

7933

R-020-208.15

**REMOVAL ACTION NUMBER 9 - REMOVAL OF WASTE INVENTORIES,  
NOTIFICATION OF TREATMENT OF PYROPHORIC MATERIALS**

12/20/96

DOE-0350-97  
DOE-FEMP      EPAS  
2  
LETTER



## Department of Energy

Ohio Field Office  
Fernald Area Office

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



DEC 20 1996

DOE-0350-97

Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - 5HSF-5J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5th Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

### REMOVAL ACTION NUMBER 9 - REMOVAL OF WASTE INVENTORIES, NOTIFICATION OF TREATMENT OF PYROPHORIC MATERIALS

This is to notify you that on December 18, 1996, the Fernald Environmental Management Project (FEMP) began treatment of pyrophoric wastes to meet the waste acceptance criteria (WAC) for shipment of low-level radioactive waste to the Nevada Test Site (NTS). Treatment to deactivate the pyrophoric nature of the waste in order to meet the NTS WAC complies with the plan scope under Removal Action Number 9, "Removal of Waste Inventories."

There are approximately 50 drums stored at the Fernald site which contain potentially pyrophoric uranium chips and turnings. This waste stream consists of excess source material from the production of uranium metal as defined under Section 11 of the Atomic Energy Act (AEA). Section 1004 (27) of the Resource Recovery and Conservation Act (RCRA) specifically excludes these materials from the definition of solid and hazardous wastes. However, the material is regulated as a solid, low level radioactive waste under ORC-3734.01 (J)(1) and (2).

The pyrophoric material, in its current form, does not meet the NTS WAC without deactivation. Deactivation of the uranium metal will be accomplished by mixing it with mineral oil and gypsum. The material will be packaged in a safe configuration by Perma-Fix Environmental Services, Inc., utilizing the existing procedures for the Neutralization-

Precipitation-Deactivation-Stabilization (NPDS) project. A copy of the procedures for treatment and packaging of the pyrophoric materials will be submitted for you information.

If there are any questions, please contact Robert Danner at (513) 648-3167.

Sincerely,



Johnny Reising  
Fernald Remedial Action  
Project Manager

FEMP:Danner

cc:

S. Fauver, EM-42/CLOV  
G. Jablonowski, USEPA-V, 5HRE-8J  
T. Hagen, FDF/65-2  
AR Coordinator/78  
EDC, FDF/52-7