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**MINUTES OF JULY 31, 1989, MEETING WITH
OEPA AND USEPA**

08/04/89

**DOE-1425-89
DOE-FMPC/EPA
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LETTER**



Department of Energy

FMPC Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6319

August 4, 1989
DOE-1425-89

Dr Richard L. Shank, Director
Ohio Environmental Protection Agency
1800 WaterMark Dr.
Columbus, Ohio 43215

Mr. Basil G. Constantelos, Director
Waste Management Division
U. S. Environmental Protection Agency
Region V - 5H-12
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Gentlemen:

MINUTES OF JULY 31, 1989, MEETING WITH OEPA AND USEPA

Reference: Letter, James A. Reafsnyder to Basil G. Constantelos and Richard L. Shank, "Review of Historical Documents - - FMPC Waste Pit 5", dated July 10, 1989.

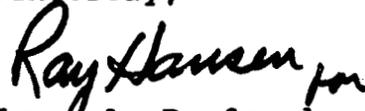
Please find attached the minutes of the July 31, 1989, meeting with representatives of the Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (U.S. EPA) that was held in Columbus, Ohio. The primary points discussed in the meeting were laboratory waste disposal, wastewater exemptions, and the status of Waste Pit 5. Presently, the United States Department of Energy (U.S. DOE) is investigating and documenting the types and quantities of laboratory waste that were discharged into the wastewater treatment system.

As discussed and agreed, the results of this investigation will be submitted to OEPA and U.S. EPA by August 31, 1989. A meeting will be held to discuss the results of the investigation on September 27, 1989, in Columbus, Ohio.

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If you have any questions concerning this letter, please contact Jack Craig at (513) 738-6159.

Sincerely,



James A. Reafsnyder
FMPC Site Manger

DP-84:Reafsnyder

Enclosure: As stated

cc w/encl.:

C. A. McCord, U.S. EPA - V
G. Mitchell, OEPA - Dayton
M. Walsh, OEPA-Columbus
P. Pardi, OEPA-Columbus

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bcc w/attachment:

- A. Rampertaap, EH-232
- B. J. Davis, SE-31
- J. Craig, DP-84
- B. Crattie, LWA, O.R.
- B. Weinreich, WMCO

Minutes of July 31, 1989 Meeting with USEPA and OEPA

On July 31, 1989, a meeting was held in Columbus to review the status of Laboratory waste disposal and the potential need for classifying units of the Wastewater Treatment System as RCRA units. The meeting was attended by USEPA, OEPA, WMCO and DOE. The agenda topics were passed out at the meeting and are attached for information, as is a list of people in attendance.

Laboratory Waste: The background of the laboratory waste disposal concern was presented to OEPA, since they had not been present at the Technical Information Exchange meeting held on July 18, 1989. Briefly, it was identified that the revised part A Application for the FMPC had not included information previously submitted via 3010(a) notification to EPA in 1980. The information submitted in 1980 identified that U and P listed laboratory wastes were being disposed into the wastewater treatment system and then into Pit 5. A letter documenting this information and oversight was identified to USEPA and OEPA on July 10, 1989.

Following the presentation of the background information, action items being taken by the FMPC were identified to USEPA and OEPA. The ensuing discussion focused on the 1981 amendment to the RCRA regulations, which exempted "mixtures of waste water and wastes which are generated by laboratory operations." The discussion focused on clarification of waste water collection and treatment systems, surface impoundments, and the definition of toxic (T) wastes. OEPA and USEPA were of the judgement that the P and U listed wastes are included in the Laboratory waste water exemption for toxic (T) waste given in 40 CFR 261.3.

The FMPC identified that they were investigating and documenting the types and quantities of Laboratory wastes which were discharged into the waste water treatment system. Based on the results of this investigation, the RCRA status of Waste Pit 5 and other units will be determined. The FMPC will submit results of this investigation to USEPA and OEPA by August 31, 1989. A meeting will be held to discuss the results of the investigation on September 27, 1989 in Columbus.

Several additional topics were also discussed at this meeting. The following is a brief synopsis.

Permitting: There is some confusion about FMPC's filing status with OEPA. USEPA indicated that since there is no interim status in Ohio, although there is a provision for late filers, the FMPC's filing status with the state should be determined.

RCRA Closures: Closure plans have been prepared for the Oil Burner at the Boiler Plan, Plant 6 Pad, Tank T5 and Tank T6. It has since been determined that the Oil Burner ceased operation on May 31, 1979, and will not require RCRA closure.

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USEPA asked about what will be done with material that is excavated from Pit 5 during closure. WACO replied that one option would be to store the material onsite in a tumulus. Before doing this, delisting options, possible land-ban restrictions, and permitting requirements will have to be determined.

USEPA stated that, since sufficient documentation about the contents of the waste pits does not exist, all of the pits may have to be closed under RCRA.

OEPA Personnel: Tony Sasson and Randy Meyer are responsible for closures, Ed Wynn for permitting. Paul Pardi is district representative.

ACTION ITEMS

- o Laboratory Waste Exemption
- o Cradle to Grave Histories
- o Laboratory Waste Control
- o Part A Revision
- o Closure Plans

BACKGROUND

- o Review of Part A Application
- o 3010 (A) Initial Notification
- o Document Search
- o Waste Pit 5/Laboratory Waste

Attendees, July 31, 1989 Meeting Columbus, Ohio

Graham Mitchell	OEPA	(513) 449-6357
Paul Pardi	OEPA	(513) 449-6357
Randy Meyer	OEPA	(614) 644-2956
Michael Eggert	OEPA	(614) 644-2905
Anthony Sasson	OEPA	(614) 644-2956
Jan Carlson	OEPA	(614) 644-2905
Maury Walsh	OEPA	(614) 644-2782
Catherine McCord	USEPA	(312) 886-4436
Margaret Wilson	DOE	(513) 738-6161
Bill Weinreich	WMCO	(513) 738-6711
Dan Yeager	WMCO	(513) 738-6093
Brad Crattie	LWA	(615) 483-9870

Distribution for Attendees:

Graham Mitchell, OEPA
Paul Pardi, OEPA
Randy Meyer, OEPA
Michael Eggert, OEPA
Anthony Sasson, OEPA
Jan Carlson, OEPA
Maury Walsh, OEPA
Catherine McCord, OEPA
Margaret Wilson, DOE/FMPC
Bill Weinreich, WMCO
Dan Yeager, WMCO
Brad Crattie, LWA