

5380

**CLARIFICATION OF POLYCHLORINATED
BIPHENYL WASTE DISPOSITION STATUS**

03/31/94

**DOE-1360-94
DOE-FN/USEPA
11
LETTER**



5880

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

MAR 3 1 1994

DOE-1360-94

Mr. Tony Silvasi
PCB Control Section (SP-14J)
U. S. Environmental Protection Agency
77 West Jackson Blvd
Chicago, IL 60604

Dear Mr. Silvasi:

CLARIFICATION OF POLYCHLORINATED BIPHENYL WASTE DISPOSITION STATUS

Reference: Letter, DOE-0605-94, W. Quaidler to P. Gehring, "Multi-Media Polychlorinated Biphenyls Inspection Response to Request for Additional Information," dated December 23, 1993

Letter, DOE-2361-93, R. Hansen to T. Silvasi, "Fernald Environmental Management Project's Semi-Annual Polychlorinated Biphenyls Status Report, July 1993," dated July 1, 1993

Letter, DOE-0738-94, Quaidler to T. Silvasi, "Contract DE-AC05-92OR21972, Semi-Annual Polychlorinated Biphenyls Status Report," dated January 12, 1994

The purpose of this letter is to provide a response to your questions regarding the following items:

1. Classification of liquid v. solid radiologically contaminated PCBs;
2. Explanation of 53 drums contained in the Fernald Environmental Management Project (FEMP) Semi-Annual Report dated July, 1993, 54 drums contained in the FEMP PCB inventory in August, 1993 during the Multi-Media inspection, and the 48 drums contained in the FEMP Semi-Annual Report dated January, 1994.
3. Clarification of the drum tracking records for drum numbers: 435, 734, and 14401. This information was requested pertaining for these drums as a result of the Multi-Media inspection in August, 1993.

In August of 1993, Phil Gehring of the United States Environmental Protection Agency (US EPA) performed a Multi-Media inspection of the FEMP which included Toxic Substance Control Act (TSCA) compliance. Mr. Gehring reviewed the PCB inventory which at that time was comprised of 54 drums. In October, 1993, the

FEMP segregated 9 drums of PCB fluorescent light ballasts from the inventory in the anticipation of sending the drums to FulCircle for recycling. These nine drums were opened for inspection and it was discovered that some of the drums contained leaking PCB fluorescent ballasts that could not be sent to the recycler and had to be returned to proper TSCA storage. Because these drums could not be sent to the recycler, they were placed back into the PCB inventory. Therefore, when the FEMP reported its status on the Semi-Annual Report in January, 1994, there was a total of 48 PCB drums.

Also during the August, 1993 inspection, Phil Gehring requested detailed information on the status of three PCB drums (435, 14401, and 734). In an effort to provide this information, the FEMP enclosed printouts of the drum tracking records for the 3 drums. The purpose of the drum tracking records was to demonstrate to the Region that when materials are removed from or added to drums, the FEMP maintains batch records as required under 40 CFR 761. The purpose of the printouts was only to provide clarification on the three drums as requested by the Region and was not for the purpose of addressing all of the remaining drums in the PCB inventory.

On November 14, 1991, the USEPA 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 mixed PCBs. As a follow-up action, USEPA requested that the 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 which would detail efforts undertaken to dispose of PCB wastes at the FEMP. The Semi-Annual report is in addition to the PCB Annual Document Log required to be prepared and maintained by the FEMP by July 1 annually under TSCA regulations.

From the time that the Report in July, 1993 was provided until January, 1994, several actions were taken by the FEMP to better manage the PCBs and PCB items in storage. As the FEMP has indicated to the Region, it has taken a proactive approach to pursue disposal options for radiologically contaminated PCBs and PCB items. As an ongoing result, PCB drum contents may be segregated, reevaluated, and/or consolidated while visual inspections are performed, or when radiological and other analytical information is being sought. Sometimes these efforts make it possible to recharacterize drums previously classified according to process knowledge. Therefore, there have been numerical changes in the PCB inventory as well as changes in the classification of solid v. liquid waste streams. Such actions have included:

- Visual inspections of the inventory indicated that some drums previously thought to contain liquids actually contained solids (Attachment 1 is a table comparing the classification status of liquid v. solid for the July, 1993, Semi-Annual Report v. the January, 1994 Semi-Annual Report).
- Shipment of 6 drums to FulCircle of PCB fluorescent lights for recycling purposes (Attachment 2 is a list of the drums removed, the drums consolidated, and the net drums shipped and/or returned to Building 81);

- Addition of one drum to the inventory on "suspect" PCB lab samples (drum inventory no. 14401); and
- Radiological and analytical information have indicated that six drums previously thought to contain PCBs actually do not and will be removed from the PCB inventory.

