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**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT SEMI-ANNUAL
POLYCHLORINATED BIPHENYL STATUS REPORT, JANUARY 1995**

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DOE-FN USEPA
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REPORT



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Department of Energy
Fernald Environmental Management Project
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JAN 05 1995

DOE-0385-95

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

Dear Mr. Silvasi:

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT SEMI-ANNUAL POLYCHLORINATED BIPHENYL STATUS REPORT, JANUARY 1995

- Reference: 1) USEPA-V, P. A. Reed to R. E. Tiller, "Notice of Noncompliance for Polychlorinated Biphenyls (PCB) Storage," dated February 26, 1992
- 2) DOE 2081-94, W. Quaid to T. Silvasi, "Semi-Annual Status Report," July 1994

The purpose of this letter is to transmit the Fernald Environmental Management Project Semi-Annual Polychlorinated Biphenyl (PCB) Status Report to the United States Environmental Protection Agency (USEPA) Region V pertaining to PCB activities from the period of July, 1994 through December 1994. In Reference 1, USEPA Region V requested the Department of Energy Fernald Office (DOE-FN) 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 will update the status of the PCBs and PCB items identified in Reference 2.

Background

A USEPA representative conducted an inspection of the FEMP site on August 20, 1991, to determine regulatory compliance with the Toxic Substances Control Act (TSCA) regulations set forth in 40 CFR (Code of Federal Regulations) Part 761 in regard to PCBs. On November 14, 1991, the USEPA issued to the FEMP a Notice of Noncompliance (NON) for storing PCB containers in excess of one year. In response to the NON, the DOE-FN described the limited treatment and disposal options for radioactively contaminated PCBs. As a follow-up action, USEPA requested that DOE-FN submit a Semi-Annual PCB Status Report for the three waste categories: (1) Radioactively Contaminated PCB Liquids; (2) Radioactively Contaminated PCB Solids; and (3) Non-Radioactively Contaminated PCB Solids for Commercial Disposal.

PCB Inventory

The FEMP currently has 244 containers of PCBs and PCB items at the FEMP in its PCB inventory. An additional 205 drums of radioactively contaminated PCBs solids have been generated since Reference 2 report was submitted in July 1994. NOTE: There are 20 drums of radioactively contaminated PCB liquids in storage for disposal for more than one year. These additional generation of radioactively contaminated PCB solids are attributed to the Fire Training Facility and Detrex Still Removal Actions. The Fire Training Facility Removal Action is identified as Hazardous Waste Management Unit (HWMU) Number 1 and managed under Removal Action No. 29. The Detrex Still Removal Action is identified as HWMU Number 26 and managed under a number of removal actions: Removal Action No. 9 (Removal of Waste Inventories), Removal Action No. 12 (Safe Shutdown), Removal Action No. 17 (Improved Storage of Soil and Debris), and Removal Action No. 26 (Asbestos Abatement). These projects are further discussed later in this document.

A breakdown of the inventory of PCB drums in storage for disposal is provided below:

Radioactively Contaminated PCB Solids	224 Drums
Radioactively Contaminated PCB Liquids	20 Drums
Non-Radioactively Contaminated PCB Solids & Liquids	<u>0 Drums</u>
TOTAL	244 Drums

Radioactively Contaminated PCB Liquids

There have been no changes in the status of storage of radioactively contaminated PCB liquids since Reference 2 was submitted. There are 20 drums containing radioactively contaminated PCB liquids. These 20 drums of radioactively contaminated PCB liquids are scheduled to be incinerated in the TSCA Incinerator at the Oak Ridge Facility in Oak Ridge, Tennessee. Radioactively contaminated PCB liquids are currently being stored in a FEMP warehouse (Building 81) in compliance with the storage regulations set forth in 40 CFR 761. Disposal of the radioactively contaminated PCB liquids are scheduled to be pursued in conjunction with Removal Action No. 9, Removal of Waste Inventories.

Discussions have been initiated and will continue with personnel from Oak Ridge who operate the TSCA Incinerator. Based on these discussions, these twenty drums of radioactively contaminated PCB liquids have been tentatively placed on the DOE burn schedule for disposal in 1995.

Radioactively Contaminated PCB Solids

There have been changes in the status of radioactively contaminated PCB solid items since Reference 2 was submitted. There are currently 224 drums of radioactively contaminated PCB solids in the FEMP PCB inventory. The additional 205 drums of radioactive contaminated PCB solids generated since Reference 2 was submitted were generated from the Fire Training Facility and

PCB Solids and Liquids/Commercial Disposal Facility

There are no non-radioactively contaminated PCB solids or liquids currently in the FEMP PCB inventory.

PCB Actions

As stated above, the radioactively mixed PCB liquids are to be incinerated in the TSCA incinerator at the Oak Ridge facility. The schedule of incineration has yet to be determined. 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 viable disposal options of radioactively mixed PCBs have been determined.

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

Very truly yours,

Wally Quaid
Walter J. Quaid
Acting Associate Director
Office of Safety & Assessment

FN:Skintik

cc:

- J. Sanz, USEPA-V
- K. A. Chaney, EM-432, QO
- S. L. Hinnefeld, FERMCO/31
- J. W. Reising, DOE-FN
- T. D. Hagen, FERMCO/65-2
- M. L. West, FERMCO, 35-1
- Administrative Record, FERMCO