

RECORD OF TELEPHONE CONVERSATION TC:OPI(EC): 98-0002

FROM: Betsy Brucken^{BB} DATE: July 13, 1998
 LOCATION: Fernald
 TO: Paula Canter LOCATION: Ohio EPA
 SUBJECT: OHIO EPA REVIEW OF FEMP's 1997 RCRA ANNUAL REPORT

DISTRIBUTION:

Bob Danner, DOE-FEMP, MS45	Mark Sucher, MS8	Administrative Record, MS78
Bob Heck, MS2	Tom Walsh, MS65-2	RCRA Operating Record, MS65-2
Harry McCann, MS16-2	D. Sandoval-Andrews, 65-2	

I contacted Paula Canter of Ohio EPA in response to her voice-mail indicating that she had a few questions regarding the FEMP's 1997 RCRA Annual Report. The following are Paula's comments and my responses:

- 1) Comment: Form GM, p. 142: Section 2 states that the FEMP generated 1,806 pounds of this waste stream in 1996 and 0 pounds in 1997. However, Section 4, Box A states that the quantity of waste in storage was generated during 1997.

Response: Section 4, Box A should be corrected to indicate that the stored waste was generated prior to 1997.

- 2) Comment: Form GM, p. 314: Handling Code and Unit of Measurement were not provided in Section 4, Box B for this waste stream.

Response: The Handling Code should be S01(container storage) and the Unit of Measurement is P (pounds).

- 3) Comment: Two forms have been completed for one waste stream - a Form GM for treatment of the waste (p. 269, 270) and a Form WR for waste receipt. This is waste received from MSC. Only a Form WR is required to be completed for this waste stream.

Response: The Form GM for this waste stream can be deleted. In addition, it was noted that the quantity listed as being treated in 1997 on the Form GM is 1,153 pounds less than the total quantity of this waste stream that was received on-site. According to Harry McCann of Mixed Waste Projects, four containers of this waste stream were recharacterized as low-level waste after being received on-site and were not treated through the Stabilization Project. Therefore, the actual quantity of waste treated through the

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Stabilization Project should be 32,424 pounds. Section C of the Form PS provided on p. 535 should be revised to reflect this quantity for both the total quantity and the quantity of hazardous waste treated by the Stabilization Subproject.

Paula stated that these corrections to the RCRA Annual Report could be completed based on our telephone conversation and that the FEMP would not be required to submit corrected copies of these forms to Ohio EPA. Copies of the revised pages are attached with this conversation report to replace copies of the RCRA Annual Report maintained on-site. In addition to the revisions, please note that pages 269 and 270 should be removed from the RCRA Annual Report 9 (based on Comment #3).

EAB:jes
Attachments

c: File Record Storage Copy 102.5

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State of Ohio Environmental Protection Agency



PLACE PREPRINTED LABEL HERE OR ENTER FACILITY ID NUMBER

OH6890008976

1997 Annual Hazardous Waste Report

Form PS - Process Systems for Treatment, Disposal, or Recycling

By system type, list the amount of waste commercially processed in each treatment, disposal, or recycling system.

PS 1	A. Treatment, disposal, or recycling system description (60 characters max.) NPDS - STABILIZATION SUBPROJECT		
	B. System type M1111	C. 1997 influent quantity Total 32424 RCRA 32424	UOM Density P lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>

PS 2	A. Treatment, disposal, or recycling system description (60 characters max.) SOLVENT EXTRACTION		
	B. System type M023	C. 1997 influent quantity Total 5288 RCRA 5288	UOM Density P lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>

PS 3	A. Treatment, disposal, or recycling system description (60 characters max.)		
	B. System type M	C. 1997 influent quantity Total RCRA	UOM Density lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>

PS 4	A. Treatment, disposal, or recycling system description (60 characters max.)		
	B. System type M	C. 1997 influent quantity Total RCRA	UOM Density lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>

COMMENTS:

PS1, PS2: TREATMENT OF MIXED WASTES CONDUCTED AS A CERCLA REMEDIAL ACTION.
PS2, BOX C: NOTE THAT ONLY 2,386 POUNDS OF THE TOTAL QUANTITY OF 5,288 POUNDS OF WASTE WERE SUCCESSFULLY TREATED TO MEET LDR REQUIREMENTS.

