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WASTE ANALYSIS FOR SILOS U.S. DOE-FERNALD OH6 890 008 976

02/01/89

USEPA            DOE-FMPC  
2  
COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 230 SOUTH DEARBORN ST.  
 CHICAGO, ILLINOIS 60604

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REPLY TO THE ATTENTION OF:  
 5HR-12

FEB 01 1989

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James A. Reafsnyder  
 United States Department Of Energy  
 P.O. Box 398705  
 Cincinnati, Ohio 45239-8705

Re: Waste Analysis for Silos  
 U.S. DOE-Fernald  
 OH6 890 008 976

Dear Mr. Reafsnyder:

The United States Environmental Protection Agency (U.S. EPA) would like to acknowledge the receipt of a December 23, 1988, letter from the United States Department of Energy (U.S. DOE) regarding the characterization of waste in the K-65 silos. To summarize your letter, it is U.S. DOE's position that waste materials in silos #1 and #2 are not considered solid waste, as defined by 40 CFR Part 261 because U.S. DOE classifies them as being by-product material (40 CFR 261.4(a)(4)).

There are several additional waste analysis issues that I have previously raised that were not addressed by your December 23, 1988, letter. These issues include:

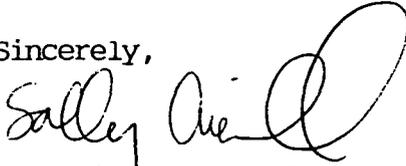
- (1) Currently available information indicates that additional waste materials were also placed in silos #1 and #2. What is this other material? Is it or was it hazardous waste? Waste analysis should be presented for the other materials placed in silos #1 and #2.
- (2) Waste characterization information for materials in silo #3 should also be presented. Specifically, what is the source of the raffinate and any other material in this tank.
- (3) Recent information presented by U.S. DOE indicates that liquid is present in silo #4. What is the source of this waste material? Is there also a solid phase in the tank? Is this waste a hazardous waste?

Date Rec'd FEB 03 1989  
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 File \_\_\_\_\_  
 Library 1

U.S. DOE should complete this waste analysis and respond in writing within thirty (30) days of the receipt of this letter.

Please contact me at (312) or FTS 886-4436, if there are any questions.

Sincerely,



for Catherine A. McCord  
RCRA Enforcement Branch

cc: Graham Mitchell, OEPA-SWDO  
Michael Savage, OEPA-CO  
Mike Starkey, OEPA-SWDO  
Don Marshall, OEPA-SWDO