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**FACT SHEET: LIQUIDS STORED IN WHITE METAL BOXES IN
BLDG 71 AT THE FERNALD ENVIRONMENTAL MANGEMENT PROJECT
SITE**

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FACT SHEET

FACT SHEET: LIQUIDS STORED IN WHITE METAL BOXES IN BLDG. 71 AT THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT SITE.**Situation:**

Recent internal review of a Task Order to move nine white metal boxes containing aqueous mixed waste from the loading dock at Building 71 to the liquid mixed waste bulking area revealed that the containers were not properly labeled. Additional review revealed that the boxes had not yet been moved to an approved area for storage of liquid RCRA hazardous waste.

Background:

From February to August 1995, a project was undertaken to sort approximately 7,000 containers of trash in order to facilitate their disposal. During the sorting of the trash, liquids which were generated were collected in white metal boxes used at the FEMP as waste transport/disposal containers. The boxes are 7' L x 4' W x 4' H and hold approximately 600 gallons each.

These liquids were sampled on October 10, 1995 with the lab analysis available within 30 days. Characterization of the liquid in the boxes was not completed until October 1996, eleven months after data was available. The characterization indicated that the waste water would be classified as RCRA hazardous waste (EPA Codes D018 - benzene; D019 - carbon tetrachloride; D034 - tetrachloroethylene; and D040 - trichloroethylene). The liquid was then designated for inclusion in the Liquid Mixed Waste Project (Batch 7) to be transported to the Oak Ridge TSCA Incinerator for treatment. Moving the boxes to the bulking facility to be added to Batch 7 would have resulted in sloshing of the liquid during the move. A Task Order was prepared in December 1996 to use a tanker to pump the waste water from the boxes and transport it to the bulking tanks. At the time the tanker was not operational and the contents of the boxes have subsequently frozen making it impossible to remove.

It was during a February 4th review of this Task Order that it was noted that RCRA hazardous waste labels had not yet been placed on the boxes. Also, in anticipation of their being moved to the bulking tanks, the boxes had remained on the loading dock of Building 71. The loading dock is covered with a tension support structure to provide weather shelter for waste loading operations. It is included as part of the Plant 1 Pad RCRA unit as designated in the FEMP RCRA Part B Permit application, but it is not one of the areas specified for storage of containers of hazardous wastes with free liquids.

No evidence of spills or leaks has been observed from the boxes. The integrity of the boxes is currently being checked and RCRA hazardous waste labels are being applied. The boxes are currently being moved into Tension Support Structure No. 5, which is a designated RCRA hazardous liquid waste storage area.

Potential Violations:

At least two RCRA violations seem apparent. Hazardous waste not being properly labeled and the storage of these wastes in an area not approved for free liquids. The storage of RCRA liquids in White Metal Boxes is being investigated.

Corrective Action:

Immediate steps are being taken to correct the noncompliance. Containers are being correctly labeled, temporary secondary containment for spill prevention is being put in place, and arrangements are being made for the movement and proper disposition of the material.

Phil Harris, Ohio Environmental Protection Agency, was verbally notified at 12:30 pm February 7, 1997.