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OhioEPA

State of Ohio Environmental Protection Agency
 1997 Annual Hazardous Waste Report



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OH6890008976

Form GM - Generation and Management

SECTION 1		A. Hazardous waste description (60 characters max.)										
		LAB PACKS - NON-RADIOLOGICALLY CONTAMINATED										
B. Hazardous waste codes		D001	D002	D004	D005	D006	D007	D008	D009	D010	D011	D012
		D035	D039	D040	P098	U080	U129	U226	U228	U247	More... <input type="checkbox"/>	
C. SIC Code	D. Origin code/System type	E. Source code	F. Point of measurement	G. Waste form code	H. RCRA-radioactive mixed							
4953	1 M	A94	1	B003	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>							

SECTION 2	A. Quantity generated in 1996	B. Quantity generated in 1997	C. UOM	Density	D. Was this waste treated, disposed of, or recycled ON-SITE or discharged to a sewer/POTW	
	1806	0	P		Yes <input type="checkbox"/> (continue to system 1) No <input checked="" type="checkbox"/> (skip to SEC3)	
Onsite system 1			On-site system 2			
On-site system type Quantity treated, disposed or recycled in 1997			On-site system type Quantity treated, disposed or recycled in 1997			
M			M			

SECTION 3	A. Was any of this waste shipped off site in 1997				X Yes (continue to box 8) No (skip to SEC. 4)
Site 1	B. EPA ID number of facility waste was shipped to	C. System type	D. Off-site availability code	E. Total quantity shipped in 1997	
	IND093219012	M141	1	1059	
Site 2		M			
Site 3		M			

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OhioEPA

State of Ohio Environmental Protection Agency
 1997 Annual Hazardous Waste Report



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Form GM - Generation and Management

SECTION 1		A. Hazardous waste description (60 characters max.) UNH			
B. Hazardous waste codes D002 D007 D008 More... <input type="checkbox"/>					
C. SIC Code 4953	D. Origin code/System type 2 M	E. Source code A56	F. Point of measurement 1	G. Waste form code B103	H. RCRA-radioactive mixed Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

SECTION 2	A. Quantity generated in 1996 0	B. Quantity generated in 1997 12563	C. UOM Density P lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>	D. Was this waste treated, disposed of, or recycled ON-SITE or discharged to a sewer/POTW Yes <input type="checkbox"/> (continue to system 1) No <input checked="" type="checkbox"/> (skip to SEC3)
<u>Onsite system 1</u> On-site system type Quantity treated, disposed or recycled in 1997 M		<u>On-site system 2</u> On-site system type Quantity treated, disposed or recycled in 1997 M		

SECTION 3	A. Was any of this waste shipped off site in 1997 <input type="checkbox"/> Yes (continue to box B) <input checked="" type="checkbox"/> NO (skip to SEC. 4)			
Site 1	B. EPA ID number of facility waste was shipped to	C. System type M	D. Off-site availability code	E. Total quantity shipped in 1997
Site 2		M		
Site 3		M		

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SECTION 4		On-site Waste Storage and Inactive Disposal Units																						
If 1 or 2 is 'Yes', continue to Box B. If both 1 and 2 are 'No', skip Box B. This form is complete		A. As of December 31, did any of this waste remain on-site in: <table style="width:100%; margin-top: 10px;"> <tr> <td style="width:70%;"></td> <td style="text-align: center; width:10%;">YES</td> <td style="text-align: center; width:10%;">NO</td> <td style="width:10%;"></td> </tr> <tr> <td>1. a greater than 90 day storage unit.....</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td></td> </tr> <tr> <td style="padding-left: 20px;">X a. generated during 1997</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="padding-left: 20px;">b. generated prior to 1997</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td></td> </tr> </table>				YES	NO		1. a greater than 90 day storage unit.....	<input checked="" type="checkbox"/>	<input type="checkbox"/>		X a. generated during 1997				b. generated prior to 1997				2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	YES	NO																						
1. a greater than 90 day storage unit.....	<input checked="" type="checkbox"/>	<input type="checkbox"/>																						
X a. generated during 1997																								
b. generated prior to 1997																								
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input checked="" type="checkbox"/>																						
B. Storage of disposal unit	Handling code	Amount	UOM	Density																				
UNIT 1	S01	12563	P	lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>																				
UNIT 2				lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>																				
UNIT 3				lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>																				
UNIT 4				lbs/gal <input type="checkbox"/> sg <input type="checkbox"/>																				

Comments:

Extra Waste Codes:

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