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**SEMI-ANNUAL POLYCHLORINATED BIPHENYLS
STATUS REPORT**

01/12/94

**DOE-0738-94
DOE-FN/USEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
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JAN 12 1994
DOE-0738-94

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

Dear Mr. Silvasi:

CONTRACT DE-AC05-92OR21972, SEMI-ANNUAL POLYCHLORINATED BIPHENYLS STATUS REPORT

- Reference:
- 1) Letter, US EPA S-14J, P. A. Reed to R. E. Tiller, "Notice of Noncompliance for Polychlorinated Biphenyls (PCB) Storage," dated February 26, 1992
 - 2) Letter, C:OP:93-0752, N. C. Kaufman to R. J. Hansen, "Semi-Annual PCB Status Report," dated June 16, 1993

The purpose of this letter is to provide the United States Environmental Protection Agency (U.S. EPA) with the Semi-Annual Polychlorinated Biphenyls (PCB) Status Report. In Reference 1, U.S. EPA Region V requested the Department of Energy (DOE) to provide a Semi-Annual Status Report detailing the efforts undertaken to dispose of PCBs and PCB items at the Fernald Environmental Management Project (FEMP). This report is in addition to the PCB Annual Document Log required to be prepared and maintained by the FEMP by July 1, 1994, annually.

Background

A representative of the U.S. EPA Region V conducted an inspection of the FEMP site on August 20, 1991, to determine compliance with the Toxic Substances Control Act (TSCA) regulations set forth in 40 CFR 761 in regard to Polychlorinated Biphenyls (PCBs). On November 14, 1991, the U.S. EPA issued to the FEMP a Notice of Noncompliance (NON) for storing a large number of PCB containing drums in excess of one year which is a violation of 40 CFR 761.65(a). In response to the NON, the DOE described the limited disposal options for radioactively (RAD) mixed PCBs. As a follow-up action, U.S. EPA requested that DOE submit a Semi-Annual PCB Status Report for the three waste categories: Radioactively Contaminated PCB Liquids; Radioactively Contaminated PCB Solids; and Non-Radioactively Contaminated PCB Solids for Commercial Disposal.

PCB Inventory

The FEMP currently has 48 drums of PCBs and PCB items at the FEMP (Building 81) in its inventory. Pursuant to analytical information, it is anticipated that 6 drums out of the 48 will be removed for a remaining total of 42 PCB drums in storage. After further sampling and analyses, these 6 drums have been characterized as Resource Conservation and Recovery Act (RCRA) mixed waste and will be stored appropriately. For your information, after drum consolidations, 7 drums of PCB fluorescent light ballasts were shipped to a recycling facility on October 13, 1993. A breakdown of the inventory of drums held for more than one year including the disposal status is provided below:

Non-PCB Drums to be Removed from Inventory	6 Drums
Radioactively Contaminated PCB Liquids for Incineration.	19 Drums
PCB Solids/Non-RAD Commercial Disposal Facility	2 Drums
PCB Solids/RAD Unknown	3 Drums
Radioactively Contaminated PCB Solids - No Disposal Option	<u>18 Drums</u>
TOTAL	48 Drums

Enclosed is a table to identify each of the above 48 drums along with inventory numbers, a description of the contents, its classification of liquid or solid, and what analytical information is available.

Radioactively Contaminated PCB Liquids

After an in-depth review of visual inspections, analyses, and historical information, it has been determined that there are 19 drums of radioactively contaminated PCB liquids rather than the 32 drums as reported in the previous Semi-Annual Report. These 19 drums will be incinerated in the Toxic Substance Control Act (TSCA) Incinerator at the Oak Ridge Facility in Oak Ridge, Tennessee. They are currently being stored in a FEMP warehouse (Building 81) in compliance with the regulations set forth in 40 CFR 761. Disposal of the 19 drums is scheduled to be pursued in conjunction with Removal Action No. 9, Removal of Waste Inventories.

Discussions have been ongoing with personnel from Oak Ridge who operate the TSCA Incinerator and these PCBs have been placed on the DOE burn schedule for disposal through July, 1995.

It should be noted that these 19 drums actually contain a mixture of liquids and solids, and will be segregated when a definite shipping date has been determined. Because the TSCA Incinerator is unable to accept solid PCBs for disposal, the liquids will be pumped into a tanker vehicle and the solids will be consolidated into drums and returned to storage.

Radioactively Contaminated PCB Solids

A Disposal Options Report has been written to address disposal options available for the disposition of 18 drums of radioactively contaminated solid PCBs. The 18 drums of radioactive contaminated PCB solids include trash, debris, and electrical equipment that cannot be decontaminated. All radioactively mixed PCBs and PCB items are stored in a FEMP warehouse (Building 81). These wastes have no current disposal options and will remain in storage until a viable disposal option is available.

Non-Radioactively Contaminated PCB Solids/Commercial Disposal Facility

The FEMP was able to disposition (after drum consolidation) seven drums containing PCB fluorescent light ballasts which were transported to a recycling vendor in October, 1993. A purchase order is in the process of being prepared to dispose of two other drums containing non-radioactively contaminated PCB Items; there are three other drums which require further radiological assessment to determine whether they may be included in this shipment. It is anticipated that shipment will take place prior to March, 1994.

