



## Department of Energy

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JUL 29 1997

DOE-1227-97

Mr. Paul Pardi, Hazardous Waste Group Leader  
 Ohio Environmental Protection Agency  
 401 East 5th Street  
 Dayton, Ohio 45402-2911

Dear Mr. Pardi:

### DECONTAMINATION AND DISMANTLEMENT OF HAZARDOUS WASTE STORAGE AREA IN THE PILOT PLANT WAREHOUSE (BUILDING 68)

Reference: Letter and Director's Final Findings and Orders from Thomas E. Crepeau to Phil Hamric and John Bradburne dated June 6, 1996.

This letter serves as notification of the Department of Energy, Fernald Environmental Management Project's (DOE-FEMP) intent to decontaminate and dismantle the hazardous waste storage area located inside the Pilot Plant Warehouse (Building 68). This action is necessary to accommodate other proposed uses for Building 68, including contaminated trash handling. The hazardous waste storage area is 69 feet by 7 feet and is located in the center of the building. This area is currently listed for the storage of hazardous waste with and without free liquids in the FEMP's Resource Conservation and Recovery Act (RCRA) Part B Permit Application and was used most recently for the storage of thorium-contaminated hazardous wastes. Prior to 1989, the area was also used for the storage of containers of barium chloride wastes.

The hazardous waste storage area consists of a U-shaped concrete dike with the end of the U-shaped dike enclosed by a smaller U-shaped temporary containment structure consisting of Herculite sheeting and PVC piping. Radiological surveys conducted in the building following removal of the thorium wastes have documented that there is no thorium contamination associated with Building 68. A review of spill release records dating from 1989 indicates that only one spill has been recorded in Building 68, resulting in the release of two ounces of corrosive liquid (D002) from a cracked battery. This spill was immediately cleaned up using absorbent pads.

Containers of hazardous wastes have not been stored in Building 68 since 1995. Decontamination activities will involve removal of the Herculite sheeting and PVC piping. These materials will be containerized and characterized for disposition. Although there has been only one release of hazardous waste reported since 1989 (when the facility began

keeping spill release records), the area was used to store containers of barium chloride wastes (D005) prior to this time period. These containers were stored on the concrete floor within the diked area. The floor of this area will be vacuumed to remove surface residues. Temporary berms and/or absorbent pads will be placed around the perimeter of the storage area. The pad will be rinsed using a high pressure spray wash. Decontamination rinse water will be mopped or vacuumed from the floor, collected in clean containers and sampled for barium to ensure compliance with the Ohio Environmental Protection Agency (OEPA) closure guidance level of 1.0 mg/l. A copy of the sampling results will be placed in the RCRA Operating Record. Following verification of rinsewater sampling results, the decontamination rinsewater will be disposed in accordance with existing site procedures and a sealant will be applied to the floor of this area.

Note that these activities do not constitute final closure of the hazardous waste storage area in Building 68. Final closure of this unit will be addressed under the RCRA/CERCLA Integrated Process in accordance with the June 1996 Director's Findings and Orders. Building 68 is currently scheduled for decontamination and dismantlement by 2002 as part of the Pilot Plant Complex. Any remaining issues relative to the remediation of this area will be addressed in the implementation plan for this complex and summarized in the Project Completion Report. It is the FEMP's intent to continue to include the Pilot Plant Warehouse in the FEMP's RCRA Part B Permit Application in case the storage capacity is needed at a later date. The OEPA will be notified prior to reestablishing this area for the storage of hazardous waste. The FEMP will conduct annual inspections of the storage area (while not used for the storage of hazardous waste) and will keep copies of these inspection forms in the RCRA Operating Record.

If you have any questions or require additional information, please contact Robert Danner at (513) 648-3167.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Danner

cc:

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