Below is a summarization of the classification of PCBs for the period of the time covered by the July, 1993 Semi-Annual Report, the inventory present during the Multi-Media inspection in August, 1993, and the period of time covered by the January, 1994 Semi-Annual Report:

July, 1993 Semi-Annual Report

LR - Liquid RAD Contaminated PCBs = 32
SR - Solid RAD Contaminated PCBs = 21
Total Drums in Inventory = 53

August, 1993 Multi-Media Inspection

LR - Liquid RAD Contaminated = 33
SR - Solid RAD Contaminated = 21
Total Drums in Inventory = 54

January, 1994 Semi-Annual Report

LR - Liquid RAD Contaminated = 19
SR - Solid RAD Contaminated = 19
RM - Remove from Inventory = 6
S? - Solid RAD Unknown = 2
NR - Solid Non-RAD = 2
Total Drums in Inventory = 48

If you or your staff have any questions regarding this matter, please contact Ed Skintik, at (513) 648-3151.

Sincerely,



Walter J. Quaid
Assistant Manager
Technical Support

FN:Skintik

Enclosure: As Stated

5380

cc w/enc:

K. A. Chaney, EM-424 TREV II
J. W. Reising, DOE-FN
S. K. Kaster, FERMCO/76
Administrative Record

cc. w/o enc:

K. L. Alkema, FERMCO/65-2
J. E. King, FERMCO/52-3
K. R. Kolthoff, FERMCO/76
J. J. McGuire, FERMCO/35-1
D. Ofte, FERMCO/1

0888
- 5380

COMPARISON OF CLASSIFICATION OF
PCBs AND PCB ITEMS IN THE FEMP INVENTORY

Drum No.	Drum Contents Description	Class. as indicated on the PCB Annual Document Log dated July, 1993	Class. during August, 1993 Multi Media Inspection	Class. after Visual Inspections and Rad Surveys as indicated on the Semi-Annual Report dated January, 1994	Sampling Data Available
361	Water	LR	LR	LR	PCB and RAD data available
434	2 Electrical Switches Contaminated Pads 5 Leaking Ballasts	SR	SR	SR	RAD data available
436	2 Leaking Ballasts	SR	SR	SR	RAD data available
658	5 Leaking Ballasts	SR	SR	SR	No RAD data available
688	Floor Dry, Dicalite	LR	LR	SR	RAD data available
689	Oil in Plastic Bags	LR	LR	LR	PCB and RAD data available
696	Oily Sludge	LR	LR	LR	PCB and RAD data available
697	Oily Plastic Bags	LR	LR	LR	PCB and RAD data available.
701	Oily Rags	LR	LR	LR	PCB and RAD data available
702	Rags, Trash	LR	LR	SR	PCB and RAD data available
703	Anti-Cs Gloves	LR	LR	SR	PCB and RAD data available
704	Oil, 3/4 Full	LR	LR	RM	Remove from Inventory
705	Oil, 3/4 Full	LR	LR	RM	Remove from Inventory
706	Oil, 3/4 Full	LR	LR	RM	Remove from Inventory
707	Oily Plastic	LR	LR	LR	PCB and RAD data available

E 5380

Drum No.	Drum Contents Description	Class. as indicated on the PCB Annual Document Log dated July, 1993	Class. during August, 1993 Multi Media Inspection	Class. after Visual Inspections and Rad Surveys as indicated on the Semi-Annual Report dated January, 1994	Sampling Data Available
708	Oil	LR	LR	RM	Remove from Inventory
713	Floor Sweepings, Floor Dry	SR	SR	SR	RAD data available
714	Absorbent Pads, Dry Rags, Trash	LR	LR	SR	PCB and RAD data available
715	Dry Rags, Trash	LR	LR	SR	PCB and RAD data available
716	Oily Plastic Bags	LR	LR	LR	PCB and RAD data available
717	Absorbent Pads	LR	LR	SR	PCB and RAD data available
720	Absorbent Pads	LR	LR	SR	PCB and RAD data available
721	Oily Plastic	LR	LR	LR	PCB and RAD data available
723	Oily Rags	LR	LR	LR	PCB and RAD
724	Absorbent	LR	LR	RM	Remove from Inventory
725	Absorbent Pads	LR	LR	SR	
726	Damp Coveralls	LR	LR	SR	PCB and RAD data available
727	Plastic Oil	LR	LR	LR	PCB and RAD data available
731	Plastic Oil, Sheets, Bags	LR	LR	LR	PCB and RAD data available
732	Oily Sludge	LR	LR	LR	
733	Rags	LR	LR	LR	
734	Sample Jars Residues	LR	LR	LR	
735	Probably Plastic-Oil	LR	LR	LR	

Drum No.	Drum Contents Description	Class. as indicated on the PCB Annual Document Log dated July, 1993	Class. during August, 1993 Multi Media Inspection	Class. after Visual Inspections and Rad Surveys as indicated on the Semi-Annual Report dated January, 1994	Sampling Data Available
736	Probably Plastic-Oil	LR	LR	LR	
737	Probably Plastic-Oil	LR	LR	LR	
738	Oily Plastic	LR	LR	LR	PCB and RAD data available
1861	2 Leaking Ballasts	SR	SR	SR	RAD data available
3704	Graphite Coatings Materials, Floor Dry	SR	SR	SR	RAD data available
4644	5 Leaking Capacitors	SR	SR	SR	RAD data available
4651	2 Capacitors	SR	SR	SR	RAD data available
6321	Lab Pack - 17 quart jars	SR	SR	LR	RAD data available
6504	Trash, Gloves, Plastic Bags	SR	SR	SR	RAD data available
7765	Empty Drum	SR	SR	SR	No RAD data available
10098	PCB Fluorescent Light Ballasts	SR	SR	NA	Shipped October, 1993 as inventory #14693
10872	PCB Fluorescent Light Ballasts	SR	SR	NA	Shipped October, 1993 as inventory #14691
10873	PCB Fluorescent Light Ballasts	SR	SR	NA	Shipped October, 1993 as inventory #14689
13834	PCB Fluorescent Light Ballasts	SR	SR	NA	Changed to inventory #14694
13942	PCB Fluorescent Light Ballasts	SR	SR	NA	Shipped October, 1993 as inventory #14689