PCB Actions

As stated above, the radioactively contaminated PCB liquids are scheduled to be incinerated in the TSCA incinerator at the Oak Ridge facility through July, 1995. Meanwhile, all radioactively contaminated PCBs and PCB items are being stored and managed in a storage facility (Building 81), and will continue to remain in such storage until a viable disposal option has been determined. All non-radioactively contaminated PCBs and PCB items will be dispositioned by March, 1994.

On November 12, 1993, an Addendum to Removal Site Evaluation - Management of PCBs and PCB Items was incorporated into the Administrative Record as the third action within Removal Action 9 (Removal of Waste Inventories). The purpose of this action is to identify, remove and disposition PCBs and PCB items at the FEMP not currently inventoried, as well as to evaluate disposal options for those PCBs and PCB items currently in storage. These objectives will be accomplished through a site survey of areas suspected of containing PCBs and PCB items, identification of applicable disposal technologies for PCB contaminated waste materials, and evaluation of off-site storage and disposal facilities.

If you have any further questions concerning this letter and the proposed action, please contact Ed Skintik, 513 648-3151.

Sincerely,



Walter J. Quaid
Assistant Manager
Technical Support

FN:Skintik

Enclosure: As Stated

cc w/enc:

K. A. Chaney, EM-424, TREV II
K. L. Alkema, FERMCO/65-2
J. E. King, FERMCO/52-3
M. West, FERMCO/35-1
D. Paine, FERMCO/31
S. K. Kaster, FERMCO/76
L. B. Ko, FERMCO/16-3
Administrative Record, FERMCO

PCBs AND PCB ITEMS CURRENTLY IN STORAGE

Drum Inventory	Description of Drum Contents	Classification	Sampling Data Available
361	Water	LR	PCB and RAD data available
434	2 Electrical Switches Contaminated Pads 5 Leaking Ballasts	SR	RAD data available
436	2 Leaking Ballasts	SR	RAD data available
658	5 Leaking Ballasts	S?	No RAD data available
688	Floor Dry, Dicalite	SR	RAD data available
689	Oil in Plastic Bags	LR	PCB and RAD data available
696	Oily Sludge	LR	PCB and RAD data available
697	Oily Plastic Bags	LR	PCB and RAD data available
701	Oily Rags	LR	PCB and RAD data available
702	Rags, Trash	SR	PCB and RAD data available
703	Anti-Cs Gloves	SR	PCB and RAD data available
704	Oil, 3/4 Full	RM	Remove from Inventory
705	Oil, 3/4 Full	RM	Remove from Inventory
706	Oil, 3/4 Full	RM	Remove from Inventory
707	Oily Plastic	LR	PCB and RAD data available
708	Oil	RM	Remove from Inventory

Drum Inventory	Description of Drum Contents	Classification	Sampling Data Available
713	Floor Sweepings, Floor Dry	SR	RAD data available
714	Absorbent Pads, Dry Rags, Trash	SR	PCB and RAD data available
715	Dry Rags, Trash	SR	PCB and RAD data available
716	Oily Plastic Bags	LR	PCB and RAD data available
717	Absorbent Pads	SR	PCB and RAD data available
720	Absorbent Pads	SR	PCB and RAD data available
721	Oily Plastic	LR	PCB and RAD data available
723	Oily Rags	LR	PCB and RAD
724		RM	Remove from Inventory
725	Absorbent Pads	SR	
726	Damp Coveralls	SR	PCB and RAD data available
727	Plastic Oil	LR	PCB and RAD data available
731	Plastic Oil, Sheets, Bags	LR	PCB and RAD data available
732	Oily Sludge	LR	
733	Rags	LR	
734	Sample Jars Residues	LR	
735	Probably Plastic-Oil	LR	
736	Probably Plastic-Oil	LR	
737	Probably Plastic-Oil	LR	
738	Oily Plastic	LR	PCB and RAD data available
1861	2 Leaking Ballasts	SR	RAD data available

Drum Inventory	Description of Drum Contents	Classification	Sampling Data Available
3704	Graphite Coatings Materials, Floor Dry	SR	RAD data available
4644	5 Leaking Capacitors	SR	RAD data available
4651	2 Capacitors	SR	RAD data available
6321	Lab Pack - 17 quart jars	LR	RAD data available
6504	Trash, Gloves, Plastic Bags	SR	RAD data available
7765	Empty Drum	SR	No RAD data available
13944	Ballasts	S?	No RAD data available
13998	Leaking Ballasts	S?	No RAD data available
14401	Contents from Drum 435	RM	PCB and RAD data available, Indicate Non-PCB
*14890	Leaking Capacitors and Ballasts	NC	RAD data available Not RAD contaminated
*14694	Ballasts, Capacitor, Electrical Parts	NC	RAD data available Not RAD contaminated

LR - Liquid RAD contaminated = 19

SR - Solid RAD contaminated = 18

RM - Remove from Inventory = 6

S? - Solid RAD unknown = 3

NR - Solid Non-RAD = 2

Total = 48