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**FERNALD ENVIRONMENTAL MANAGEMENT  
PROJECT'S SEMI-ANNUAL POLYCHLORINATED  
BIPHENYL STATUS REPORT, JULY 1993**

**07/01/93**

**DOE-FN/USEPA**

**DOE-2361-93**

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**LETTER**



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

JUL 01 1993  
DOE-2361-93

Mr. Tony Silvasi  
PCB Control Section (SP-14J)  
United States Environmental  
Protection Agency  
230 South Dearborn  
Chicago, IL 60604

Dear Mr. Silvasi:

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT'S SEMI-ANNUAL POLYCHLORINATED BIPHENYLS STATUS REPORT, JULY 1993.**

- References:
1. USEPA-V S-14J, P. A. Reed to R. E. Tiller, "Notice of Noncompliance for Polychlorinated Biphenyls (PCB) Storage," February 26, 1992.
  2. FERMCO:C:OP:93-088M, N. C. Kaufman to J. J. Fiore, "Semi-Annual PCB Status Report," dated December 28, 1992.

The purpose of this letter is to transmit the semi-annual Polychlorinated Biphenyl (PCB) status report to the United States Environmental Protection Agency (U.S. EPA) Region V. In Reference 1, USEPA Region V requested the Department of Energy (DOE) 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 Reference 2. This report is in addition to the PCB Annual Document Log required to be filed onsite 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 12 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 the DOE submit a semi-annual PCB status report for the three waste categories identified in Reference 1.

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**PCB Inventory**

The FEMP currently has fifty-three 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 were incinerated. Table 1 (attached) lists the previous and current FEMP inventories for the categories listed in Reference 1.

**Radioactive PCB Liquids**

The thirty-two drums are to be incinerated in the Toxic Substance 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, Removal of Waste Inventories. CERCLA Removal Action No. 9 addressed current low level waste management, thorium management, and PCB waste management. This Removal Action includes the removal, storage, and disposal of PCBs and PCB items.

Discussions have been initiated and will continue with personnel from 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 PCB solid items since Reference 2 was submitted. Five additional drums of PCB solids have been generated since that time. These drums contain PCB light ballasts from the Laboratory renovation project and general plant maintenance. These non-leaking PCB light ballasts may be disposed as municipal solid waste (40 CFR 761.60 (b) (2) (II)). However, due to current FEMP policy, these are managed as regulated PCB items.

It may be possible to decontaminate or otherwise demonstrate that these drums can be disposed at a commercial facility. Disposal of the eleven total drums of non-leaking light ballasts is scheduled to be pursued in conjunction with CERCLA Removal Action No. 9. Several of the ballast drums are only partially full due to the 30 day limit on temporary storage. Consolidation of these drums is being planned along with recycling and disposal of non-radioactive PCB light ballast at a Long Island, New York facility.

The initial 10 drums of radioactive contaminated PCB solid identified in Reference 2 include trash and electrical equipment that cannot be decontaminated. All twenty-one 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 a facility 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. In addition, recycling and disposal for the non-radioactive light ballasts at a New York facility is being planned. Meanwhile, all fifty-three 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 action, please contact Ed Skintik at (513) 648-3151.

Sincerely,



Raymond J. Hansen  
Acting Manager

FN:Skintik

Enclosures: As Stated

cc w/enc:

K. A. Chaney, EM-424, TREV II  
K. L. Alkema, FERMCO/65  
S. M. Beckman, FERMCO/65-2  
J. T. Curtis, FERMCO/8  
D. L. Dunaway, FERMCO/28  
S. K. Kaster, FERMCO/52-5  
L. B. Ko, FERMCO/16-3  
K. R. Kolthoff, FERMCO/76  
J. T. Witzeman, FERMCO/16-2  
Administrative Record, FERMCO  
RCRA Operating Record, FERMCO

Table 1  
FEMP 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
7-1-93 Semi-Annual PCB Report	32	0	21	53

- The number of drums in this inventory is subject to continuous change as PCB wastes are either generated in the process of ongoing activities at the FEMP, or disposed of as capacity becomes available.
- \*\* The 28 drums were transported to Rollins Environmental Services in Deer Park, Texas for incineration on January 24, 1992.