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**TEMPORARY STORAGE OF BATTELLE COLUMBUS LABORATORIES
DECOMMISSIONING PROJECT TOXIC SUBSTANCE CONTROL ACT
INCINERATOR RESIDUALS**

09/27/96

DOE-1397-96

DOE-CL DOE-FN

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MEMORANDUM

United States Government

Department of Energy

Fernald Area Office

memorandum

SEP 27 1996

DATE: DOE-1397-96

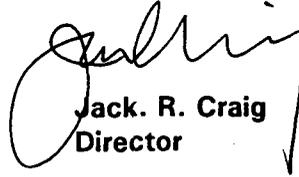
REPLY TO
ATTN OF: FEMP:DannerSUBJECT: **TEMPORARY STORAGE OF BATTELLE COLUMBUS LABORATORIES DECOMMISSIONING
PROJECT TOXIC SUBSTANCE CONTROL ACT INCINERATOR RESIDUALS**

TO: Thomas A. Baillieul, DOE-CL

This memorandum is in response to your request regarding the Department of Energy, Fernald Environmental Management Project (FEMP) consideration to temporarily store Toxic Substance Control Act (TSCA) Incinerator residuals from your project in the event that immediate disposal is not possible. It is recognized that the material to be sent from the BCLDP constitutes less than two drum equivalents of PCB contaminated oils, from which the residues would be minimal. Although we would prefer that the residuals be returned to the Battelle site, we recognize that Battelle does not currently possess a site Resource Conservation and Recovery Act (RCRA) permit which would allow receipt of residuals containing RCRA hazardous constituents. Therefore, we can agree to consider receipt and storage of the residual materials under the following conditions.

1. These contingency plans will only be enacted if disposal of residuals directly from the incinerator facility becomes impossible and the state of Tennessee insists on removal of the materials from the Oak Ridge site.
2. The waste residuals to be shipped will be subject to the same analytical requirements as those outlined in the Fernald Residual Management Plan.
3. No hazardous waste from off-site facilities will be accepted and/or stored at the FEMP unless the conditions of the Residuals Management Plan and of the Consent Decree and its Stipulated Amendments are met. Under the terms of the Consent Decree, "No hazardous or mixed waste from an off-site source not already listed in the FEMP Part B Permit Application, or a revision as of the date of entry of this Consent Decree, shall be stored, disposed or treated at the FEMP without approval from the state of Ohio".
4. The waste residuals meet the Waste Acceptance Criteria for both hazardous and radioactive contaminants as outlined in the Fernald Residual Management Plan.
5. The BCLDP portion of the residuals contains no radionuclides not present in residuals designated as Fernald's share.

If you have any questions regarding this issue, please contact Robert Danner at (513) 648-3167.



Jack. R. Craig
Director

cc:

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