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**URANYL NITRATE "EMERGENCY" REMOVAL
ACTION**

11/15/93

**OEPA/DOE-FN
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LETTER
OU3**



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

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George V. Voinovich
Governor

November 15, 1993

RE: URANYL NITRATE "EMERGENCY"
REMOVAL ACTION

Mr. Phil Hamric
Site Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Hamric:

The purpose of this letter is to, once again, request a status report on the Uranyl Nitrate (UNH) Removal Action. On April 3, 1992, Ohio EPA requested a status report on this emergency removal action and were told on April 24, 1992 that batch operations would start in May, 1992. From other updates we know that the UNH and associated treatment systems have experienced some technical difficulties. However, it now appears to us that this removal action has ground to a complete halt - bogged down in DOE's own bureaucracy and discussions with outside review groups.

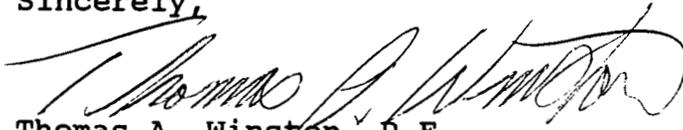
The bottom line is that DOE has over 200,000 gallons of uranyl nitrate solution stored in twenty tanks in the refinery area. These tanks, associated piping, and treatment systems are deteriorating and have continued to deteriorate in the over two years that DOE has been dealing with this emergency. DOE is storing a mixed hazardous waste in tanks that do not meet RCRA standards. In September, 1991, Ohio EPA agreed to the emergency removal action plan believing this material would soon be treated.

DOE needs to realize that this must be treated in the very near future. DOE must also realize that the "old" systems of Fernald must be used now rather than continue to allow them to deteriorate further. This is certainly better for the environment and worker safety than taking no action and risking a possible catastrophic failure in one or more of the tanks or associated piping. While we can appreciate concerns about the "old" equipment, continued delay clearly ignores the urgency of the situation.

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In summary, Ohio EPA is asking for a status report on this removal action. We are also considering our options regarding the continued storage of this mixed hazardous waste. Please respond to this letter by December 3, 1993. If you have any questions please contact Graham Mitchell or me.

Sincerely,



Thomas A. Winston, P.E.
Chief, Southwest District Office

TAW/bjb

- cc: Thomas Grumbly, U.S. DOE
- Pat Whitfield, U.S. DOE
- Bill Muno, U.S. EPA
- Jenny Tiell, Ohio EPA
- Jack Van Kley, Ohio AGO
- Nick Kaufman, FERMCO
- Linda Welch, Ohio EPA