- 5380

Drum No.	Drum Contents Description	Class. as indicated on the PCB Annual Document Log dated July, 1993.	Class. during August, 1993 Multi Media Inspection	Class. after Visual Inspections and Rad Surveys as indicated on the Semi-Annual Report dated January, 1994	Sampling Data Available
13943	PCB Fluorescent Light Ballasts	SR	SR	NA	Changed to inventory #14890
13944	PCB Fluorescent Light Ballasts	SR	SR	S?	No RAD data available
13977	PCB Fluorescent Light Ballasts	SR	SR	NA	Shipped October, 1993 as inventory #14692
13998	Leaking PCB Fluorescent Light Ballasts	SR	SR	S?	No RAD data available
14064	PCB Fluorescent Light Ballasts	SR	SR	NA	Shipped October, 1993 as inventory 14691
14401	Contents from Drum 435	NA	LR	RM	PCB and RAD data available, Indicate Non-PCB
14890	Leaking Capacitors and Ballasts	NA	NA	NR	RAD data available Not RAD contaminated - Was identified as inventory #13943
14694	Leaking Fluorescent Light Ballasts, Capacitor, Electrical Parts	NA	NA	NR	RAD data available Not RAD contaminated - Was identified previously as inventory #13834

- 5380
0888

Classification of Drums as Indicated on PCB Semi-Annual Report dated July, 1993

LR - Liquid RAD Contaminated = 32
SR - Solid RAD Contaminated = 21
Total Drums in Inventory = 53

NA - Not applicable = 3 (Drums were generated after report was prepared)

Classification of Drums during Multi-Media Inspection, August, 1993

LR - Liquid RAD contaminated = 33
SR - Solid RAD contaminated = 21
~~Total Drums in Inventory = 54~~

NA - Not Applicable = 2 (Drums were generated after inspection)

Classification of Drums as Indicated on PCB Semi-Annual Report dated January, 1994 after Performing Visual Inspections and Radiation Surveys

LR - Liquid RAD contaminated = 19
SR - Solid RAD contaminated = 19
RM - Remove from Inventory = 6
S? - Solid RAD unknown = 2
NR - Solid Non-RAD = 2
Total Drums in Inventory = 48

NA - Not Applicable = 8 (Drums were generated after Report)

0888
- 5380

9 ORIGINAL PCB DRUMS

<u>INV=</u>	<u>CONTENTS</u>
7765	70 BALLAST, 27 CAPACITORS
10872	62 BALLAST
13977	28 BALLAST
13834	1 LARGE CAPACITOR
10873	96 BALLAST
13942	11 BALLAST, 1 CAPACITOR
14064	7 BALLAST
10098	67 BALLAST, 8 CAPACITORS
13943	52 BALLAST, 26 CAPACITORS, 1 BAG ELECTRICAL PARTS

6 NEW PCB DRUMS

<u>INV=</u>	<u>CONTENTS</u>	<u>FROM ORIGINAL INV#</u>
✓ 14689	114 BALLAST	6 BALLAST FROM #13942 13 BALLAST FROM #7765 95 BALLAST FROM #10873
14690	9 LEAKING BALLAST 1 LEAKING CAPACITOR	1 BALLAST FROM #13943 2 BALLAST FROM #13977 4 BALLAST FROM #7765 1 CAPACITOR FROM #7765 1 BALLAST FROM #10872 1 BALLAST FROM #10873
✓ 14691	110 BALLAST	37 BALLAST FROM #13943 7 BALLAST FROM #14064 61 BALLAST FROM #10872 5 BALLAST FROM #13942
✓ 14692	92 BALLAST	14 BALLAST FROM #13943 26 BALLAST FROM #13977 52 BALLAST FROM #7765

5380

6 NEW PCB DRUMS CONT.

<u>INV#</u>	<u>CONTENTS</u>	<u>FROM ORIGINAL INV#</u>
✓ 14693	67 BALLAST	67 BALLAST FROM #10098
14694	1 LARGE BALLAST	8 CAPACITORS FROM #10098
	62 CAPACITORS	1 BAG ELECTRICAL PARTS FROM #1394
	1 BAG ELECTRICAL PARTS	26 CAPACITORS FROM #13943
		1 LARGE BALLAST FROM #7765
		26 CAPACITORS FROM #7765
		1 CAPACITOR FROM #13942
		1 CAPACITOR FROM #13834