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UPDATE OF AEROSOL CAN DISPOSAL PROGRAM

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LETTER



Department of Energy

Ohio Field Office
Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



SEP 27 1996
DOE-1387-96

Mr. Paul Pardi
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2011

Dear Mr. Pardi:

UPDATE OF AEROSOL CAN DISPOSAL PROGRAM

Reference: Letter, DOE-1195-95, David Kozlowski to Paul Pardi, "Notification of Aerosol Can Disposal Program," dated July 11, 1995

This letter is to provide an update on the Aerosol Can Puncturing Program being initiated by the Fernald Environmental Management Project (FEMP) to puncture used and unusable aerosol cans to render them "RCRA empty" [(OAC 3745-51-07(B)(1) and (2); 40 CFR 261.7(b)(1) and (2)].

As mentioned in the referenced letter dated July 11, 1995, the Aerosol Can Puncturing Program was scheduled to start by mid-1995. Due to a number of concerns which had risen during the preliminary steps, a revised start up has been scheduled for the first quarter of FY 1997. Several safety issues resulting from the final waste determination needed to be addressed prior to start up.

Out of approximately 273 drummed equivalents (DE) of backlog aerosol cans, it was determined that about 50% of the aerosol cans had contained paint. As a result, these cans did not meet the definition of characteristics for ignitability and reactivity (OAC 3745-51-21 and 3745-51-23; 40 CFR 261.21 and 261.23). In the above referenced letter, the cans were not considered to meet the characteristics of ignitability.

The safety issues addressed due to the ignitability factor are:

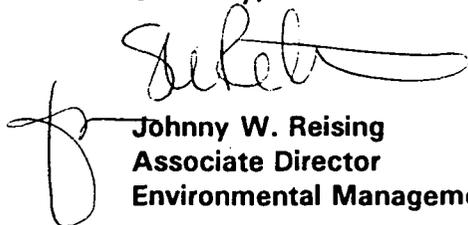
- 1) Use of a non-sparking carbide tipped puncture instrument;
- 2) Combustible gas meter inside Aerosol Can Puncturing Facility;
- 3) Personal protective clothing and fire extinguisher in the Aerosol Can Puncturing Facility;

- 4) Establishment of Satellite Accumulation Area (SAA) for hazardous waste accumulation and management;
- 5) Segregation of compatible/incompatible wastes prior to puncturing;

There will be segregation of radiological/non-radiological aerosol cans. Recycling options for non-radiological aerosol cans will be investigated to minimize disposal costs. If mixed waste is determined to exist, it will be managed in accordance with the FEMP's Federal Facility Compliance Act Site Treatment Plan.

In conclusion, the FEMP Site Aerosol Can Puncturing Program satisfies the above conditions as well as applicable RCRA regulations and intends to manage aerosol cans with ignitable wastes through the Aerosol Can Puncturing Facility. If you have any questions, comments or concerns about the project, please call Robert Danner at (513) 648-3167.

Sincerely,



Johnny W. Reising
Associate Director
Environmental Management

FEMP:Danner

cc:

P. Yerace, DOE-FEMP
C. Menche, FDF/51
T. Walsh, FDF/65-2
M. West, FDF/35-1
RCRA Operating Record
AR Coordinator/78
EDC, FDF/52-7