised permit application is submitted in accordance with the March 29, 1993 submittal date approved by the Ohio Environmental Protection Agency (OEPA) in Reference 1 (Attachment 1) for responding to the Notice of Deficiency issued for the permit application in Reference 2 (Attachment 2). Section 3.11 of the Stipulated Amendment to the Consent Decree Entered December 2, 1988 (SACD), as amended January 22, 1993, also requires the FEMP to submit a report on Hazardous Waste Management Units (HWMUs) to OEPA within ninety days. Submission of this revised RCRA Part A/B Permit Application fulfills the requirement to submit a "90 day report".

The permit application has been revised as indicated to incorporate comments from OEPA's technical/completeness review. Each comment is followed by a response and references where the comment is addressed in the FEMP's RCRA Part A/B Permit Application (Attachment 3).

The following revisions have also been incorporated into the permit application:

- As discussed with Mr. Paul Pardi and Mr. Phil Harris of the OEPA on August 11, 1992, the FEMP has taken the position that the site will not accept offsite waste unless that waste contains radionuclides which have originated from the FEMP. Any variation from this position will be in accordance with the Consent Decree and its Stipulated Amendment.
- Additional information on upgrades conducted at Plant 1 Pad, CP Storage Warehouse (Building 56) and the KC-2 Warehouse (Building 63) to accommodate the storage of hazardous wastes with free liquids has been provided.
- In accordance with Reference 3 (Attachment 4), the application has been modified to address the storage of thorium nitrate solutions and other liquid hazardous wastes containing thorium in the Pilot Plant Storage Area (Building 68). This area was formerly used to store only hazardous wastes without free liquids.
- The dimensions of the Pilot Plant Storage Area (Building 68) have been corrected although the permitted capacity remains unchanged.
- Maximum storage capacities have been recalculated for some of the RCRA storage areas to incorporate revised aisle spacing and drum stacking heights based on National Fire Protection Association (NFPA) recommendations. The maximum storage capacities for the KC-2 Warehouse (Building 63) and CP Storage Warehouse (Building 56) have also been revised to include the diking installed during the upgrades.
- The dimensions for the Nitric Acid Rail Car and Area (HWMU #9) in the Part A Permit Application have been corrected to correspond with the dimensions listed in the approved Removal Action Work Plan for this unit.
- The status of the Sludge Drying Beds (HWMU #41) has been revised to indicate that this unit is no longer in operation.
- Information in the application has been updated, as needed.
- Grammatical and typographical errors have been corrected.
- The FEMP is currently reviewing previous hazardous and mixed waste characterizations and hazardous waste management unit classifications and will be seeking, in future submittals, to change these characterizations and classifications based on analytical and/or regulatory review. In this revision two HWMUs have been deleted: the Equipment Storage Area and the Parts

Cleaner in Welding Shop - Maintenance Building 12. Based on the June 2, 1992 letter from Ohio EPA to John Sattler, recommendation was made to delete this unit as a HWMU. Similarly, in DOE correspondence DOE-997-92 which was sent to OEPA, the Parts Cleaner in Welding Shop was also removed from being a HWMU.

As agreed in a March 19, 1993 telephone conversation with Mr. Phil Harris of OEPA, the following changes to the permit application have also been completed:

- Descriptions and drawings of Solid and Hazardous Waste Management Units have been removed from Section J, Corrective Action for Solid Waste Management Units. Section VIII of the Amended Consent Agreement, as signed by the Department of Energy (DOE) and US EPA, states that the corrective action requirements of Sections 3004(u) and 3004(v) of RCRA will be addressed under the provisions of this Agreement. Language from the Amended Consent Agreement has been inserted into this section for clarification.
- The Part A Permit Application has been revised to incorporate a listing of EPA waste codes stored on-site. Previous Part A submittals had listed individual wastestreams. The new format will more clearly identify the hazardous constituents of concern for hazardous wastes stored at the FEMP.
- The format for Section C, Waste Characteristics, has been reorganized to provide specific information for wastestream categories. A table has been included in Section C describing the location of the individual permitting checklist items within this section.

Revisions have been made using the format provided in Reference 2 (Attachment 2). Old language has been overstruck and new language has been shaded. Significant alterations to the format for Section C, Waste Characteristics, Section D, Process Information, Section H, Personnel Training, and Section J, Corrective Action for Solid Waste Management Units, have resulted in the submittal of complete revisions to these sections.

Note that Bay 2 of the KC-2 Warehouse is still listed as an active storage area in the permit application. The recent discovery of an abandoned groundwater well in Bay 2 may alter the status of this unit. No hazardous waste is currently stored in this bay. A revised RCRA Part A/B Permit Application to address this bay will be submitted, if necessary.

Copies of the revised RCRA Part A/B Permit Application have been forwarded as noted below.

If you have any questions, please contact Ed Skintik, of my staff, at (513) 648-3151.

Sincerely,

for Ray Hansen
Thomas J. Rowland
Acting Manager

FN:Skintik

Enclosures: As Stated

cc w/enc:

T. Crepeau, OEPA/Columbus
P. Pardi, OEPA/Dayton (2)
AR Coordinator, FERMCO
RCRA Operating Record, FERMCO

cc w/o enc:

D. P. Dubois, FERMCO/65-2
L. B. Ko, FERMCO/16-3
G. E. Mitchell, OEPA/Dayton
J. Saric, USEPA-V